

MULLANEY ENGINEERING, INC.

9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

ENGINEERING STATEMENT

LOW-POWER TELEVISION CLASS A STATION

CH 13 DISPLACEMENT STATEMENT

**WOCH-CA
ANALOG CHANNEL 13
BLTVA-20021125AAU
CHICAGO, IL**

**FCC FACILITY NUMBER
35092**

NARRATIVE STATEMENT

I. GENERAL:

This engineering statement and the instant engineering exhibit of which it is part has been prepared on behalf of KM LPTV OF CHICAGO-13, L.L.C., (hereinafter "KM").

KM holds a valid license (BLTVA-20021125AAU) to operate a low-power Class A analog television station on Channel 13, Chicago, Illinois.

The geographical coordinates of the WOCH-CA transmitting antenna are:

North American Datum (1927)

41-53-56 N. Latitude.

87-37-23 W. Longitude

WREX-DT, Rockford, Illinois (BLCDT-20041012AIQ) is a full-service digital television station which holds a construction permit¹ to commence operation on digital Channel 13 on the DTV transition date. The allotment of digital television Channel 13 to WREX-DT is listed in the DTV table of allotments.

The geographical coordinates of the WREX-DT digital transmitting antenna are:

North American Datum (1927)

42-17-50 N. Latitude.

89-14-24 W. Longitude

The distance between the two facilities is 140.89 kilometers (87.545 miles).

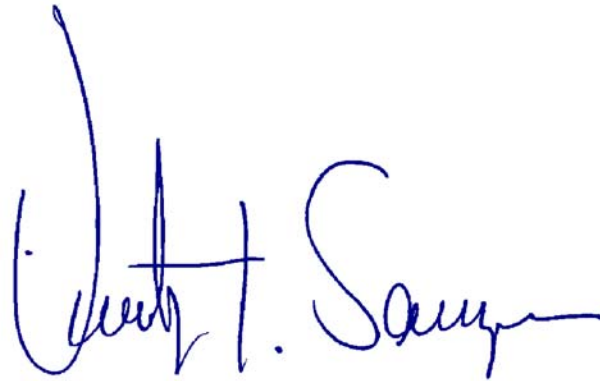
Sections 73.3572 (a)(4)(iii) and (iv)(A)(3) state that a Class A television VHF station operating on channels 7-13, whose geographical separation is equal or less than 260 kilometers from a co-channel DTV facility or allotment qualifies for displacement relief.

As the geographical separation between co-channel WOCK-CA and WREX-DT is a meager 140.89 kilometers, WOCK-CA qualifies for displacement relief under the Commission's application processing priorities.

¹ WREX-DT has on-file a pending application to modify its digital channel 13 operation (a post DTV maximization application - BMPCDT-20080619ADW) which proposes operation at the same site location. Therefore, its post DTV application facilities if granted would not change the distance between the two stations.

KM has identified a suitable channel for its use in Chicago and will file concurrently with this statement an application for a displacement channel.

10 December 2008

A handwritten signature in blue ink, appearing to read "Timothy Z. Sawyer". The signature is fluid and cursive, with a large initial "T" and "S".

Timothy Z. Sawyer

TIMOTHY Z. SAWYER
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