

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)

Advanced Television Systems and)
their Impact Upon the Existing)
Television Broadcast Service)

MB DOCKET NO. 87-268

**WWAZ LICENSE, LLC's PETITION
FOR RECONSIDERATION OF SEVENTH REPORT AND ORDER**

WWAZ License, LLC ("WWAZ License"), by its attorneys and pursuant to Section 1.429(a) of the Commission's Rules,¹ hereby petitions the Commission to reconsider a limited aspect of its *Seventh Report and Order*, FCC 07-138, released August 6, 2007, in the above-captioned proceeding.² WWAZ License respectfully requests that the Commission modify the Table of Allotments adopted in the *Seventh Report and Order* to substitute Digital Television ("DTV") Channel 9 in Fond du Lac, Wisconsin, for the existing allotment of DTV Channel 44. Station WWAZ-DT has had cumulative net operating losses of nearly \$9 million since inception, and currently is financially unsustainable. Substituting DTV Channel 9, and making related changes in the Station's coverage and program service that would be made possible by such a channel change, would enable the station to serve the larger Spanish-speaking communities in and around Milwaukee, Wisconsin and would thereby give WWAZ-DT a chance to become financially viable. The following is respectfully shown:

¹ 47 C.F.R. Section 1.429(a).

² See *In the Matter of Advanced Television Systems and their Impact Upon the Existing Television Broadcast Service*, MB Docket No. 87-268, Seventh Report and Order, FCC 07-138 (rel. Aug. 6, 2007) ("*Seventh Report and Order*"). This petition is being filed within 30 days following the date of publication of the *Seventh Report and Order* in the Federal Register, which occurred on September 26, 2007. See 72 Fed. Reg. 54720 (Sept. 26, 2007). Thus, this Petition is timely under Sections 1.429(d) and 1.4(b)(1) of the FCC Rules. 47 C.F.R. Sections 1.429(d) and 1.4(b)(1).

I. PRELIMINARY STATEMENT

WWAZ License holds a construction permit from the Commission, as modified and extended,³ and a special temporary authorization (“STA”) from the Commission, as modified and extended,⁴ that authorizes WWAZ License to build and operate (with facilities at values reduced below the specifications in the construction permit) commercial DTV broadcast station WWAZ-DT (the “Station”) on DTV Channel 44 in Fond du Lac (Facility Identification No. 60571).⁵

WWAZ License requests that the Commission reconsider its allotment in the *Seventh Report and Order* of DTV Channel 44 to Fond du Lac and instead allot DTV Channel 9 to Fond du Lac, in accordance with the operating parameters set forth in the Engineering Statement of Kevin T. Fisher, WWAZ License’s broadcast engineering consultant, appended hereto as Appendix A.⁶ This request should be granted due to a number of considerations that clearly are in the public interest. First, the Station has been operating with severe financial losses for a number of years, and will be unable to survive and continue to provide programming to Fond du Lac, its city of license, in the absence of this change. Second, WWAZ License intends to change the programming service of the Station to Spanish-language programming, under the banner of the emerging television network TuVisión (which is under common control with WWAZ

³ See File No. BPCDT-19991101ADW, granted on June 2, 2000, as modified and extended.

⁴ See File No. BDSTA-20020307ACU, granted on March 19, 2002, as modified and extended.

⁵ WWAZ License also holds a license from the Commission that authorizes WWAZ License to operate full power analog commercial television broadcast station WWAZ (TV) on “out-of-core” NTSC Channel 68 in Fond du Lac. Concurrently with this Petition, WWAZ License is filing a request to the Commission for permission to surrender to the Commission for cancellation WWAZ License’s license from the Commission for the analog station.

⁶ See Appendix A at Exhibit C.

License), and needs to be able to serve the significant Spanish-speaking populations in and around Milwaukee in order to become financially viable. As noted herein, the Commission has long promoted the growth and development of new networks, as well as foreign-language programming, and granting this request would further these important public-interest objectives. Lastly, granting this WWAZ License request would advance the odds that Fond du Lac will be able to retain its only local television transmission service, as well as enable the Station to serve additional underserved market segments.

II. WWAZ-DT'S DESPARATE FINANCIAL SITUATION NECESSITATES A CHANGE IN PROGRAMMING, COVERAGE, AND MARKET POSITION IN ORDER FOR IT TO HAVE ANY CHANCE OF SURVIVING

A. The Financial Situation of WWAZ-DT is Dire and Unsustainable

WWAZ-DT and its "sister" analog station, WWAZ (TV), are not financially viable. Indeed, the current financial state of those stations is bleak. A review of WWAZ License's historical financial performance, and that of its sole member, Pappas Telecasting of Wisconsin, L.P., establishes that the Station is currently hemorrhaging money, and is simply not economically sustainable at this point. WWAZ License believes that making the changes requested below will afford it a reasonable opportunity to transform the Station into an economically-viable operation.

Analog station WWAZ (TV), operating at full power for the past 12 ½ years, and DTV Station WWAZ-DT, operating with reduced facilities in order to conserve resources and minimize costs,⁷ have posted cumulative net operating losses of \$8,971,354.⁸ This is from the inception of service (March 24, 1995) through July 31, 2007.

⁷ See *supra* note 4.

⁸ This is based upon excerpts from audited financial statements (attached as Appendix B) for the year ended 2006 and unaudited financial statements for 2007 through July 31 of this year.

The Commission has previously granted special indulgences in its DTV rules and procedures due to financial constraints. For instance, the Commission, in its *Notice of Proposed Rulemaking* (“*NPRM*”) in the Third Periodic Review proceeding regarding DTV,⁹ has proposed to revise the standards for granting extensions of time in which to complete construction of DTV stations, where the cost of meeting DTV build-out requirements exceeds a station’s financial resources.¹⁰ The Commission proposed that, in seeking an extension to complete construction of a DTV station, the licensee/permittee must show that it is “...(1) the subject of a bankruptcy or receivership proceeding, or (2) experiencing severe financial hardship, as defined by negative cash flow for the past three years.”¹¹ The Commission noted that this test is similar to the showing considered in determining whether a station is a “failed station” for purposes of a waiver of the local television ownership rules (though it also noted that it did not intend to use the failed station standard in its entirety as applied in the context of local television ownership in determining whether a station should be granted an extension of time to construct its DTV facilities).¹² WWAZ License submits that the Station meets this standard, as proposed by the Commission, based upon the Station’s historical financial performance, as set forth in the profit-and-loss statements for 2004, 2005, and 2006 appended hereto at Appendix C. As shown in Appendix C, which presents excerpts from WWAZ License’s and its sole member’s end-of-year audited financial statements for the years ended December 31, 2004, December 31, 2005, and December 31, 2006, the net operating losses in each of those years were: \$1,799,891 (2004); \$2,181,659 (2005); and \$1,653,049 (2006).

⁹ *Third Periodic Review of the Commission’s Rules and Policies Affecting the Conversion to Digital Television*, Notice of Proposed Rulemaking, MB Docket No. 07-91, FCC 07-70 at paras. 81-82 (rel. May 18, 2007).

¹⁰ *See id.* at para. 81.

¹¹ *See id.*

¹² *See id.* at n. 155.

B. Adoption of a Spanish-language Program Service, Along with Increased Signal Coverage to Serve a Larger Hispanic Population, May Provide a Basis for the Station to Survive

WWAZ License believes that the Station may be able to be successful if its program service were converted to Spanish-language programming and its ability to reach certain urban areas containing significant Hispanic populations were enhanced. WWAZ License has determined in particular that the Station needs to be able to transmit a signal that is adequate to reach the Hispanic populations clustered in and around Milwaukee.

The proposed new programming for the Station would be provided by the emerging network TuVisión, which is off to a very promising start (and is owned by an affiliate of the ultimate owner of WWAZ License). However, in order to reach a critical mass of viewers to allow the Station a chance at success, WWAZ-DT must be able to reach as many Hispanic viewers as possible, particularly in Milwaukee. Unfortunately, the signal of WWAZ-DT operating at full power on DTV Channel 44 as contemplated by Appendix B of the *Seventh Report and Order* would not provide adequate coverage to those Hispanic viewers in and around Milwaukee. Nor can WWAZ License modify the Station's DTV facilities on Channel 44 in order to improve the signal in Milwaukee, by (for example) moving the Station's transmitting facilities closer to those population centers to the south. This is largely due to the first-adjacent-channel relationship of WWAZ-DT (Channel 44) and DTV Station WWRS-DT in Mayville, Wisconsin (Channel 43), as the two stations must keep their antennas in close proximity to one another in order to avoid the risk of mutually-destructive interference.¹³ This relationship limits WWAZ-DT's ability to exploit opportunities to modify its facilities in order to increase the

¹³ See Appendix A at Exhibit A.

strength of the Station's signal to available Hispanic populations in the Milwaukee metropolitan area.

In order to resolve this problem, WWAZ License's broadcast engineering consultant recently discovered that WWAZ-DT could operate on DTV Channel 9 from an existing antenna tower in Milwaukee.¹⁴ There, WWAZ-DT could be co-located with first-adjacent-channel noncommercial, educational DTV station WMVS-DT on DTV Channel 8 in order to minimize the risk of mutually destructive interference between WMVS-DT and WWAZ-DT.¹⁵

Adopting this revised channel allotment and antenna relocation for the Station would allow WWAZ-DT to provide an adequate signal for reaching a significant Hispanic population. Indeed, as demonstrated in Appendix A, the increase in Hispanic population reached by the Station's signal operating on DTV Channel 9 from the Milwaukee tower would be over twofold: from 110,430 to 246,403.¹⁶ These combined changes would afford an opportunity for the Station to become financially viable, and allow for the Station to continue providing service to its city of license, Fond du Lac, which has no other local television transmission service.

III. GRANTING THIS REQUEST WOULD SUBSTANTIALLY SERVE THE PUBLIC INTEREST

A. The Revised Allotment and Coverage Enhancements Would Increase the Likelihood of the Survival of Fond du Lac's Only Local Television Station

In granting this request, the Commission would also be promoting the interests of the city of license of WWAZ-DT, Fond du Lac. As demonstrated by the engineering data presented in Appendix A, Fond du Lac would continue to be covered by a signal from WWAZ-DT having a

¹⁴ See *id.* at Exhibit A.

¹⁵ See *id.* In point of fact, given the first-adjacent-channel relationship between WWAZ-DT on DTV Channel 9 and WMVS-DT on DTV Channel 8, co-location of the antennas of those two stations will be necessary in order to prevent them from creating a risk of mutually-destructive interference.

¹⁶ See Appendix A at Exhibit D-2.

predicted field strength of at least 43 dBu.¹⁷ Indeed, in granting this request, the Commission would not only be fostering the possibility of developing a viable television station that is geared toward providing service to minority viewers, but would also help ensure that local service to Fond du Lac is not lost completely, due to the Station's current unsustainable circumstances. The Commission has a long-standing policy of trying to maintain at least one channel allotment to each community of any appreciable size that can support a local station.¹⁸ In granting this request, the Commission would be providing an opportunity to maintain a viable television station which can serve Fond du Lac's needs for local self-expression.

B. The Commission Has a Policy of Fostering Increased Service and Coverage to Minority Populations

The Commission has consistently advanced a policy of increasing service and coverage to minority populations, as well as a policy of fostering new networks. Indeed, "...the Commission has previously supported changes in its policies and waivers of its rules partly or sometimes solely on the basis that such waivers would result in greater consumer access to foreign-language programming and, more specifically, Spanish-language programming."¹⁹ Moreover, the Commission approved a channel exchange in San Francisco/San Mateo, California, based in part upon a commercial station's improved ability to serve an important part of the total Spanish-language population in a ten-county area.²⁰ In addition, the "... Commission's grant of network representation rule waivers have been based in part on its finding

¹⁷ See *id.* at Exhibit A.

¹⁸ See *Sixth Report and Order on Television Allocations*, 41 FCC 4870 (1952).

¹⁹ See *Amendment of the Television Table of Allotments to Delete Noncommercial Reservation of Channel *39, 620-626 MHz, Phoenix, Arizona, and to Add Noncommercial Reservation on Channel 11, 198-204 MHz, Holbrook, Arizona*, Memorandum Opinion and Order, 20 FCC Rcd 16854 at para. 20 (rel. Oct. 13, 2005).

²⁰ See *Amendment of Section 73.606(b), Table of Assignments, Television Broadcast Stations (San Francisco and San Mateo, California)*, Report and Order, 68 FCC 2d 860 (re. Jul. 14, 1978).

that such waivers would encourage the growth and development of new networks and foster foreign language development.”²¹

Thus, it is clear that it would be in the public interest, as well as in accordance with prior Commission policy and precedent, to adopt WWAZ License’s request to substitute an allotment of DTV Channel 9 for the *Seventh Report and Order*’s allotment of DTV Channel 44.²²

C. This Request Would Make Use of an Existing Tower and Would Allow the Dismantling of an Existing Tower

If the Commission were to grant this request, WWAZ-DT would be able to move its antenna to an existing tower located at 4350 North Humbolt Avenue in Milwaukee, owned by American Tower Company. In doing so, WWAZ-DT would be able to remove its existing antenna tower at 6699 Madison Road in Iron Ridge, Wisconsin. This would conform to the Commission’s policy of antenna clustering, as WWAZ-DT’s current antenna tower could be dismantled.²³

Lastly, the proposed allotment of DTV Channel 9 to Fond du Lac would be consistent with nearly all engineering requirements of the Commission.²⁴ The one exception is that the

²¹ See *Amendment of the Television Table of Allotments to Delete Noncommercial Reservation of Channel *39, 620-626 MHz, Phoenix, Arizona, and to Add Noncommercial Reservation on Channel 11, 198-204 MHz, Holbrook, Arizona*, Memorandum Opinion and Order, 20 FCC Rcd 16854 at para. 20 (rel. Oct. 13, 2005); see also *Network Representation of TV Stations in National Spot Sales*, 5 FCC Rcd 7280, 7281-7282 (1990). These cases support the proposition that the achievement of the Commission’s policy goals that WWAZ License seeks to advance here – promotion of television service to minority viewers, fostering the development of new networks, especially foreign-language networks, and preservation of a community’s sole local television service – are adequate to justify waivers of, or departures from, the requirements of the Commission’s rules and policies.

²² The Commission will entertain a petition for reconsideration if it is based on new evidence, changed circumstances, or if reconsideration is in the public interest. See *Numbering Resource Optimization*, Fourth Order on Reconsideration, 22 FCC Rcd 8047 at para. 5 (rel. Apr. 26, 2007). Limited reconsideration of the *Seventh Report and Order* as requested here by WWAZ License is justified in the public interest as contemplated by Section 1.429(b)(3), 47 C.F.R. § 1.429(b)(3).

²³ The Commission has advocated a policy of antenna farms, to “promote air safety and to minimize receiving antenna orientation problems.” See *Application of Carolina Broadcasting Co., Charlotte, N.C. for a Construction Permit*, Memorandum Opinion and Order, 18 FCC 2d 482 at para. 6 (July 2, 1969); *WLCY-TV, Inc., Largo-FL for Construction Permit*, Decision, 16 FCC 2d 506 (Feb. 3, 1969).

²⁴ See Appendix A.

allotment of DTV Channel 9 to Fond du Lac would cause 1.0% interference to WAOW-DT, which will operate post-transition on DTV Channel 9 in Wausau, Wisconsin. That level of interference is greater than the interference standard used by the Commission in these instances.²⁵ Thus, WWAZ License requests a waiver of the relevant Commission standard. As noted previously, waivers have been granted in a number of instances, such as this one, where the granting of such a waiver would promote a number of the Commission's policy goals, such as promotion of television service to minority viewers, fostering the development of new networks, especially foreign-language networks, and preservation of a community's sole local television service.²⁶

IV. CONCLUSION

The foregoing premises having been duly considered, WWAZ License respectfully requests that the Commission reconsider a limited aspect of its *Seventh Report and Order*, and allot DTV Channel 9 to Fond du Lac, in lieu of the allotment of DTV Channel 44, in accordance with the operating parameters set forth in Appendix A hereto.

²⁵ See *id.* at Exhibit E-1.

²⁶ See *supra* note 21.

Respectfully submitted,

WWAZ License, LLC

/s/ John Griffith Johnson, Jr.
John Griffith Johnson, Jr.
Michael Lazarus
Paul, Hastings, Janofsky & Walker LLP
875 15th Street, N.W.
Washington, D.C. 20005
Phone: (202) 551-1700
Fax: (202) 551-0262

Peter C. Pappas
Executive Vice President
Legal and Governmental Affairs
Pappas Telecasting Companies
1776 I Street, NW
Suite 900
Washington, DC 20006
Phone: (202) 316-7800
Fax: (202) 756-7878

Its Attorneys

October 26, 2007

LEGAL_US_E # 76571549.8

APPENDIX A

**Engineering Statement of Kevin Fisher
WWAZ License's Broadcast Engineering Consultant**

EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of WWAZ LICENSE, LLC, permittee of WWAZ-DT in Fond du Lac, Wisconsin, in support of its Petition for Reconsideration of the Commission's Seventh Report and Order concerning its assignment of digital television (DTV) station operating parameters for all full-power television facilities in the United States.

WWAZ-DT was allotted DTV Channel 44 at the authorized WWAZ site. Due to the need to relocate the transmitting facility to a site which will better cover the intended Spanish-language audience and the fact that Channel 44 must be essentially co-located with WWRS-DT on Channel 43 in Mayville, Wisconsin, in order to avoid mutually-destructive interference between the two stations, it is proposed herein to change the assigned parameters of WWAZ-DT to operate on DTV Channel 9 and relocate the antenna to the site of WMVS-DT, Channel 8 in Milwaukee, Wisconsin, with sufficient power and height to allow coverage of Fond du Lac with the requisite city-grade contour. Co-located operation with WMVS-DT will eliminate mutually destructive interference between WMVS-DT and proposed WWAZ-DT on Channel 9.

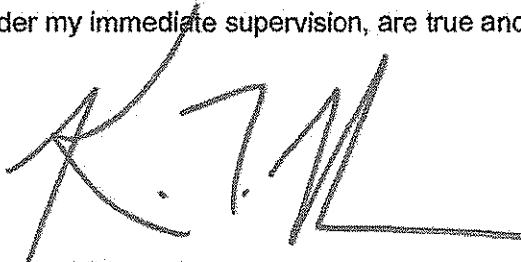
It is proposed to mount a standard directional antenna at the 362-meter level of an existing 370-meter tower. Azimuth and elevation pattern data for the proposed antenna are provided in Exhibit B. Exhibit C is a tabulation of proposed operating parameters. A contour map is included as Exhibit D. As shown, the city of Fond du Lac is located within the predicted 43 dBu contour.

EXHIBIT A

In Exhibit E, we provide an interference analysis with respect to post-transition DTV facilities. It concludes that the facility proposed herein meets the Commission's interference standard to all facilities of concern, except one. A waiver of the Commission's interference policy with respect to post-transition WAOW-DT is requested in Exhibit E. A power density calculation is included as Exhibit F.

Since no change in the overall height or location of the existing tower is proposed herein, the FAA will need no notification of this proposal. In addition, the FCC issued Antenna Structure Registration Number 1057482 to this tower.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read 'K. T. Fisher', with a long horizontal line extending to the right.

KEVIN T. FISHER

October 25, 2007

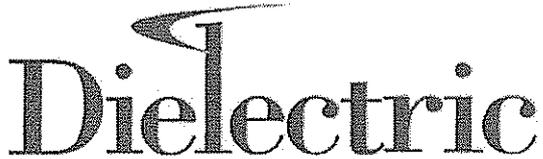
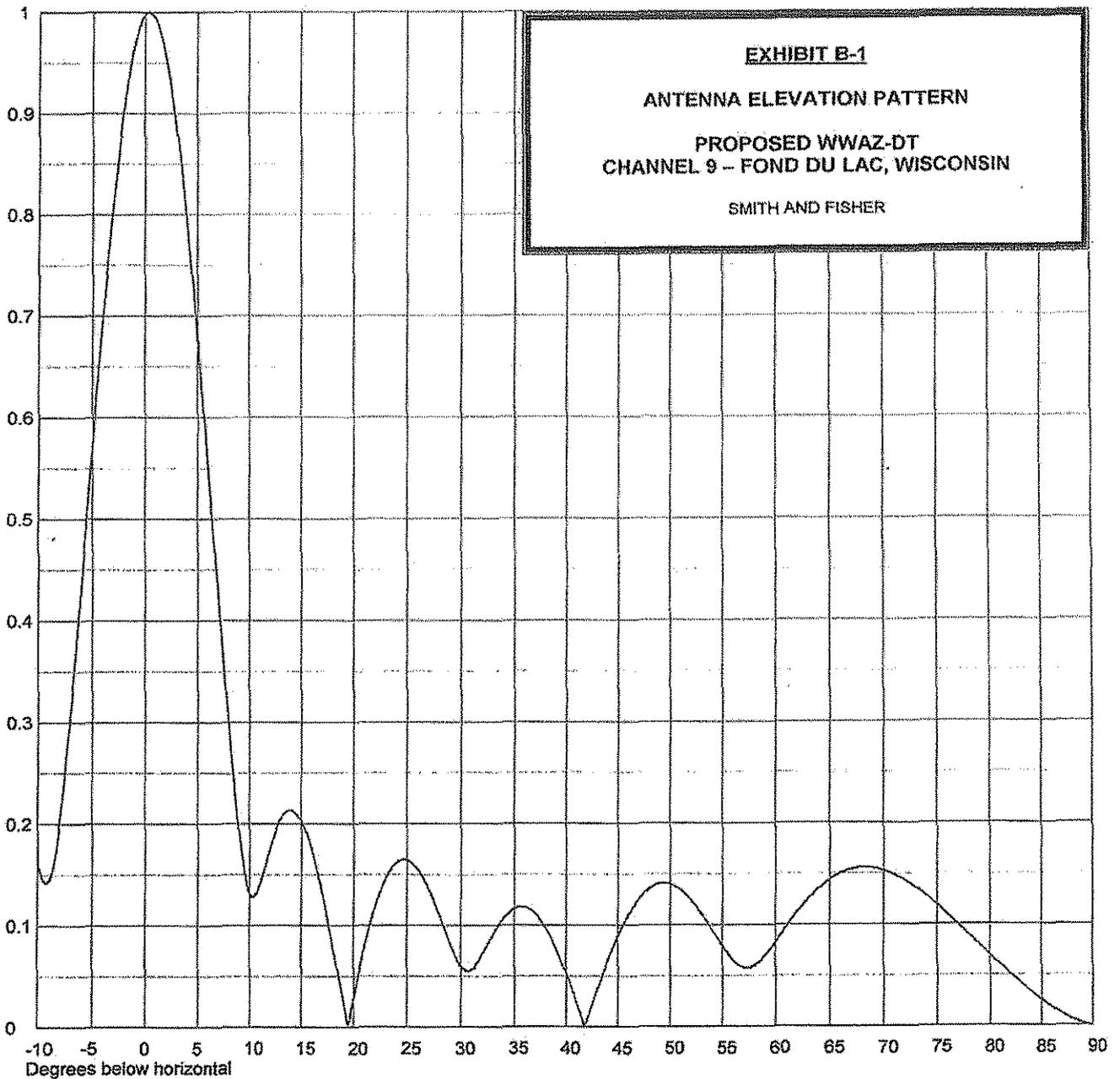


Exhibit No.

Date 25 Oct 2007
Call Letters Channel 9
Location FOND DU LAC, WI
Customer
Antenna Type THA-MC-6/12-1

ELEVATION PATTERN

RMS Gain at Main Lobe	6.0 (7.78 dB)	Beam Tilt	0.60 Degrees
RMS Gain at Horizontal	6.0 (7.78 dB)	Frequency	189.00 MHz
Calculated / Measured	Calculated	Drawing #	06H060060-90



Remarks:

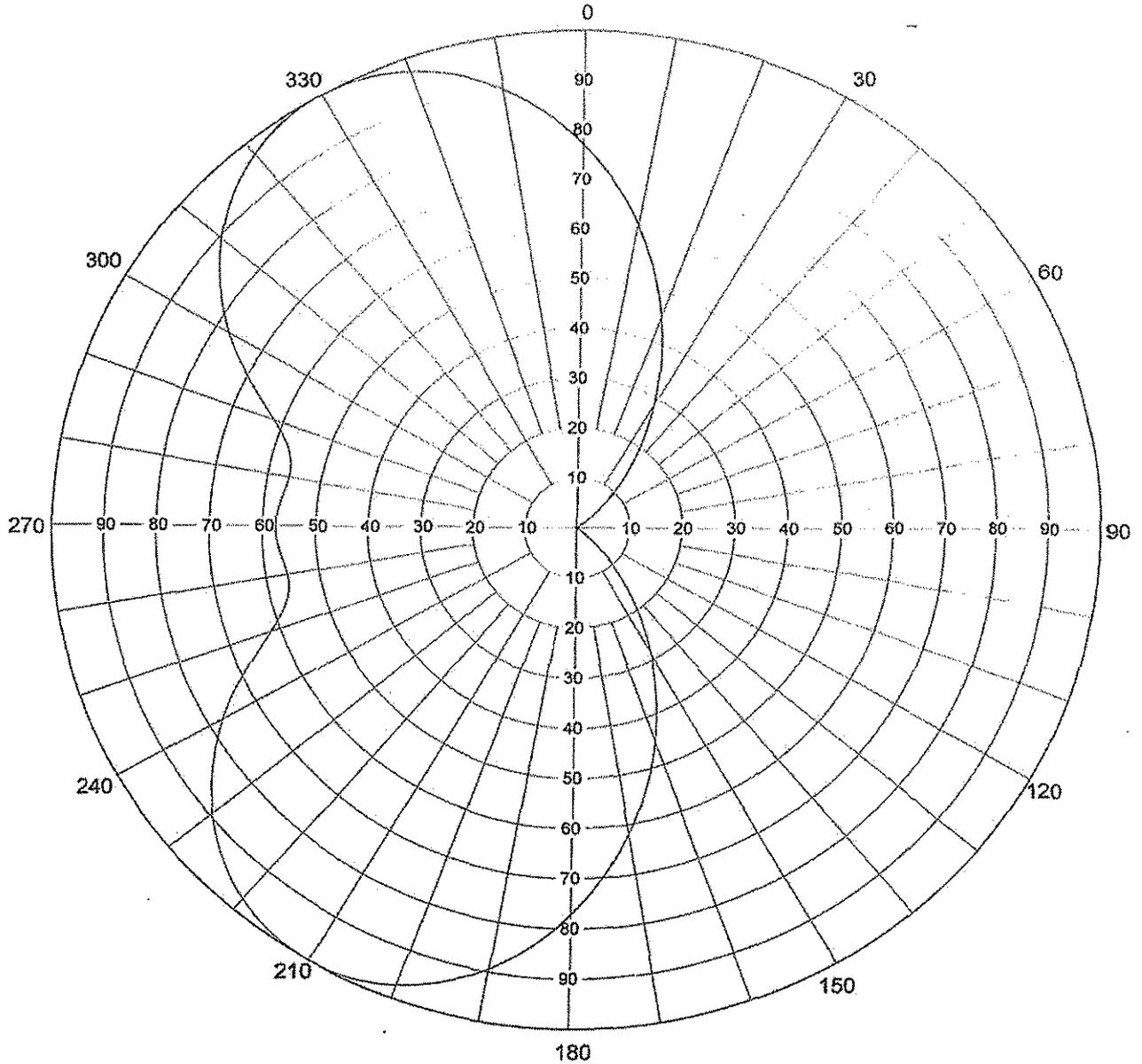


Exhibit No.

Date 25 Oct 2007
Call Letters Channel 9
Location FOND DU LAC, WI
Customer
Antenna Type THA-MC-6/12-1

AZIMUTH PATTERN

Gain 2.50 (3.98 dB) Frequency 189 MHz
Calculated / Measured Calculated Drawing # THA-MC2



Remarks:

EXHIBIT B-2
ANTENNA AZIMUTH PATTERN
PROPOSED WWAZ-DT
CHANNEL 9 - FOND DU LAC, WISCONSIN
SMITH AND FISHER



Exhibit No.

Date 25 Oct 2007
 Call Letters Channel 9
 Location FOND DU LAC, WI
 Customer
 Antenna Type THA-MC-6/12-1

TABULATION OF AZIMUTH PATTERN

Azimuth Pattern Drawing # THA-MC2

Angle	Field	ERP (kW)	ERP (dBk)
0	0.772	16.7	12.22
10	0.619	10.7	10.31
20	0.451	5.7	7.56
30	0.287	2.3	3.63
40	0.145	0.6	-2.30
50	0.043	0.1	-12.86
60	0.000	0.0	0.00
70	0.000	0.0	0.00
80	0.000	0.0	0.00
90	0.000	0.0	0.00
100	0.000	0.0	0.00
110	0.000	0.0	0.00
120	0.000	0.0	0.00
130	0.043	0.1	-12.86
140	0.145	0.6	-2.30
150	0.287	2.3	3.63
160	0.451	5.7	7.56
170	0.619	10.7	10.31
180	0.772	16.7	12.22
190	0.894	22.4	13.50
200	0.973	26.5	14.23
210	1.000	28.0	14.47
220	0.973	26.5	14.23
230	0.894	22.4	13.50
240	0.772	16.7	12.22
250	0.617	10.7	10.28
260	0.559	8.7	9.42
270	0.574	9.2	9.65
280	0.559	8.7	9.42
290	0.617	10.7	10.28
300	0.772	16.7	12.22
310	0.894	22.4	13.50
320	0.973	26.5	14.23
330	1.000	28.0	14.47
340	0.973	26.5	14.23
350	0.894	22.4	13.50

Maxima

Angle	Field	ERP (kW)	ERP (dBk)
0	0.772	16.7	12.22
210	1.000	28.0	14.47
270	0.574	9.2	9.65
330	1.000	28.0	14.47

Minima

Angle	Field	ERP (kW)	ERP (dBk)
90	0.000	0.0	0.00
259	0.559	8.7	9.42
281	0.559	8.7	9.42

EXHIBIT B-3
ANTENNA RELATIVE FIELD VALUES
PROPOSED WWAZ-DT
CHANNEL 9 - FOND DU LAC, WISCONSIN
 SMITH AND FISHER

Remarks:

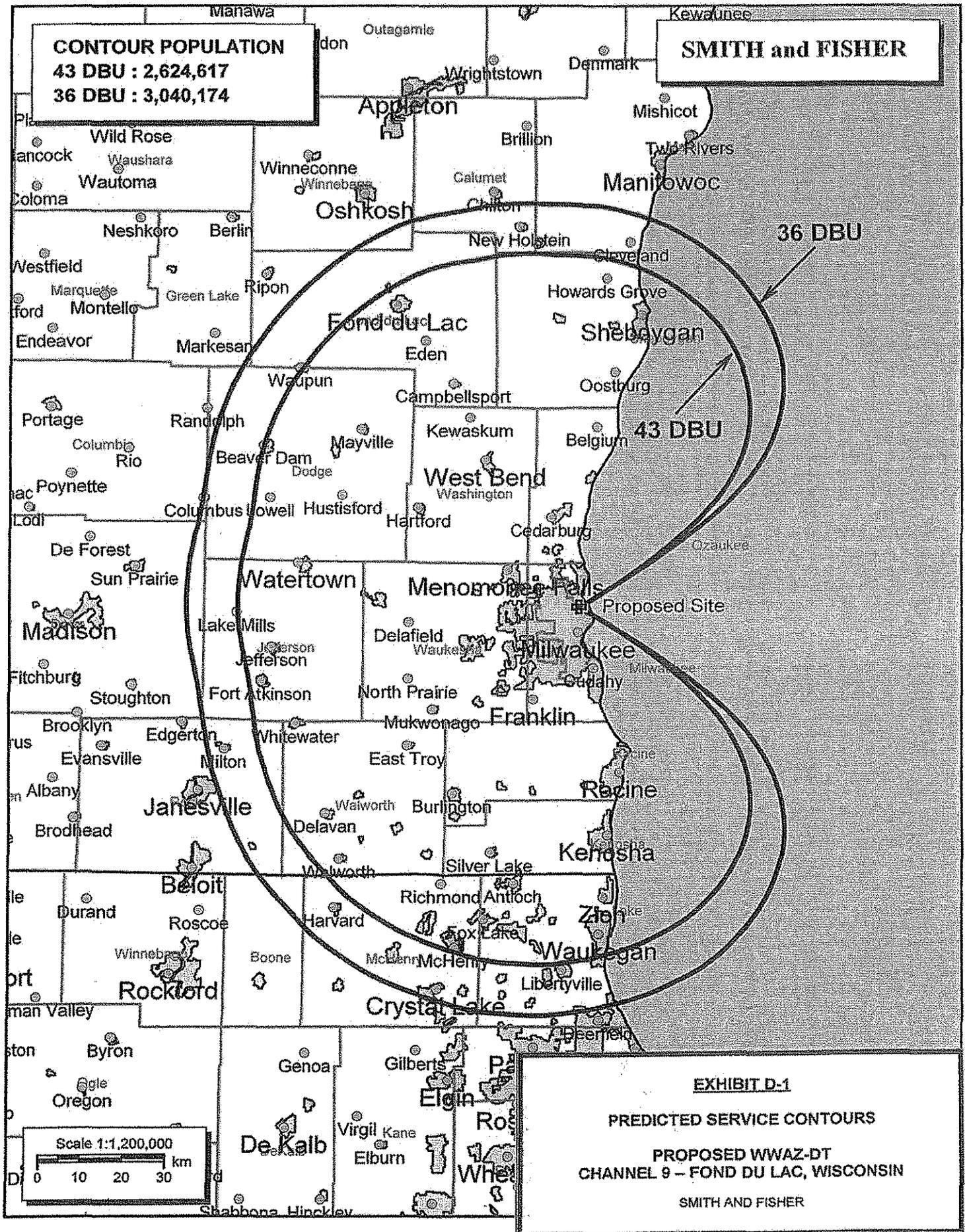
EXHIBIT C

PROPOSED OPERATING PARAMETERS

PROPOSED WWAZ-DT
CHANNEL 9 – FOND DU LAC, WISCONSIN

ERP (main-lobe, maximum)	28 kw
Site Elevation AMSL	191.4 meters
Overall Structure Height AGL	369.7 meters
Radiation Center Height AGL	362.1 meters
Radiation Center Height AMSL	553.5 meters
Radiation Center Height AAT	354 meters
Antenna Structure Registration Number	1057482
Antenna Make and Model	Dielectric THA-MC-6/12-1
Orientation	270° T*
Beam Tilt	0.6 degrees
Geographic Coordinates	43-05-46 N 87-54-15 W
NTSC Channel	68
FCC Facility ID Number	60571

*line of symmetry



CONTOUR POPULATION
 43 DBU : 2,624,617
 36 DBU : 3,040,174

SMITH and FISHER

36 DBU

43 DBU

Proposed Site

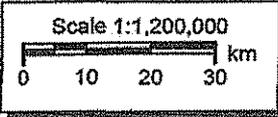
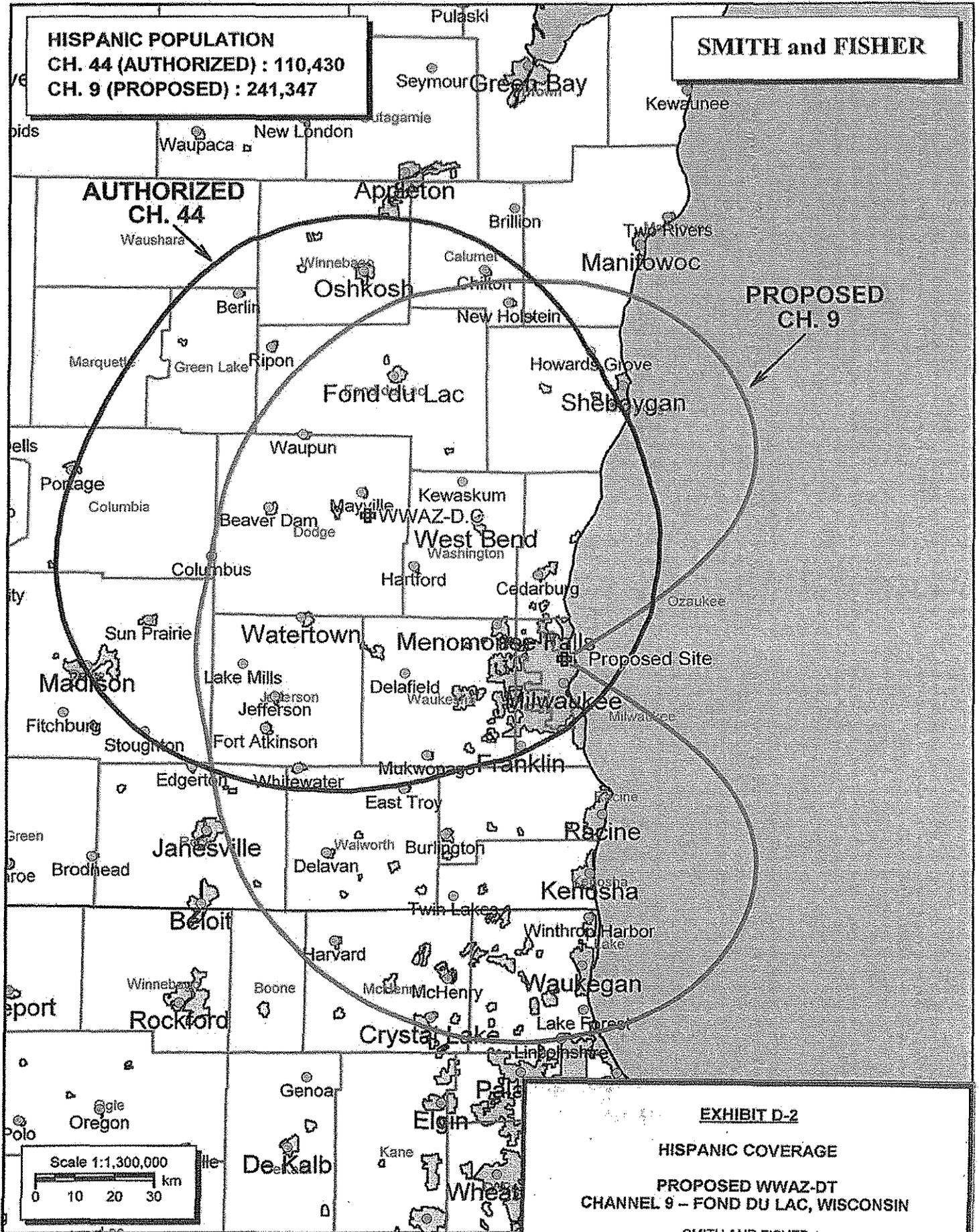


EXHIBIT D-1
PREDICTED SERVICE CONTOURS
PROPOSED WWAZ-DT
CHANNEL 9 – FOND DU LAC, WISCONSIN
 SMITH AND FISHER

HISPANIC POPULATION
CH. 44 (AUTHORIZED) : 110,430
CH. 9 (PROPOSED) : 241,347

SMITH and FISHER



AUTHORIZED
CH. 44

PROPOSED
CH. 9

EXHIBIT D-2

HISPANIC COVERAGE

PROPOSED WWAZ-DT
CHANNEL 9 - FOND DU LAC, WISCONSIN

SMITH AND FISHER

INTERFERENCE STUDY
PROPOSED WWAZ-DT
CHANNEL 9 – FOND DU LAC, WISCONSIN

The instant proposal specifies an ERP of 28 kw (directional) at 354 meters above average terrain, which we have determined to be allowable under the FCC's proposed interference standard with respect to various DTV facilities, except one.

We looked at the interference situation with respect to facilities as they will exist on or before February 17, 2009, the date by which all stations will be operating with the digital facilities recently adopted in the Commission's DTV Table of Allotments.

In evaluating the interference effect of this proposal, we have relied upon the V-Soft Communications "Probe III" computer program, which has been found generally to mimic the FCC's program. In conducting our studies, we employed a cell size of 1.0 kilometers and an increment spacing of 0.1 kilometer along each radial. In addition, we utilized the 1990 U.S. Census. Changes in interference caused by proposed WWAZ-DT to other pertinent stations are tabulated in Exhibit E-2.

As shown, the proposed WWAZ-DT facility would not cause significant interference to the service population of any post-transition facility except for WAOW-DT, Channel 9 in Wausau, Wisconsin. That station is predicted to receive interference to 1.0 percent of its service population, and a waiver of the Commission's interference policy with respect to WAOW-DT is respectfully requested.

A Longley-Rice interference study also reveals that the proposed WWAZ-DT facility does not cause interference within the protected 74 dBu contour of any potentially affected Class A low power television station.

EXHIBIT E-2

INTERFERENCE STUDY SUMMARY
 PROPOSED WWAZ-DT
 CHANNEL 9 – FOND DU LAC, WISCONSIN

<u>Call Sign</u>	<u>City, State</u>	<u>CH.</u>	<u>Coverage Population</u>	<u>Interference Population From WWAZ-DT</u>	<u>%</u>
KCRG-DT Post-Transition	Cedar Rapids, IA	9	928,417	915	0.1
WILL-DT Post-Transition	Urbana, IL	9	1,071,363	132	<0.1
WAOW-DT Post-Transition	Wausau, WI	9	486,667	5,076	1.0

EXHIBIT F

POWER DENSITY CALCULATION
PROPOSED WWAZ-DT
CHANNEL 9 – FOND DU LAC, WISCONSIN

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Fond du Lac facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 28 kw, an antenna radiation center 362 meters above ground, and the vertical pattern of the Dielectric antenna, maximum power density two meters above ground of 0.00016 mw/cm^2 is calculated to occur 145 meters west of the base of the tower. Since this is significantly less than 0.1 percent of the 0.2 mw/cm^2 reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 9 (186-192 MHz), this proposal may be excluded from consideration with respect to public exposure to nonionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive nonionizing radiation.

APPENDIX B

**Excerpts from Audited Financial Statements for the Year Ended 2006 and Unaudited
Financial Statements for 2007 Through July 31 of This Year for WVAZ License and its
Sole Member**

**PAPPAS TELECASTING
OF WISCONSIN, L. P.**

CONSOLIDATED FINANCIAL STATEMENTS

**Year Ended December 31, 2006 and the
Period from Inception (March 24, 1995)
Through December 31, 2006**



M. Green and Company LLP

CERTIFIED PUBLIC ACCOUNTANTS

REPORT OF INDEPENDENT AUDITORS

To the Partners
Pappas Telecasting of Wisconsin, L. P.

We have audited the accompanying consolidated balance sheet of Pappas Telecasting of Wisconsin, L. P. (a Delaware limited partnership) (a development stage company) and its subsidiary as of December 31, 2006, and the related consolidated statements of operations, changes in partners' equity, and cash flows for the year then ended and for the period from inception (March 24, 1995) through December 31, 2006. These consolidated financial statements are the responsibility of the Company and its subsidiary's management. Our responsibility is to express an opinion on these consolidated financial statements based on our audits.

We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audits to obtain reasonable assurance about whether the consolidated financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the consolidated financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audits provide a reasonable basis for our opinion.

In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the financial position of Pappas Telecasting of Wisconsin, L. P. and its subsidiary as of December 31, 2006, and the results of their operations and their cash flows for the year then ended and the period from inception (March 24, 1995) through December 31, 2006, in conformity with accounting principles generally accepted in the United States of America.

M. Green and Company LLP

April 26, 2007
Tulare, California

*Dinuba
Hanford
Tulare
Visalia*

PAPPAS TELECASTING OF WISCONSIN, L. P.

**CONSOLIDATED STATEMENTS OF OPERATIONS
YEAR ENDED DECEMBER 31, 2006 AND THE PERIOD FROM
INCEPTION (MARCH 24, 1995) THROUGH DECEMBER 31, 2006**

<u>EXPENSES:</u>	<u>2006</u>	<u>From Inception (March 24, 1995) Through December 31, 2006</u>
Operating expenses	\$ 412,522	\$ 2,601,414
Depreciation	437,876	1,904,818
Corporate allocation fee	-	50,000
Total expenses	<u>850,398</u>	<u>4,556,232</u>
<u>OTHER INCOME (EXPENSES):</u>		
Rental income	3,500	9,990
Interest income	-	49,185
Other revenue	2,284	4,428
Disposal of assets	-	(11,374)
Intangible amortization	-	(310,807)
Interest expense	(808,435)	(3,142,120)
Total other income (expenses)	<u>(802,651)</u>	<u>(3,400,698)</u>
Net loss	<u>\$ (1,653,049)</u>	<u>\$ (7,956,930)</u>

See accompanying notes.

WWAZ - Pappas Telecasting of Wisconsin, LP

INCOME & EXPENSE STATEMENT FOR THE MONTH ENDING 7/31/2007

Unaudited

<u>THIS MONTH ACTUAL</u>	<u>THIS MONTH LAST YEAR</u>	<u>THIS MONTH BUDGET</u>	<u>VARIANCE TO BUDGET</u>	<u>VAR% +/- BUDGET</u>		<u>THIS YEAR TO DATE</u>	<u>LAST YEAR TO DATE</u>	<u>Y-T-D BUDGET</u>	<u>VARIANCE TO BUDGET</u>	<u>VAR% +/- BUDGET</u>
					<u>REVENUE:</u>					
-	-	-	-	0%	CASH AIRTIME REVENUE	-	-	-	-	0%
-	-	-	-	0%	CASH AIRTIME REVENUE-DIGITAL	-	-	-	-	0%
-	-	-	-	0%	TRADE REVENUE	-	-	-	-	0%
-	-	-	-	0%	TRADE REVENUE-DIGITAL	-	-	-	-	0%
1,000.00	0.01	-	(1,000.00)	0%	OTHER CASH REVENUE	15,901.65	5,783.74	-	(15,901.65)	0%
1,000.00	0.01	-	1,000.00	0%	TOTAL REVENUE	15,901.65	5,783.74	-	15,901.65	0%
					<u>EXPENSES:</u>					
107.67	119.00	-	107.67	0%	PROGRAMMING	1,035.00	674.91	-	1,035.00	0%
-	-	-	-	0%	NEWS & PUBLIC AFFAIRS	78.75	-	-	78.75	0%
16,117.52	19,523.16	-	16,117.52	0%	ENGINEERING	141,392.37	209,574.79	-	141,392.37	0%
-	157.50	-	-	0%	PRODUCTION	-	315.00	-	-	0%
133,328.02	147,848.90	-	133,328.02	0%	GENERAL & ADMINISTRATION	887,819.25	907,330.55	-	887,819.25	0%
149,553.21	167,648.56	-	149,553.21	0%	TOTAL EXPENSES	1,030,325.37	1,117,895.25	-	1,030,325.37	0%
(148,553.21)	(167,648.55)	-	(148,553.21)	0%	PROFIT <LOSS>	(1,014,423.72)	(1,112,111.51)	-	(1,014,423.72)	0%
					<u>MEMO:</u>					
36,500.00	59,996.38	-	36,500.00	0%	DEPRECIATION	255,500.00	419,974.66	-	255,500.00	0%
85,183.06	77,231.84	-	85,183.06	0%	INTEREST EXPENSE	559,005.94	427,129.97	-	559,005.94	0%
-	(0.01)	-	-	0%	OTHER REVENUE	-	(0.11)	-	-	0%
(26,870.15)	(30,420.34)	-	(26,870.15)	0%	BROADCAST CASH FLOW	(199,917.78)	(265,006.99)	-	(199,917.78)	0%

APPENDIX C

**Excerpts from Audited Financial Statements for the Years Ended December 31, 2004,
December 31, 2005, and December 31, 2006 for WWAZ License and its Sole Member**

**PAPPAS TELECASTING
OF WISCONSIN**

CONSOLIDATED FINANCIAL STATEMENTS

**Year Ended December 31, 2004 and the
Period from Inception (March 24, 1995)
Through December 31, 2004**



M. Green and Company LLP

CERTIFIED PUBLIC ACCOUNTANTS

REPORT OF INDEPENDENT AUDITORS

To the Partners
Pappas Telecasting of Wisconsin

We have audited the accompanying consolidated balance sheet of Pappas Telecasting of Wisconsin (a limited partnership) (a development stage company) and its subsidiary as of December 31, 2004, and the related consolidated statements of operations, changes in partners' equity, and cash flows for the year then ended and for the period from inception (March 24, 1995) through December 31, 2004. These consolidated financial statements are the responsibility of the Company and its subsidiary's management. Our responsibility is to express an opinion on these consolidated financial statements based on our audits.

We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audits to obtain reasonable assurance about whether the consolidated financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the consolidated financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audits provide a reasonable basis for our opinion.

In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the financial position of Pappas Telecasting of Wisconsin and its subsidiary as of December 31, 2004, and the results of their operations and their cash flows for the year then ended and the period from inception (March 24, 1995) through December 31, 2004, in conformity with accounting principles generally accepted in the United States of America.

M. Green and Company LLP

April 15, 2005
Tulare, California

Tulare
Visalia
Hanford
Dinuba

PAPPAS TELECASTING OF WISCONSIN

CONSOLIDATED STATEMENTS OF OPERATIONS YEAR ENDED DECEMBER 31, 2004 AND THE PERIOD FROM INCEPTION (MARCH 24, 1995) THROUGH DECEMBER 31, 2004

<u>EXPENSES:</u>	<u>2004</u>	<u>From Inception (March 24, 1995) Through December 31, 2004</u>
Operating expenses	\$ 278,914	\$ 1,831,842
Depreciation	497,361	746,985
Corporate allocation fee	-	50,000
Total expenses	<u>776,275</u>	<u>2,628,827</u>
<u>OTHER INCOME (EXPENSES):</u>		
Interest income	23,231	25,635
Other revenue	131	2,115
Disposal of assets	(11,374)	(11,374)
Intangible amortization	(158,623)	(158,623)
Interest expense	(876,981)	(1,351,148)
Total other income (expenses)	<u>(1,023,616)</u>	<u>(1,493,395)</u>
Net loss	<u>\$ (1,799,891)</u>	<u>\$ (4,122,222)</u>

See accompanying notes.

**PAPPAS TELECASTING
OF WISCONSIN, L. P.**

CONSOLIDATED FINANCIAL STATEMENTS

**Year Ended December 31, 2005 and the
Period from Inception (March 24, 1995)
Through December 31, 2005**



M. Green and Company LLP

CERTIFIED PUBLIC ACCOUNTANTS

REPORT OF INDEPENDENT AUDITORS

To the Partners
Pappas Telecasting of Wisconsin, L. P.

We have audited the accompanying consolidated balance sheet of Pappas Telecasting of Wisconsin, L. P. (a limited partnership) (a development stage company) and its subsidiary as of December 31, 2005, and the related consolidated statements of operations, changes in partners' equity, and cash flows for the year then ended and for the period from inception (March 24, 1995) through December 31, 2005. These consolidated financial statements are the responsibility of the Company and its subsidiary's management. Our responsibility is to express an opinion on these consolidated financial statements based on our audits.

We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audits to obtain reasonable assurance about whether the consolidated financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the consolidated financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audits provide a reasonable basis for our opinion.

In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the financial position of Pappas Telecasting of Wisconsin, L. P. and its subsidiary as of December 31, 2005, and the results of their operations and their cash flows for the year then ended and the period from inception (March 24, 1995) through December 31, 2005, in conformity with accounting principles generally accepted in the United States of America.

M. Green and Company LLP

May 4, 2006
Tulare, California

*Tulare
Visalia
Hanford
Dinuba*

PAPPAS TELECASTING OF WISCONSIN, L. P.

**CONSOLIDATED STATEMENTS OF OPERATIONS
YEAR ENDED DECEMBER 31, 2005 AND THE PERIOD FROM
INCEPTION (MARCH 24, 1995) THROUGH DECEMBER 31, 2005**

		From Inception (March 24, 1995) Through December 31, 2005
<u>EXPENSES:</u>	<u>2005</u>	
Operating expenses	\$ 357,050	\$ 2,188,892
Depreciation	719,957	1,466,942
Corporate allocation fee	-	50,000
Total expenses	<u>1,077,007</u>	<u>3,705,834</u>
 <u>OTHER INCOME (EXPENSES):</u>		
Rental income	6,490	6,490
Interest income	23,550	49,185
Other revenue	29	2,144
Disposal of assets	-	(11,374)
Intangible amortization	(152,184)	(310,807)
Interest expense	<u>(982,537)</u>	<u>(2,333,685)</u>
Total other income (expenses)	<u>(1,104,652)</u>	<u>(2,598,047)</u>
Net loss	<u>\$ (2,181,659)</u>	<u>\$ (6,303,881)</u>

See accompanying notes.

**PAPPAS TELECASTING
OF WISCONSIN, L. P.**

CONSOLIDATED FINANCIAL STATEMENTS

**Year Ended December 31, 2006 and the
Period from Inception (March 24, 1995)
Through December 31, 2006**



M. Green and Company LLP

CERTIFIED PUBLIC ACCOUNTANTS

REPORT OF INDEPENDENT AUDITORS

To the Partners
Pappas Telecasting of Wisconsin, L. P.

We have audited the accompanying consolidated balance sheet of Pappas Telecasting of Wisconsin, L. P. (a Delaware limited partnership) (a development stage company) and its subsidiary as of December 31, 2006, and the related consolidated statements of operations, changes in partners' equity, and cash flows for the year then ended and for the period from inception (March 24, 1995) through December 31, 2006. These consolidated financial statements are the responsibility of the Company and its subsidiary's management. Our responsibility is to express an opinion on these consolidated financial statements based on our audits.

We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audits to obtain reasonable assurance about whether the consolidated financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the consolidated financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audits provide a reasonable basis for our opinion.

In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the financial position of Pappas Telecasting of Wisconsin, L. P. and its subsidiary as of December 31, 2006, and the results of their operations and their cash flows for the year then ended and the period from inception (March 24, 1995) through December 31, 2006, in conformity with accounting principles generally accepted in the United States of America.

M. Green and Company LLP

April 26, 2007
Tulare, California

*Dinuba
Hanford
Tulare
Visalia*

PAPPAS TELECASTING OF WISCONSIN, L. P.

**CONSOLIDATED STATEMENTS OF OPERATIONS
YEAR ENDED DECEMBER 31, 2006 AND THE PERIOD FROM
INCEPTION (MARCH 24, 1995) THROUGH DECEMBER 31, 2006**

<u>EXPENSES:</u>	<u>2006</u>	<u>From Inception (March 24, 1995) Through December 31, 2006</u>
Operating expenses	\$ 412,522	\$ 2,601,414
Depreciation	437,876	1,904,818
Corporate allocation fee	-	50,000
Total expenses	<u>850,398</u>	<u>4,556,232</u>
<u>OTHER INCOME (EXPENSES):</u>		
Rental income	3,500	9,990
Interest income	-	49,185
Other revenue	2,284	4,428
Disposal of assets	-	(11,374)
Intangible amortization	-	(310,807)
Interest expense	(808,435)	(3,142,120)
Total other income (expenses)	<u>(802,651)</u>	<u>(3,400,698)</u>
Net loss	<u>\$ (1,653,049)</u>	<u>\$ (7,956,930)</u>

See accompanying notes.