



**Engineering Statement in Response to Objection by WLFI Lafayette, IN
To the Proposed Post DTV Transition Allotment Parameter Change by
WHAS Louisville, KY
December 13, 2007**

This engineering statement has been prepared for Belo Corp. (“Belo”) in support of its response to the Partial Opposition of Primeland Television, Inc., licensee of WLFI(TV)(DT) (“WLFI”) filed against Belo’s Petition for Reconsideration of the DTV Table, Appendix B (“Appendix B”) facilities specified for WHAS(DT), Louisville, Kentucky (“WHAS”).

WHAS is assigned Channel 11 for analog operations and Channel 55 for digital operations. Channel 55 is out-of-core; therefore, WHAS elected to revert to Channel 11 for post-transition operations.¹ WHAS intends to operate on Channel 11 post-transition using its current analog omni-directional antenna. However, the parameters specified for WHAS in Appendix B are based upon the current directional pattern of its Channel 55 directional digital facility.² This facility cannot be carried back to the Channel 11 post-transition facility with the use of an omni-directional antenna without a significant loss in service to WHAS’ viewers.

The current allotment specifies operation on Channel 11 at 15.7kW using a directional antenna pattern. In order to use its omni-directional antenna and avoid violating the Commission’s restriction on expanding the coverage area beyond what is currently authorized by the allotted facility, WHAS would have to

¹ FCC File No. BFRECT-20050103AIL.

² In its Form 381 WHAS certified to operate post-transition at maximized facilities as authorized by FCC File No. BLCDDT-20020503AAT. The confusion surrounding the use of this form is discussed in more detail in the Petition for Reconsideration filed by WHAS as well as in its Response.



reduce power to 735 watts. At this power level, there would be a predicted loss in service to 168,806 viewers currently served by WHAS' analog facility; 203,258 viewers currently served by WHAS' Channel 55 digital facility; and 190,381 viewers who would be served by the post-transition Channel 11 digital facility currently specified in Appendix B (or 11.8% of the currently *allotted* service population). In addition, the area inside the predicted service contour would be reduced by 8494.8 square kilometers or 31.2% of the area within the allotted contour.

In order to avoid this significant loss of service to its viewers, WHAS requested in its Petition for Reconsideration that its post-transition allotment parameters be modified to specify use of its current analog omni-directional antenna with an ERP of 6 kW. This power would be sufficient to replicate its current analog Grade B service contour. Maps 1 and 2 attached hereto show the following predicted service contours for WHAS: (1) WHAS' current Channel 11 analog facilities; (2) WHAS' current Channel 55 digital facilities; (3) WHAS' post-transition Channel 11 digital facilities operating at 735 watts with its existing omni-directional antenna; and (4) WHAS' post-transition Channel 11 digital facilities operating at 6 kW with its existing omni-directional antenna.

It is important to note that at 6 kW WHAS is not able to serve the population and area currently served by its maximized Channel 55 DTV facility. In order to fully replicate its current digital operations using its omni-directional antenna, WHAS would need to operate with an ERP of approximately 11.8 kW.



WLFI DTV Channel 11, Lafayette, Indiana filed an opposition to the Appendix B modification requested by WHAS. WLFI argues that the proposal submitted by WHAS would result in substantial interference to its allotted digital facilities which would result in an aggregate service loss.

The proposal submitted by WHAS, however, results in no new interference to WLFI and in fact reduces by 55% the current interference caused by WHAS' analog Channel 11 operations to WLFI's digital Channel 11 facility. Currently, WHAS' analog facility causes interference to 202,808 people within WLFI's digital contour. Operating digitally at 6 kW as proposed in the Petition, WHAS would cause interference to only 91,278 people within WLFI's digital contour..

This engineering analysis was prepared using the same methodology used by the Commission during the channel election process. This methodology defined new interference as "interference beyond that caused by *existing* analog and DTV operations..."³ During the channel election process, the Commission determined that an interference conflict existed when more than 0.1% *new* interference was predicted.⁴

The WHAS proposal does not cause any *new* interference to WLFI and therefore complies with the Commission's interference methodology. In fact, WHAS' proposal causes 55% *less* interference than is caused currently to WLFI. See attached Maps 3 and 4 which show the location of the interference currently

³ Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, MB Docket 03-15, FCC 04-192, released September 7, 2004 (emphasis added).

⁴ Id.



received by WLFI and further show the significant reduction in predicted interference to be caused to WLFI by WHAS' proposed post-transition operation on Channel 11 at 6 kW with its omni-directional analog antenna.

Moreover, the interference experienced by WLFI is on the fringe of its contour and well outside its DMA. See attached Maps 3 and 4. In contrast, if the Appendix B parameters for WHAS are not modified and WHAS reduces power in order to operate using an omni-directional antenna within the current allotment, 73,345 of the DTV viewers and 49,583 of the analog viewers *within* WHAS' DMA are predicted to lose its service. Additionally, if WHAS' request is denied, many of its viewers will be left without any over-the-air ABC network programming when the transition ends. Map 5 attached hereto shows the post-transition digital contours of all ABC-affiliated stations within 150 miles of WHAS. If WHAS must reduce power in order to keep its omni-directional antenna within its current allotment, a significant number of viewers in the western and southeastern portions of WHAS' Grade B contour will lose ABC programming. See Maps 1, 2 and 5.

Based on the above engineering showing the public interest would be best served if the Commission grants the changes to Appendix B proposed by WHAS.

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