

Engineering Statement and Interference Analysis

This technical statement supports this application to modify BMPDTL-20090514ACR for WCHU-LD (“WCHU”) on channel 44, Chicago, IL, Facility ID 129745.

Digital Displacement Relief

On February 17, 2009, the Applicant (“VTG”) was granted a STA to operate WCHU on digital channel 44, see FCC File No. BSTA-20090729ADZ, in order to expedite digital television service to the Spanish speaking community the station serves.

However, WLS Television, Inc., the licensee of WLS-TV subsequently petitioned for a change in its digital channel allotment from channel 7 to channel 44 and was granted channel 44. On October 29, 2009, VTG received notification from WLS Television, Inc., of its intent to conduct equipment tests and commence operation on channel 44 and on October 31, 2009 in accordance with its FCC authorization, see Attachment A.

As a relief to the displacement by WLS-TV, on October 29, 2009, VTG applied for a STA for WCHU to operate on digital channel 33, see FCC File No. BSTA-20091029ACT (“STA”) and was granted the STA on October 30, 2009. WCHU has been operating pursuant to the STA since and the current extension is scheduled to expire on October 30, 2010. As a permanent relief to the displacement by WLS-TV, VTG proposes to move WCHU from digital channel 44 to digital channel 33 pursuant to the technical parameters specified herein.

Technical Analysis

The proposed channel 33 facility was studied using the Techware’s tv_process_2010 software on a Sun Blade 1500 using the post transition data and the 2000 US Census, See Attachment B. The Cell Size for Service Analysis 1.0 km/side and the Distance Increments for Longley-Rice Analysis 1.00 km. The study in Attachment B specifies use of a STRINGENT MASK FILTER.

Like the granted STA, the facility proposed herein however uses a FULL SERVICE MASK FILTER and as such is predicted to cause “*de minimis*” (less than 0.5%) interference to the licensed analog facility and the authorization construction permit facility of adjacent channel 34 station WEDE-CA at Arlington Heights, Illinois (Facility ID 66978). VTG has obtained consent from First United, Inc., the licensee and permittee of WEDE-CA, see Attachment C. Also attached are interference studies specifying use of a full mask filter against the adjacent channel Class A analog license of WEDE-CA, BLTTLA-20050308AAS, see Attachment D, and the digital construction permit of WEDE-CA, BDFCDTA-20081014AAM, see Attachment E. These two studies demonstrate that no interference will be caused to WEDE-CA.

It is believed that the proposed facility complies with the requirements Sections 74.709, 74.793(e)-(h), 74.794(B), 73.1030 and other applicable parts of the Rules and Regulations of the Federal Communications Commission. However, to the degree that it is deemed necessary, the Applicant requests a waiver of these other applicable Commission rules in order to allow for the grant of this instant application.

Digital TV Station Protection

The proposed operation causes less than 0.5% interference to surrounding digital authorized facilities (i.e., “*de minimis*”). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards. If necessary, a waiver of the FCC rules is respectfully requested for this digital allocation study based on use of the OET-69 procedures and all possible variance from FCC rules.

Class A, Low Power TV and TV Translator Station Protection

The proposed operation causes less than 0.5% interference to surrounding low power and class A authorized facilities (i.e., “*de minimis*”). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards. If necessary, a waiver of the FCC rules is respectfully requested for this low power allocation study based on use of the OET-69 procedures and all possible variance from FCC rules.