

Exhibit 6 - Statement A  
**ALLOCATION and INTERFERENCE CONSIDERATIONS**  
prepared for  
**Ventana Television, Inc.**  
W23CH Atlanta, Georgia  
Facility ID 61199  
Ch. 23+ 18.1 kW

*Ventana Television, Inc.* (“*Ventana*”) is the licensee of analog low power television station W23CH, Channel 24, Atlanta, Georgia, Facility ID 61199 (file number BLTTL-19881118IV) and permittee for Channel 23 (BMPTTL-20010103ABT). The instant application requests authority to move the authorized, CP facility for W23CH to a different antenna support structure 2.3 km distant with essentially identical facility parameters.

**NTSC and DTV Considerations**

A detailed analysis of the potential for interference that may result from the use of Channel 23 as proposed herein for W23CH has been performed. The instantly proposed facility complies with contour overlap and minimum distance separation requirements with respect to all but the following authorized LPTV, Class A eligible, NTSC stations and DTV stations:

Call	Ch.	City, State	Distance
WELF(TV)	23	Dalton, GA	159.2 km
WPBA(TV)	30	Atlanta, GA	5.3 km
WSKC-LP(App)	22	Atlanta, GA	30.8 km
WGTV-DT(CP)	22	Athens, GA	18.1 km
WPXK-DT	23	Jellico, TN	265.4 km
WJSP-DT(CP)	23	Columbus, GA	111.1 km

**OET-69 Study Background**

With regard to these stations, pursuant to the Commission’s Rules, requests for waivers of the standard contour protection requirements of §§73.705, 74.706, 74.707, and 74.708 may be based on a more detailed analysis to show that interference is not likely. Specifically, interference protection to an NTSC, DTV, Class A, or LPTV station from an LPTV minor modification may be demonstrated using OET-69 methods.

Exhibit 6 - Statement A  
**ALLOCATION CONSIDERATIONS**  
(page 2 of 2)

A detailed interference study was therefore conducted in accordance with the terrain dependent Longley-Rice point-to-point propagation model, per the Commission's Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, July 2, 1997 ("OET-69").<sup>1</sup> The interference study examined the net change in interference that would result from the proposed facility. The results, as listed in **Table I** for DTV, NTSC, and LPTV/Class A facilities, show that there is no new interference proposed when the impact, in terms of percentage, is rounded to the nearest whole percent.

Thus, the instant proposal complies with the Commission's protection requirements with respect to these stations which fail to meet the contour protection or minimum distance separation requirement. If necessary, waivers of the contour protection requirements toward these stations are respectfully requested based on the OET-69 interference analyses described herein.

### **Conclusion**

The proposed use of Channel 23 fully complies with the standard requirements of §§74.705, 74.706, 74.707, and 74.708 of the FCC Rules. Requisite interference protection will be provided to primary TV, Low Power TV, TV translator stations, Class A television stations and digital television stations.

Accordingly, it is believed that there will be no impact to NTSC facilities, DTV facilities, LPTV facilities, or Class A television facilities as a result of the instant proposal.

---

<sup>1</sup> The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A standard cell size of 2 km was employed for all facilities except LPTV/Class A eligible station WSKC-LP(App) for which a nominal cell size of 1 km was employed (since the LPTV/Class A station service area is much smaller than that for full-power stations). It should also be noted that the service area for the involved analog LPTV/Class A eligible facility is that area predicted to receive signal levels of at least 74 dBμ using the Longley-Rice methodology, and within the 74 dBμ F(50,50) service contour distance as corrected with the dipole factor. Comparisons of various results of this computer program to the Commission's implementation of OET-69 show good correlation.

Exhibit 6 - Table I  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**  
 prepared for  
**Ventana Television, Inc.**  
 W23CH Atlanta, Georgia  
 Facility ID 61199  
 Ch. 23+ 18.1 kW

**DTV Facilities**

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population (1)</u>	<u>Calculated “Before” Service Population (2)</u>	<u>Calculated “After” Service Population (3)</u>	<u>--- Net “New” Interference --- (“0.5 percent” test)</u>	
						<u>Population (4)</u>	<u>Percentage (5)</u>
WGTV-DT (CP)	Athens, GA 22	18.1	3,373,000	3,339,500	3,339,500	0	0.00
WJSP-DT  (CP)	Columbus, GA  23	111.1	843,000	1,023,168	1,019,091	4,077	0.48
WPXK-DT (Lic)	Jellico, TN 23	265.4	221,000	859,869	859,869	0	0.00

**NTSC Facilities**

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population (1)</u>	<u>Calculated “Before” Service Population (2)</u>	<u>Calculated “After” Service Population (3)</u>	<u>--- Net “New” Interference --- (“0.5 percent” test)</u>	
						<u>Population (4)</u>	<u>Percentage (5)</u>
WELF(TV) (Lic)	Dalton, GA 23	159.2	731,760	627,064	626,590	474	0.06
WPBA(TV) (Lic)	Atlanta, GA 30	5.3	3,025,872	2,910,258	2,910,258	0	0.00

Exhibit 6 - Table I  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**  
(page 2 of 2)

**Class A TV Facilities**

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population (1)</u>	<u>Calculated “Before” Service Population (2)</u>	<u>Calculated “After” Service Population (3)</u>	<u>--- Net “New” Interference --- ( “0.5 percent” test)</u>	
						<u>Population (4)</u>	<u>Percentage (5)</u>
WSKC-LP (App)	Atlanta, GA 22	30.8	999,811	174,875	174,875	0	0.00

OET-69 DTV, NTSC Notes:

- (1) For DTV stations, greater of NTSC or DTV Service Population, from FCC Table  
For NTSC stations, total population within noise-limited contour  
For Class A Stations (UHF) Population within 74 dBμ contour
- (2) Service population after reduction from terrain and interference losses, before consideration of proposal
- (3) Service population after reduction from terrain and interference losses, considering proposal
- (4) Net change in population receiving interference resulting from proposal, equals (2) minus (3). A number in parenthesis indicates a *reduction* in interference.
- (5) Proposal’s impact in terms of percentage, equals (3)/(1) times 100 percent: not to exceed zero when rounded to the nearest whole percent

The determination of stations for consideration and the determination of baseline population and interference percentages were made as described in the Commission’s August 10, 1998 Public Notice “*Additional Application Processing Guidelines for Digital Television*”