

### **Engineering Statement and Interference Analysis**

This technical statement supports this amendment to make changes in WLFM-LP on channel 6 in Chicago, IL, Facility ID 128239.

In this amendment, the Applicant is proposing to turn its authorized directional antenna ERI ATW25H3-HSO-45 from 239 degrees to 277 degrees, just 38 degrees clockwise. No other change is proposed. (This facility was constructed under BLTVL-20090505ABA. In this license application, the Applicant reported in Exhibit 5 that the facility was constructed at 384.9 meters AGL instead of 383 meters as authorized in the construction permit BDISTVL-20061026AEA, a change of less than 2 meters from the authorization construction permit BDISTVL-20061026AEA. However, that was not reflected in the license authorization. Therefore, by this amendment, the Applicant proposes to again correct the height of radiation center above ground to 384.9 meters.)

The instant proposed facility on channel 6 was studied using the Techware's tv\_process\_dlptv software on a Sun Blade 1500 using the post transition data and the 2000 US Census, see Attachment A.

#### **Application Process**

The Applicant has filed a license to cover application on May 5, 2009, see FCC File No. BLTVL - 20090505ABA, for the underlying construction permit specified herein. Pursuant to information provided by the head of the LPTV Branch in May 2009, this minor modification of construction permit BDISTVL-20061026AEA will be considered a modification of the license since it is applied during the time that the license application is pending.

#### **TV Broadcast Analog System Protection**

The proposed operation causes less than 0.5% interference to surrounding analog assignments and allotments (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 analog allocation study based on use of the OET-69 procedures.

#### **Digital TV Station Protection**

The proposed operation causes less than 0.5% interference to surrounding digital assignments and allotments and 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.

#### **Low Power TV and TV Translator Station Protection**

The proposed operation causes less than 0.5% interference to surrounding low power assignments and allotments (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.

To the degree it is deemed necessary, the applicant requests a waiver of Section 74.705, 74.706, 74.707, 74.708, 74.709 & 74.710 and other applicable parts of the Rules and Regulations of the Federal Communications Commission in order to allow for the grant of this instant application.