

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
 Washington, DC 20554

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MAY 25 2001

FEDERAL COMMUNICATIONS COMMISSION  
 OFFICE OF THE SECRETARY

In the Matter of )  
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 )  
 Amendment of Section 73.622(b), ) MM Docket No. 01-  
 Table of Allotments, ) RM-  
 Digital Television Broadcast Stations )  
 (Lynchburg, Virginia) )

To: Chief, Video Services Division

**PETITION FOR RULEMAKING**

WSET Incorporated ("WSET"), licensee of television station WSET-TV, NTSC Channel 13, Lynchburg, Virginia, by its undersigned attorneys and pursuant to Sections 1.401 and 73.623 of the Federal Communications Commission's rules, hereby petitions for rulemaking to amend the Digital Television ("DTV") Table of Allotments, 47 C.F.R. § 73.622(b). Specifically, WSET requests that the Commission substitute Channel 34 for Channel 56 as the DTV channel assigned to WSET-DT. Under this proposal, the DTV Table of Allotments would be amended as follows:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Lynchburg, Virginia	20, 56	20, 34

For the reasons set forth below, and as demonstrated by the attached Engineering Statement of Cavell, Mertz & Davis, Inc. ("Engineering Statement"), WSET submits that the proposed amendment to the DTV Table of Allotments is consistent with the Commission's rules and is in the public interest.

1. As set forth in the attached Engineering Statement, the proposed DTV channel substitution is fully consistent with the requirements of Section 73.623(c)(1).

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Specifically, the operation of WSET-DT on Channel 34 satisfies the Commission's 2%-10% *de minimis* interference test. No analog or DTV station will receive incremental interference exceeding two percent of the population currently served. In addition, the proposed channel change will not result in any new interference to stations already experiencing maximum DTV interference (i.e., interference in excess of ten percent of their current NTSC population), nor will it result in interference that would cause another station to begin experiencing DTV interference to greater than ten percent of the population currently served. Moreover, to the extent such protection is required, there will be no impermissible interference to protected Class A television stations.<sup>1</sup>

2. DTV Channel 34 can be allotted to WSET using the station's authorized NTSC transmitter site in full compliance with the principal community coverage requirements of Section 73.625(a).

3. The proposed channel substitution would benefit the public interest for several reasons. First, implementing WSET's DTV operation on an "in core channel" would eliminate the need to change DTV channels yet again at the end of the transition period. WSET would be able to complete the build-out of its DTV facilities earlier and at less cost, resulting in improved service to the public. The proposed change will also eliminate the potential to confuse or frustrate the public by requiring them to find WSET-DT on a second channel.

4. Second, operation on DTV Channel 34 as opposed to DTV Channel 56 would improve signal coverage for viewers in the Lynchburg DMA. Presently, WSET-TV operates on NTSC Channel 13. As demonstrated in the Engineering Statement, the proposed operation of WSET-DT on Channel 34 would achieve a 25 percent increase in interference-free

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<sup>1</sup> WSET does not concede that it is necessary to protect Class A television stations from additional interference in a petition for a DTV channel change. WSET submits the DTV channel change requested here – substituting a core DTV channel for a non-core channel – represents an appropriate solution to a technical problem that ensures the long-term replication and maximization of WSET's NTSC service area. Accordingly, WSET submits that no Class A protection is required under the Community Broadcasters' Protection Act of 1999. See 47 U.S.C. § 336(f)(1)(D) (2000).

population over that of the current NTSC facility's licensed Grade B contour. WSET submits that the public interest would be served by the more efficient use of the broadcast spectrum.

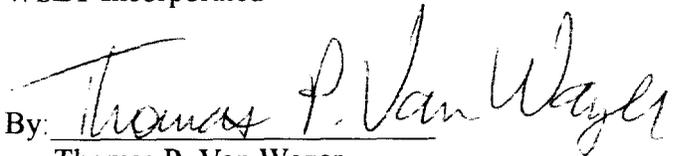
5. Third, WSET submits that its proposal to vacate an out-of-core DTV channel is itself in the public interest. As evidenced by the current public policy debate over the appropriate steps the Commission should take to clear channels 60-69, the process of clearing incumbents from reallocated spectrum is exceedingly difficult. The instant proposal serves to make the next round of broadcast spectrum reallocation easier for the Commission. Accordingly, WSET submits that this fact alone warrants a finding that the proposed channel change request is in the public interest.

### **CONCLUSION**

For the foregoing reasons, WSET respectfully requests that the Commission initiate a rulemaking to substitute DTV Channel 34 for DTV Channel 56 as the digital television channel assigned to WSET Incorporated, Lynchburg, Virginia.

Respectfully submitted,

WSET Incorporated

By: 

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Its Attorneys

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Dated: May 25, 2001

\* Admitted only in Virginia

Engineering Statement  
prepared for  
**WSET Incorporated**  
WSET-DT Lynchburg, Virginia  
Ch. 34 660 kW 625 m

This engineering statement has been prepared on behalf of *WSET Incorporated* (“WSET”), licensee of WSET-TV, NTSC Channel 13, Lynchburg, Virginia. In the Commission’s Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders on Advanced Television (“SMO&O”),<sup>1</sup> DTV Channel 56 was allotted as a “paired” DTV Channel for WSET-TV. The instant statement supports a *Petition for Rulemaking* on behalf of *WSET*, to propose a substitute channel for WSET-DT. DTV Channel 34 is sought as that substitute channel.

**Discussion**

An engineering review of the DTV allotments and NTSC assignments in the region surrounding Lynchburg showed that an alternate channel could be used for the Channel 56 DTV allotment. Detailed interference studies were conducted with respect to domestic NTSC and DTV allotments and facilities, in accordance with §73.623(c) (as required in the *SMO&O*). Consideration was given to Low Power Television (LPTV) stations that are listed as eligible for Class A status. The studies showed that DTV Channel 34 could be used for WSET-DT at 660 kW non-directional effective radiated power (ERP) and an antenna height above average terrain (HAAT) of 625 meters. This facility will provide interference-free service to 1,059,754 people, which is 25% greater than the 847,799 people served by the current WSET-TV NTSC facility.

The technical data for the proposed Channel 34 allotment are summarized on the following page. The site specified is the same as that for the WSET-DT “reference” allotment. The power and height combination is specified as shown (for the proposed “reference” point) as a basis to avoid impermissible interference to NTSC and DTV stations and Low Power Television (LPTV) stations eligible for Class A status.

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<sup>1</sup> See MM Docket 87-268, *Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service*, FCC 98-315, released December 18, 1998.

Engineering Statement

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**Summary Technical Data for Proposed DTV Channel 34**

Coordinates (NAD-27)	37° 18' 52" N-Lat 79° 38' 04" W-Lon
Channel	34
Effective Radiated Power	660 kW
Antenna Height	944 m AMSL 625 m HAAT

The proposed ERP exceeds the maximum permitted for the proposed antenna HAAT of 625 meters currently permitted by §73.622(f)(8)(i). However, §73.622(f)(5) permits the maximum ERP to be exceeded in order to provide the same geographic coverage area as the largest station within the same market. In this case, the proposed service area does not exceed that of station WDBJ-DT (DTV Ch. 18, Roanoke, VA, 48.1 km distant), which provides the largest service area in the Roanoke-Lynchburg market. The total area within the proposed WSET-DT 40.68 dB $\mu$ <sup>1</sup> contour is 43,743 square kilometers, which does not exceed the 44,148 square kilometers within the 39.15 dB $\mu$  noise-limited contour of the WDBJ-DT reference allotment. A depiction of the service areas for WDBJ-DT and the proposed WSET-DT is supplied as **Figure 1**. Thus, the ERP specified herein is in compliance with §73.622(f)(5) of the Commission's Rules.

**NTSC and DTV Allocation Considerations**

Criteria for evaluating the impact of DTV station proposals were released in the Commission's August 10, 1998 Public Notice entitled "*Additional Application Processing Guidelines for Digital Television.*" In that Public Notice, the Commission's Mass Media Bureau stated that "interference to [NTSC stations and DTV stations and allotments] affecting less than 2 percent of the population they serve is considered to be *de minimis*. However, any interference is considered unacceptable (there is no amount considered to be *de minimis*) if the station to be protected already is receiving interference to more than 10 percent of the population it would otherwise serve...." The same Public Notice states that for DTV proposals, the determination of

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<sup>1</sup>For this comparison, the dipole factor is used to adjust the standard UHF DTV 41 dB $\mu$  coverage contour value, consistent with the Commission's replication procedure used to establish DTV allotments and protected service areas.

## Engineering Statement

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interference to NTSC and DTV facilities (as calculated per OET Bulletin 69) will be rounded to the nearest tenth of a percent. The August 10, 1998 Public Notice regarding the channel change proposed herein requires that interference criteria (as described above and in §73.623(c)) be utilized to evaluate the new channel facility's impact on NTSC and DTV.

Accordingly, a study was conducted to evaluate the change in interference to pertinent NTSC and DTV assignments that may be attributed to the proposed Channel 34 facility. A detailed interference study was conducted in accordance with the terrain dependent Longley-Rice point-to-point propagation model, per the Commission's Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, July 2, 1997 ("OET-69").<sup>2</sup> The interference study examined the net change in interference as experienced by NTSC and DTV stations that would result from the proposal.

All stations considered in this study are listed in **Table 1**. As shown in **Table 1**, any increase in interference to NTSC and DTV facilities complies with the Commission's 2%/10% "*de minimis*" guidelines. No interference is predicted to any other NTSC or DTV station or allotment. Thus, this proposal is believed to be in compliance with Commission policy regarding DTV channel changes as they may affect NTSC and DTV stations.

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<sup>2</sup>The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A standard terrain profile step size of 1 km and cell size of 2 km were used. The Longley-Rice computer program input data, following the guidelines established under OET-69, includes a location variability of 50%, a time availability of 10%, a situation variability of 50%, horizontal polarization, 0.005 S/m conductivity, a climate constant of 15, an assumption of a continental temperate climate zone, and a receive antenna height of 10 meters. The service area for each DTV facility under study is that area predicted to receive signal levels of at least 41 dB $\mu$  using the Longley-Rice methodology, and within the DTV F(50,90) service contour distance as determined per §73.625(b). In instances where the DTV reference ERP is 50 kW or 1,000 kW, the Grade B contour of the associated analog station (as authorized April 3, 1997) is used to determine the extent of the DTV station's service area. The F(50,90) DTV service contour level is established by the formula  $41 - 20\log[615/(\text{channel mid-frequency})]$  dB $\mu$ . The service area for each NTSC facility under study is that area predicted to receive signal levels of at least 64 dB $\mu$  using the Longley-Rice methodology, and within the NTSC F(50,50) service contour distance as determined per §73.684. The F(50,50) NTSC service contour level is established by the formula  $64 - 20\log[615/(\text{channel mid-frequency})]$  dB $\mu$ . Comparisons of various results of this computer program to the Commission's implementation of OET-69 show good correlation.

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**Class A Television**

An allocation study of possible conflicts was conducted with respect to LPTV / translator stations that may be eligible for Class A status.<sup>3</sup> The study determined that the following LPTV / translator stations are close enough to the proposed DTV Channel 34 allotment facility to warrant detailed review:

Channel	Call			City	State	Lat	Distance
Applicant/Licensee						Long	Bearing
19+	WTLU-CA	LIC	TX Zn:	LYNCHBURG	, VA	37-20-56	41.51
LIBERTY UNIVERSITY, INC.					OM	79-10-05	84.6
24.20 kW							
32Z	W40BM	LIC	TX Zn:	LYNCHBURG	, VA	37-28-13	28.68
TRINITY BROADCASTING NETWORK					OM	79-22-34	52.83
30.30 kW							
33N	W33AD	LIC	TX Zn:	CONCORD	, VA	37-20-30	57.37
PAUL H. PASSINK					OM	78-59-17	86.79
1.13 kW							
34+	W34AX	LIC	TX Zn:	HENDERSON	, NC	36-21-41	151.68
TIME WARNER ENTERTAINMENT					OM	78-24-56	133.84
25.70 kW							
34+	W34BN	LIC	TX Zn:	CHARLOTTE	, NC	35-16-33	249.32
THREE ANGELS B/CING. NETWORK, INC.					OM	80-48- 5	205.21
32.60 kW							
34+	WACN-LP	CP	TX Zn:	APEX, ETC.	, NC	35-42-49	192.39
LIGHTHOUSE COMMUNICATIONS, INC.					OM	78-48-35	157.17
13.30 kW							
34+	W62CZ	APP	TX Zn:	ROANOKE	, VA	37-22-23	26.79
NORTH EAST LPTV, INC.					OM	79-55-40	284.14
13.50 kW							
34Z	DW34BX	CP	TX Zn:	BLUEFIELD	, WV	37-15-26	137.06
SULLIVAN B/CING. COMPANY III, INC.					OM	81-10-42	267.81
15.20 kW							
34N	DW34BX	LIC	TX Zn:	PRINCETON, ETC.	, WV	37-35-24	134.50
SULLIVAN B/CING. COMPANY III, INC.					OM	81- 6-53	283.59
15.80 kW							
34-	WARZ-LP	CP	TX Zn:	SMITHFIELD-SELMA	, NC	35-31-46	231.33
WATERS & BROCK COMMUNICATIONS, INC.					OM	78-18- 7	148.50
12.00 kW							

From the list above, a study was made to determine which LPTV stations' protected contours are overlapped by the corresponding interfering contour from the proposed WSET-DT facility, using the criteria of §73.623(c)(5). With respect to interference caused from the various LPTV stations to the proposed WSET-DT facility, an evaluation was conducted per §73.6013, which would require

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<sup>3</sup>The Commission recently created a new class of television stations. See *Establishment of a Class A Television Service*, MM Docket 00-10, FCC 00-115, released April 4, 2000.

## Engineering Statement

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that an analog Class A station not cause 0.5 percent (or more) interference to a DTV facility's service population. The detailed interference study was conducted in accordance with the terrain dependent Longley-Rice point-to-point propagation model, per the Commission's Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, July 2, 1997 ("OET-69").<sup>4</sup>

All of the LPTV stations under consideration that would cause any interference (including interference below 0.5 percent population) to the proposed WSET-DT are listed below, along with any LPTV stations that would receive contour overlap from the proposed WSET-DT. A description of how the overlap or interference does not create a conflict with Class A television is also provided below.

<u>Station</u>	<u>Channel</u>	<u>Disposition</u>
WTLU-CA	19	See text below
W40BM	32	See Note 1
W34AX	34	See Note 1
WACN-LP	34	See Note 1
W62CZ(APP)	34	See Note 1
DW34BX (LIC/CP)	34	See Notes 1,2
WARZ-LP (CP)	34	See text below

Note 1: Station is not on the Commission's June 2, 2000 list of stations deemed eligible to file an application for Class A station status, and protection is therefore not required.<sup>5</sup>

Note 2: Station's license has been canceled. Therefore, protection is not required.

Stations WTLU-CA and WARZ-LP are on the Commission's June 2, 2000 list of stations deemed eligible to file an application for Class A station status. The proposed WSET-DT facility

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<sup>4</sup>The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A standard terrain profile step size of 1 km and cell size of 2 km were used. The service area for the proposed WSET-DT is that area predicted to receive signal levels of at least 41 dB $\mu$  using the Longley-Rice methodology, and within the DTV 40.68 dB $\mu$  F(50,90) service contour distance as determined per §73.625(b). Comparisons of various results of this computer program to the Commission's implementation of OET-69 show good correlation.

<sup>5</sup>See June 2, 2000 Public Notice *Certificates of Eligibility for Class A Television Station Status*, DA 00-1224.

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would *not* experience interference from WTLU-CA or WARZ-LP (as determined under the OET-69 criteria, per §73.6013). Contour overlap with these stations (that would be prohibited under §73.623(c)(5)) would occur with respect to the proposed Channel 34 facility. However, §73.623(c)(5)(iii) allows for the use of the terrain dependent Longley-Rice point-to-point propagation model of OET Bulletin 69 to show that no interference to Class A TV stations is expected to occur<sup>6</sup>, in support of a request for waiver of §73.623(c)(5). Accordingly, a detailed interference study was conducted in accordance with OET-69 to demonstrate that interference would not be caused to WTLU-CA or WARZ-LP. The results of this study are included in **Table 2**. As shown in **Table 2**, the instant proposal causes no interference to WTLU-CA or WARZ-LP. Accordingly, a waiver of §73.623(c)(5) is respectfully requested based on this analysis.

No other LPTV or Class A stations would experience or cause interference with respect to the proposed WSET-DT facility.

### Summary

It is proposed that DTV Channel 34 be allotted to Lynchburg, Virginia as a substitute for Channel 56. The substitution will not cause excessive interference to any NTSC or DTV facility. There is no conflict with LPTV stations eligible for Class A status.

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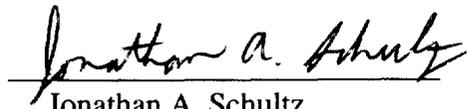
<sup>6</sup>The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein, except that the cell size is 1 km (which provides a finer resolution than the standard 2 km cell size). A standard terrain profile step size of 1 km was used. The service area for each affected Class A Television station is that area predicted to receive signal levels of at least 74 dB $\mu$  using the Longley-Rice methodology, and within the Class A 74 dB $\mu$  F(50,50) service contour. Comparisons of various results of this computer program to the Commission's implementation of OET-69 show good correlation.

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**Certification**

Under the penalty of perjury, the undersigned hereby certifies that the foregoing statement was prepared by him or under his direction, and that it is true and correct to the best of his knowledge and belief. Mr. Schultz is an associate in the firm of *Cavell, Mertz & Davis, Inc.*, holds a Bachelor of Science degree from the University of Rochester in Physics, and has previously submitted engineering exhibits to the Federal Communications Commission. His qualifications are a matter of record with that entity.



Jonathan A. Schultz

May 24, 2001

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Map source:  
Tiger data

**FIGURE 1**  
**COVERAGE AREA COMPARISON**  
**LARGEST SERVICE IN MARKET**

prepared May 2001 for  
**WSET Incorporated**  
WSET-DT Lynchburg, Virginia

Ch. 34 660 kW 625 m

**Cavell, Mertz & Davis, Inc.**  
Fairfax, Virginia

Proposed WSET-DT  
DTV Contour (40.68 dBμ)  
Area 43,743 sq. km

WDBJ-DT (Ref) Ch. 18  
DTV Contour (39.15 dBμ)  
Area 44,148 sq. km

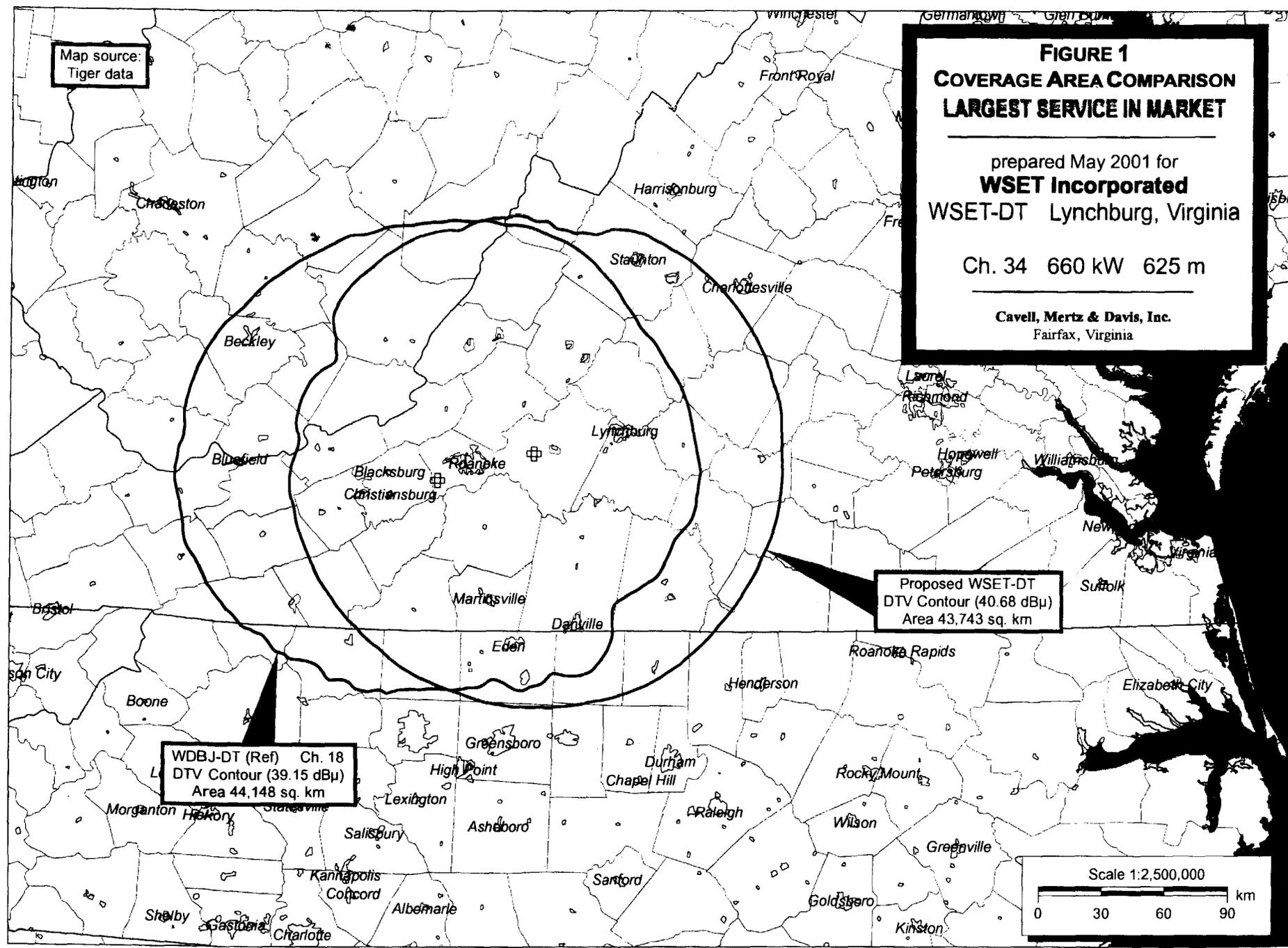
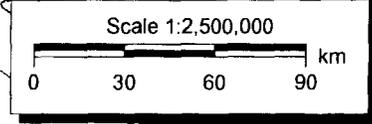


Table 1  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**

prepared for  
**WSET Incorporated**  
WSET-DT Lynchburg, Virginia  
Ch. 34 660 kW 625 m

**DTV Facilities**

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population</u> (1)	<u>Calculated "Before" Service Population</u> (2)	<u>Calculated "After" Service Population</u> (3)	<u>--- Net "New" Interference ---</u> ( "2 percent" test)		<u>Percentage Reduction of Baseline Population ("10 percent" test)</u> (6)
						<u>Population</u> (4)	<u>Percentage</u> (5)	
WUPN-DT (Ref 50.0 kW)	Greensboro, NC 33	161.3				----- no interference caused by proposal -----		
WUPN-DT (*Ref 200.0 kW)	Greensboro, NC 33	161.3	1,563,000	2,135,980	2,135,241	739	0.05	0.00
WUPN-DT (APP 700.0 kW)	Greensboro, NC 33	161.5	1,563,000	2,277,127	2,275,274	1,853	0.12	0.00
WSOC-DT (Ref 740.5 kW)	Charlotte, NC 34	248.0	2,143,000	2,145,926	2,137,594	8,332	0.39	0.25
WSOC-DT (Lic 370.0 kW)	Charlotte, NC 34	248.0				----- checklist facility, protection not required -----		
WSOC-DT (App 1000.0 kW)	Charlotte, NC 34	248.0	2,143,000	2,206,652	2,202,391	4,261	0.20	0.00
WPBY-DT (Ref 63.1 kW)	Huntington, WV 34	261.0	735,000	729,050	729,047	3	0.00	0.81
WPBY-DT (*Ref 200.0 kW)	Huntington, WV 34	261.0	735,000	817,326	817,326	0	0.00	0.00
WPBY-DT (APP 62.0 kW)	Huntington, WV 34	261.0				----- checklist facility, protection not required -----		

Table 1  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**  
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<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population</u> (1)	<u>Calculated "Before" Service Population</u> (2)	<u>Calculated "After" Service Population</u> (3)	<u>--- Net "New" Interference ---</u> ( "2 percent" test)		<u>Percentage Reduction of Baseline Population ("10 percent" test)</u> (6)
						<u>Population</u> (4)	<u>Percentage</u> (5)	
WUSA-DT (Ref 1000.0 kW)	Washington, DC 34	288.3	6,440,000	6,439,740	6,439,060	680	0.01	0.01
WUSA-DT (Lic 646.0 kW)	Washington, DC 34	288.3	6,440,000	6,357,135	6,356,505	630	0.01	1.30
WUSA-DT (App 1000.0 kW)	Washington, DC 34	288.3	6,440,000	6,352,441	6,351,653	788	0.01	1.37
WJAC-DT (Ref 1000.0 kW)	Johnstown, PA 34	344.0	2,717,000	2,681,907	2,681,907	0	0.00	1.29
WJAC-DT (APP 126.0 kW)	Johnstown, PA 34	344.0				----- checklist facility, protection not required -----		
WPXU-DT (Ref 52.4 kW)	Jacksonville, NC 34	368.1				----- no interference caused by proposal -----		
WPXU-DT (*Ref 200.0 kW)	Jacksonville, NC 34	368.1				----- no interference caused by proposal -----		
WPXU-DT (CP 600.0 kW)	Jacksonville, NC 34	368.1				----- no interference caused by proposal -----		
WTNZ-DT (Ref 50.3 kW)	Knoxville, TN 34	414.0				----- no interference caused by proposal -----		
WTNZ-DT (*Ref 200.0 kW)	Knoxville, TN 34	414.0				----- no interference caused by proposal -----		

Table 1  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**  
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<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population</u> (1)	<u>Calculated "Before" Service Population</u> (2)	<u>Calculated "After" Service Population</u> (3)	<u>--- Net "New" Interference ---</u> ( "2 percent" test)		<u>Percentage Reduction of Baseline Population ("10 percent" test)</u> (6)
						<u>Population</u> (4)	<u>Percentage</u> (5)	
WTNZ-DT (App 1000.0 kW)	Knoxville, TN 34	414.0				----- no interference caused by proposal -----		
WGHP-DT (Ref 759.4 kW)	High Point, NC 35	167.6	2,217,000	2,204,309	2,204,038	271	0.01	0.58
WGHP-DT (App 1000.0 kW)	High Point, NC 35	167.6	2,217,000	2,321,135	2,320,187	948	0.04	0.00

**NTSC Facilities**

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population</u> (1)	<u>Calculated "Before" Service Population</u> (2)	<u>Calculated "After" Service Population</u> (3)	<u>--- Net "New" Interference ---</u> ( "2 percent" test)		<u>---Total Interference---</u> <u>from DTV only</u> ( "10 percent" test)	
						<u>Population</u> (4)	<u>Percentage</u> (5)	<u>Population</u> (7)	<u>Percentage</u> (8)
WUNL-TV (LIC)	Winston-Salem, NC 26	123.1				----- no interference caused by proposal -----			
WFXR-TV (LIC)	Roanoke, VA 27	48.0	991,859	761,204	761,191	13	0.00	56,822	5.73
WRLH-TV (LIC)	Richmond, VA 35	172.5				----- no interference caused by proposal -----			

Table 1  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**  
 (Page 4 of 4)

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population</u> (1)	<u>Calculated "Before" Service Population</u> (2)	<u>Calculated "After" Service Population</u> (3)	<u>--- Net "New" Interference --- ("2 percent" test)</u>		<u>---Total Interference--- from DTV only ("10 percent" test)</u>	
						<u>Population</u> (4)	<u>Percentage</u> (5)	<u>Population</u> (7)	<u>Percentage</u> (8)
WRLH-TV (CP)	Richmond, VA 35	172.6		----- no interference caused by proposal -----					
WPXR(TV) (APP)	Roanoke, VA 38	48.3	745,435	626,171	623,366	2,805	0.38	14,090	1.89
WPXR(TV) (CP)	Roanoke, VA 38	48.3	770,658	633,448	630,686	2,762	0.36	15,452	2.01
WPXR(TV) (LIC)	Roanoke, VA 38	48.4	767,515	630,886	628,151	2,735	0.36	16,245	2.12
WHTJ(TV) (LIC)	Charlottesville, VA 41	125.8		----- no interference caused by proposal -----					

- Notes:
- (1) For DTV stations, greater of NTSC or DTV Service Population, from FCC Table  
For NTSC stations, total population within noise-limited contour
  - (2) Service population after reduction from terrain and interference losses, before consideration of proposal
  - (3) Service population after reduction from terrain and interference losses, considering proposal
  - (4) Net change in population receiving interference resulting from proposal, equals (2) minus (3). A negative number indicates a *reduction* in interference.
  - (5) Proposal's impact in terms of percentage, equals (4)/(1) times 100 percent: not to exceed *de minimis* limit of 2.0 percent
  - (6) Total interference to DTV stations: equals 100 percent minus [(3)/(1) X 100%]; proposal may not add interference above 10% total. Zero total interference is indicated if (3) is greater than (1).
  - (7) NTSC station total population subject to interference from DTV only sources (considering proposal)
  - (8) Proposal's impact to NTSC station in terms of percentage, equals (7)/(1) times 100 percent; proposal may not add interference above 10% total

\* Additional study with DTV reference ERP raised to 200 kW

The determination of stations for consideration and the determination of baseline population and interference percentages were made as described in the Commission's August 10, 1998 Public Notice "Additional Application Processing Guidelines for Digital Television"

Table 2  
**CLASS A STATION INTERFERENCE ANALYSIS RESULTS SUMMARY**  
 prepared for  
**WSET Incorporated**  
 WSET-DT Lynchburg, Virginia  
 Ch. 34 660 kW 625 m

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population</u> (1)	<u>Service Population</u> (2)	<i>---- Unique Interference ---- from WSET-DT</i>	
					<u>Population</u> (3)	<u>Percentage</u> (4)
WTLU-CA (LIC)	Lynchburg, VA 19	41.5	128,531	127,006	0	0.00
WARZ-LP (CP)	Smithfield-Selma, NC 10	231.3	31,748	31,684	0	0.00

OET-69 Class A station analysis notes:

- (1) Population within protected contour
- (2) Service population after reduction from terrain and interference losses, before consideration of proposal
- (3) Net change in population receiving interference resulting from proposal
- (4) Proposal's impact in terms of percentage, equals (3)/(1) times 100 percent: not to exceed zero when rounded to the nearest whole percent