

Exhibit 11 – Statement A
NATURE OF THE PROPOSAL
PROPOSED ANTENNA SYSTEM
prepared for
WLS Television, Inc.
New Replacement Coverage LPTV
Chicago, Illinois
Ch. 32 15 kW (MAX-DA)

WLS Television, Inc. (“*WLS*”) is the permittee of digital television station WLS-TV, digital Channel 7¹, Chicago, Illinois. As the Commission is aware, reception of the Channel 7 digital operation has become problematic since the termination of analog operation. Viewers that *were* able to receive transmissions from the station’s pre-transition WLS-DT UHF facility are now *unable* to receive the digital VHF transmissions. Because of the large number of reported cases of the loss of ABC programming near the downtown Chicago area, *WLS* herein respectfully requests authorization, on an expedited basis, to construct a new UHF Replacement Low Power Television Translator station to replace lost ABC coverage in accordance with the *Report and Order*² establishing the new Replacement Low Power Television (“LPTV”) Translator service.

The facility proposed herein will operate from the existing developed transmitting facility atop the Sears building in downtown Chicago, Antenna Structure Registration number 1032959. This location was selected to replace lost ABC programming to viewers in the downtown Chicago area.

The antenna proposed for the television translator operation is an ERI (formerly Andrew) model number ALP8L1-HSWR is directional in the horizontal plane. This antenna is represented by the Commission’s standard pattern, Antenna ID 16992, rotated 165°. A maximum effective radiated power (“ERP”) of 15 kW will be employed. A “stringent” emissions mask is specified.

The Channel 32 service contour will not extend past that of the authorized WLS-TV Channel 7 digital service contour as demonstrated in the attached **Exhibit 11-Figure 1**.

¹ See construction permit authorization BPCDT-20080529AJS and licensee application BLCDDT-20090612AEE.

² See *Report and Order*, Amendment of Parts 73 and 74 of the Commission’s Rules to Establish Rules for Replacement digital Low Power Television Translator Stations, MD Docket 08-253, FCC 09-36, Released May 8, 2009, and published in the Federal Register on May 20, 2009.

Exhibit 11 – Statement A

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An interference study was performed in accordance with the procedures set forth in the Commission's Office of Engineering and Technology Bulletin No. 69 ("OET-69"). The results of the study are summarized in the attached **Exhibit 11-Table I**. The proposed digital translator operation is mutually exclusive³ with the application for a digital companion facility, BDCCDTL-20061030ASM. In accordance with the Report and Order, applications for LPTV translators that are intended to replace lost analog coverage have priority over companion digital facility applications.

The proposed replacement service translator site is located 370.8 km from the nearest point on the international border with Canada. Since WFLD-TV, analog Channel 32 formerly employed this site, international coordination may not be required. However, if Commission Staff deems it necessary, such coordination is respectfully requested on behalf of the applicant. The nearest FCC monitoring station is Allegan, MI at a distance of 160.5 km from the proposed site. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. There are no AM stations located within 3.2 km of the existing tower site.

Thus, this proposal is believed to be in compliance with the current Commission's Rules and policy with respect to allocation matters.

³ The proposed STA facility is also mutually exclusive with BDISDTL-20090608AAC.
Cavell, Mertz & Associates, Inc.

EXHIBIT 11-FIGURE 1
PREDICTED COVERAGE CONTOURS

prepared June 2009 for

WLS Television, Inc.

New Replacement Coverage Translator
Chicago, Illinois
Ch. 32 15 kW (MAX-DA)

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

WLS-TV Digital Ch. 7
(BPCDT-20080529AJS)
Service Contour

Proposed Digital Ch. 32
Replacement Coverage Translator
Service Contour

30 0 30 60 90
Kilometers

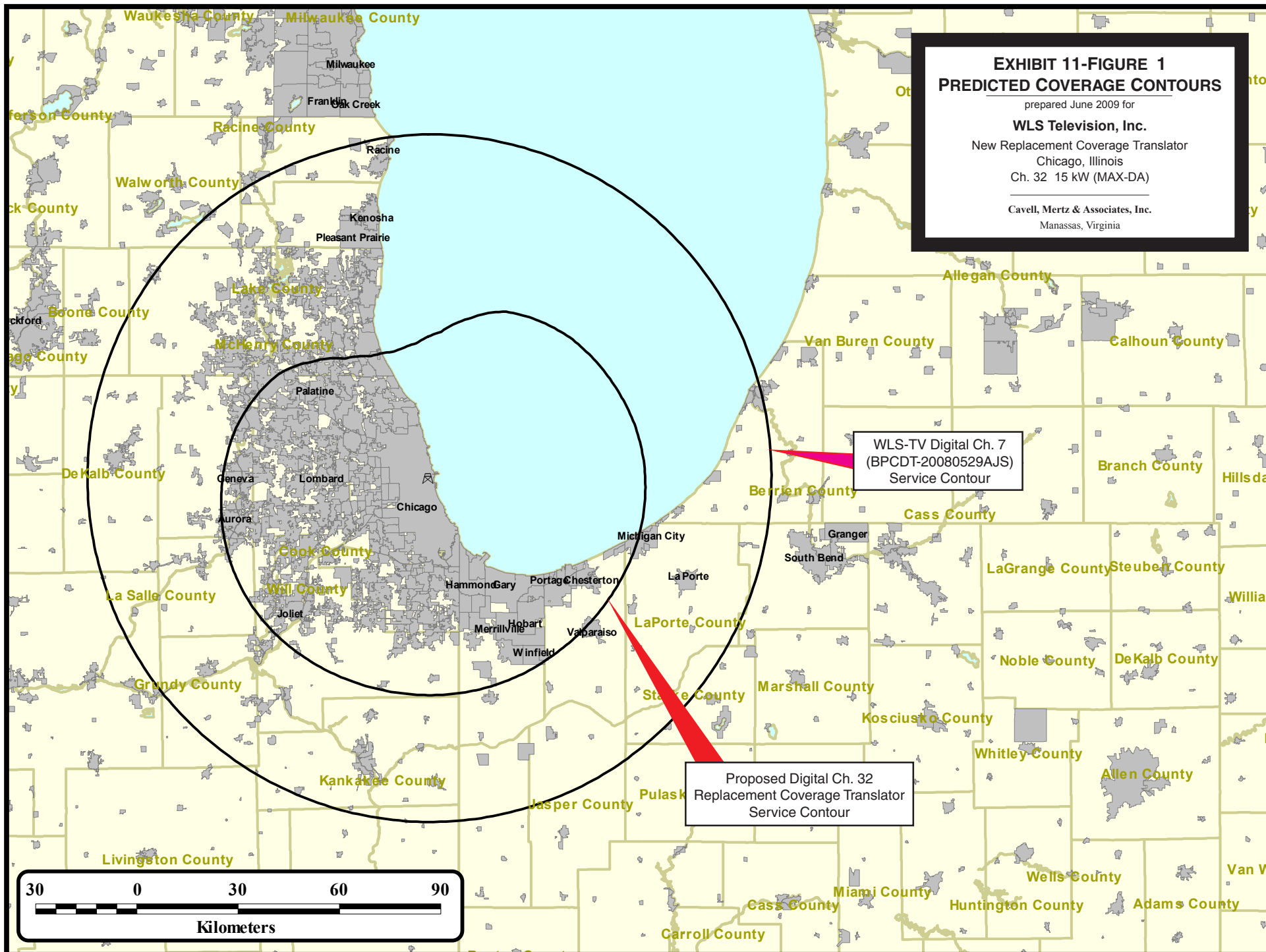


Exhibit 11 - Table I
INTERFERENCE STUDY RESULTS

prepared for

WLS Television, Inc.

New Replacement Coverage Translator Chicago, IL

Facility Id: New

Ch. 32 15 kW (MAX-DA) 514 m

| <u>Channel</u> | <u>Affected Station</u> | <u>City, State</u> | <u>File Number</u> | <u>Calculated Baseline (2000 Census)</u> | <u>Interference Population without Proposal (2000 Census)</u> | <u>Interference Population with Proposal (2000 Census)</u> | <u>New Interference Population</u> | <u>Percentage</u> |
|----------------|-------------------------|--------------------|---------------------|--|---|--|------------------------------------|-------------------|
| 18 | W18CF | Elkhart, IN | BLTT-20001011AEF | | | --- No Interference --- | | |
| 18 | WHNW-LP | Gary, IN | BSTA-20070309ACD | | | --- No Interference --- | | |
| 18 | WHNW-LP | Gary, IN | BLTTTL-19920330IQ | | | --- No Interference --- | | |
| 24 | W24AJ | Aurora, IL | BLTTTL-19990716JA | | | --- No Interference --- | | |
| 24 | WHVI-LP | Valparaiso, IN | BLTTTL-19921102JE | | | --- No Interference --- | | |
| 24 | WMLW-CA | Milwaukee, WI | BDISTTA-20081230ACP | | | --- No Interference --- | | |
| 25 | W25DW | Arbury Hills, IL | BLTTTL-20080609ABO | | | --- No Interference --- | | |
| 25 | WMKB-LP | Rochelle, IL | BLTTTL-20070813AFM | | | --- No Interference --- | | |
| 25 | WMKB-LP | Rochelle, IL | BSTA-20070627ABX | | | --- No Interference --- | | |
| 25 | W25CL | Rockford, IL | BLTT-20020307ABP | | | --- No Interference --- | | |
| 25 | WCWW-LP | South Bend, IN | BLTTTL-20021010AAP | | | --- No Interference --- | | |
| 29 | W29DJ | Sheboygan, WI | BPTTL-20080311ABX | | | --- No Interference --- | | |
| 30 | WSPY-LP | Plano, IL | BLTTTL-19900514IR | | | --- No Interference --- | | |
| 31 | WFLD | Chicago, IL | BPCDT-20080616AAN | 9,531,755 | 25,971 | 29,342 | 3,371 | 0.035 % |
| 31 | WFLD | Chicago, IL | BLCDT-20050606ABF | 9,476,645 | 23,223 | 27,061 | 3,838 | 0.041 % |
| 31 | W31BX-D | Danville, IL | BLDTT-20090304ABU | | | --- No Interference --- | | |
| 31 | W52DB | Muskegon, MI | BDISDTT-20060202AAB | | | --- No Interference --- | | |
| 31 | W48BY | Beaver Dam, WI | BPTTL-20011119AAV | | | --- No Interference --- | | |
| 31 | WBWT-LP | Milwaukee, WI | BDCCDTL-20061025ADF | | | --- No Interference --- | | |
| 32 | W29BG | Decatur, IL | BDISDTT-20060329ALT | | | --- No Interference --- | | |
| 32 | WTJR | Quincy, IL | BMPCDT-20080919ABT | | | --- No Interference --- | | |
| 32 | W24BV | Rock Island, IL | BPTTL-20020513AAU | | | --- No Interference --- | | |
| 32 | WNDY-TV | Marion, IN | BLCDT-20021029AAG | 2,247,406 | 21,328 | 21,368 | 40 | 0.002 % |
| 32 | WKMF-LP | Sullivan, IN | BLTTTL-20060905AAC | | | --- No Interference --- | | |
| 32 | WFQX-DR | Cadillac, MI | BPRM-20080620AOP | 515,480 | 165 | 203 | 38 | 0.007 % |
| 32 | WFQX-TV | Cadillac, MI | BMPCDT-20090527AFA | | | --- No Interference --- | | |
| 32 | WFQX-TV | Cadillac, MI | BPCDT-20090505AAI | | | --- No Interference --- | | |
| 32 | DW39BO | Crystal, MI | BPTTL-19980602JH | | | --- No Interference --- | | |
| 32 | WHNE-LP | Flint, MI | BLTTTL-20060425AAT | | | --- No Interference --- | | |
| 32 | WOKZ-LD | Kalamazoo, MI | BDCCDTL-20061020ACV | 436,759 | 1,269 | 1,285 | 16 | 0.004 % |

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|----------------|-----------------------------|--------------------|--------------------|--|---|--|-------------------------|-------------------|
| | | | | | | | <u>Population</u> | <u>Percentage</u> |
| 32 | WBWM-LP | Mount Pleasant, MI | BLTTL-20001220ABG | | | --- | No Interference | --- |
| 32 | WWRD-LP | Centerville, OH | BSTA-20071115ABH | | | --- | No Interference | --- |
| 32 | WWRD-LP | Dayton, OH | BLTTL-20071011AAP | | | --- | No Interference | --- |