

TECHNICAL NARRATIVE CONCERNING
THE TV CLASS A LICENSE APPLICATION FROM
STATION WOHz-LP
FACILITY ID 41892
MANSFIELD, OHIO
CH 41 13.3 KW (MAX-DA)

This Technical Statement supports the Class A TV license application from low power television (LPTV) station WOHz-LP on channel 41 at Mansfield, Ohio (Facility ID 41892). In particular, this statement addresses the interference issues raised in Part A, Section 1 on page 3 of FCC Form 302-CA. The Federal Communications Commission (FCC) Consolidated Database System (CDBS) has been the source of the technical information for the TV assignments employed in the interference studies conducted.

Background

Station WOHz-LP is currently licensed to operate channel 50 at Mansfield, OH (BLTTL-19920903IB). As channel 50 was allotted to WEAO at Akron, OH for its DTV operation (WEAO is located only 90 km from WOHz-LP), WOHz-LP filed a DTV displacement application for channel 57 for which a construction permit has been issued (BPTTL-JG0601ZC). Due to the reallocation of channels 52-59, WOHz-LP subsequently filed a displacement application for construction permit (BPTTL-20000731AEY) to operate on channel 41. As detailed below, the proposed channel 41 operation has recently become available for WOHz-LP based on the addition of a "minus" carrier frequency offset by W41AP at Sandusky, OH. Therefore, this Class A license application is based on the facilities specified in the pending channel 41 application.

Specifically, WOHz-LP proposes to operate on channel 41 with a "plus" carrier frequency offset. An Andrew ALP16L2-HSOC directional antenna system is employed (antenna ID 16531) with the main lobe oriented at 175 degrees true. The visual effective radiated power (ERP) is 13.3 kilowatts (kW). The antenna center of radiation is located 533 meters above mean sea level (AMSL). The maximum antenna height above average terrain (HAAT) is 181 meters. The transmitter site coordinates are 40-45-50, 82-37-04.

Interference studies have been performed using the methods outlined in the FCC rules. Where appropriate, interference calculations have been made using the procedures outlined in the FCC's OET-69 Bulletin and a 2 square kilometer grid.

Analog TV Broadcast Station Protection

With respect to other full service stations and assignments operating on analog (NTSC) channels, a study was performed using the FCC's normal LPTV allocation method (i.e. separations & non-overlapping predicted contours). The study indicates station WOHz-LP has no allocation or interference problems to other full service operations.

Digital TV Station/Allotment Protection

With respect to digital television (DTV) assignments and allotments on channels 40, 41 and 41, interference calculations have been made using the procedures outlined in the FCC's OET-69 Bulletin and a 2 square kilometer grid.¹ Figure 1, provides the output of study based on OET-69 Bulletin which demonstrates that the proposed WOHz-LP operation complies with the FCC's DTV interference criteria based on the 0.5% interference threshold value.

LPTV/TV Translator, Class A and Digital Class A Protection

A study has been conducted which indicates that the WOHz-LP proposal will not create prohibited interference to other existing, authorized or proposed LPTV, TV Translator, Class A and Digital Class A stations with the exception of the licensed operation of W41AP on channel 41 at Sandusky, Ohio (BLTTL-19891227IS). However, W41AP notified the FCC on August 6, 2002 that, as of August 2, 2002, W41AP had commenced operation with a "minus" carrier frequency offset (previously W41AP did not operate with a carrier frequency offset).

¹ The du Treil, Lundin & Rackley, Inc. DTV interference analysis program is based on the program and procedures outlined by the FCC in the Sixth Report and Order; subsequent Memorandum Opinion and Order; and FCC OET Bulletin No. 69. A nominal grid size resolution of 2 km was employed. An Alpha based processor computer system was employed. The results have been found to be in very close agreement with the results of the FCC implementation of OET Bulletin No. 69.

OET-69 DTV INTERFERENCE CAUSED STUDY

CELL SIZE : 2.00
Using offset in determining thresholds
Per 6th Report & Order and FCC OET-69 Bulletin

WHIZ-T 39-55-42 081-59-07 40(N) 620.000 kw 422.4 m 90.0 % 41.2 dBu
ZANESVILLE OH 10820 399 DTVSERVICE: 399000 NTSCSERVICE: 384000
CP MOD BMPCDT20020314AAE

Using DEFAULT vertical antenna pattern

	Area	Pop
within Noise Limited Contour	19006.40	821098
not affected by terrain losses	18335.87	734446

WOHZ-L 40-45-50 082-37-04 41(+) 13.300 kw 533 m DA 10.0 % 74.2
MANSFILED OH
APP BPTTL20000731AEY

1.00	0.99	0.98	0.95	0.92	0.87	0.82	0.77	0.71	0.67	0.63	0.61
0.60	0.61	0.62	0.64	0.66	0.67	0.68	0.67	0.66	0.64	0.62	0.61
0.60	0.61	0.63	0.67	0.71	0.77	0.82	0.87	0.92	0.95	0.98	0.99

Ref Az: 175.0

Using DEFAULT vertical antenna pattern

D/U Baseline: -49.00

	Area	Pop
Interference	0	0

DWHIZT 39-55-42 081-59-06 40(0) 50.000 kw 423 m DA 90.0 % 41.2 dBu
ZANESVILLE OH 10820 399 DTVSERVICE: 399000 NTSCSERVICE: 384000
DTVALL DTV ALLOTMENT

1.00	1.00	1.00	0.99	0.99	0.99	0.99	1.00	1.00	1.00	1.00	1.00
1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.99
0.99	0.99	0.98	0.98	0.99	0.99	1.00	1.00	1.00	1.00	1.00	1.00

Ref Az: 0.0

Using DEFAULT vertical antenna pattern

USING NTSC GRADE B FOR SERVICE AREA

	Area	Pop
within Noise Limited Contour	11039.84	414905
not affected by terrain losses	10940.06	410968

WOHZ-L 40-45-50 082-37-04 41(+) 13.300 kw 533 m DA 10.0 % 74.2
MANSFILED OH
APP BPTTL20000731AEY

1.00	0.99	0.98	0.95	0.92	0.87	0.82	0.77	0.71	0.67	0.63	0.61
0.60	0.61	0.62	0.64	0.66	0.67	0.68	0.67	0.66	0.64	0.62	0.61
0.60	0.61	0.63	0.67	0.71	0.77	0.82	0.87	0.92	0.95	0.98	0.99

Ref Az: 175.0

Using DEFAULT vertical antenna pattern

D/U Baseline: -49.00

	Area	Pop
Interference	0	0

WKBN-T 41-03-24 080-38-44 41(N) 700.000 kw 743 m DA 90.0 % 41.2 dBu
YOUNGSTOWN OH 19743 2533 DTVSERVICE: 2533000 NTSCSERVICE: 2366000

APP BPCDT19991025ACU

1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00

Ref Az: 0.0

Using DEFAULT vertical antenna pattern

	Area	Pop
within Noise Limited Contour	33763.95	5673190
not affected by terrain losses	32253.33	5079609

WOHZ-L 40-45-50 082-37-04 41(+) 13.300 kw 533 m DA 10.0 % 74.2
MANSFILED OH

APP BPTTL20000731AEY

1.00	0.99	0.98	0.95	0.92	0.87	0.82	0.77	0.71	0.67	0.63	0.61
0.60	0.61	0.62	0.64	0.66	0.67	0.68	0.67	0.66	0.64	0.62	0.61
0.60	0.61	0.63	0.67	0.71	0.77	0.82	0.87	0.92	0.95	0.98	0.99

Ref Az: 175.0

Using DEFAULT vertical antenna pattern

D/U Baseline: 2.00

	Area	Pop
Interference	96.42	533(0.021)

DWKBN 41-03-28 080-38-42 41(0) 50.000 kw 768 m DA 90.0 % 41.2 dBu
YOUNGSTOWN OH 19743 2533 DTVSERVICE: 2533000 NTSCSERVICE: 2366000

DTVALT DTV ALLOTMENT

1.00	1.00	1.00	1.00	0.99	0.99	0.99	0.99	0.99	0.99	0.99	0.99
0.98	0.98	0.98	0.98	0.98	0.98	0.99	0.98	0.98	0.98	0.98	0.98
0.99	0.99	0.99	0.99	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00

Ref Az: 0.0

Using DEFAULT vertical antenna pattern

USING NTSC GRADE B FOR SERVICE AREA

	Area	Pop
within Noise Limited Contour	20418.23	2622732
not affected by terrain losses	20064.67	2589582

WOHZ-L 40-45-50 082-37-04 41(+) 13.300 kw 533 m DA 10.0 % 74.2
MANSFILED OH

APP BPTTL20000731AEY

1.00	0.99	0.98	0.95	0.92	0.87	0.82	0.77	0.71	0.67	0.63	0.61
0.60	0.61	0.62	0.64	0.66	0.67	0.68	0.67	0.66	0.64	0.62	0.61
0.60	0.61	0.63	0.67	0.71	0.77	0.82	0.87	0.92	0.95	0.98	0.99

Ref Az: 175.0

Using DEFAULT vertical antenna pattern

D/U Baseline: 2.00

	Area	Pop
Interference	0	0

DWHIOT 39-44-02 084-14-52 41(0) 493.200 kw 612 m DA 90.0 % 41.2 dBu
 DAYTON OH 27263 3242 DTVSERVICE: 3242000 NTSCSERVICE: 3069000
 DTVALT DTV ALLOTMENT
 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99 1.00
 1.00 1.00 1.00 1.00 0.99 0.99 0.99 0.99 0.99 0.99 0.99 0.99
 0.99 0.99 0.99 0.99 1.00 1.00 1.00 1.00 1.00 1.00 0.99 0.99
 (134.0 1.00)(135.0 1.00)(136.0 1.00)(137.0 1.00)

Ref Az: 0.0
 Using DEFAULT vertical antenna pattern

	Area	Pop
within Noise Limited Contour	28115.54	3277783
not affected by terrain losses	27851.36	3263807

 WOHz-L 40-45-50 082-37-04 41(+) 13.300 kw 533 m DA 10.0 % 74.2
 MANSFILED OH
 APP BPTTL20000731AEY
 1.00 0.99 0.98 0.95 0.92 0.87 0.82 0.77 0.71 0.67 0.63 0.61
 0.60 0.61 0.62 0.64 0.66 0.67 0.68 0.67 0.66 0.64 0.62 0.61
 0.60 0.61 0.63 0.67 0.71 0.77 0.82 0.87 0.92 0.95 0.98 0.99

Ref Az: 175.0
 Using DEFAULT vertical antenna pattern

D/U Baseline: 2.00

	Area	Pop
Interference	224.16	1629(0.05)

 WHIO-T 39-44-02 084-14-53 41(N) 1000.000 kw 555 m DA 90.0 % 41.2 dBu
 DAYTON OH 27263 3242 DTVSERVICE: 3242000 NTSCSERVICE: 3069000
 CP BPCDT19991027ABD
 0.89 0.86 0.84 0.85 0.91 0.96 0.99 0.96 0.90 0.85 0.83 0.85
 0.88 0.93 0.97 0.99 0.98 0.92 0.84 0.71 0.55 0.36 0.19 0.28
 0.37 0.28 0.19 0.33 0.53 0.71 0.85 0.94 0.99 1.00 0.98 0.94
 (221.0 0.19)(328.0 1.00)

Ref Az: 0.0
 Using DEFAULT vertical antenna pattern

	Area	Pop
within Noise Limited Contour	24916.57	3088569
not affected by terrain losses	24632.38	3060284

 WOHz-L 40-45-50 082-37-04 41(+) 13.300 kw 533 m DA 10.0 % 74.2
 MANSFILED OH
 APP BPTTL20000731AEY
 1.00 0.99 0.98 0.95 0.92 0.87 0.82 0.77 0.71 0.67 0.63 0.61
 0.60 0.61 0.62 0.64 0.66 0.67 0.68 0.67 0.66 0.64 0.62 0.61
 0.60 0.61 0.63 0.67 0.71 0.77 0.82 0.87 0.92 0.95 0.98 0.99

Ref Az: 175.0
 Using DEFAULT vertical antenna pattern

D/U Baseline: 2.00

	Area	Pop
Interference	148.10	1388(0.04)

WXYZ-2 42-28-14 083-15-01 41(N) 465.000 kw 498 m 90.0 % 41.2 dBu
 DETROIT MI 26867 5516 DTVSERVICE: 5516000 NTSCSERVICE: 5147000
 LIC BLCDT19990329KI

Using DEFAULT vertical antenna pattern
 Area Pop
 within Noise Limited Contour 23771.31 5167661
 not affected by terrain losses 23747.17 5166372

WOHZ-L 40-45-50 082-37-04 41(+) 13.300 kw 533 m DA 10.0 % 74.2
 MANSFILED OH
 APP BPTTL20000731AEY
 1.00 0.99 0.98 0.95 0.92 0.87 0.82 0.77 0.71 0.67 0.63 0.61
 0.60 0.61 0.62 0.64 0.66 0.67 0.68 0.67 0.66 0.64 0.62 0.61
 0.60 0.61 0.63 0.67 0.71 0.77 0.82 0.87 0.92 0.95 0.98 0.99

Ref Az: 175.0
 Using DEFAULT vertical antenna pattern

D/U Baseline: 2.00

Interference Area Pop
 4.02 78(0.0)

WXYZ-T 42-28-14 083-15-01 41(N) 770.000 kw 497.5 m 90.0 % 41.2 dBu
 DETROIT MI 26867 5516 DTVSERVICE: 5516000 NTSCSERVICE: 5147000
 CP BPCDT20000426AAV

Using DEFAULT vertical antenna pattern
 Area Pop
 within Noise Limited Contour 26239.07 5431210
 not affected by terrain losses 26210.90 5430624

WOHZ-L 40-45-50 082-37-04 41(+) 13.300 kw 533 m DA 10.0 % 74.2
 MANSFILED OH
 APP BPTTL20000731AEY
 1.00 0.99 0.98 0.95 0.92 0.87 0.82 0.77 0.71 0.67 0.63 0.61
 0.60 0.61 0.62 0.64 0.66 0.67 0.68 0.67 0.66 0.64 0.62 0.61
 0.60 0.61 0.63 0.67 0.71 0.77 0.82 0.87 0.92 0.95 0.98 0.99

Ref Az: 175.0
 Using DEFAULT vertical antenna pattern

D/U Baseline: 2.00

Interference Area Pop
 0 0

DWXYZT 42-28-15 083-15-00 41(0) 1000.000 kw 516 m DA 90.0 % 41.2 dBu
 DETROIT MI 26867 5516 DTVSERVICE: 5516000 NTSCSERVICE: 5147000
 DTVALT DTV ALLOTMENT

0.95 0.92 0.89 0.86 0.84 0.84 0.83 0.83 0.83 0.83 0.83 0.83
 0.83 0.83 0.83 0.82 0.82 0.82 0.82 0.82 0.82 0.82 0.82 0.83
 0.83 0.85 0.86 0.88 0.90 0.93 0.96 0.99 0.99 0.98 0.97 0.96
 (316.0 1.00)

Ref Az: 0.0
 Using DEFAULT vertical antenna pattern
 USING NTSC GRADE B FOR SERVICE AREA
 Area Pop

within Noise Limited Contour 28717.68 5609411
not affected by terrain losses 28689.52 5608769

WOHZ-L 40-45-50 082-37-04 41(+) 13.300 kw 533 m DA 10.0 % 74.2
MANSFILED OH
APP BPTTL20000731AEY
1.00 0.99 0.98 0.95 0.92 0.87 0.82 0.77 0.71 0.67 0.63 0.61
0.60 0.61 0.62 0.64 0.66 0.67 0.68 0.67 0.66 0.64 0.62 0.61
0.60 0.61 0.63 0.67 0.71 0.77 0.82 0.87 0.92 0.95 0.98 0.99
Ref Az: 175.0
Using DEFAULT vertical antenna pattern

D/U Baseline: 2.00

Interference **Area** **Pop**
8.05 **169(0.0)**

DWCHST 38-24-28 081-54-13 41(0) 388.500 kw 613 m DA 90.0 % 41.2 dBu
CHARLESTON WV 26064 929 DTVSERVICE: 929000 NTSCSERVICE: 889000
DTVALT DTV ALLOTMENT
0.98 0.99 0.99 1.00 1.00 1.00 0.99 0.98 0.97 0.97 0.97 0.97
0.98 0.98 0.98 0.97 0.97 0.97 0.97 0.97 0.97 0.97 0.97 0.97
0.97 0.97 0.97 0.98 0.98 0.98 0.98 0.98 0.98 0.98 0.98 0.98
(45.0 1.00)(46.0 1.00)
Ref Az: 0.0
Using DEFAULT vertical antenna pattern

Area **Pop**
within Noise Limited Contour 28162.95 1023894
not affected by terrain losses 26313.62 948084

WOHZ-L 40-45-50 082-37-04 41(+) 13.300 kw 533 m DA 10.0 % 74.2
MANSFILED OH
APP BPTTL20000731AEY
1.00 0.99 0.98 0.95 0.92 0.87 0.82 0.77 0.71 0.67 0.63 0.61
0.60 0.61 0.62 0.64 0.66 0.67 0.68 0.67 0.66 0.64 0.62 0.61
0.60 0.61 0.63 0.67 0.71 0.77 0.82 0.87 0.92 0.95 0.98 0.99
Ref Az: 175.0
Using DEFAULT vertical antenna pattern

D/U Baseline: 2.00

Area **Pop**
Interference **8.06** **109(0.0)**

WCHS-T 38-24-28 081-54-13 41(N) 1000.000 kw 613 m 90.0 % 41.2 dBu
CHARLESTON WV 26064 929 DTVSERVICE: 929000 NTSCSERVICE: 889000
CP BPCDT19991019ABT
Using DEFAULT vertical antenna pattern

Area **Pop**
within Noise Limited Contour 33444.77 1234863
not affected by terrain losses 31176.45 1109283

WOHZ-L 40-45-50 082-37-04 41(+) 13.300 kw 533 m DA 10.0 % 74.2
MANSFILED OH
APP BPTTL20000731AEY
1.00 0.99 0.98 0.95 0.92 0.87 0.82 0.77 0.71 0.67 0.63 0.61
0.60 0.61 0.62 0.64 0.66 0.67 0.68 0.67 0.66 0.64 0.62 0.61
0.60 0.61 0.63 0.67 0.71 0.77 0.82 0.87 0.92 0.95 0.98 0.99

Ref Az: 175.0
Using DEFAULT vertical antenna pattern

D/U Baseline: 2.00

Interference	Area	Pop
	0	0

WGGN-2 41-23-48 082-47-31 42(N) 1000.000 kw 405.4 m DA 90.0 % 41.3 dBu		
SANDUSKY OH 13436 657 DTVSERVICE: 657000 NTSCSERVICE: 657000		
APP BMPCDT20000501AIZ		
0.20 0.21 0.22 0.21 0.20 0.25 0.32 0.44 0.60 0.72 0.85 0.92		
0.97 1.00 0.98 0.96 0.92 0.92 0.96 0.99 1.00 0.99 0.96 0.92		
0.92 0.96 0.98 1.00 0.97 0.92 0.85 0.72 0.60 0.44 0.32 0.25		
Ref Az: 0.0		

Using DEFAULT vertical antenna pattern

	Area	Pop
within Noise Limited Contour	19399.49	1644055
not affected by terrain losses	19351.48	1642850

WOHZ-L 40-45-50 082-37-04 41(+)	13.300 kw 533	m DA 10.0 % 74.2
MANSFILED OH		
APP BPTTL20000731AEY		
1.00 0.99 0.98 0.95 0.92 0.87 0.82 0.77 0.71 0.67 0.63 0.61		
0.60 0.61 0.62 0.64 0.66 0.67 0.68 0.67 0.66 0.64 0.62 0.61		
0.60 0.61 0.63 0.67 0.71 0.77 0.82 0.87 0.92 0.95 0.98 0.99		
Ref Az: 175.0		

Using DEFAULT vertical antenna pattern

D/U Baseline: -48.00

Interference	Area	Pop
	4.00	19(0.0)

WGGN-T 41-23-48 082-47-31 42(N) 58.900 kw 405.4 m 90.0 % 41.3 dBu		
SANDUSKY OH 13436 657 DTVSERVICE: 657000 NTSCSERVICE: 657000		
CP BPCDT19991108AAE		

Using DEFAULT vertical antenna pattern

	Area	Pop
within Noise Limited Contour	14695.05	765788
not affected by terrain losses	14691.06	765660

WOHZ-L 40-45-50 082-37-04 41(+)	13.300 kw 533	m DA 10.0 % 74.2
MANSFILED OH		
APP BPTTL20000731AEY		
1.00 0.99 0.98 0.95 0.92 0.87 0.82 0.77 0.71 0.67 0.63 0.61		
0.60 0.61 0.62 0.64 0.66 0.67 0.68 0.67 0.66 0.64 0.62 0.61		
0.60 0.61 0.63 0.67 0.71 0.77 0.82 0.87 0.92 0.95 0.98 0.99		
Ref Az: 175.0		

Using DEFAULT vertical antenna pattern

D/U Baseline: -48.00

Interference	Area	Pop
	0	0

DWGGNT 41-23-48 082-47-31 42(0) 50.000 kw 431 m DA 90.0 % 41.3 dBu
 SANDUSKY OH 13436 657 DTVSERVICE: 657000 NTSCSERVICE: 657000

DTVALT DTV ALLOTMENT

1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.99	0.99	0.99
0.99	0.99	0.99	0.99	0.99	0.98	0.98	0.98	0.98	0.98	0.98	0.99
0.99	0.99	0.99	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00

Ref Az: 0.0
 Using DEFAULT vertical antenna pattern
 USING NTSC GRADE B FOR SERVICE AREA

	Area	Pop
within Noise Limited Contour	13432.16	657119
not affected by terrain losses	13432.16	657119

 WOHz-L 40-45-50 082-37-04 41(+) 13.300 kw 533 m DA 10.0 % 74.2
 MANSFILED OH

APP BPTTL20000731AEY

1.00	0.99	0.98	0.95	0.92	0.87	0.82	0.77	0.71	0.67	0.63	0.61
0.60	0.61	0.62	0.64	0.66	0.67	0.68	0.67	0.66	0.64	0.62	0.61
0.60	0.61	0.63	0.67	0.71	0.77	0.82	0.87	0.92	0.95	0.98	0.99

Ref Az: 175.0
 Using DEFAULT vertical antenna pattern

D/U Baseline: -48.00

Interference	Area	Pop
	0	0

Summary of Calculations

Facility	Channel	Type	Baseline	Permissible	IX	%Base
WHIZ-T, ZANESVILLE, OH	40	DTV	399000	0.5	0	0.00
DWHIZT, ZANESVILLE, OH	40	DTV	399000	0.5	0	0.00
WKBN-T, YOUNGSTOWN, OH	41	DTV	2533000	0.5	533	0.02
DWKBNT, YOUNGSTOWN, OH	41	DTV	2533000	0.5	0	0.00
DWHIOT, DAYTON, OH	41	DTV	3242000	0.5	1629	0.05
WHIO-T, DAYTON, OH	41	DTV	3242000	0.5	1388	0.04
WXYZ-2, DETROIT, MI	41	DTV	5516000	0.5	78	0.00
WXYZ-T, DETROIT, MI	41	DTV	5516000	0.5	0	0.00
DWXYZT, DETROIT, MI	41	DTV	5516000	0.5	169	0.00
DWCHST, CHARLESTON, WV	41	DTV	929000	0.5	109	0.01
WCHS-T, CHARLESTON, WV	41	DTV	929000	0.5	0	0.00
WGGN-2, SANDUSKY, OH	42	DTV	657000	0.5	19	0.00
WGGN-T, SANDUSKY, OH	42	DTV	657000	0.5	0	0.00
DWGGNT, SANDUSKY, OH	42	DTV	657000	0.5	0	0.00

Operation of W41AP with a "minus" carrier frequency offset eliminates the prohibited contour overlap between W41AP and WOHz-LP's proposed operation on channel 41.

Land Mobile Station Protection

The WOHz-LP operation does not cause interference to land mobile radio stations (LMRS) as specified in Section 73.6020 and 74.709 of the FCC rules.

In summary, as indicated by the above narrative, it is believed station WOHz-LP complies with the FCC's interference criteria for Class A status.

If there are questions concerning this Technical Statement, please communicate with the office of the undersigned.

W. Jeffrey Reynolds

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September 4, 2002