

**ENGINEERING STATEMENT
RE: REPLY COMMENTS OF
WSJV TELEVISION, INC.**

INTRODUCTION

WSJV Television, Inc. licensee of analog TV station WSJV, Channel 28, and permittee of DTV station WSJV-DT, Channel 58, Elkhart, Indiana (Facility ID No. 74007), seeks to modify the pre-election certification for WSJV-DT to reflect a certain license modification made to the analog Channel 28 facility subsequent to the creation of the original 1997 DTV Table in the *Sixth Report & Order, DTV Allocations*, FCC 97-115. Specifically, the analog station license involved an inaccuracy in the orientation of the existing Channel 28 directional antenna and this discrepancy was carried over to the paired Channel 58 allotment for WSJV-DT in the establishment of the initial DTV Table. Detection of this defect was not made until after the adoption of the table in 1997 and as a result the service area established for WSJV-DT was not derived from the correct antenna pattern rotation of its associated analog TV station. WSJV-DT certified on FCC Form 381 that it will construct replication facilities and since curative steps were taken to successfully correct the analog station license as evidenced in BLCT-19991223ACN, a change in the DTV station's certification to reflect the existing antenna and pattern rotation that will be used post-transition is requested in accordance with the *Seventh Further Notice of Proposed Rulemaking*, MM Docket 87-268, FCC 06-150 ("7th FNPRM").

WSJV-DT elected Channel 28 as its post-transition channel using FCC Form 382. The Commission approved the election and assigned Channel 28 as the tentative channel designation (“TCD”) for WSJV-DT based on the service area derived from the station’s pre-election certification. This statement provides technical information to demonstrate that the request to modify the station’s certification will not result in additional interference to any licensee’s existing TCD in excess of 0.1 percent.

PROPOSED CERTIFICATION

The pre-election certification for WSJV-DT was filed on November 4, 2004. It specified that WSJV-DT would construct replication facilities and, as described above, that certification apparently did not reflect use of the Channel 28 antenna in operation at the time of the certification, as authorized in BLCT-19991223ACN. In view of the fact that the corrected antenna description on the analog station license, Antenna ID No. 30747 and 60 degrees rotation, will result in extension of the noise-limited contour (40.11dBu with dipole factor modification) beyond the present certification contour in various directions. Attached to this statement as Figure 1 is a map depicting the present and proposed certification contours.

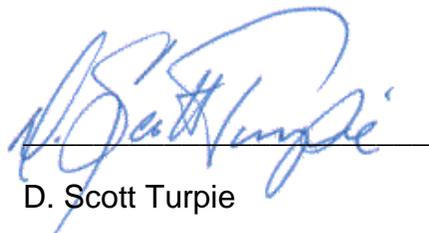
An interference analysis of the proposed change in certification has been conducted by the office of the undersigned using a commercial version of the TV Interference and Spacing Analysis software that was developed for the Commission by Techware, Inc. A summary of the analysis results for WSJV-DT is attached to this statement as Figure 2. The summary demonstrates that the proposed change in certification will not result in interference in excess of 0.1 percent to any licensee’s existing TCD. Accordingly, the

technical information in Appendix B of the 7th FNPRM for TCD 28 at Elkhart IN can be modified as follows:

Facility ID	State & City	NTSC		DTV								
		Chan	Chan	ERP (kW)	HAAT (m)	Antenna ID	Rotation (degrees)	Latitude (DDMMSS)	Longitude (DDMMSS)	Area (sq km)	Population (thousand)	% Interference Received
74007	IN ELKHART	28	28	205	335	30747	60	413658	861138	21736	1342	3.7

Respectfully submitted,

LOHNES AND CULVER



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FIGURE 2
INTERFERENCE ANALYSIS SUMMARY
WSJV-DT 205KW-DA 335 M HAAT
28A IN ELKHART

AFFECTED STATIONS	28A IN ELKHART	
	TCD in 7th FNPRM (Initial 381 Certification)	Proposed TCD (Certified Facility Modification)
Results for: 27A IL CHICAGO		
HAAT 510.0 m, ERP 160.0 kW		
Population within NL Contour	9,296,588	9,296,588
not affected by terrain losses	9,296,521	9,296,521
lost to NTSC IX	0	0
lost to additional IX by digital TCD(s)	22,862	11,705
lost to IX by digital TCD(s) only	22,862	11,705
lost to all IX	22,862	11,705
Percentage of received IX	0.25%	0.13%
Results for: 28A IL BLOOMINGTON		
HAAT 293.0 m, ERP 1000.0 kW		
Population within NL Contour	1,016,912	1,016,912
not affected by terrain losses	1,016,352	1,016,352
lost to NTSC IX	0	0
lost to additional IX by digital TCD(s)	2,384	2,384
lost to IX by digital TCD(s) only	2,384	2,384
lost to all IX	2,384	2,384
Percentage of received IX	0.23%	0.23%
Results for: 28A WI MILWAUKEE		
HAAT 305.0 m, ERP 1000.0 kW		
Population within NL Contour	3,001,756	3,001,756
not affected by terrain losses	2,990,946	2,990,946
lost to NTSC IX	0	0
lost to additional IX by digital TCD(s)	134,342	134,484
lost to IX by digital TCD(s) only	134,342	134,484
lost to all IX	134,342	134,484
Percentage of received IX	4.49%	4.50%
Results for: 29A IL CHICAGO		
HAAT 508.0 m, ERP 350.0 kW		
Population within NL Contour	9,540,682	9,540,682
not affected by terrain losses	9,539,142	9,539,142
lost to NTSC IX	0	0
lost to additional IX by digital TCD(s)	21,174	18,830
lost to IX by digital TCD(s) only	21,174	18,830
lost to all IX	21,174	18,830
Percentage of received IX	0.22%	0.20%