

Interference

This technical statement supports this application to make changes in W55DF on channel 55 in Rochelle, IL. FCC File No. BNPTTL-20000831AUQ, Facility ID 128239.

In this application, the Applicant is proposing to modify W55DF to change the transmitting facility and location. Attachment A shows the overlap of protected 74dBu contours between the W55DF licensed facilities and this application.

The proposed channel 55 facilities were studied using the RadioSoft ComStudy program version 2.2 and the results are attached hereto. The study performed a contour study in accordance with FCC rules 74.705, 74.706 and 74.707 and is summarized in Attachment B. The program lists in a column labeled “Clearance” the separation in kilometers between the proposed interfering contour and the protected contours of pertinent stations. In cases where either the contour protection or distance separation requirements are not met, the “Clearance” is a negative number. The “Total Pop” and “Old Pop” reflect the existing station’s coverage without this proposed station. The “New Pop%” and “New Pop” show the effect of this proposal on the studied station. Interference is shown even if one person is affected. In Attachment C, the coverage contours of applicable stations along with non-interfered coverage, as calculated by Longley-Rice are in green, and interfered coverage, as calculated by Longley-Rice are in red.

TV Broadcast Analog System Protection

The following is a summary of the calculated interference caused by the proposed Rochelle operation to pertinent surrounding analog television allotments and assignments. Interference to these stations was studied

by the Comstudy 2.2 program using a Longley-Rice routine. The factors applied follow OET 69 with a 1 km block size.

Assignment	Facility ID	Location	Channel	Service Population	Total Interference
WRSP-TV (CP)	62009	Springfield, IL	55	579,929	0 (0.0%)
WRSP-TV (Lic)	62009	Springfield, IL	55	579,343	0 (0.0%)
WPXE (Lic)	37104	Kenosha, WI	55	2,044,767	9,329 (0.46%)
WJYS (Lic)	32334	Hammond, IN	62	6,876,566	0 (0.0%)
WYIN (App)	49803	Gary, IN	56	7,783,539	36,277 (0.47%)
960920WE (App)	83953	Kankakee, IL	54	1,367,785	0 (0.0%)
WYIN (Lic)	49803	Gary, IN	56	4,484,753	7,410 (0.17%)

As demonstrated, 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 following is a summary of the calculated interference caused by the proposed Rochelle operation to pertinent surrounding digital television allotments and assignments. Interference to these stations was studied by the Comstudy 2.2 program using a Longley-Rice routine. The factors applied follow OET 69 with a 1 km block size.

Assignment	Facility ID	Location	Channel	Service Population	Total Interference
KWWL (DTV Allot)	593	Waterloo, IA	55	875,619	2,898 (0.33%)
KWWL (Lic)	593	Waterloo, IA	55	709,698	1,338 (0.19%)
WREX-TV (DTV Allot)	73940	Rockford, IL	54	1,446,937	1,115 (0.08%)
WREX-DT (CP)	73940	Rockford, IL	54	1,027,627	0 (0.0%)
WREX-DT (Lic)	73940	Rockford, IL	54	668,127	0 (0.0%)

As demonstrated, the proposed operation causes less than 0.5% interference to surrounding digital 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 digital allocation study based on use of the OET-69 procedures.

Low Power TV and TV Translator Station Protection

The following is a summary of the calculated interference caused by the proposed Rochelle operation to pertinent surrounding low power television allotments and assignments. Interference to these stations was studied by the Comstudy 2.2 program using a Longley-Rice routine. The factors applied follow OET 69 with a 1 km block size.

Assignment	Facility ID	Location	Channel	Service Population	Total Interference
New (App)	128345	Rochelle, IL	40	1,790	0 (0.0%)
W54BE (Lic)	71111	Sugar Grove, IL	54	6,975	0 (0.0%)

As demonstrated, 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.

This application does not cause any predicted interference to any of the other proposals. The applicant requests a waiver of Section 74.705, 74.706, and 74.707 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.