

Compliance with 47 C.F.R. 73.525**Introduction**

There are several considerations outlined in 47 C.F.R. 73.525 for TV Channel 6 protection. Outlined below are the various factors as they apply to the proposed operation and WITI-TV.

Distance between proposed operation and WITI-TV

47 C.F.R. 73.525(a)(1) requires a minimum separation of 159 km for a channel 219 operation. The distance between the proposed station and WITI-TV is 104.80 km.

Population Limitation

When a proposed non-commercial station is not co-located with the channel 6 station question, the applicant is required to show that the interference area (as predicted by the procedures outlined in 47 C.F.R. 73.525(e)(1)) contains no more than 3,000 persons.

Vertically Polarized Transmissions

When an applicant wishes to use vertically polarized transmissions only, C.F.R. 74.525(e)(4) limits the vertical ERP to the maximum permissible horizontally polarized ERP multiplied by 40 (if the predicted interference area lies entirely outside the limits of a city of 50,000 persons) or 10 (if not). Since the predicted interference area lies entirely outside the limits of a city of 50,000 persons, that is multiplied by 40 to obtain the vertical-only ERP of 6.5 kilowatts specified in this application.

All population limits were calculated using the maximum permitted horizontally polarized-only power of 0.1625 kilowatts. The actual population figures are contained in Exhibit 19-B, and a map of the potential interference area is shown in Exhibit 19-A.

Discussion

Population in the predicted interference area was determined using the centroid method and the 2000 census. The predicted interference contour (of the theoretical horizontal component of 0.1625 kilowatts) crosses the WITI channel 6 grade B (47 dBu F(50,50)) contour (see Exhibit 19-A).

The predicted interference contour is determined from 47 C.F.R. 73.599 Figure 1 for channel 219 to be 83 dBu (see Exhibit 19-C for a tabulation of the WITI protected contour values and the corresponding channel 219 interfering contours).

Exhibit 19-A shows the 47 dBu F(50,50) contour for WITI and the corresponding F(50,10) interfering contour for the proposed channel 219 facility. A population report of the area contained within the interfering contour is included at Exhibit 19-B. The total population contained within the interfering contour is 67 persons.

Conclusion

Therefore, the proposed operation is within the limitations of 47 CFR 73.525(c).



Exhibit 19-A

WZKL.A

Latitude: 42-17-56 N
Longitude: 088-35-34 W
ERP: 0.1625 kW
Channel: 219
Frequency: 91.7 MHz
AMSL Height: 369.0 m
Horiz. Pattern: Directional
Vert. Pattern: No
Prop Model: None

WITI

BLCT19990129KT
Latitude: 43-05-26 N
Longitude: 087-53-50 W
ERP: 100.00 kW
Channel: 06Z
Frequency: 85.0 MHz
AMSL Height: 511.0 m
Horiz. Pattern: Omni
Vert. Pattern: Yes
Elec Tilt: 0.0

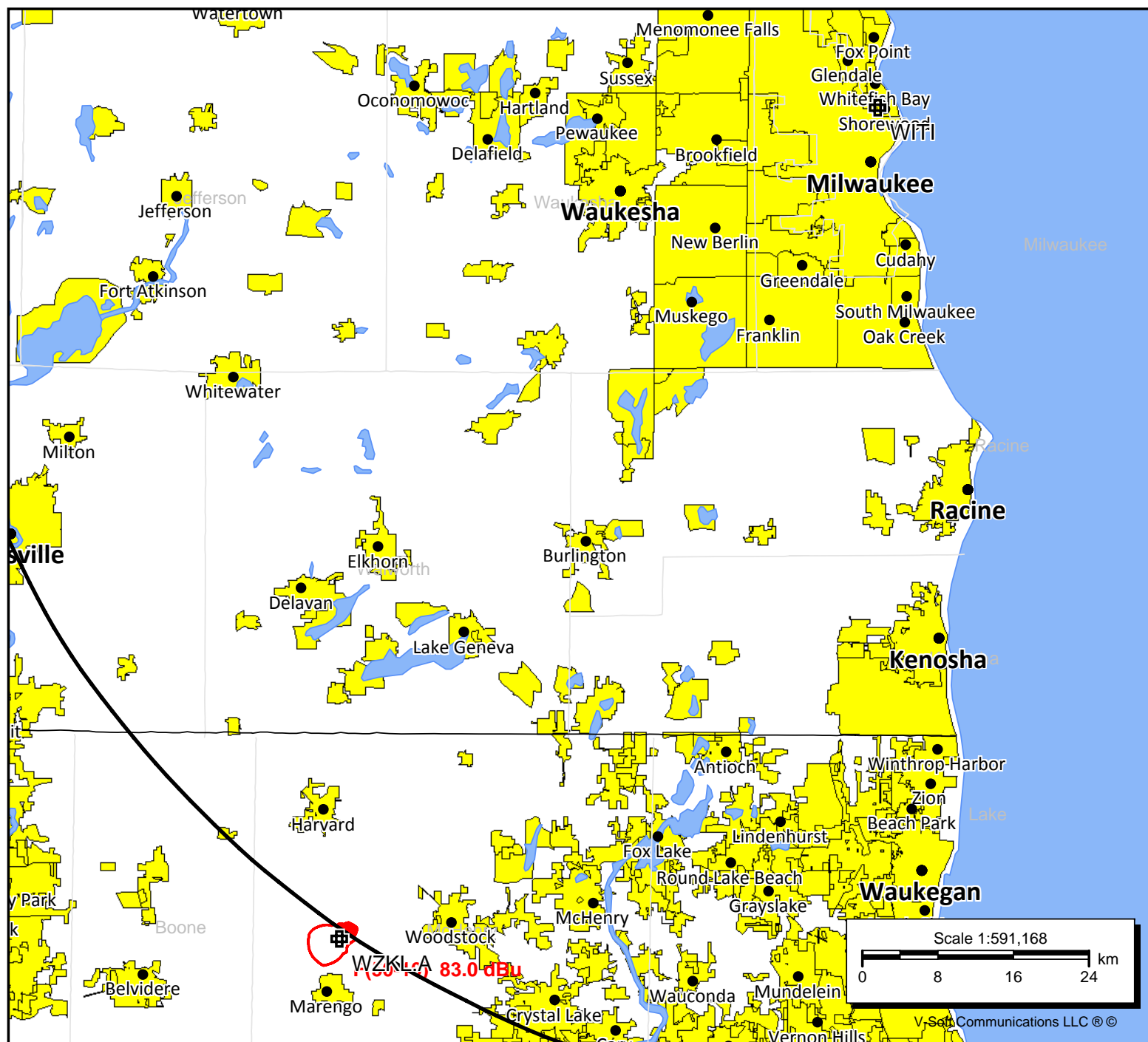


Exhibit 19-B

V-Soft Communications Population Report

WZKL.A / WITI

This overlap region consists of the intersection of the following contours:

WZKL.A: FCC F(50-10) 83.00 dBu

WITI: FCC F(50-50) 47.00 dBu

Population Database: 2000 US Census (SF1)

Total Population Within Overlap Region: 67

Total Housing Units Within Overlap Region: 28

Total Area Within Overlap Region: 1.81 sq. km

Channel 6 vs Channel 219

Channel 6 Contour	Value from 73.599	Channel 219 Contour	Adjusted 6 dB
47	36.0	83.0	89.0
48	34.9	82.9	88.9
49	33.8	82.8	88.8
50	32.8	82.8	88.8
51	31.4	82.4	88.4
52	30.1	82.1	88.1
53	28.8	81.8	87.8
54	27.7	81.7	87.7
55	26.6	81.6	87.6
56	25.5	81.5	87.5
57	24.5	81.5	87.5
58	23.5	81.5	87.5
59	22.5	81.5	87.5
60	21.6	81.6	87.6
61	20.7	81.7	87.7
62	19.8	81.8	87.8
63	19.0	82.0	88.0
64	18.2	82.2	88.2
65	17.4	82.4	88.4
66	16.8	82.8	88.8
67	16.3	83.3	89.3

Channel 6 Contour	Value from 73.599	Channel 219 Contour	Adjusted 6 dB
68	15.7	83.7	89.7
69	15.3	84.3	90.3
70	15.0	85.0	91.0
71	14.6	85.6	91.6
72	14.4	86.4	92.4
73	14.2	87.2	93.2
74	14.0	88.0	94.0
75	13.8	88.8	94.8
76	13.7	89.7	95.7
77	13.5	90.5	96.5
78	13.4	91.4	97.4
79	13.3	92.3	98.3
80	13.2	93.2	99.2
81	13.0	94.0	100.0
82	12.9	94.9	100.9
83	12.7	95.7	101.7
84	12.6	96.6	102.6
85	12.4	97.4	103.4
86	12.3	98.3	104.3
87	12.2	99.2	105.2
88	12.1	100.1	106.1
89	12.0	101.0	107.0
90	11.8	101.8	107.8