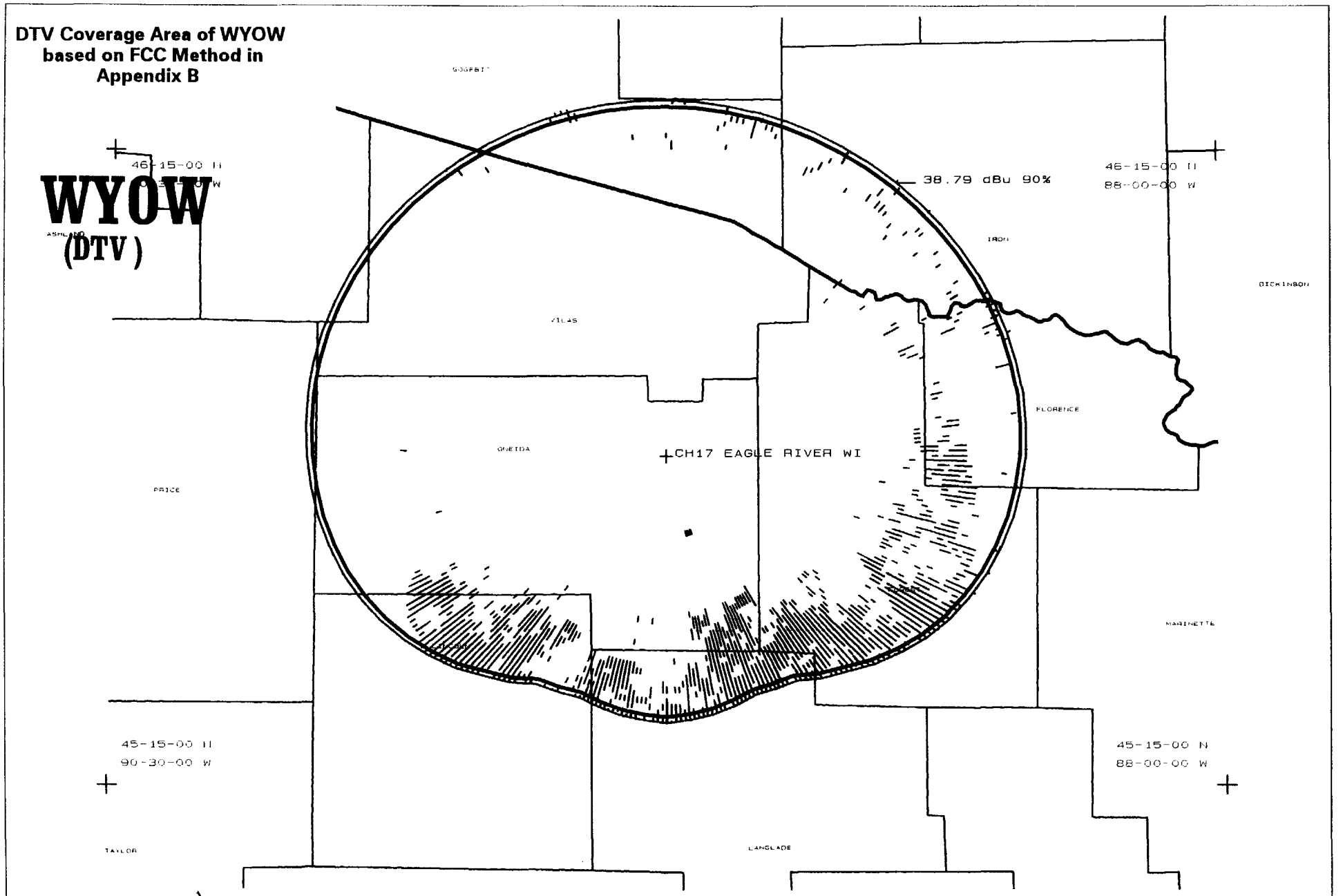
DTV Coverage Area of WYOW based on FCC Method in Appendix B



Terrain loss - Red, Interference NTSC - Blue, DTV - Green

WYOW-DTV Ch. 17 ERP 50.0 HAAT 124.5

EAGLE RIVER WI Dir. Ant. YES

MAJOR DIVISIONS ARE: 10.0 KM
SCALE IS: 21.81 KM/INCH
13.55 MILES/INCH

Longley-Rice analysis of ATV station
WYOW EAGLE RIVER WI Channel 17
ERP 50.02 kw 16.99 dBk HAAT: 124.5 meters ERP MAX 50.0 kw 17.0 dBk

Percent quantiles: Time 90.0% Locations 50.0% Confidence 50.0%

FCC noise limited service area equals 10656.6 square km 10656.6 square km
Service contour: 38.8 dBu Curve F50/90 63.8 km 63.8 km

Above based on replication power of: 40.3 KW

Population within noise limited service area 73005 73005

Longley-Rice noise limited service area equals 10519.2 square km

Longley-Rice service population 72182

Total IX from NTSC stations 0.0 square km

Population in IX area 0

IX from ATV station KNLD DULUTH MN 17 1.0 square km
ERP 45.13 kw 16.54 dBk MAX ERP 50.00 kw 16.99 dBk
Protection ratio 15.27 dB
Population in IX area 0

IX from ATV station WJFWTV RHINELANDER WI 16 1030.1 square km
ERP 485.08 kw 26.86 dBk MAX ERP 485.87 kw 26.87 dBk
Protection ratio -41.98 dB
Population in IX area 9742

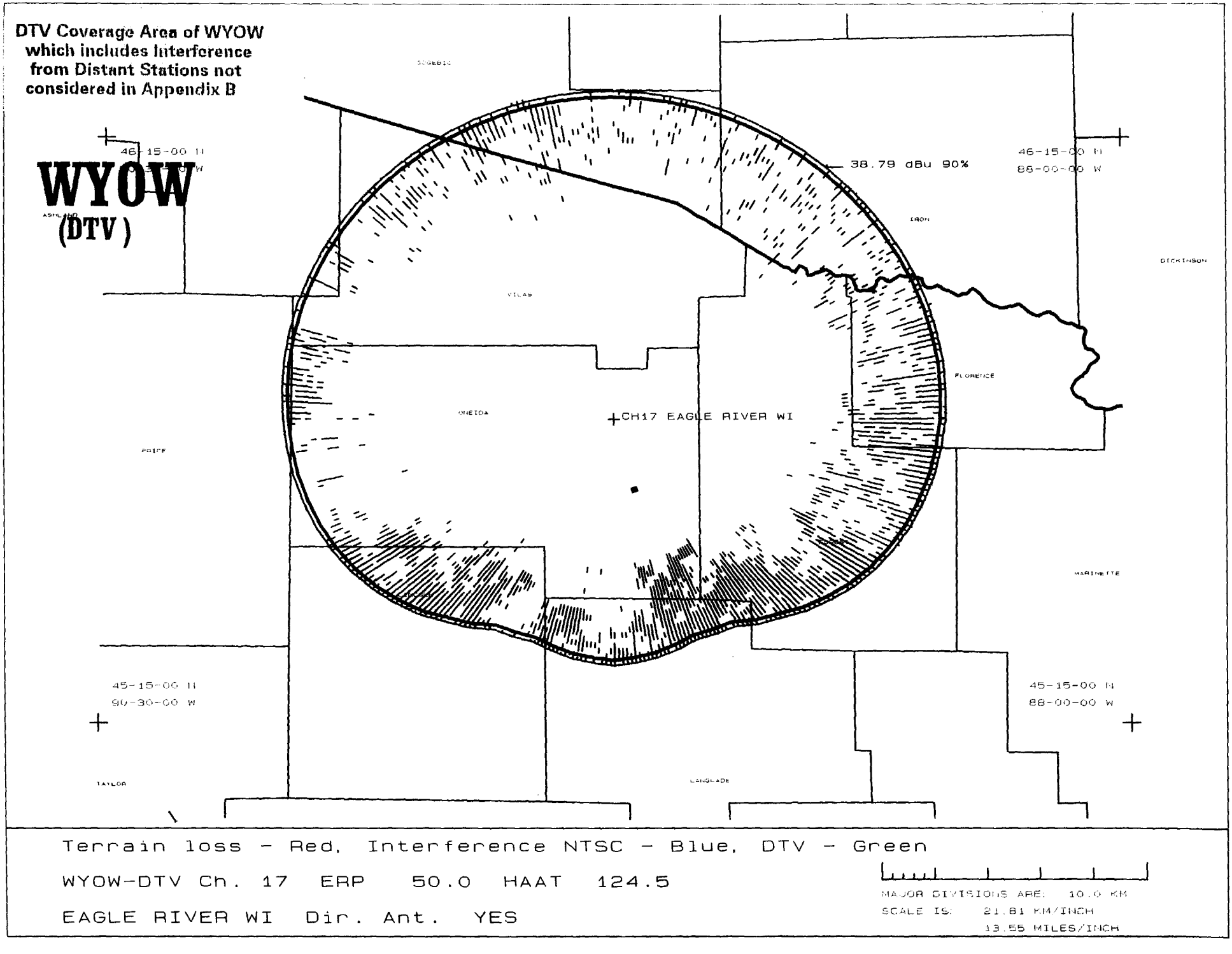
Total IX from ATV stations 1031.1 square km

Population in IX area 9742

Interference caused to: 1031.1 square km of service area

Population in IX area 9742

Percent Match: 90.5



Terrain loss - Red, Interference NTSC - Blue, DTV - Green

WYOW-DTV Ch. 17 ERP 50.0 HAAT 124.5

EAGLE RIVER WI Dir. Ant. YES

MAJOR DIVISIONS ARE: 10.0 KM

SCALE IS: 21.81 KM/INCH

13.55 MILES/INCH

Longley-Rice analysis of ATV station
WYOW EAGLE RIVER WI Channel 17
ERP 50.02 kw 16.99 dBk HAAT: 124.5 meters ERP MAX 50.0 kw 17.0 dBk

Percent quantiles: Time 90.0% Locations 50.0% Confidence 50.0%

FCC noise limited service area equals 10656.6 square km 10656.6 square km
Service contour: 38.8 dBu Curve F50/90 63.8 km 63.8 km

Above based on replication power of: 40.3 KW

Population within noise limited service area 73005 73005

Longley-Rice noise limited service area equals 10519.2 square km

Longley-Rice service population 72182

Total IX from NTSC stations 0.0 square km

Population in IX area 0

IX from ATV station KNLD DULUTH MN 17 1.0 square km
ERP 45.13 kw 16.54 dBk MAX ERP 50.00 kw 16.99 dBk
Protection ratio 15.27 dB
Population in IX area 0

IX from ATV station WJFWTV RHINELANDER WI 16 1843.3 square km
ERP 485.08 kw 26.86 dBk MAX ERP 485.87 kw 26.87 dBk
Protection ratio -41.98 dB
Population in IX area 12198

Total IX from ATV stations 1844.3 square km

Population in IX area 12198

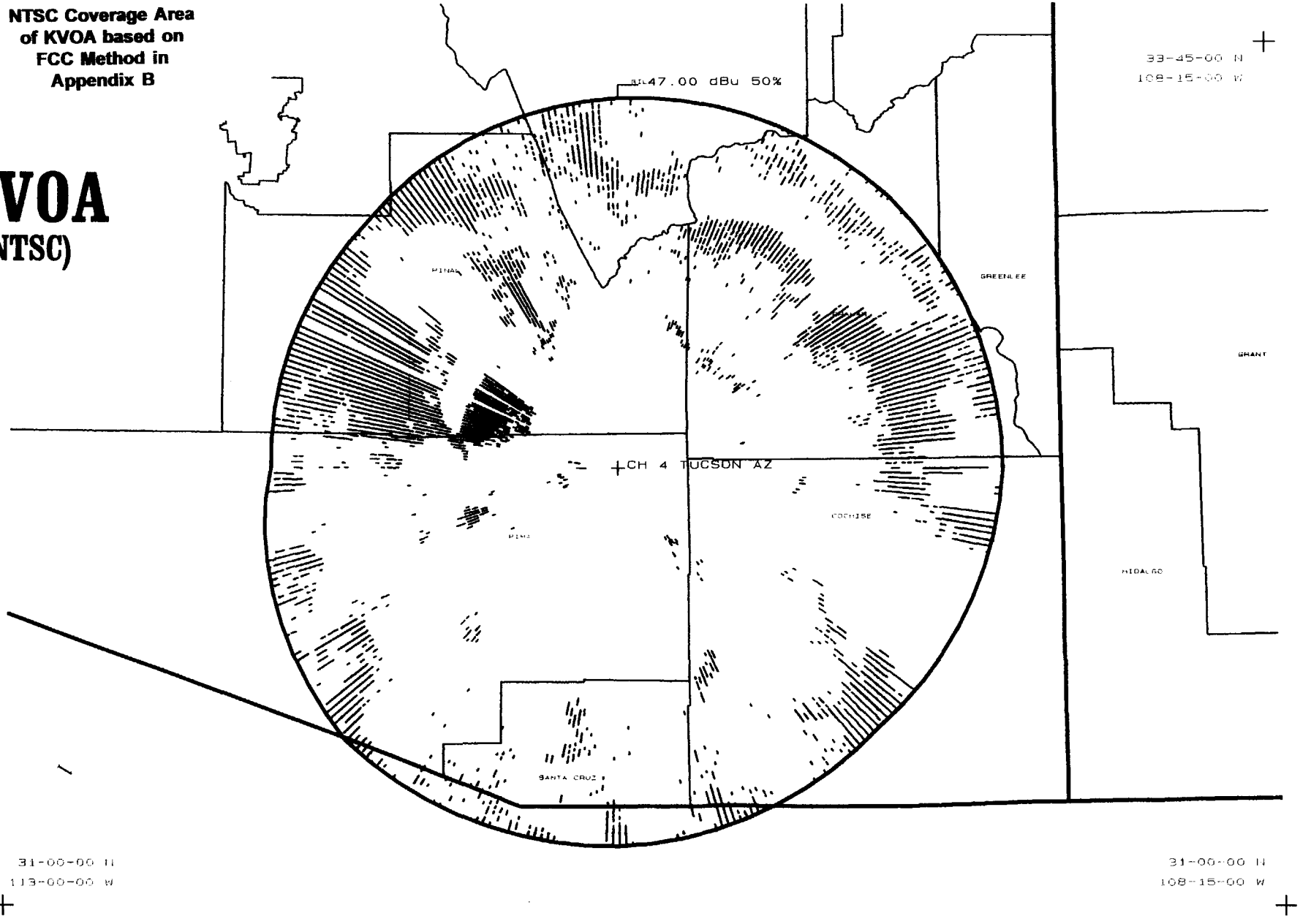
Interference caused to: 1844.3 square km of service area

Population in IX area 12198

Percent Match: 84.8

NTSC Coverage Area of KVOA based on FCC Method in Appendix B

KVOA
(NTSC)



Terrain loss - Red, Interference NTSC - Green, DTV - Blue

KVOA-NTSC Ch. 4 ERP 34.7 HAAT 1128.0

TUCSON AZ Dir. Ant. NONE

MAJOR DIVISIONS ARE: 10.0 KM
SCALE IS: 46.69 KM/INCH
29.01 MILES/INCH

Longley-Rice analysis of NTSC station
KVOA TUCSON AZ Channel 4
ERP 34.700 kw 15.40 dBk HAAT: 1128.0 meters

Percent quantiles: Time 50.0% Locations 50.0% Confidence 50.0%

FCC noise limited service area equals 54290.4 square km
Service contour: 47.0 dBu Curve F50/50 136.7 km

Population within noise limited service area 891675

Longley-Rice noise limited service area equals 49335.0 square km

Longley-Rice service population = 838846

IX from NTSC station NEW DOUGLAS AZ 3 378.0 square km
ERP 20.00 kw 13.01 dBk
Protection ratio -3.00 dB
Population in IX area 465

IX from NTSC station KTFL FLAGSTAFF AZ 4 2258.7 square km
ERP 63.10 kw 18.00 dBk
Protection ratio 28.00 dB
Population in IX area 20369

IX from NTSC station KTVK PHOENIX AZ 3 1660.0 square km
ERP 100.00 kw 20.00 dBk
Protection ratio -3.00 dB
Population in IX area 13695

IX from NTSC station KDBCTV EL PASO TX 4 216.1 square km
ERP 100.00 kw 20.00 dBk
Protection ratio 28.00 dB
Population in IX area 2

Total IX from NTSC stations 3961.2 square km

Population in IX area 30083

Total IX from ATV stations 0.0 square km

Population in IX area 0

Total interference area: 3961.2 square km

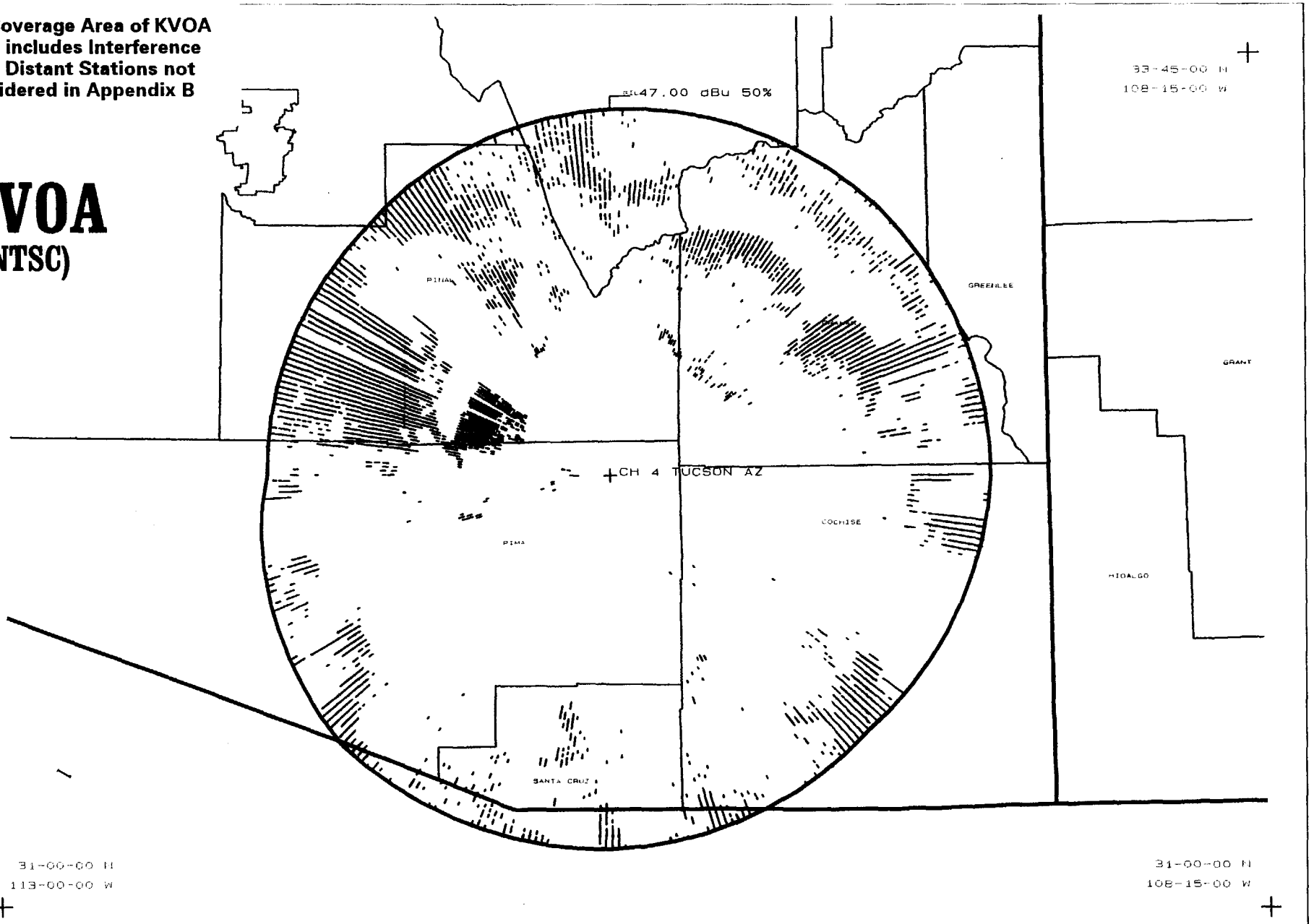
Population in total IX area 30083

New IX to NTSC from ATV: 0.0 square km
Percent of contour area: 0.0 Percent of Longley-Rice NL area: 0.0

Population in new IX area 0

NTSC Coverage Area of KVOA which includes Interference from Distant Stations not considered in Appendix B

KVOA
(NTSC)



Terrain loss - Red, Interference NTSC - Green, DTV - Blue

KVOA-NTSC Ch. 4 ERP 34.7 HAAT 1128.0

TUCSON AZ Dir. Ant. NONE

MAJOR DIVISIONS ARE: 10.0 KM
SCALE IS: 46.69 KM/INCH
29.01 MILES/INCH

Longley-Rice analysis of NTSC station
KVOA TUCSON AZ Channel 4
ERP 34.700 kw 15.40 dBk HAAT: 1128.0 meters

Percent quantiles: Time 50.0% Locations 50.0% Confidence 50.0%

FCC noise limited service area equals 54290.4 square km
Service contour: 47.0 dBu Curve F50/50 136.7 km

Population within noise limited service area 891675

Longley-Rice noise limited service area equals 49335.0 square km

Longley-Rice service population = 838846

IX from NTSC station NEW DOUGLAS AZ 3 393.2 square km
ERP 20.00 kw 13.01 dBk
Protection ratio -3.00 dB
Population in IX area 478

IX from NTSC station KTFL FLAGSTAFF AZ 4 2950.5 square km
ERP 63.10 kw 18.00 dBk
Protection ratio 28.00 dB
Population in IX area 20620

IX from NTSC station KTVK PHOENIX AZ 3 2231.9 square km
ERP 100.00 kw 20.00 dBk
Protection ratio -3.00 dB
Population in IX area 13827

IX from NTSC station KOB ALBUQUERQUE NM 4 10.9 square km
ERP 26.90 kw 14.30 dBk
Protection ratio 28.00 dB
Population in IX area 0

IX from NTSC station KDBCTV EL PASO TX 4 1158.6 square km
ERP 100.00 kw 20.00 dBk
Protection ratio 28.00 dB
Population in IX area 5771

Total IX from NTSC stations 5389.4 square km

Population in IX area 31047

Total IX from ATV stations 0.0 square km

Population in IX area 0

Total interference area: 5389.4 square km

Population in total IX area 31047

New IX to NTSC from ATV: 0.0 square km
Percent of contour area: 0.0 Percent of Longley-Rice NL area: 0.0

Exhibit 9

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 429-7000

WAYNE D. JOHNSEN
(202) 429-7303

FACSIMILE
(202) 429-7049

June 2, 1997

BY HAND DELIVERY

Victor Tawil
Association for Maximum Service
Television, Inc.
1776 Massachusetts Avenue, N.W.
Suite 310
Washington, D.C. 20036

Dear Victor:

I spoke to you last week regarding a major error the Commission made in assigning a DTV channel to Young Broadcasting's station in Sioux Falls, South Dakota.

Attached is some material I filed with Bruce Franca on May 22nd. It supplied the staff with the application material which led to a modification of KELO's auxiliary transmitter site and which the Commission, unfortunately, now has used as the site and facilities for assigning a DTV channel for KELO's main station operation.

The correct site for KELO's main station operation is:

N. Latitude 43° 31' 07"

W. Longitude 96° 32' 04".

Indeed, as noted in the Franca letter, KELO shares an antenna with KSFY, another station in Sioux Falls, which is at 2000 feet (or 610 meters) above average terrain at the aforementioned location. KELO's DTV assignment should, of course, reflect this existing NTSC operation - i.e., location, height, etc.

We will, obviously, continue to pursue this matter before the Commission, but would hope that you could, in addition, include this example in the section of MSTV's anticipated reconsideration petition that will highlight various mistakes in the NTSC database.

Please let me know if you need any further information relevant to this matter.

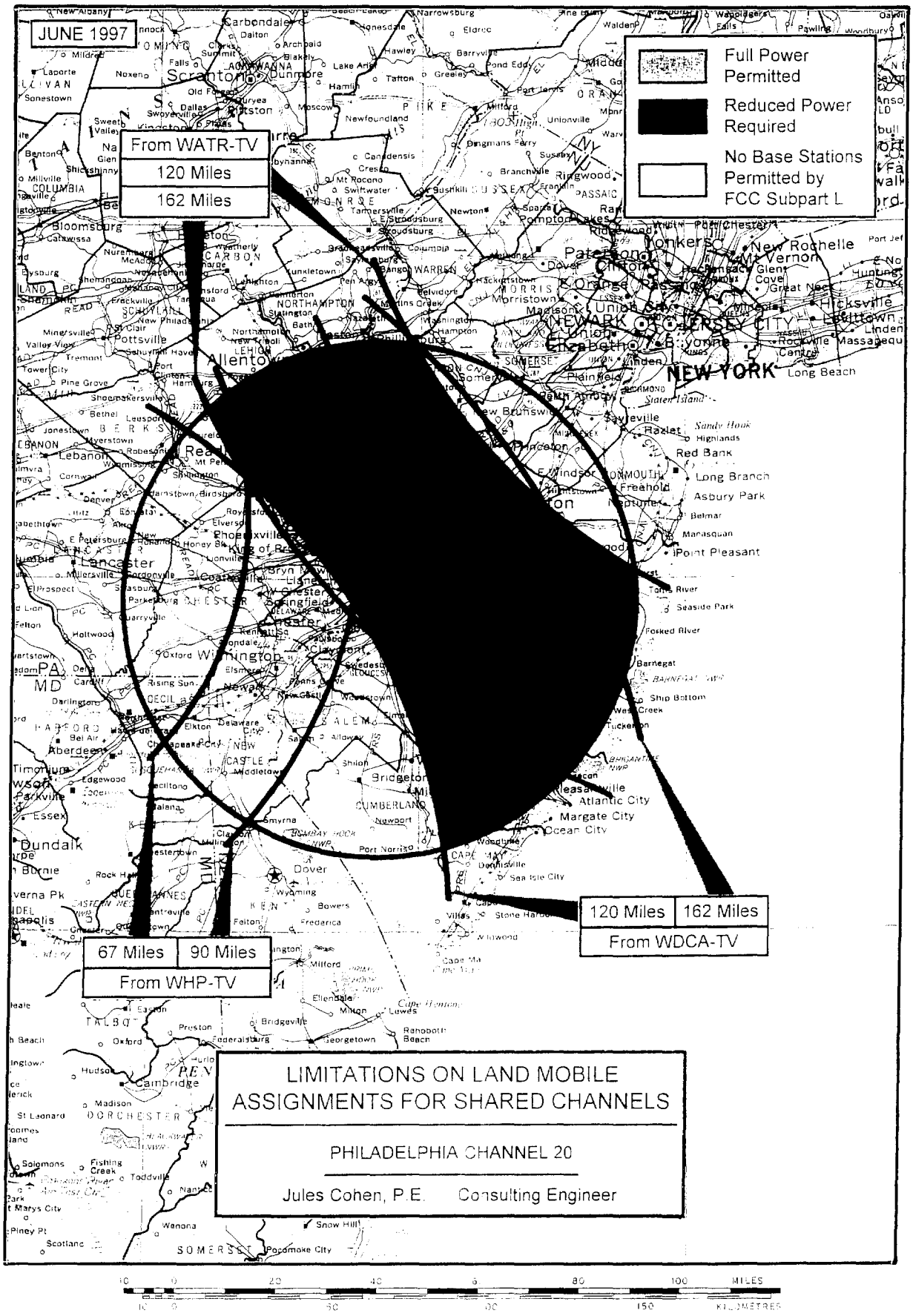
Best regards.

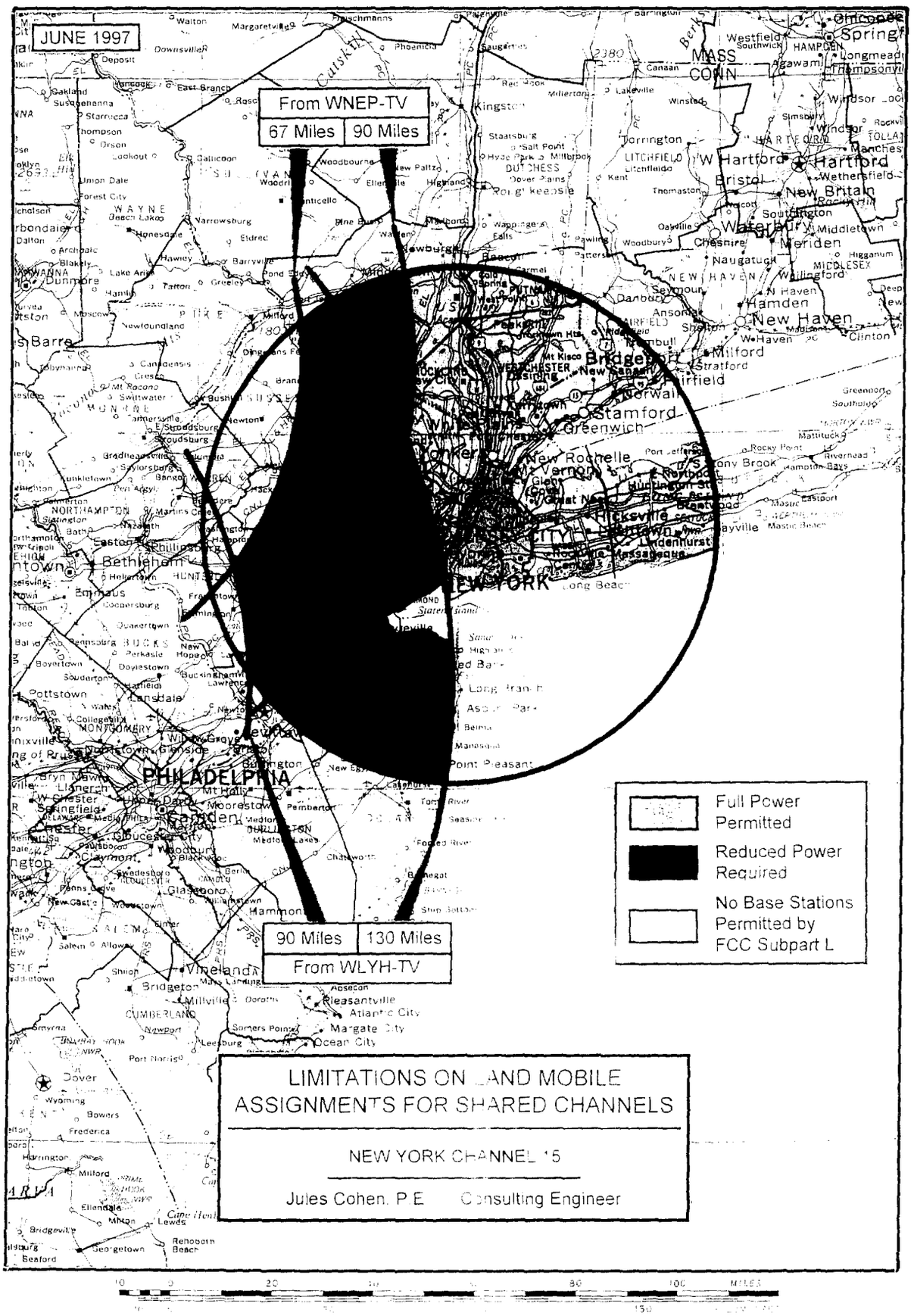
Sincerely,

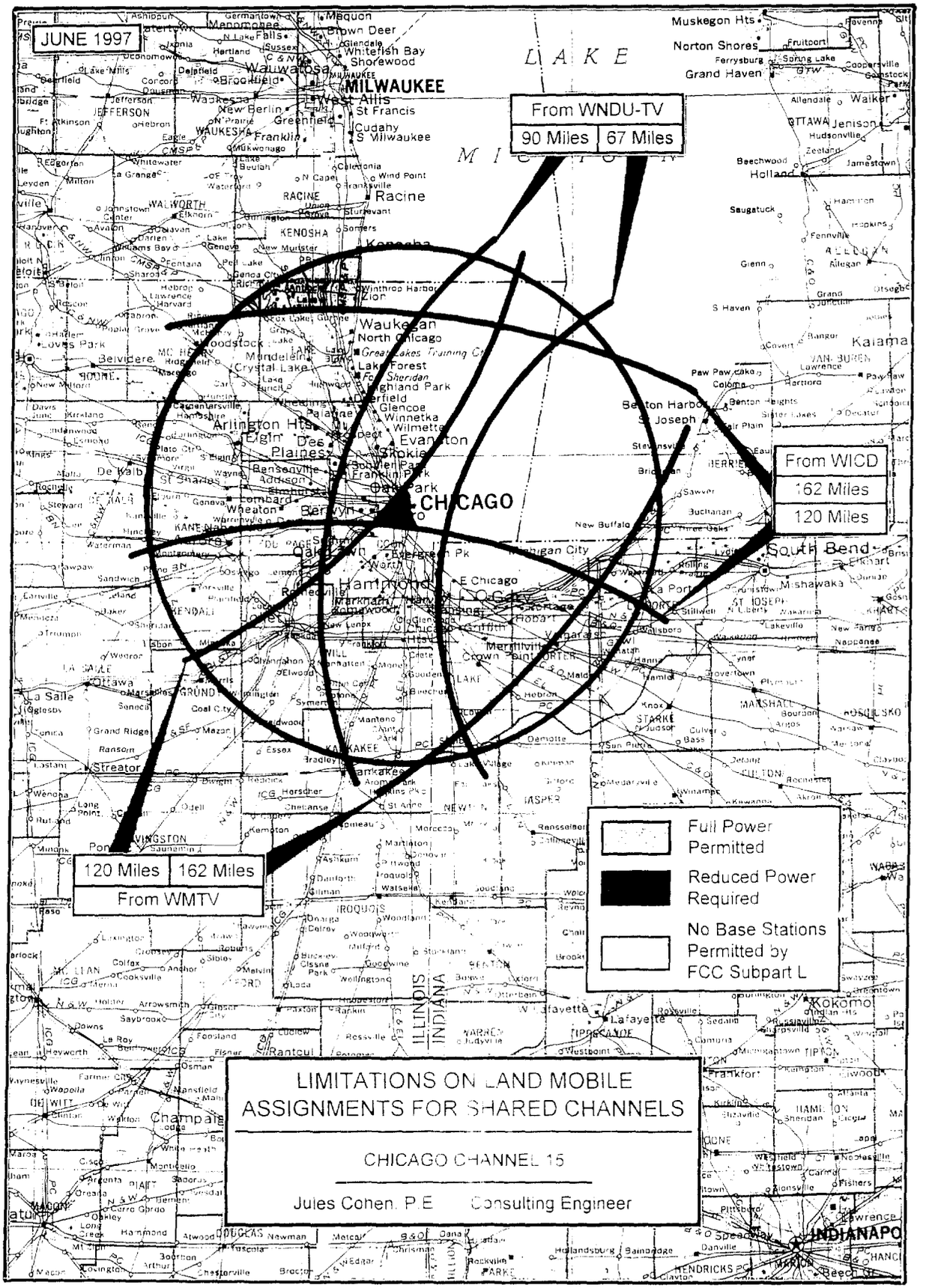
Carl R. Ramey

Enclosure

Exhibit 10


JUNE 1997
Full Power Permitted
Reduced Power Required
No Base Stations Permitted by FCC Subpart L
From WATR-TV
120 Miles
162 Miles
120 Miles
162 Miles
From WDCA-TV
67 Miles
90 Miles
From WHP-TV
LIMITATIONS ON LAND MOBILE ASSIGNMENTS FOR SHARED CHANNELS
PHILADELPHIA CHANNEL 20
Jules Cohen, P.E. Consulting Engineer
MILES
KILOMETRES


JUNE 1997
From WNEP-TV
67 Miles
90 Miles
90 Miles
130 Miles
From WLYH-TV
Full Power Permitted
Reduced Power Required
No Base Stations Permitted by FCC Subpart L
LIMITATIONS ON LAND MOBILE ASSIGNMENTS FOR SHARED CHANNELS
NEW YORK CHANNEL 15
Jules Cohen, P.E. Consulting Engineer
PHILADELPHIA
NEW YORK
Bridgeport
Stamford
New Haven
Hartford
Waterbury
Bethlehem
Camden
Vineland
Atlantic City
Margate City
Ocean City
Pleasantville
Dover
MASS
CONN
MILES


JUNE 1997
From WNDU-TV
90 Miles
67 Miles
From WICD
162 Miles
120 Miles
From WMTV
120 Miles
162 Miles
Full Power Permitted
Reduced Power Required
No Base Stations Permitted by FCC Subpart L
LIMITATIONS ON LAND MOBILE ASSIGNMENTS FOR SHARED CHANNELS
CHICAGO CHANNEL 15
Jules Cohen, P.E. Consulting Engineer
LAKE MICHIGAN
MILWAUKEE
CHICAGO
ILLINOIS
INDIANA

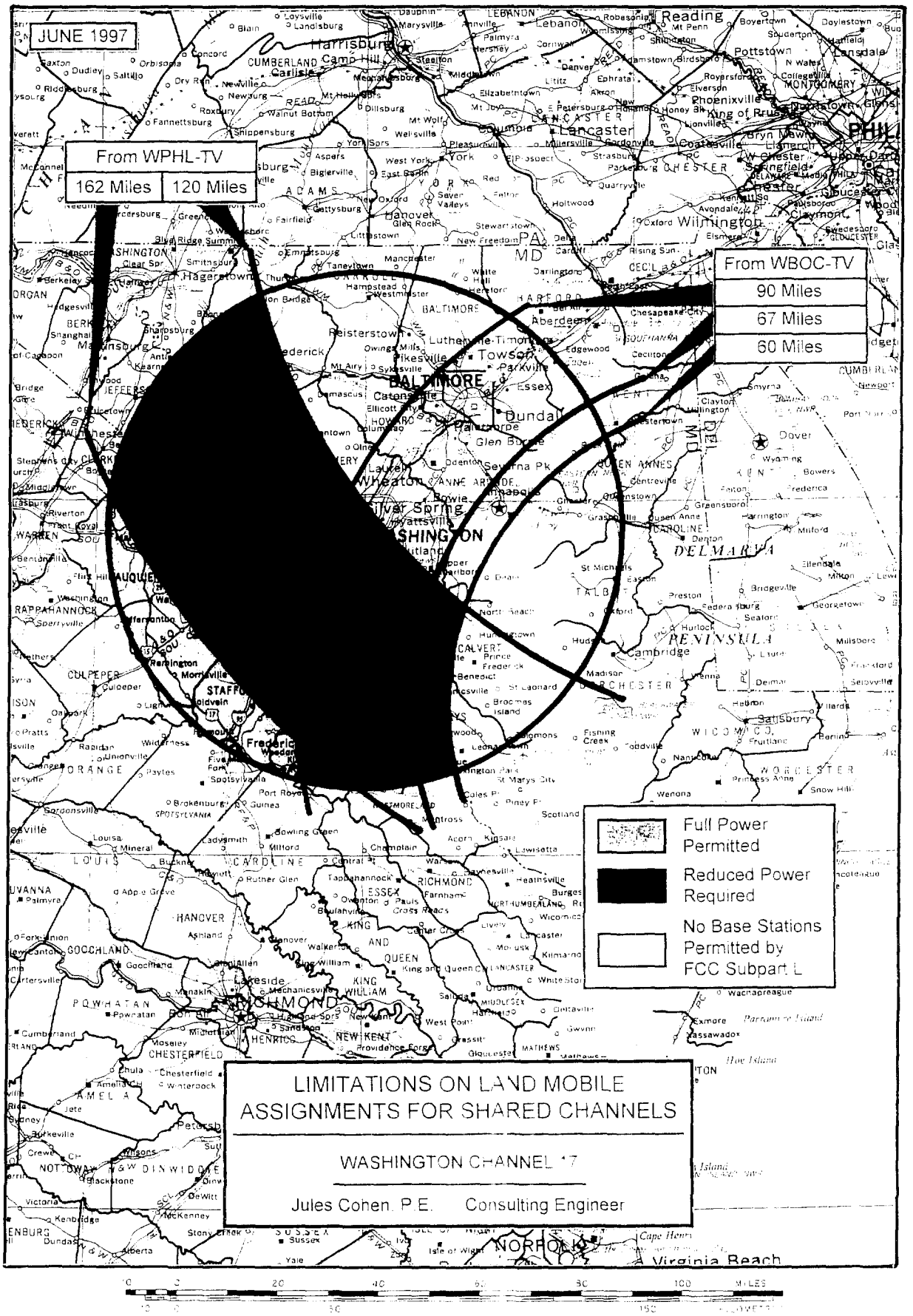

JUNE 1997
From WPHL-TV
162 Miles
120 Miles
From WBOC-TV
90 Miles
67 Miles
60 Miles
Full Power Permitted
Reduced Power Required
No Base Stations Permitted by FCC Subpart L
LIMITATIONS ON LAND MOBILE ASSIGNMENTS FOR SHARED CHANNELS
WASHINGTON CHANNEL 17
Jules Cohen, P.E. Consulting Engineer

Exhibit 11

LIST OF NTSC STATIONS THAT ARE LESS THAN 155 KM FROM CLOSEST CO-CHANNEL DTV ASSIGNMENT

CALL LETTERS	CITY, STATE	NTSC CHANNELS	CO-CHANNEL SEPARATION DISTANCE
WFIQ	Florence, AL	36	150.9
WYLE	Florence, AL	26	149.1
New	Bakersfield, CA	36	147.9
KESQ	Palm Springs, CA	39	153.1
KMTP	San Francisco, CA	32	154.4
KVEA	Corona, CA	52	152.7
KUSI	San Diego, CA	51	150.7
KSTS	San Jose, CA	48	154.9
KCMY	Sacramento, CA	29	154.0
KFTY	Santa Rosa, CA	50	147.7
KTEH	San Jose, CA	54	147.7
WHRC	Norwell, MA	46	146.8
WCVB	Boston, MA	5	148.0
WNYW	New York, NY	5	148.0
WJAR	Providence, RI	10	146.7
WLNE	New Bedford, MA	6	147.9
WPRI	Providence, RI	12	149.5
WHTM	Harrisburg, PA	27	150.9
WTVK	Naples, FL	46	152.9
WHFT	Miami, FL	45	152.9
WIFR	Freeport, IL	23	147.6
WFTE	Salem, IN	58	154.8
WLMB	Toledo, OH	40	121.0

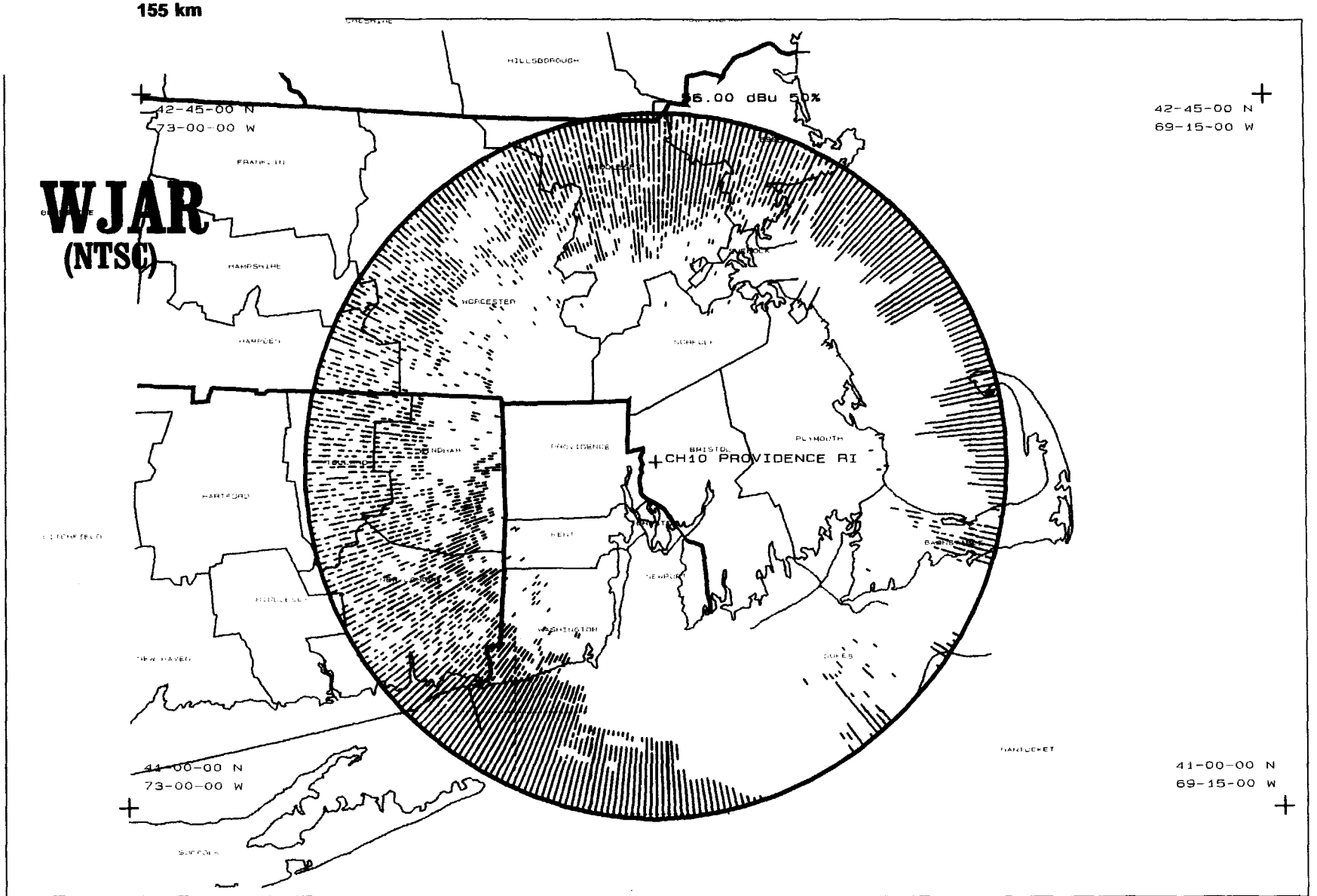
LIST OF NTSC STATIONS THAT ARE LESS THAN 155 KM FROM CLOSEST CO-CHANNEL DTV ASSIGNMENT

CALL LETTERS	CITY, STATE	NTSC CHANNELS	CO-CHANNEL SEPARATION DISTANCE
WGVU	Grand Rapids, MI	35	151.3
WPBO	Portsmouth, OH	42	147.6
WKPD	Paducah, KY	29	145.4
WVIT	New Britain, CT	30	148.2
WWLP	Springfield, MA	22	150.8
WEKW	Keene, NH	52	154.9
WOCD	Amsterdam, NY	55	150.0
WLNY	Riverhead, NY	55	151.1
WVPY	Front Royal, VA	42	148.9
WTXF	Philadelphia, PA	29	146.9
WNVC	Fairfax, VA	56	151.7
WWAC	Atlantic City, NJ	53	147.9
WNVT	Goldvein, VA	53	148.7
WJUE	Battle Creek, MI	43	145.2
WADL	Mount Clemens, MI	38	144.9
WHTV	Jackson, MI	18	151.3
New	Greenville, NC	38	145.8
WFBC	Anderson, SC	40	147.7
WWLA	Lewiston, ME	35	151.1
WHTM	Harrisburg, PA	27	148.2
WTVE	Reading, PA	51	140.3
WTIC	Hartford, CT	61	148.0
WTNH	New Haven, CT	8	144.8

LIST OF NTSC STATIONS THAT ARE LESS THAN 155 KM FROM CLOSEST CO-CHANNEL DTV ASSIGNMENT

CALL LETTERS	CITY, STATE	NTSC CHANNELS	CO-CHANNEL SEPARATION DISTANCE
WTXF	Philadelphia, PA	29	148.6
WGRZ	Buffalo, NY	2	154.6
WLIW	Garden City, NY	21	153.9
WEDH	Hartford, CT	24	150.8
WVIT	New Britain, CT	30	147.7
WGBY	Springfield, MA	57	151.1
WPTO	Oxford, OH	14	154.8
WOIO	Shaker Heights, OH	19	146.7
WACI	Atlantic City, NJ	62	145.4
WNPB	Morgantown, WV	24	148.2
WPSG	Philadelphia, PA	57	148.7
WNJS	Camden, NJ	23	150.2
WMPB	Baltimore, MD	67	147.2
WNUV	Baltimore, MD	54	154.8
WNYE	New York, NY	25	152.5
WGCB	Red Lion, PA	49	154.2
WNBU	Concord, NH	21	153.8
WHKY	Hickory, NC	14	147.7
WCVW	Richmond, VA	57	154.9
WBFX	Lexington, NC	20	151.2

Stations with Co-Channel Separations Less Than 155 km



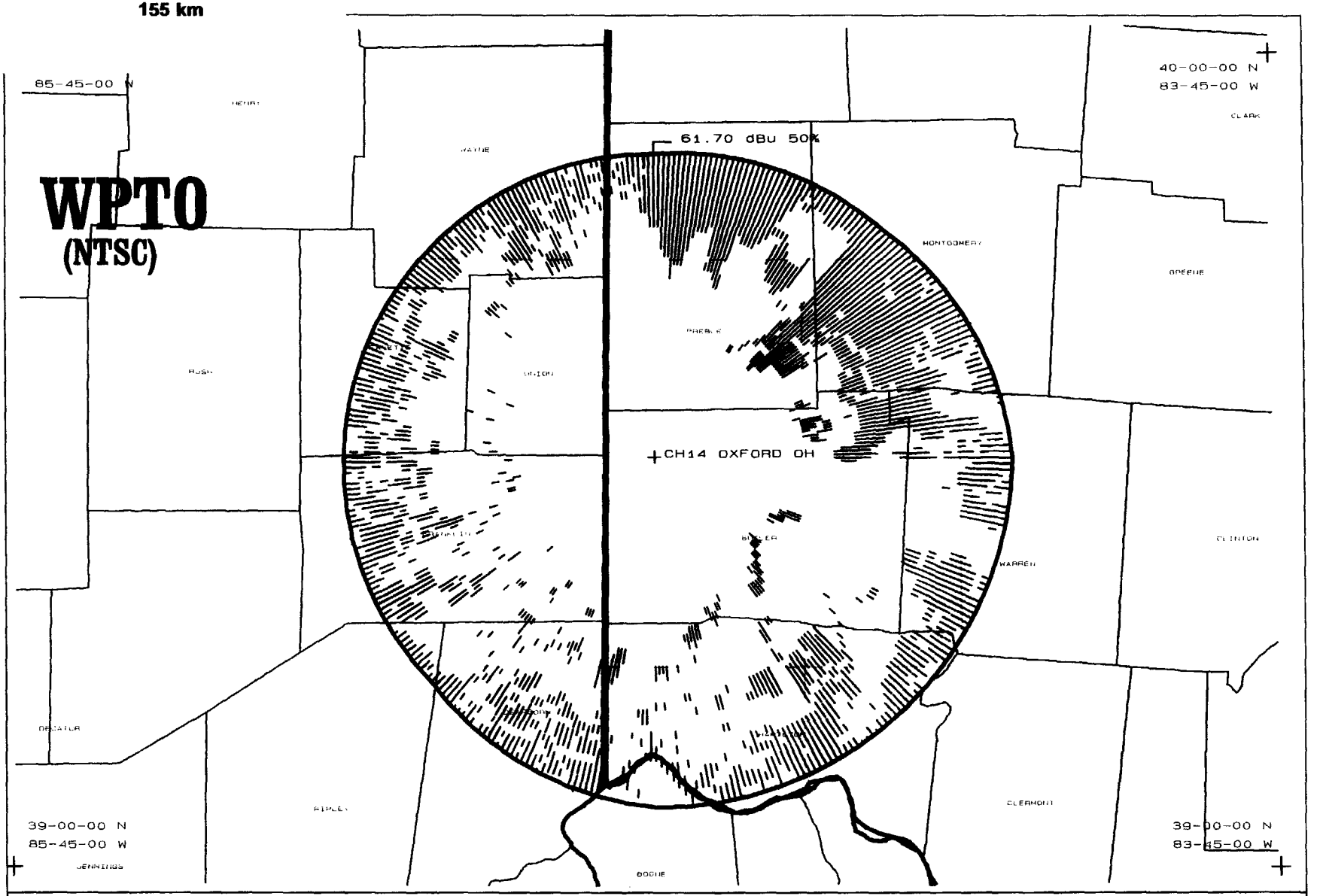
Terrain loss - Red, Interference NTSC - Green, DTV - Blue

WJAR-NTSC Ch. 10 ERP 316.0 HAAT 306.3

PROVIDENCE RI Dir. Ant. NONE

MAJOR DIVISIONS ARE: 10.0 KM
SCALE IS: 37.11 KM/INCH
23.06 MILES/INCH

Stations with Co-Channel Separations Less Than 155 km



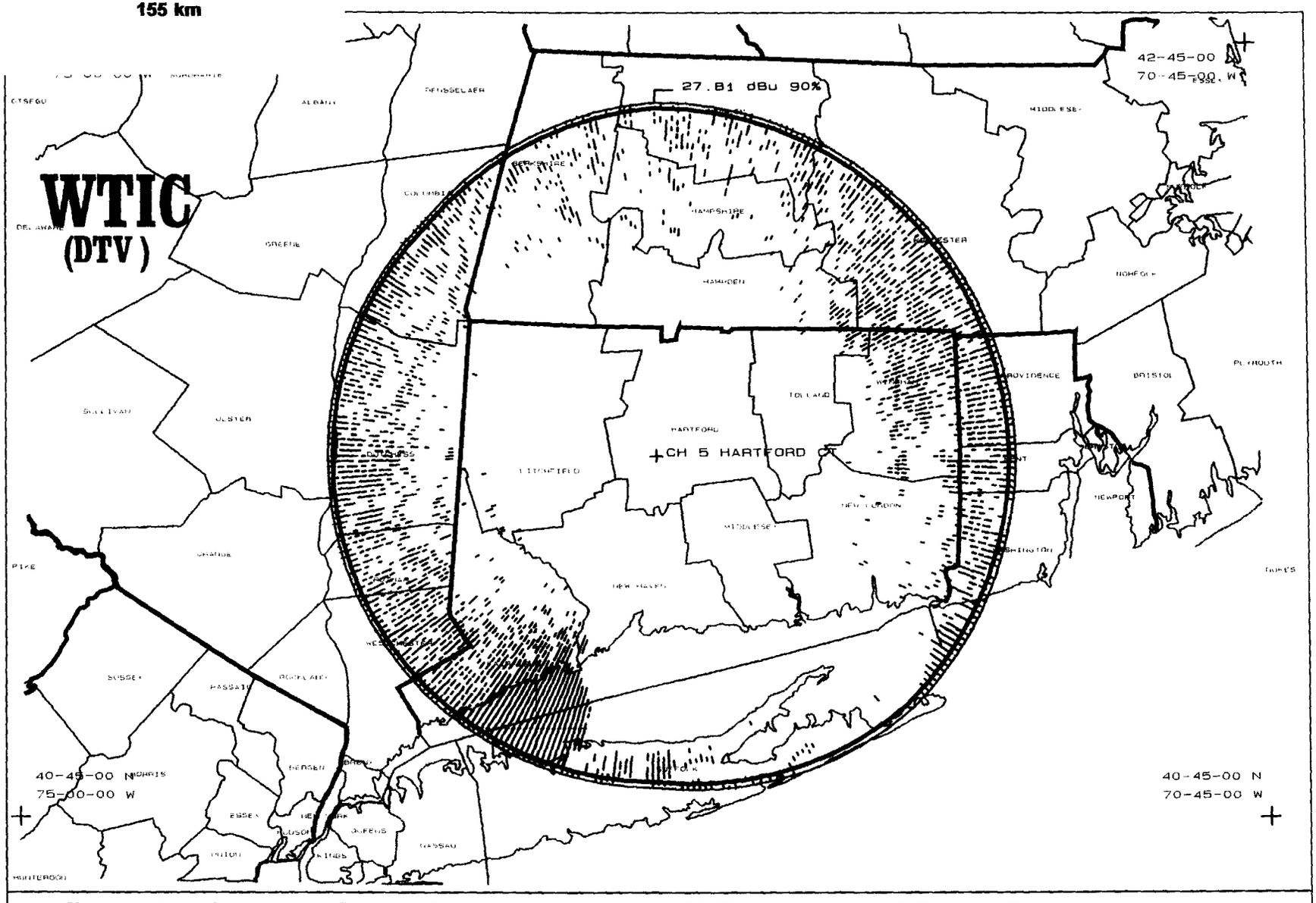
Terrain loss - Red, Interference NTSC - Green, DTV - Blue

WPTO-NTSC Ch. 14 ERP 204.0 HAAT 83.8

OXFORD OH Dir. Ant. NONE

MAJOR DIVISIONS ARE: 10.0 KM
SCALE IS: 18.54 KM/INCH
11.52 MILES/INCH

Stations with Co-Channel Separations Less Than 155 km



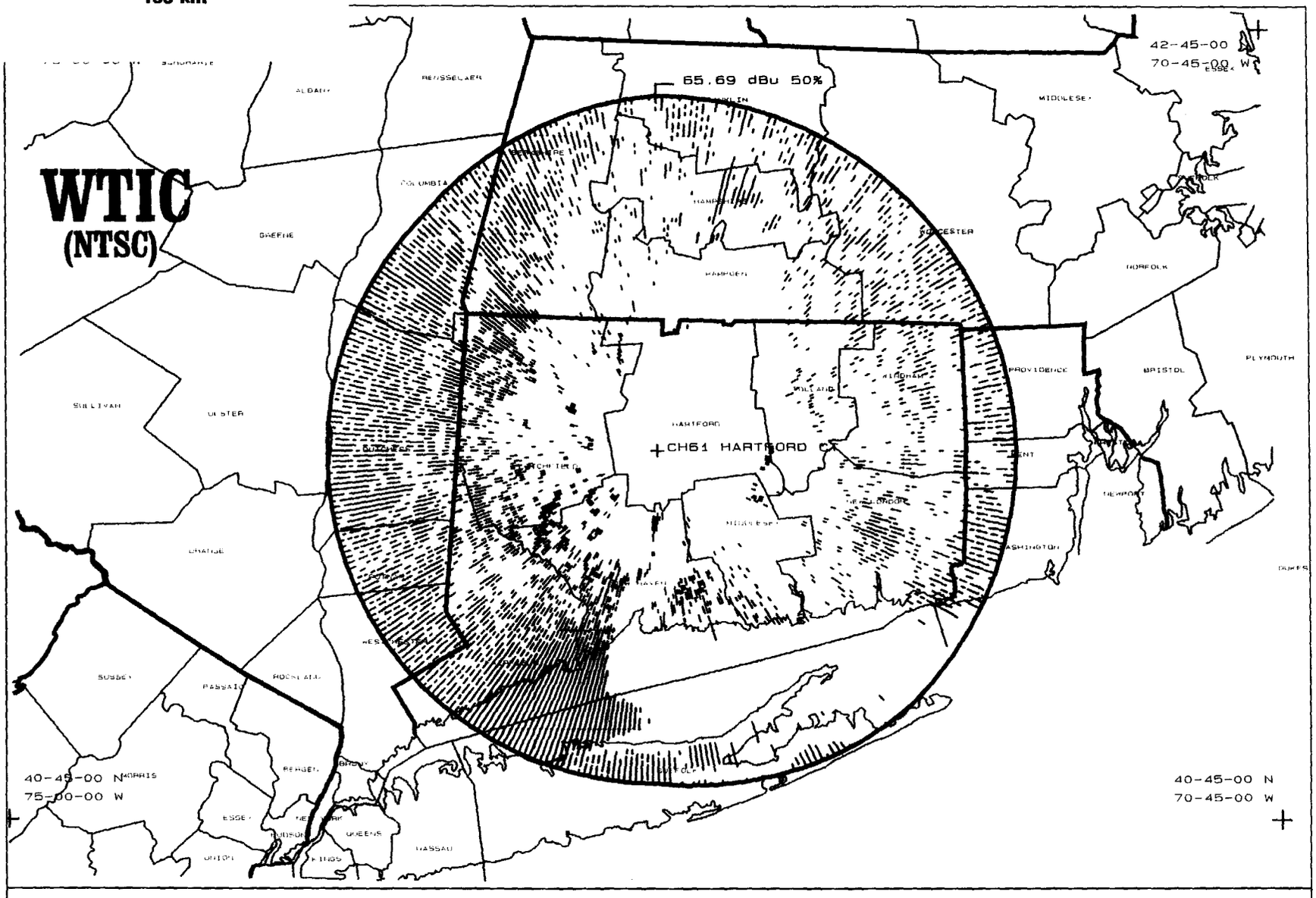
Terrain loss - Red, Interference NTSC - Blue, DTV - Green

WTIC-DTV Ch. 5 ERP 1.0 HAAT 519.8

HARTFORD CT Dir. Ant. NONE

MAJOR DIVISIONS ARE: 10.0 KM
SCALE IS: 39.09 KM/INCH
24.29 MILES/INCH

Stations with Co-Channel Separations Less Than 155 km



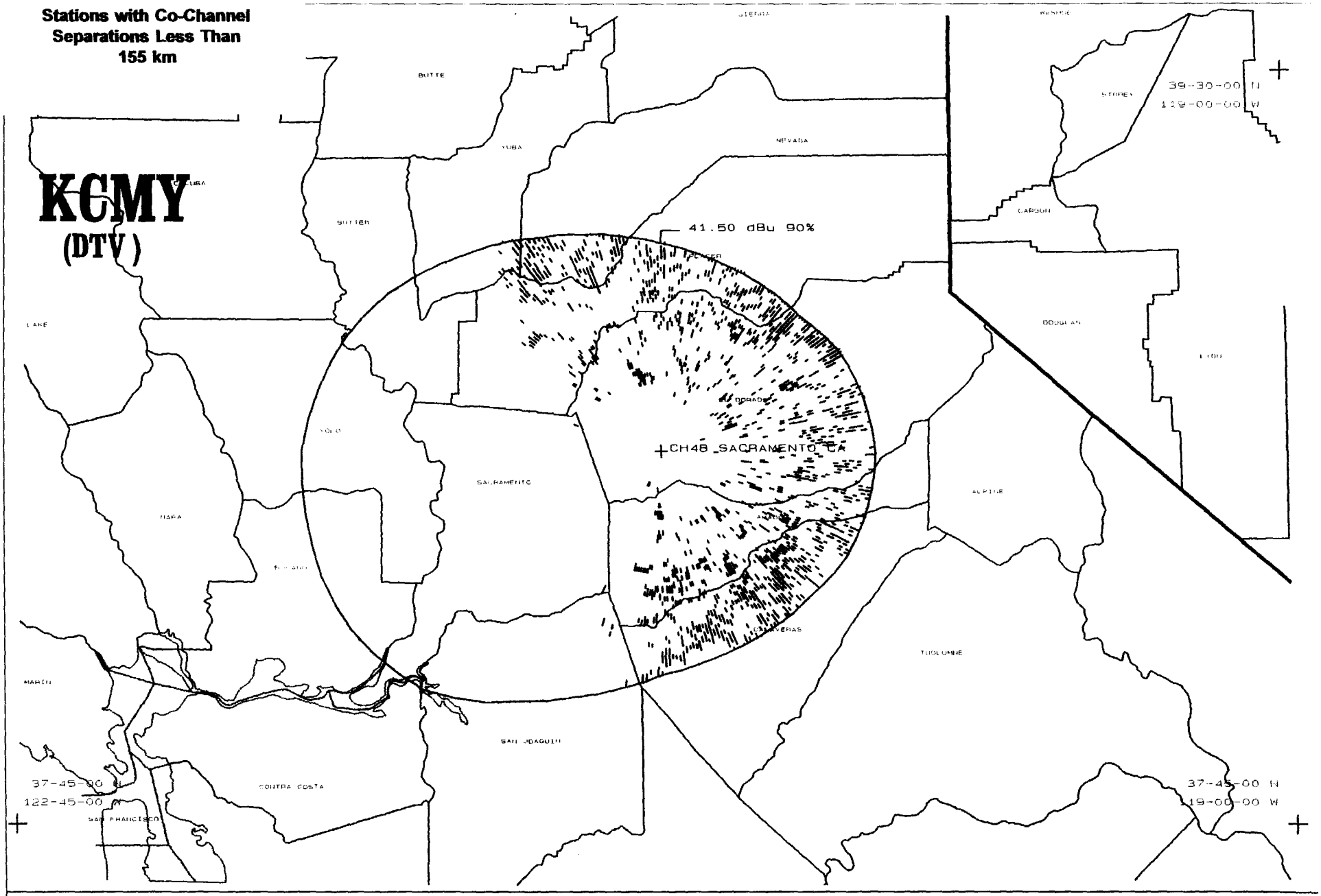
Terrain loss - Red, Interference NTSC - Green, DTV - Blue

WTIC-NTSC Ch. 61 ERP 5000.0 HAAT 519.8

HARTFORD CT Dir. Ant. NONE

MAJOR DIVISIONS ARE: 10.0 KM
SCALE IS: 38.41 KM/INCH
23.87 MILES/INCH

Stations with Co-Channel Separations Less Than 155 km



Terrain loss - Red, Interference NTSC - Blue, DTV - Green

KCMY-DTV Ch. 48 ERP 262.1 HAAT 266.7

SACRAMENTO CA Dir. Ant. YES

MAJOR DIVISIONS ARE: 10.0 KM
SCALE IS: 31.96 KM/INCH
19.86 MILES/INCH