

Exhibit 13 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS
prepared for
Adelante Media of Wisconsin License LLC
WBWT-LP Milwaukee, Wisconsin
Facility ID 56213
Ch. 38 (Digital “Flash-Cut”) 13.4 kW (MAX-DA)

Adelante Media of Wisconsin License LLC (“Adelante”) is the licensee of analog low power television station WBWT-LP, Channel 38, Milwaukee, Wisconsin, Facility ID 56213 (BLTTTL-20070223AGI). *Adelante* proposes herein to “flash-cut” WBWT-LP to digital operation. The analog WBWT-LP transmitter recently experienced a catastrophic failure. Accordingly, *Adelante* has decided to acquire a new digital transmitter rather than extensively repair the damaged analog unit in order to restore service to its viewers.

Nature of the Proposal

The proposed antenna system for the digital WBWT-LP is the same directional antenna currently employed for the analog operation. The existing SWR¹ antenna will remain side-mounted on an existing antenna structure. The antenna supporting structure is registered with the Commission, Antenna Structure Registration Number 1057482.

The proposed digital facility will operate on Channel 38 using a “simple” out of channel emission mask at the authorized WBWT-LP site. **Exhibit 13 - Figure 1** depicts the coverage contours (analog 74 dBμ and digital 51 dBμ) of the licensed and proposed facilities. As demonstrated on the provided map, the service area overlap shown demonstrates compliance with §73.3572 for a minor change.

Allocation Considerations

The instant proposal complies with the Commission’s interference protection requirements toward all NTSC, DTV, television translator, LPTV, and Class A stations. A detailed interference study was conducted in accordance with the terrain dependent Longley-Rice point-to-point

¹ The Commission’s database record shows the WBWT-LP antenna to be an Antenna Concepts ACS24BR Special. An SWR SWLP-CP24BRS/38 was substituted and the antenna replacement reported in the license application, see BLTTTL-20070223AGI.

Exhibit 13 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS
(Page 2 of 2)

propagation model, per the Commission's Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 ("OET-69")². The interference study examined the change in interference as experienced by nearby pertinent stations that would result from the proposed facility.

The results, summarized in **Exhibit 13 - Table I**, show that any new interference does not exceed the Commission's interference limits (0.5 percent to full service and Class A stations, and 2.0 percent to secondary stations.) Accordingly, the instant proposal complies with §74.793 regarding interference protection to analog and digital television, low power television, television translator, and Class A television facilities.

International Coordination

The proposed transmitter site is located 403.1 km from the U.S. - Canadian border, which is outside the 400 km coordination distance specified in the Letter of Understanding³. Thus, coordination with Canadian authorities is not required.

Other Allocation Considerations

The nearest FCC monitoring station is at Allegan, Michigan, at a distance of 168.3 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. The proposed site is also located outside the areas specified in §73.1030(a)(1) and §73.1030(b). Thus, notification of the instant proposal to the National Radio Astronomy Observatory at Green Bank, West Virginia, or the Table Mountain Radio Receiving Zone in Boulder County, Colorado is not required. There are no AM broadcast stations located within 3.2 km (2 miles) of the proposed site, according to information extracted from the Commission's engineering database.

² The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. **A cell size of 1 km was employed.**

³ See LETTER OF UNDERSTANDING BETWEEN THE FEDERAL COMMUNICATIONS COMMISSION OF THE UNITED STATES OF AMERICA AND INDUSTRY CANADA RELATED TO THE USE OF THE 54-72 MHz, 76-88 MHz, 174-216 MHz AND 470-806 MHz BANDS FOR THE DIGITAL TELEVISION BROADCASTING SERVICE ALONG THE COMMON BORDER, September 22, 2000.

Exhibit 13 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS
(Page 3 of 2)

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

COVERAGE CONTOUR COMPARISON

prepared March 2011 for

Adelante Media of Wisconsin License LLC

WBWT-LP Milwaukee, Wisconsin
Ch. 38 (Digital "Flash-Cut") 13.4 kW (MAX-DA)

Proposed WBWT-LP Facility
Ch. 38 (Digital "Flash-Cut")
13.4 kW (MAX-DA)
51 dBu F(50,90) Service Contour

WBWT-LP License Facility
(BLTTL-20070223AGI)
Ch. 38 25 kW (MAX-DA)
74 dBu F(50,50) Coverage Contour



Exhibit 13 - Table I
INTERFERENCE STUDY RESULTS SUMMARY
prepared for

Adelante Media of Wisconsin License LLC

WBWT-LP Milwaukee, WI

Facility Id: 56213

Ch. 38 13.4 kW

<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>
23	WWME-CA	Chicago, IL	BLTTA-20040129AOW			---	No Interference	---
23	WWME-CA	Chicago, IL	BPTTA-20081023AAZ			---	No Interference	---
23	W23BW	Madison, WI	BLTTA-20031125AAQ			---	No Interference	---
23	W23BW	Madison, WI	BPTTA-20030326AHF			---	No Interference	---
24	WMLW-CA	Milwaukee, WI	BDISTTA-20081230ACP			---	No Interference	---
30	W30BU	Green Bay, WI	BLTTL-20030923AAD			---	No Interference	---
34	WEDE-CA	Arlington Heights, IL	BSTA-20040603ACT			---	No Interference	---
34	WEDE-CA	Arlington Heights, IL	BLTTA-20050308AAS			---	No Interference	---
36	WMVT	Milwaukee, WI	BLET-20050623ABQ			---	No Interference	---
38	K38LE-D	Lansing, IA	BLDTT-20101213AAX			---	No Interference	---
38	WGBO-DT	Joliet, IL	BLCDT-20100709AJT	9,335,366	50,808	97,137	46,329	0.496 %
38	WQAD-TV	Moline, IL	BLCDT-20031014AEO			---	No Interference	---
38	W38EA-D	Fort Wayne, IN	BLDTL-20090508ABX			---	No Interference	---
38	WLPC-LP	Detroit, MI	BSTA-20120213AAL			---	No Interference	---
38	NEW	Elmhurst, MI	BNPDTL-20100223AEB			---	No Interference	---
38	W38EZ-D	Houghton Lake, MI	BNPDTL-20100223AAK			---	No Interference	---
38	WSYM-TV	Lansing, MI	BLCDT-20061107ADX			---	No Interference	---
38	NEW	Midland, MI	BNPDTL-20100208AAN			---	No Interference	---
38	WMKG-CA	Muskegon, MI	BLTTL-20040824AAW			---	No Interference	---
38	WTBA-LD	Traverse City, MI	BNPDTT-20090825BUK			---	No Interference	---
38	K58GC	Rochester, MN	BDISDTL-20110509ACE			---	No Interference	---
38	W38DH	Toledo, OH	BLTT-20050805AAT			---	No Interference	---
38	WEAU-DR	Eau Claire, WI	BPRM-20110513AES	120,344	820,001	820,001	0	0.000 %
38	WEAU-TV	Eau Claire, WI	BPCDT-20110816AAD	903,266	407	407	0	0.000 %
38	WMWD-LD	Madison, WI	BLDTL-20110802AAF	473,133	4,609	4,609	0	0.000 %
38	NEW	Monroe, WI	BNPDTL-20100510AKG			---	No Interference	---
38	W38EX-D	Wausau, WI	BNPDTL-20100202AAJ			---	No Interference	---
39	W39DA-D	Chana, IL	BNPDTL-20090825BOS			---	No Interference	---
39	WWME-LD	Chicago, IL	BLDTL-20100804ABG			---	No Interference	---
39	WFRV-TV	Green Bay, WI	BLCDT-20051004ABD	1,115,870	14,893	14,917	24	0.002 %

Exhibit 13 - Table I

INTERFERENCE STUDY RESULTS SUMMARY

prepared for

Adelante Media of Wisconsin License LLC

WBWT-LP Milwaukee, WI

Facility Id: 56213

Ch. 38 13.4 kW

<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>
41	WOCH-CA	Chicago, IL	BLTTA-20060103ACT			---	No Interference	---
41	WOCH-CA	Chicago, IL	BPTTA-20050127ALO			---	No Interference	---
41	WOCH-CA	Chicago, IL	BSTA-20120221ABL			---	No Interference	---
41	WMLW-CA	Milwaukee, WI	BLTTA-20021002AAA			---	No Interference	---