

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of: }  
 }  
WWAZ LICENSE, LLC }  
 }  
To Amend the Post-Transition }  
Digital Television Table of Allotment }  
for Station WWAZ-DT, Fond du Lac, WI }

MB Docket No.: \_\_\_\_\_  
RM - 11462

To: The Secretary  
Attn: Chief, Video Division  
Media Bureau

FILED/ACCEPTED  
AUG 22 2008  
Federal Communications Commission  
Office of the Secretary

AMENDMENT TO  
PETITION FOR RULEMAKING

WWAZ License, LLC ("Petitioner"), by and through its attorneys, and pursuant to Section 73.623 of the Commission's rules, 47 C.F.R. § 73.623 (2007), hereby submits this Amendment to the Petition for Rulemaking filed on June 19, 2008, to change the post-transition digital television ("DTV") channel allotment of Station WWAZ-DT, Fond du Lac, Wisconsin (the "Station") to Channel 9, and to make related technical changes to the Station's technical parameters.

As a result of interference caused to Station WAOW-TV, Wausau, Wisconsin by WWAZ's proposed operation on post-transition DTV Channel 9, Petitioner has determined that the Station's post-transition DTV channel allotment could be modified to DTV Channel 5, eliminating any risk of impermissible interference to other authorizations. As set forth in the Engineering Statement, attached hereto as Exhibit One, Petitioner has determined that the requested change in the post-transition DTV allotment to Channel 5 will fully comply with all applicable legal and technical requirements and would serve the public interest.

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Since the proposal will alter the Station's service area, Exhibit G to the Engineering Statement provides a Gain/Loss study in support of the proposed change to DTV Channel 5. As specified therein, the proposed change would create a loss area of 2,891 square kilometers and 186,253 persons. More than 99% of those in the loss area will continue to receive service from five or more post-transition digital television stations. Importantly, as shown in the Engineering Statement, no white or gray areas will be created by the proposed changes.

As specified in Exhibit D to the Engineering Statement, the proposed 35 dBu contour of the Station operating on DTV Channel 5 would serve 3,022,673 persons, whereas the current allotted facility on Channel 44 would only serve 2,167,019 persons. In addition, the target audience of the Station is Hispanic viewers, and the proposed facility would increase the service to Hispanic viewers from 110,430 to 316,179 persons.

This significant gain in the number of viewers resulting from the proposed change conforms with past Commission decisions which granted modifications to television facilities creating similar gain and loss areas. For example, in *KRCA License Corp.*, the FCC considered the target audience of the station that had proposed a change in transmitter site, and determined that the "loss area is well served by numerous other television stations...and...would, in the aggregate, provide substantial service gains to Spanish...language viewers."<sup>1</sup> Moreover, in *KNTV License, Inc.*, the Commission granted the modification of an NBC affiliate which created a loss of service to 1,138,729 persons, of which 99% would continue to receive service to at least five other television stations.<sup>2</sup>

In both of these cases, the Commission considered the substantial gain in the level of service, coupled with the remedial attributes of the engineering proposals. In the instant request,

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<sup>1</sup> *KRCA License Corp.*, Memorandum Opinion and Order, 15 FCC Rcd 1794, 1802 (1999).

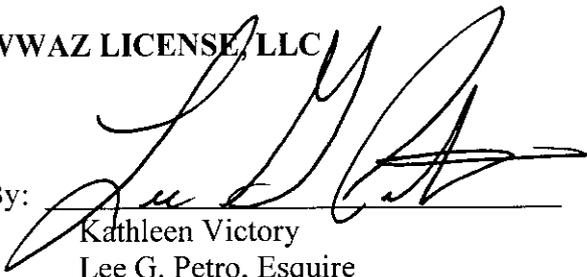
<sup>2</sup> *Letter to KNTV License Inc.*, 19 FCC Rcd 15,479, 15,481 (2004).

the proposed changed to the Station will increase the level of Spanish-language service by more than 200,000 persons, and will eliminate the adjacent-channel restrictions imposed on the Station with respect to Station WWRS, Mayville, Wisconsin. Further, the proposed modification would not create white or gray areas of television service, and 99% of the loss area will receive post-transition digital television service from at least five stations.

Therefore, Petitioner respectfully requests that the post-transition DTV Table of Allotments be amended for WWAZ-DT to specify Channel 5 and the technical parameters provided in the Engineering Statement. The requested changes comply with all applicable legal and technical requirements and would serve the public interest.

Respectfully submitted,

**WWAZ LICENSE, LLC**

By: 

Kathleen Victory

Lee G. Petro, Esquire

**FLETCHER, HEALD & HILDRETH, PLC**

1300 North 17<sup>th</sup> Street, 11<sup>th</sup> Floor

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Its Attorney

August 22, 2008

**EXHIBIT ONE**

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of WWAZ LICENSE, LLC, licensee of WWAZ-DT on Channel 44 in Fond du Lac, Wisconsin, in support of its Petition for Rulemaking to substitute Channel 5 for Channel 44 in the Commission's Digital Television Table of Allotments for post-transition operation.

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 5 and relocate the antenna to the tower which supports 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. Attached is a map on which the licensed Channel 44 and proposed Channel 5 service contours of WWAZ-DT are shown. Hispanic population within the two contours, included in that exhibit, reveals that the proposed Channel 5 facility will provide service to almost three times the Hispanic population as that of the authorized Channel 44 facility.

Attached is the engineering portion of an FCC application for the proposed operation on Channel 5. In it, the operating parameters of the station are provided. As shown in the engineering report, operation on the new channel with the specified parameters will result in a facility that places the requisite city-grade contour over the city

of license, meets the FCC's interference requirements to all post-transition DTV facilities (and Class A LPTV stations), and satisfies the Commission's human exposure guidelines to nonionizing electromagnetic radiation.

Accordingly, it is respectfully requested that the Commission substitute the allotment channel for WWAZ-DT (with the specified operating parameters) in the digital television allotment table in Section 73.622(i) of the FCC Rules as follows:

Present Allotment

Fond du Lac, WI 44

Proposed Allotment

Fond du Lac, WI 5

I declare, under penalty of perjury, that the foregoing statements and attached engineering report, which was prepared by me, is true and correct to the best of my knowledge and belief.

KEVIN T. FISHER

August 20, 2008

**HISPANIC POPULATION**  
**CH. 44 (AUTHORIZED) : 110,430**  
**CH. 5 (PROPOSED) : 316,179**

**SMITH and FISHER**

**CH. 5 (28 DBU)**

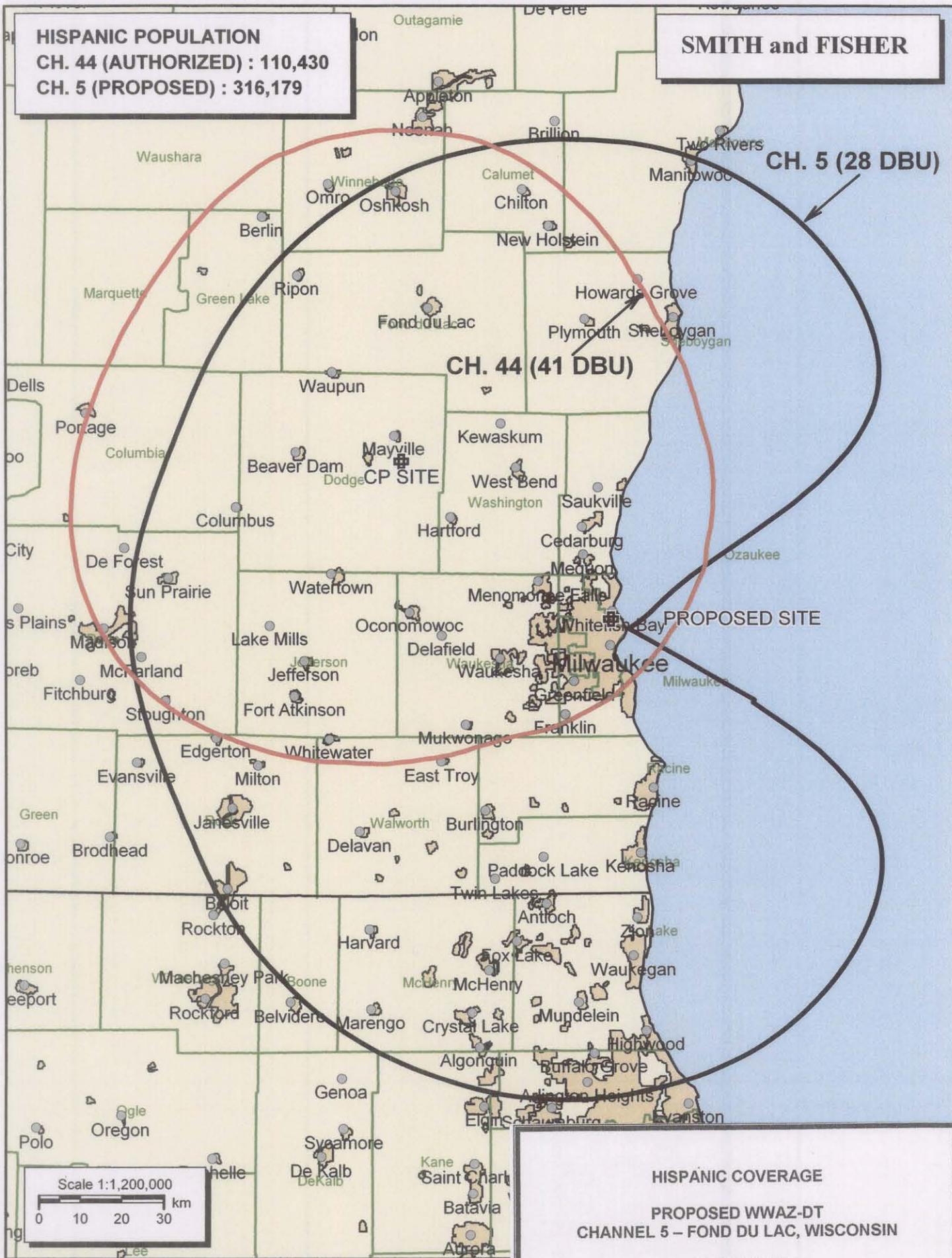
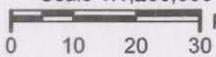
**CH. 44 (41 DBU)**

**PROPOSED SITE**

**HISPANIC COVERAGE**  
**PROPOSED WWAZ-DT**  
**CHANNEL 5 – FOND DU LAC, WISCONSIN**

SMITH AND FISHER

Scale 1:1,200,000



**Section III - D - DTV Engineering**

**Complete Questions 1-5 and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.**

**Pre-Transition Certification Checklist:** An application concerning a pre-transition channel must complete questions 1(a)-(c), and 2-5. A correct answer of "Yes" to all of the questions will ensure an expeditious grant of a construction permit application to modify pre-transition facilities. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.

**Post-Transition Expedited Processing.** An application concerning a post-transition channel must complete questions 1(a), (d)-(e), and 2-5. A station applying for a construction permit to build its post-transition channel will receive expedited processing if its application (1) does not seek to expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B"); (2) specifies facilities that match or closely approximate those defined in the new DTV Table Appendix B facilities; and (3) is filed on or before March 17, 2008 (45 days of the Report and Order in the Third DTV Periodic Review proceeding, MB Docket No. 07-91).

1. The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:
  - (a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622.  Yes  No
  - (b) It will operate a pre-transition facility from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this station as established in 47 C.F.R. Section 73.622.  Yes  No
  - (c) It will operate a pre-transition facility with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622.  Yes  No
  - (d) It will operate at post-transition facilities that do not expand the noise-limited service contour in any direction beyond that established by Appendix B of the Seventh Report and Order in MB Docket No. 87-268 establishing the new DTV Table of Allotments in 47 C.F.R. § 73.622(i) ("new DTV Table Appendix B").  Yes  No  
 N/A
  - (e) It will operate at post-transition facilities that match or reduce by no more than five percent with respect to predicted population from those defined in the DTV Table Appendix B.  Yes  No  
 N/A
2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307.  Yes  No

Applicant must **submit the Exhibit** called for in Item 13.

3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community.  Yes  No
4. The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable.  Yes  No
5. The antenna structure to be used by this facility has been registered by the Commission and will not require reregistration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7.  Yes  No

**Section III - D DTV Engineering**

**TECHNICAL SPECIFICATIONS** Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

**TECH BOX**

1. Channel Number: DTV 5 Analog TV, if any 68

2. Zone:  I  II  III

3. Antenna Location Coordinates: (NAD 27)  
43° 05' 46"  N  S Latitude  
87° 54' 15"  E  W Longitude

4. Antenna Structure Registration Number: 1057482  
 Not applicable  FAA Notification Filed with FAA

5. Antenna Location Site Elevation Above Mean Sea Level: 191.4 meters

6. Overall Tower Height Above Ground Level: 369.7 meters

7. Height of Radiation Center Above Ground Level: 362 meters

8. Height of Radiation Center Above Average Terrain: 354 meters

9. Maximum Effective Radiated Power (average power): 25 kW

10. Antenna Specifications:

|              |              |
|--------------|--------------|
| Manufacturer | Model        |
| Dielectric   | THB-C2-4/8-1 |

a.  Electrical Beam Tilt: \_\_\_\_\_ degrees  Not Applicable

c. Mechanical Beam Tilt: \_\_\_\_\_ degrees toward azimuth \_\_\_\_\_ degrees True  Not Applicable

Attach as an Exhibit all data specified in 47 C.F.R. Section 73.685(c). Exhibit No.   --  

d. Polarization:  Horizontal  Circular  Elliptical

**TECH BOX**

e. Directional Antenna Relative Field Values:  Not applicable (Nondirectional)  
 Rotation: \_\_\_\_\_ °  No rotation

| Degree              | Value | Degree | Value | Degree | Value | Degree | Value | Degree | Value | Degree | Value |
|---------------------|-------|--------|-------|--------|-------|--------|-------|--------|-------|--------|-------|
| 0                   | 0.844 | 60     | 0.001 | 120    | 0.001 | 180    | 0.844 | 240    | 0.844 | 300    | 0.844 |
| 10                  | 0.730 | 70     | 0.001 | 130    | 0.127 | 190    | 0.929 | 250    | 0.805 | 310    | 0.929 |
| 20                  | 0.594 | 80     | 0.001 | 140    | 0.282 | 200    | 0.982 | 260    | 0.851 | 320    | 0.982 |
| 30                  | 0.441 | 90     | 0.001 | 150    | 0.441 | 210    | 1.000 | 270    | 0.883 | 330    | 1.000 |
| 40                  | 0.282 | 100    | 0.001 | 160    | 0.594 | 220    | 0.982 | 280    | 0.851 | 340    | 0.982 |
| 50                  | 0.127 | 110    | 0.001 | 170    | 0.730 | 230    | 0.929 | 290    | 0.805 | 350    | 0.929 |
| Additional Azimuths |       |        |       |        |       |        |       |        |       |        |       |

If a directional antenna is proposed, the requirements of 47 C.F.R. Section 73.625(c) must be satisfied. **Exhibit required.**

Exhibit No.  
B

11. Does the proposed facility satisfy the pre-transition interference protection provisions of 47 C.F.R. Section 73.623(a)? (Applicable only if **Certification Checklist** Items 1(a), (b), or (c) are answered "No.") and/or the post-transition interference protection provisions of 47 C.F.R. Section 73.616?  Yes  No

If "No," attach as an Exhibit justification therefor, including a summary of any related previously granted waivers.

Exhibit No.  
E

12. If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefor. (Applicable only if **Certification Checklist** Item 3 is answered "No.")

Exhibit No.  
D

13. **Environmental Protection Act. Submit in an Exhibit** the following:

Exhibit No.  
F

- a. If **Certification Checklist** Item 2 is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.

By checking "Yes" to **Certification Checklist** Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radio frequency electromagnetic exposure in excess of FCC guidelines.

If **Certification Checklist** Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R. Section 1.1311.

**PREPARER'S CERTIFICATION IN SECTION III MUST BE COMPLETED AND SIGNED.**

13. **Petition for Rulemaking/Counterproposal to Add New FM Channel to FM Table of Allotments.** If the application is being submitted concurrently with a Petition for Rulemaking or Counterproposal to Amend the FM Table of Allotments (47 C.F.R. Section 73.202) to add a new FM channel allotment, petitioner/counter-proponent certifies that, if the FM channel allotment requested is allotted, petitioner/counter-proponent will apply to participate in the auction of the channel allotment requested and specified in this application.

Yes  No  N/A

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

|   |  |
|---|--|
| Typed or Printed Name of Person Signing | Typed or Printed Title of Person Signing |
| Signature                               | Date                                     |

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

### SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

|  |   |          |
|--|---|----------|
| Name   | Relationship to Applicant (e.g., Consulting Engineer) |          |
| KEVIN T. FISHER                                      | Broadcast Consultant                                  |          |
| Signature  | Date  |          |
|  | August 20, 2008                                       |          |
| Mailing Address                                      |   |          |
| SMITH and FISHER, 2237 Tackett's Mill Drive, Suite A |   |          |
| City   | State or Country (if foreign address)                 | ZIP Code |
| Lake Ridge   | Virginia  | 22192    |
| Telephone Number (include area code)                 | E-Mail Address (if available)                         |          |
| (703) 494-2101                                       | Kevin@smithandfisher.com                              |          |

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of WWAZ LICENSE, LLC, licensee of WWAZ-DT in Fond du Lac, Wisconsin, in support of its Application for Construction Permit to operate with a maximized post-transition DTV facility on Channel 5. This application is being filed with the parameters specified in the station's Petition for Rulemaking.

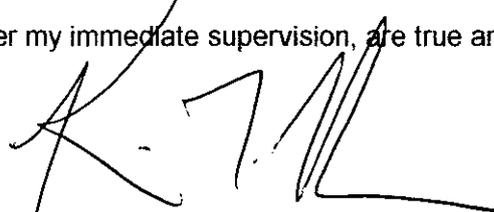
It is proposed to mount a standard Dielectric directional antenna at the 362-meter level of an existing 370-meter tower in the Milwaukee antenna farm. Exhibit B provides elevation and azimuth pattern data for the proposed antenna. Proposed operating parameters are provided in Exhibit C. Exhibit D is a map upon which the predicted service contours are plotted. As shown, the city of license is completely contained within the proposed 35 dBu service contour. An interference study is included in Exhibit E, and it is important to note that the study utilized a cell size of 2.0 kilometers and an increment spacing of 1.0 kilometer. A power density calculation is provided in Exhibit F. An analysis of the loss area created by the change in allotment facilities appears in Exhibit G.

While the proposed effective radiated power of 25 kw exceeds that allowable in Section 73.622(f)(6)(ii) of the Commission's Rules, the coverage of the facility proposed herein does not exceed that of the largest station in the market (WMVS-DT, Channel 8 in Milwaukee, Wisconsin), as allowed in Section 73.622(f)(5) of the Rules. The area within the allotted WMVS-DT 35 dBu service contour is 31,805 square kilometers, whereas the area within the proposed WWAZ-DT 28 dBu service contour is only 31,796 square kilometers.

It is not expected that the proposed facility would cause objectionable interference to any other broadcast or non-broadcast station authorized to operate at or near the new WWAZ-DT site. However, if such should occur, the owner of this station recognizes its obligation to take whatever corrective actions are necessary.

Since no change in overall height or location of the existing tower is proposed herein, the FAA has not been notified of this application. 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.



KEVIN T. FISHER

August 18, 2008

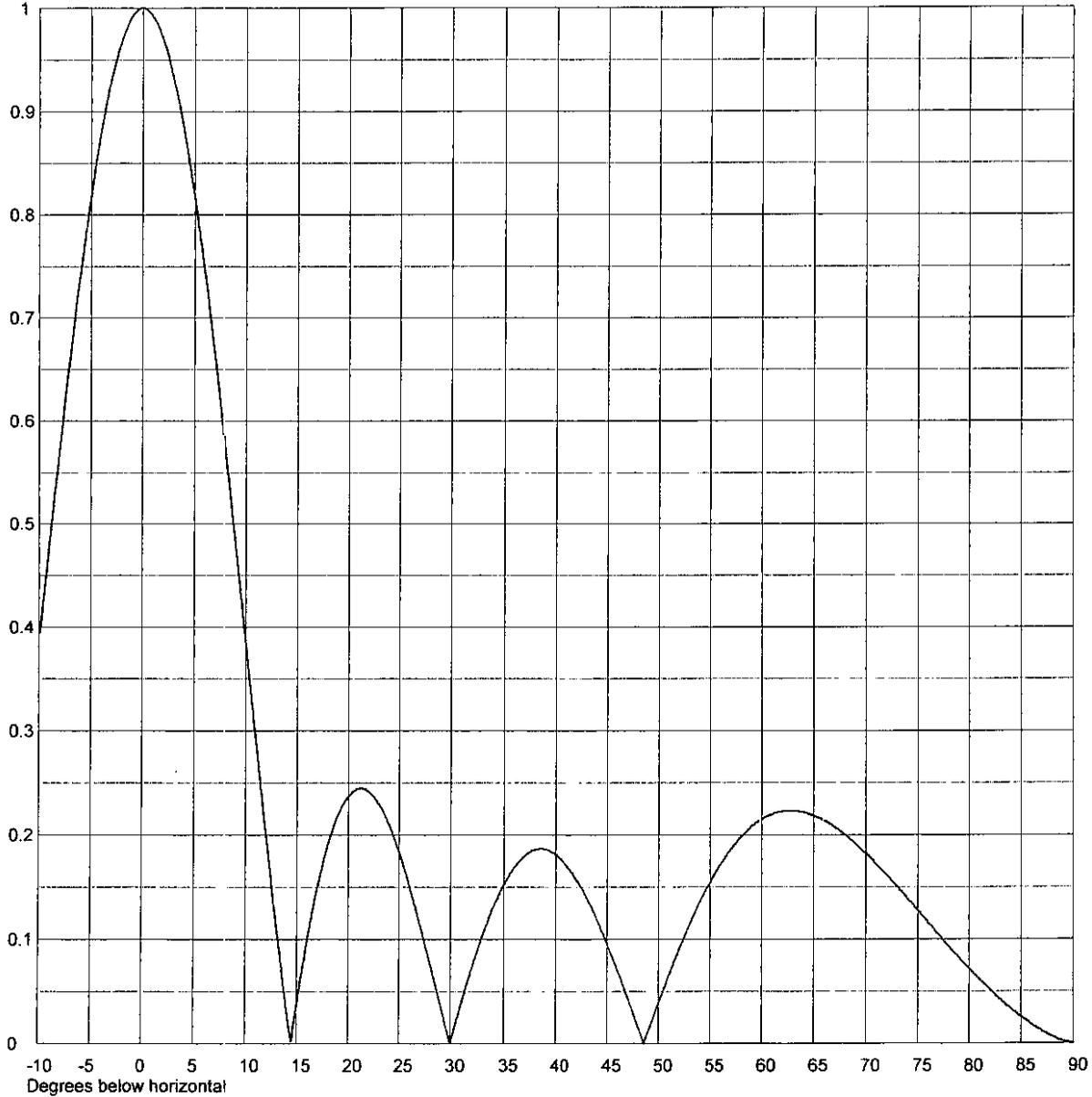


Exhibit No.

Date **14 Aug 2008**  
Call Letters **Channel 5**  
Location  
Customer  
Antenna Type **THB-C2-4/8-1**

**ELEVATION PATTERN**

|                        |                      |           |                     |
|------------------------|----------------------|-----------|---------------------|
| RMS Gain at Main Lobe  | <b>4.2 (6.23 dB)</b> | Beam Tilt | <b>0.00 Degrees</b> |
| RMS Gain at Horizontal | <b>4.2 (6.23 dB)</b> | Frequency | <b>79.00 MHz</b>    |
| Calculated / Measured  | <b>Calculated</b>    | Drawing # | <b>04H042000-90</b> |



Remarks:

**EXHIBIT B-1**  
**ANTENNA ELEVATION PATTERN**  
**PROPOSED WWAZ-DT**  
**CHANNEL 5 -- FOND DU LAC, WISCONSIN**  
**SMITH AND FISHER**



Exhibit No.

Date **14 Aug 2008**  
Call Letters  
Location  
Customer  
Antenna Type **THB-C2-4/8-1**

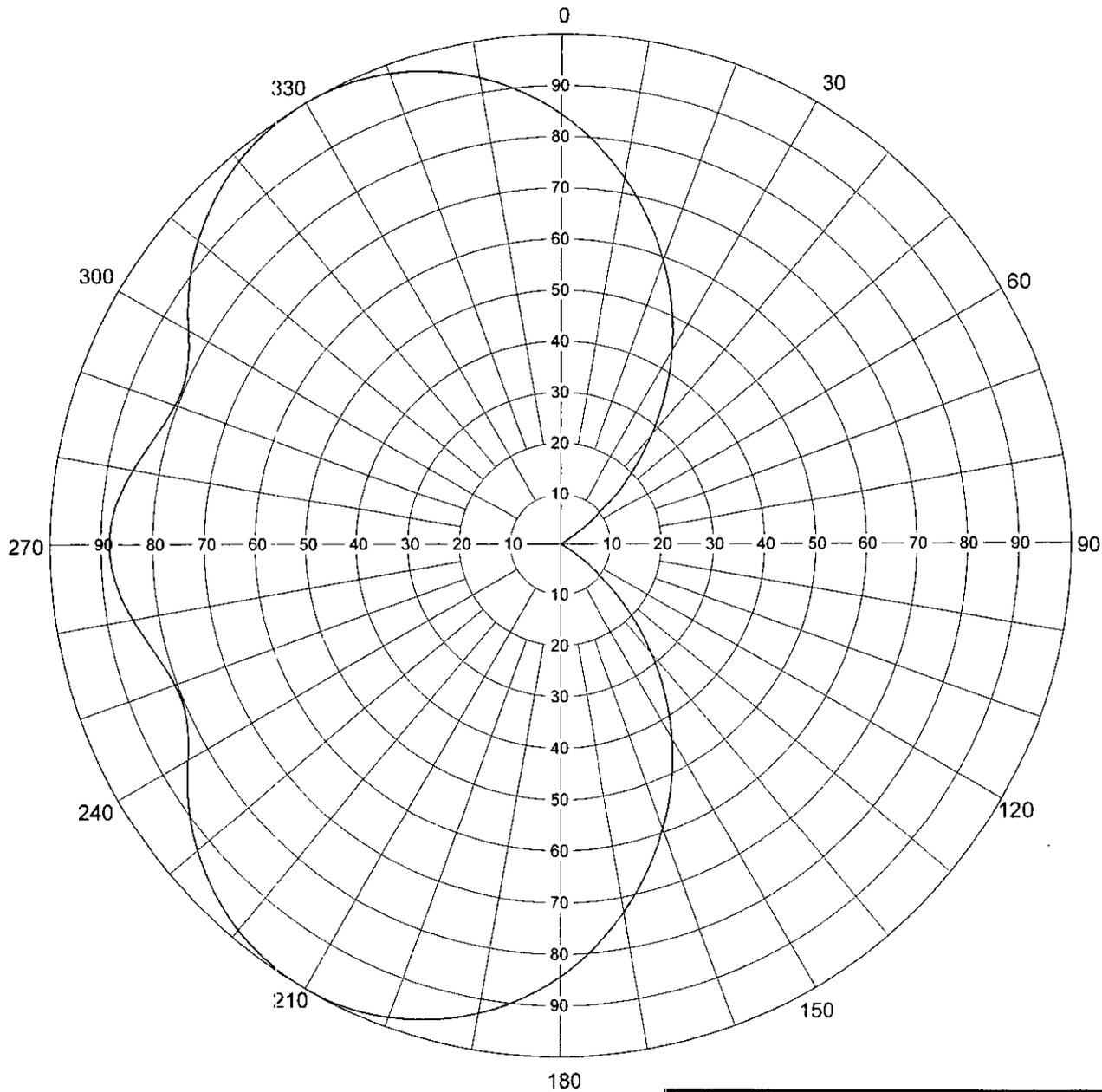
Channel **5**

**AZIMUTH PATTERN**

Gain  
Calculated / Measured

**2.00 (3.01 dB)**  
**Calculated**

Frequency **79 MHz**  
Drawing # **THB-C2**



Remarks:

**EXHIBIT B-2**  
**ANTENNA AZIMUTH PATTERN**  
**PROPOSED WVAZ-DT**  
**CHANNEL 5 – FOND DU LAC, WISCONSIN**  
**SMITH AND FISHER**



Exhibit No.

Date **14 Aug 2008**  
 Call Letters Channel **5**  
 Location  
 Customer  
 Antenna Type **THB-C2-4/8-1**

**TABULATION OF AZIMUTH PATTERN**

Azimuth Pattern Drawing # **THB-C2**

| Angle | Field | ERP (kW) | ERP (dBk) |
|-------|-------|----------|-----------|
| 0     | 0.844 | 17.8     | 12.51     |
| 10    | 0.730 | 13.3     | 11.25     |
| 20    | 0.594 | 8.8      | 9.46      |
| 30    | 0.441 | 4.9      | 6.87      |
| 40    | 0.282 | 2.0      | 2.98      |
| 50    | 0.127 | 0.4      | -3.94     |
| 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   | 0.127 | 0.4      | -3.94     |
| 140   | 0.282 | 2.0      | 2.98      |
| 150   | 0.441 | 4.9      | 6.87      |
| 160   | 0.594 | 8.8      | 9.46      |
| 170   | 0.730 | 13.3     | 11.25     |
| 180   | 0.844 | 17.8     | 12.51     |
| 190   | 0.929 | 21.6     | 13.34     |
| 200   | 0.982 | 24.1     | 13.82     |
| 210   | 1.000 | 25.0     | 13.98     |
| 220   | 0.982 | 24.1     | 13.82     |
| 230   | 0.929 | 21.6     | 13.34     |
| 240   | 0.844 | 17.8     | 12.51     |
| 250   | 0.805 | 16.2     | 12.10     |
| 260   | 0.851 | 18.1     | 12.58     |
| 270   | 0.883 | 19.5     | 12.90     |
| 280   | 0.851 | 18.1     | 12.58     |
| 290   | 0.805 | 16.2     | 12.10     |
| 300   | 0.844 | 17.8     | 12.51     |
| 310   | 0.929 | 21.6     | 13.34     |
| 320   | 0.982 | 24.1     | 13.82     |
| 330   | 1.000 | 25.0     | 13.98     |
| 340   | 0.982 | 24.1     | 13.82     |
| 350   | 0.929 | 21.6     | 13.34     |

**Maxima**

| Angle | Field | ERP (kW) | ERP (dBk) |
|-------|-------|----------|-----------|
| 0     | 0.844 | 17.8     | 12.51     |
| 210   | 1.000 | 25.0     | 13.98     |
| 270   | 0.883 | 19.5     | 12.90     |
| 330   | 1.000 | 25.0     | 13.98     |

**Minima**

| Angle | Field | ERP (kW) | ERP (dBk) |
|-------|-------|----------|-----------|
| 90    | 0.000 | 0.0      | 0.00      |
| 248   | 0.803 | 16.1     | 12.07     |
| 292   | 0.803 | 16.1     | 12.07     |

Remarks:

**EXHIBIT B-3**  
**ANTENNA RELATIVE FIELD VALUES**  
**PROPOSED WWAZ-DT**  
**CHANNEL 5 – FOND DU LAC, WISCONSIN**  
 SMITH AND FISHER

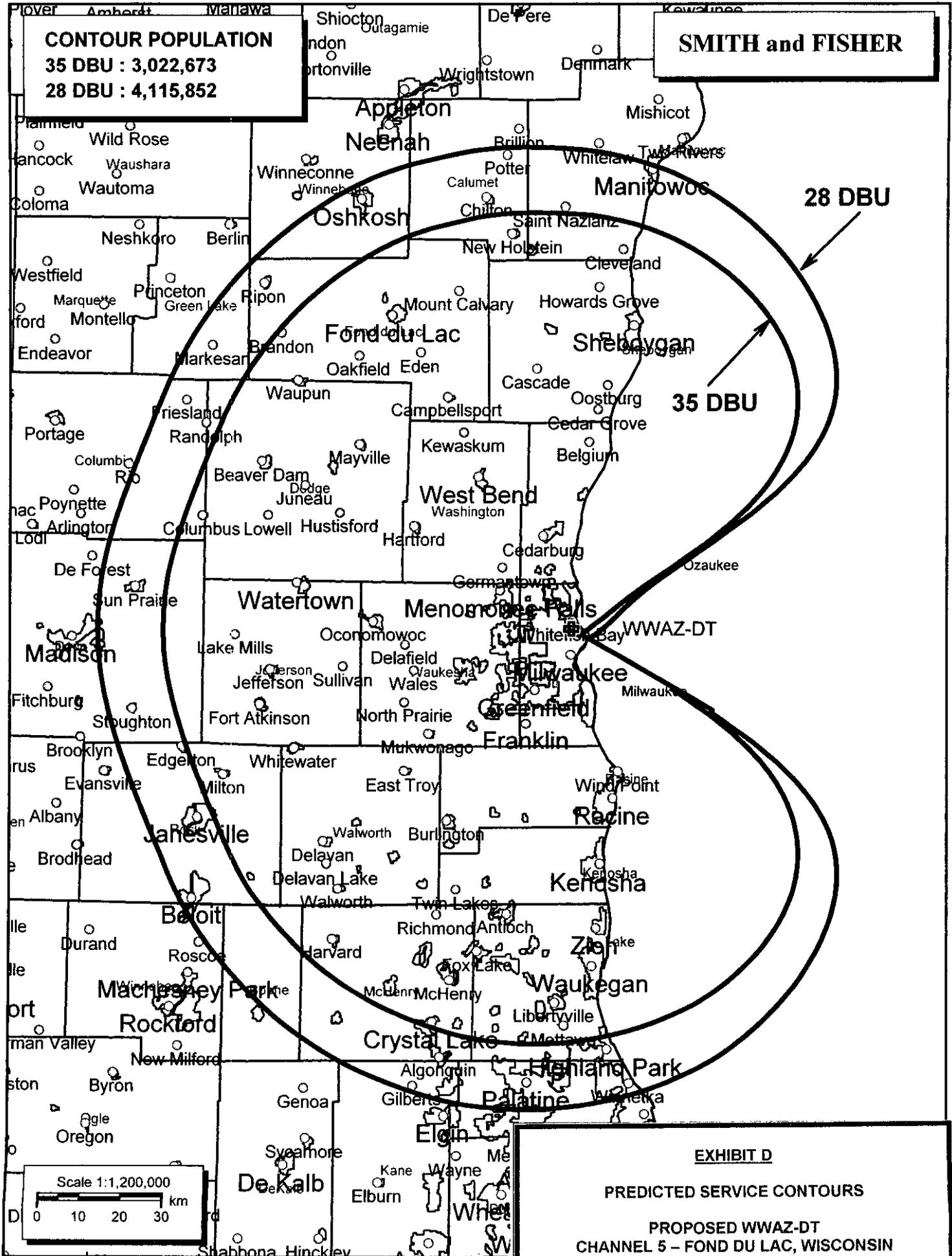
PROPOSED OPERATING PARAMETERS

PROPOSED WWAZ-DT  
CHANNEL 5 – FOND DU LAC, WISCONSIN

|  |                         |
|--|-------------------------|
| Transmitter Power Output:              | 3.5 kw                  |
| Transmission Line Efficiency:          | 85.0%                   |
| Antenna Power Gain – Main Lobe:        | 8.4                     |
| Effective Radiated Power – Main Lobe:  | 25.0 kw                 |
| Transmitter Make and Model:            | Type-accepted           |
| Transmission Line Make and Model:      | Dielectric EIA          |
| Size and Type:                         | 4-1/16" rigid           |
| Length:                                | 1200 feet*              |
| Antenna:                               |                         |
| Make and Model:                        | Dielectric THB-C2-4/8-1 |
| Orientation:                           | 270 degrees true        |
| Beam Tilt:                             | none                    |
| Radiation Center Above Ground:         | 362 meters              |
| Radiation Center Above Mean Sea Level: | 554 meters              |

**SMITH and FISHER**

**CONTOUR POPULATION**  
**35 DBU : 3,022,673**  
**28 DBU : 4,115,852**



**EXHIBIT D**  
**PREDICTED SERVICE CONTOURS**  
**PROPOSED WWAZ-DT**  
**CHANNEL 5 - FOND DU LAC, WISCONSIN**  
**SMITH AND FISHER**

INTERFERENCE STUDY  
PROPOSED WWAZ-DT  
CHANNEL 5 – FOND DU LAC, WISCONSIN

The instant proposal specifies an ERP of 25 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.

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 2.0 kilometers and an increment spacing of 1.0 kilometer along each radial. In addition, we utilized the 2000 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 digital television facility.

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-2INTERFERENCE STUDY SUMMARY  
PROPOSED WWAZ-DT  
CHANNEL 5 – FOND DU LAC, WISCONSIN

| <u>Call Sign</u>       | <u>City, State</u> | <u>CH.</u> | <u>Coverage<br/>Population</u> | <u>Interference<br/>Population<br/>From<br/>WWAZ-DT</u> | <u>%</u> |
|------------------------|--------------------|------------|--------------------------------|---|----------|
| WGVK-DT<br>(Allotment) | Kalamazoo, MI      | 5          | 2,248,395                      | 3,291   | 0.1      |
| WGVK-DT<br>(Lic.)      | Kalamazoo, MI      | 5          | 2,348,771                      | 3,291   | 0.1      |

POWER DENSITY CALCULATION

PROPOSED WWAZ-DT  
CHANNEL 5 – 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 25 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  $0.00026 \text{ mw/cm}^2$  is calculated to occur 183 meters west of the base of the tower. Since this is only 0.1 percent of the  $0.2 \text{ mw/cm}^2$  reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 5 (76-82 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.

LOSS AREA ANALYSIS  
PROPOSED WWAZ-DT  
CHANNEL 5 – FOND DU LAC, WISCONSIN

The purpose of this exhibit is to provide area and population figures for the “loss area” created by the proposed Channel 5 service contour when compared with that of the WWAZ-DT Channel 44 allotment facility (described in Appendix B of the FCC’s DTV Table of Allotments). We have analyzed this area with respect to other post-transition digital services that will be available within the Channel 44 loss area.

Exhibit G-2 is a tabulation of post-transition digital television allotments that place a service contour over a portion of the loss area. Exhibit G-3 is a “spaghetti” map upon which the proposed WWAZ-DT Channel 5 28 dBu and allotted Channel 44 41 dBu contours are plotted in relation to the service contours of the stations listed in Exhibit G-2. Exhibit G-4 is an expanded view of the loss area. Larger pockets created by overlapping contours are defined on the map by the number of other services received therein. It can be clearly seen that most of the loss area will receive five or more off-air post-transition digital television stations. In Exhibit G-5, we have highlighted the areas that would receive fewer than five such services. The Commission considers an area to be “underserved” if it lies within the service contours of fewer than five television stations.

We have determined the area and population (based on the 2000 U.S. Census) for each above-referenced pocket and have tabulated the results in Exhibit G-6. It concludes that the vast majority of the loss area (more than 98 percent, based on population) contains five or more existing digital television services available to potential viewers of WWAZ-DT on Channel 44 whose houses are located beyond the proposed Channel 5 service contour.

EXHIBIT G-1

As described in Exhibit G-6, less than 0.2% of the WWAZ-DT loss area population is predicted to have access to fewer than 5 station signals.

It is also important to note that the loss area contains no area or population defined as "white" or "gray", i.e. containing no other or only one other post-transition digital television service contour.

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

KEVIN T. FISHER

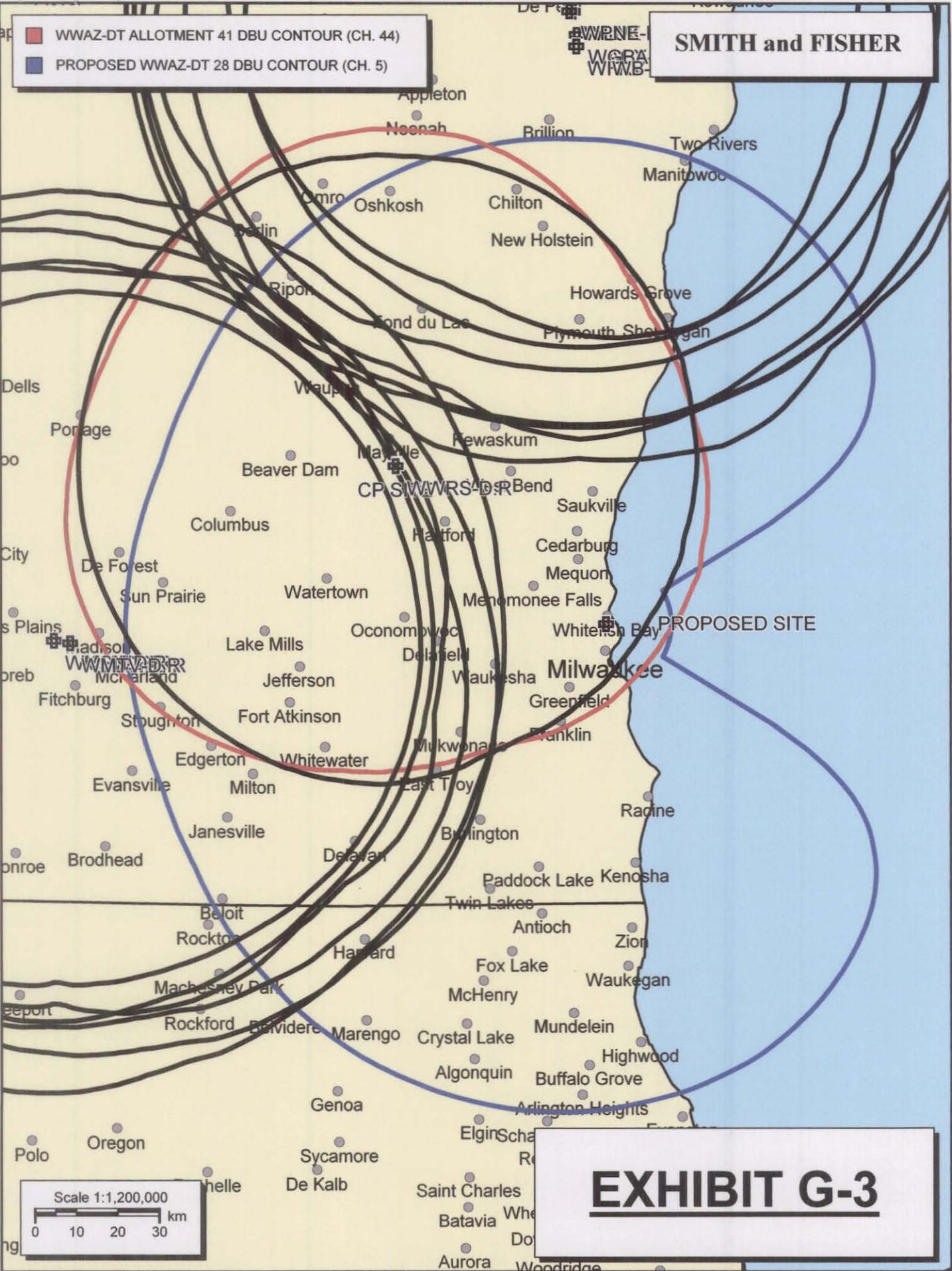
August 21, 2008

OTHER POST-TRANSITION DIGITAL SERVICES  
IN WWAZ-DT LOSS AREAPROPOSED WWAZ-DT  
CHANNEL 5 – FOND DU LAC, WISCONSIN

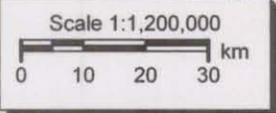
| <u>CALL SIGN</u> | <u>CITY, STATE</u> | <u>CHANNEL</u> |
|------------------|--------------------|----------------|
| WACY-DT          | Appleton, WI       | 27             |
| WBAY-DT          | Green Bay, WI      | 23             |
| WBUW-DT          | Janesville, WI     | 32             |
| WFRV-DT          | Green Bay, WI      | 39             |
| WGBA-DT          | Green Bay, WI      | 41             |
| WHA-DT           | Madison, WI        | 20             |
| WISC-DT          | Madison, WI        | 50             |
| WIWB-DT          | Suring, WI         | 21             |
| WKOW-DT          | Madison, WI        | 26             |
| WLUK-DT          | Green Bay, WI      | 11             |
| WMSN-DT          | Madison, WI        | 11             |
| WMTV-DT          | Madison, WI        | 19             |
| WPNE-DT          | Green Bay, WI      | 42             |
| WWRS-DT          | Mayville, WI       | 43             |

**SMITH and FISHER**

- WWAZ-DT ALLOTMENT 41 DBU CONTOUR (CH. 44)
- PROPOSED WWAZ-DT 28 DBU CONTOUR (CH. 5)

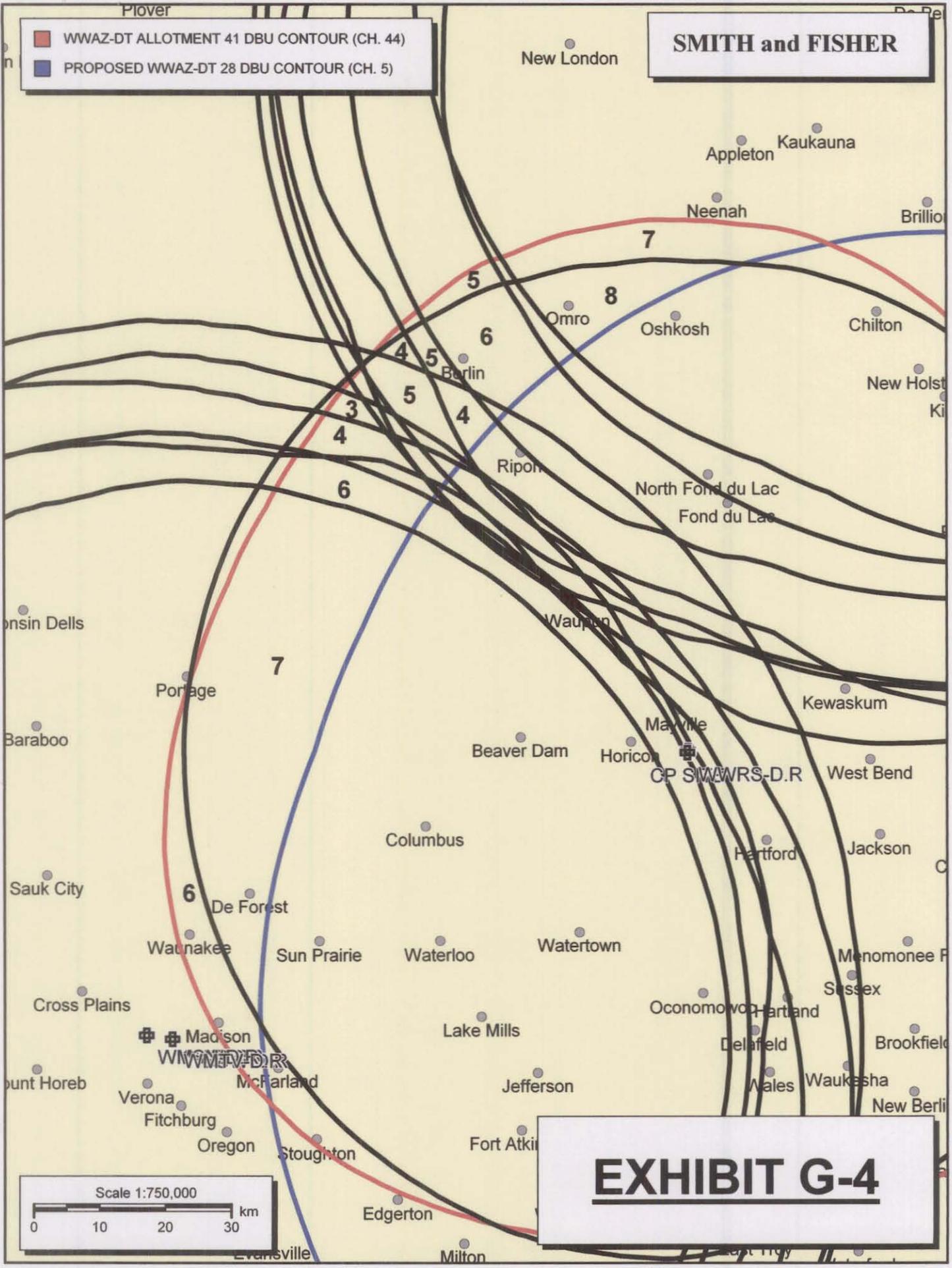


**EXHIBIT G-3**



**SMITH and FISHER**

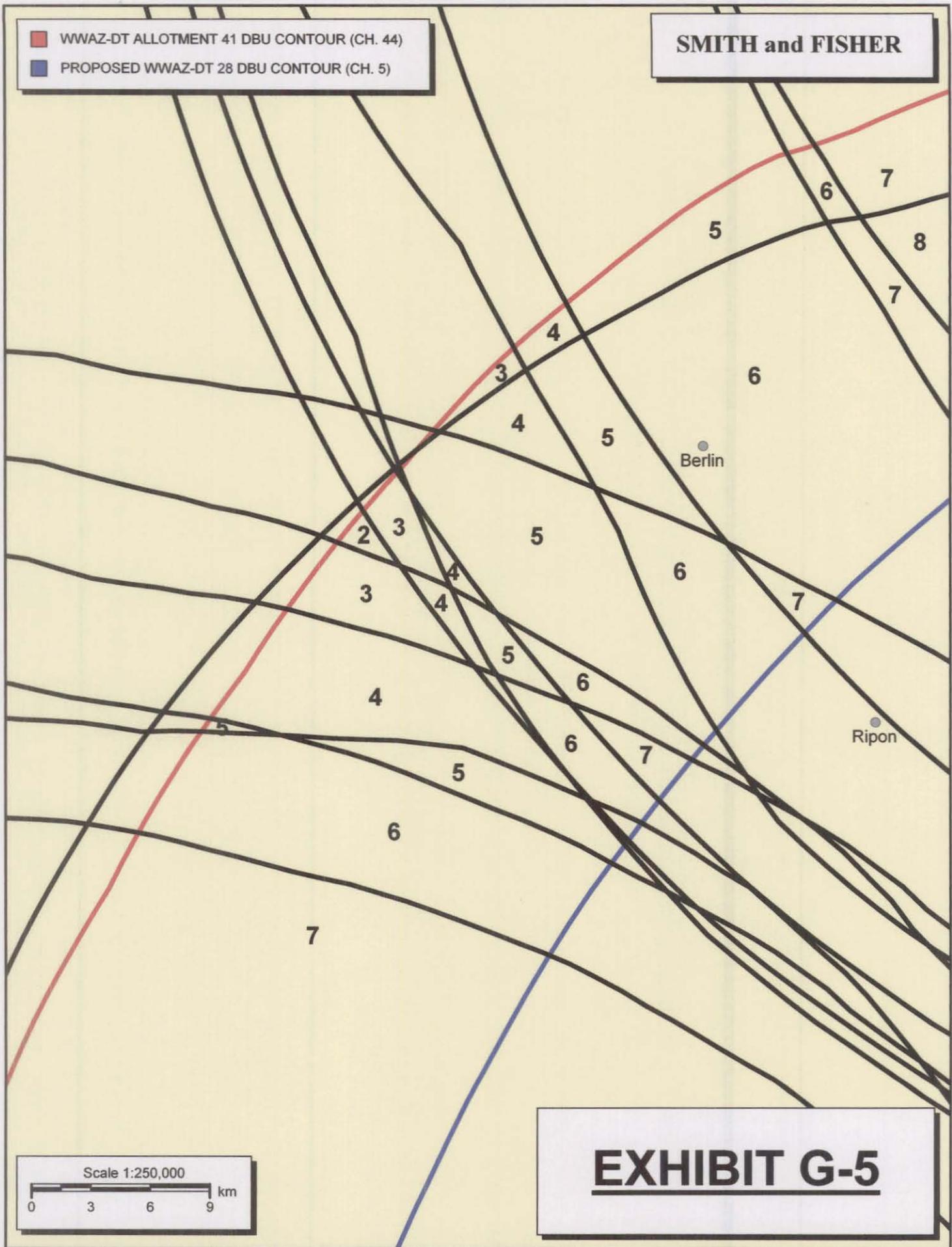
■ WWAZ-DT ALLOTMENT 41 DBU CONTOUR (CH. 44)  
■ PROPOSED WWAZ-DT 28 DBU CONTOUR (CH. 5)



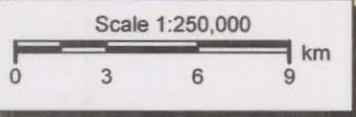
**EXHIBIT G-4**

**SMITH and FISHER**

- WWAZ-DT ALLOTMENT 41 DBU CONTOUR (CH. 44)
- PROPOSED WWAZ-DT 28 DBU CONTOUR (CH. 5)



**EXHIBIT G-5**



AREA AND POPULATION IN LOSS AREA  
 PROPOSED WWAZ-DT  
 CHANNEL 5 – FOND DU LAC, WISCONSIN

| <u>Other Post-Transition DTV<br/>Services in Area</u> | <u>Area (Sq. Km)</u> | <u>Population<br/>(2000 Census)</u> | <u>% of Allotment<br/>Population*</u> |
|---|----------------------|-------------------------------------|---------------------------------------|
| 0   | 0                    | 0                                   | 0                                     |
| 1   | 0                    | 0                                   | 0                                     |
| 2   | 3                    | 34                                  | <0.1                                  |
| 3   | 40                   | 167                                 | <0.1                                  |
| 4   | 108                  | 2,403                               | 0.1                                   |
| 5+  | <u>2,740</u>         | <u>183,649</u>                      | <u>8.5</u>                            |
| TOTAL   | 2,891                | 186,253                             | 8.6                                   |

\*Contour population for WWAZ-DT allotment facility is 2,167,019.