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CLASS A TV, LPTV, AND TV TRANSLATOR PROTECTION

Image Video Teleproductions, Inc.  
Newcomerstown, OH

The predicted 46 dBu contour for the proposed W29CU facilities will overlap the predicted 74 dBu contour for the Channel 29 facilities authorized by the construction permit (BPTTL-20010711ADC) for W25CI - Steubenville, Ohio, in violation of Section 74.707(d)(1) of the FCC Rules. Similarly, the predicted 29 dBu contour for the proposed W29CU facilities will overlap the predicted 74 dBu contour for the licensed Channel 29 operating facilities of WIIC-LP - Pittsburgh, Pennsylvania, which also violates this rule section. As shown below, however, an analysis utilizing the methodology outlined in OET Bulletin 69 shows that the proposed W29CU operating facilities will not be predicted to cause any cognizable new interference to either of these stations. Thus, based on this analysis, the attached application requests a waiver of this rule section, pursuant to Section 74.707(e) of the FCC Rules.

Studies were conducted utilizing the procedures outlined in OET Bulletin 69 to evaluate the predicted interference to LPTV stations from the proposed W29CU operating facilities. These interference studies were conducted utilizing the FCC's "FLR" computer program modified to run on a Windows 98/Windows NT platform and recompiled under the Compaq (DEC) Visual Fortran compiler. To insure sufficient accuracy given the small size of the protected service areas for these LPTV stations, a 1 kilometer cell size was utilized in these studies rather than the 2 kilometer cell size which is normally utilized in conducting interference studies for stations having larger protected service areas.

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In conducting these interference studies, interfering NTSC stations holding a construction permit were considered to be operating with their construction permit facilities, while interfering NTSC stations not holding a construction permit were considered to be operating with their licensed facilities. Interfering DTV facilities who have not yet filed a construction permit application and authorized or proposed interfering DTV facilities which are based on a checklist application were considered to be operating with their DTV allotment facilities. For interfering DTV facilities which have a pending maximization application or have been authorized operating facilities based on a maximization application, the maximized facilities were considered in these studies only if they reduced the DTV Service population for the station being studied below the value which occurs when the same station's DTV allotment facilities are considered or when it was obvious by inspection that the maximized facilities have a significantly greater potential to cause interference to the station being studied than the associated DTV allotment facilities.

Table 6.2.0 presents the results of these OET 69 interference studies to the W25CI Channel 29 construction permit facilities. This table contains a complete listing of the stations which were included in this study and the facilities which were considered for each station which was included. It also contains the output of the "FLR" program, both with and without the proposed W29CU operating facilities. As shown in this table, the proposed W29CU facilities are predicted to cause new interference to the W25CI Channel 29 construction permit facilities for 102 persons, or 0.15% of the total population within the predicted 74 dBu contour for these construction permit facilities. Since this predicted new interference is less than the 0.5% rounding tolerance permit-

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ted in this situation when an OET 69 analysis is employed to support a waiver request for an LPTV station, this predicted interference is not cognizable and should not serve as an impediment to the grant of the attached application.

Table 6.2.1 presents the results of these OET 69 interference studies for the licensed operating facilities of WIIC-LP. This table contains a complete listing of the stations which were included in this study and the facilities which were considered for each station which was included. It also contains the output of the "FLR" program, both with and without the proposed W29CU operating facilities. As shown in this table, the proposed W29CU facilities are not predicted to cause any new interference whatsoever to the presently licensed WIIC-LP operating facilities.

Based on this data, a waiver of Section 74.707(d)(1) of the FCC Rules is respectfully requested to permit the attached application to be granted in spite of the prohibited contour overlap which is predicted to these two LPTV stations.

With the exception of WIIC-LP and the W25CI construction permit facilities, the proposed W29CU operating facilities provide the required contour protection to all Class A TV, LPTV, and TV Translator facilities requiring protection consideration.

TABLE 6.2.0

OET 69 INTERFERENCE STUDIES  
W25CI - STEUBENVILLE, OH  
(CONSTRUCTION PERMIT FACILITIES)

Image Video Teleproductions, Inc.  
Newcomerstown, OH

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
W25CI	Steubenville, OH	29	NTSC	CP	BPTTL-20010711ADC

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WAOH-LP	Akron, OH	29	NTSC	Licensed	BLTTL-19900430KA
WVTX-CA	Bridgeport, OH	28	NTSC	CP	BMPTTA-20040223AAB
WOUC-TV	Cambridge, OH	44	NTSC	CP	BPET-20010321ABH
W22CU	Marietta, OH	22	NTSC	CP	BNPTTL-20000807ABA
W60BL	Butler, PA	44	NTSC	CP	BPTTL-20030407AAC
WQVC-CA	Greensburg, PA	28	NTSC	CP	BPTTA-20030602CHB
WCWB	Pittsburgh, PA	22	NTSC	Licensed	BLCT-20000724ABO
WIIC-LP	Pittsburgh, PA	29	NTSC	Licensed	BLTTL-19981230JB
WBPA-LP	Pittsburgh, PA	30	NTSC	CP	BPTTL-20000128AAB
W29CO	Sharon, PA	29	NTSC	Licensed	BLTTL-20031216ACI
WHVL-LP	State College, PA	29	NTSC	Licensed	BLTTL-19911123JH
WLPX-TV	Charleston, WV	29	NTSC	Licensed	BLCT-19990426AAA
W44CF	Clarksburg, WV	44	NTSC	CP	BNPTT-20000830BIN
WGTE-DT	Toledo, OH	29	DTV	Allotment	
WWCP-DT	Johnstown, PA	29	DTV	CP	BPCDT-19991029P
WTRF-DT	Wheeling, WV	32	DTV	Allotment	
W29CU	Newcomerstown, OH	29	NTSC	Applicant	

TABLE 6.2.0 (cont'd)

OET 69 INTERFERENCE STUDIES  
W25CI - STEUBENVILLE, OH  
(CONSTRUCTION PERMIT FACILITIES)

STUDY RESULTS WITHOUT W29CU

	POPULATION	AREA (sq km)
within Noise Limited Contour	66020	679.7
not affected by terrain losses	64251	632.8
lost to NTSC IX	247	22.5
lost to additional IX by ATV	8517	192.4
lost to all IX	8764	214.8

STUDY RESULTS WITH PROPOSED W29CU FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	66020	679.7
not affected by terrain losses	64251	632.8
lost to NTSC IX	433	24.4
lost to additional IX by ATV	8433	191.4
lost to all IX	8866	215.8

SUMMARY OF STUDY RESULTS

	<u>Without W29CU</u>	<u>With Proposed W29CU</u>	<u>Increase/(Decrease)*</u>
NTSC Service	55,487	55,385	(102)

\*Based on total noise limited population of 66,020 from study results listed above, this new interference amounts to 0.15% of the W25CI noise limited population and, thus is not cognizable because it is less than the 0.5% rounding tolerance permitted in this situation.

TABLE 6.2.1

OET 69 INTERFERENCE STUDIES  
 WIIC-LP - PITTSBURGH, PA  
(LICENSED FACILITIES)  
 Image Video Teleproductions, Inc.  
 Newcomerstown, OH

STATION BEING STUDIED

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WIIC-LP	Pittsburgh, PA	29	NTSC	Licensed	BLTTL-19981230JB

STATIONS CONSIDERED IN STUDIES

<u>Call</u>	<u>Location</u>	<u>Channel</u>	<u>Mode</u>	<u>Status</u>	<u>File Number</u>
WUTV	Buffalo, NY	29	NTSC	Licensed	BLCT-19990604KJ
WAOH-LP	Akron, OH	29	NTSC	Licensed	BLTTL-19900430KA
WVTX-CA	Bridgeport, OH	28	NTSC	CP	BMPPTA-20040223AAB
WOUC-TV	Cambridge, OH	44	NTSC	CP	BPET-20010321ABH
W25CI	Steubenville, OH	29	NTSC	CP	BPTTL-20010711ADC
W60BL	Butler, PA	44	NTSC	CP	BPTTL-20030407AAC
WMVH-CA	Charleroi, PA	26	NTSC	Licensed	BLTTL-19980727JG
WWBP-LP	Freedom, PA	31	NTSC	CP	BPTTL-20030605ADP
WQVC-CA	Greensburg, PA	28	NTSC	CP	BPTTA-20030602CHB
WCWB	Pittsburgh, PA	22	NTSC	Licensed	BLCT-20000724ABO
WBPA-LP	Pittsburgh, PA	30	NTSC	CP	BPTTL-20000128AAB
W29CO	Sharon, PA	29	NTSC	Licensed	BLTTL-20031216ACI
WHVL-LP	State College, PA	29	NTSC	Licensed	BLTTL-19911123JH
WVIR-TV	Charlottesville, VA	29	NTSC	Licensed	BLCT-19930210KE
WLPX-TV	Charleston, WV	29	NTSC	Licensed	BLCT-19990426AAA
W44CF	Clarksburg, WV	44	NTSC	CP	BNPTT-20000830BIN
WMPB-DT	Baltimore, MD	29	DTV	Allotment	
WWCP-DT	Johnstown, PA	29	DTV	CP	BPCDT-19991029ADP
WNPA-DT	Jeannette, PA	30	DTV	Allotment	
KDKA-DT	Pittsburgh, PA	25	DTV	CP	BMPCDT-20000501ADW
WQEX-DT	Pittsburgh, PA	26	DTV	Allotment	
WPGH-DT	Pittsburgh, PA	43	DTV	CP	BMPCDT-20021216AAS
WILF-DT	Williamsport, PA	29	DTV	Allotment	
W29CU	Newcomerstown, OH	29	NTSC	Applicant	

TABLE 6.2.1 (cont'd)

OET 69 INTERFERENCE STUDIES  
 WIIC-LP - PITTSBURGH, PA  
(LICENSED FACILITIES)

STUDY RESULTS WITHOUT W29CU

	POPULATION	AREA (sq km)
within Noise Limited Contour	871986	572.0
not affected by terrain losses	844744	546.1
lost to NTSC IX	4361	6.0
lost to additional IX by ATV	517362	323.4
lost to all IX	521723	329.4

STUDY RESULTS WITH PROPOSED W29CU FACILITIES

	POPULATION	AREA (sq km)
within Noise Limited Contour	871986	572.0
not affected by terrain losses	844744	546.1
lost to NTSC IX	4361	6.0
lost to additional IX by ATV	517362	323.4
lost to all IX	521723	329.4

SUMMARY OF STUDY RESULTS

	<u>Without</u> <u>W29CU</u>	<u>With Proposed</u> <u>W29CU</u>	<u>Increase/(Decrease)</u>
NTSC Service	350,263	350,263	0