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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Federal Communications Commission
Bureau / Office

Docket No. MB 08-204

In the Matter of	)	
	)	
Amendment of Section 73.622	)	
Of the Commission's Rules	)	
Digital Television Table of Allotments	)	RM No. RM-11492
(Vanderbilt, Michigan)	)	

To: The Chief, Allocations Branch

PETITION FOR RULEMAKING

Cadillac Telecasting Co. ("CTC"), licensee of television station WFUP(TV), Vanderbilt, Michigan, pursuant to the Commission's *Public Notice*, DA 08-1213, released May 30, 2008 *("Commission Lifts the Freeze on the Filing of Maximization Applications and Petitions for Digital Channel Substitutions, Effective Immediately")*, hereby respectfully requests that the Commission modify its Digital Television Table of Allotments, as set forth in Section 73.622 of the Commission's Rules, to designate DTV Channel 45, Vanderbilt, Michigan, as the digital television allotment to be used by WFUP-DT, and to take any other steps necessary to enable WFUP to apply to construct and ultimately operate digital facilities on Channel 45.

In support of this request, we respectfully note that, although designated by the Commission as the permittee of WFUP-DT, channel 59, the current Table of Allotments does not contain any digital channel for WFUP. The unfortunate reason for this is that the prior licensee of the station apparently did not wish to incur the expense of conversion and continued operation and advised the Commission that it would not build Channel 59. Consequently, this was

acknowledged in the *Seventh Report and Order* in MB Docket 88-268, 22 FCC Rcd 15581 (2007) (*"Advanced Television Systems and their Impact Upon the Existing Television Broadcast Service"*), which did not contain a digital allotment for WFUP. *Id.*, at ¶ 117.

In that *Order*, the Commission noted that the former licensee's notification had stated that it did not intend to construct a digital facility, that it would cease analog operations after February 17, 2009, and that it then would surrender its license for WFUP. *Id.*, at ¶¶ 117-118. For the reasons discussed herein, CTC believes that the public interest would be far better served by enabling WFUP to continue its service into the digital era. Unlike the former licensee, CTC has no desire to surrender the WFUP license and is willing to bear the expense and responsibility of constructing and operating a digital facility. Indeed, the incremental cost of running that facility will be contained through economies of operation to be achieved in conjunction with WFQX-TV (and a significant portion of the capital costs will be saved by using WFUP's existing transmitter site). It therefore submits this petition for rulemaking to allot it channel 45 in place of channel 59, pursuant to the plan herein described.

Apparently, the former licensee believed that it could cover the central part of its market by moving its co-owned station WFQX-TV, Cadillac, Michigan (which CTC has now acquired) north-northeast to a site near Kalkaska, Michigan. In fact, that facility is currently licensed pursuant to BLCDT-20070214ACF. However, CTC has determined that service rendered by the single facility of WFQX-TV falls far short of covering essential portions of the sizeable Traverse City-Cadillac market.

To remedy this situation, CTC proposes not only to restore service by WFUP from its

existing analog site, but also to move WFQX-TV back to its original site near Cadillac, its city of license. (A separate petition for rulemaking is being filed concurrently to change WFQX-TV's digital channel assignment, which otherwise would conflict with the use of channel 45 by WFUP.)

Attached hereto are a map (Exhibit A) and an Engineering Statement of Khanna & Guill, Inc. (Exhibit B) that document both the shortfall and the vastly improved market coverage that will result from CTC's proposed solution. As shown therein, the single signal of WFQX-DT falls far short of covering the entire market or replicating the present analog coverage, as it fails to cover the entire southern portion of the market, as well as much of the northern area. In the more significant and telling terms of population, the single existing WFQX-DT signal will reach only 378,000 people, while the combined signals of WFUP (restored, as proposed herein) and WFQX-TV (when moved back to Cadillac) will serve 215,234 and 512,923 people, respectively, for total coverage of 690,198 (after subtracting 37,959 within the relatively small overlap area between the two proposed facilities).

Even without regard to the concurrent move of WFQX-TV back to Cadillac, the Engineering Statement documents that the digital operation of WFUP will preserve service to areas of seven counties to the north and east of the market that would not be served by WFQX-TV from its presently-authorized Kalkaska site. As demonstrated in Exhibit C, this represents a population of 46,597 (when the overlap area of 168,637 with WFQX-TV at Kalkaska is subtracted from the total coverage of 215,234 for WFUP-DT). The Commission has long held that any significant deprivation or degradation of television service is *prima facie* not in the

public interest and can be justified only by countervailing public interest factors sufficient to offset that deprivation or degradation. *See, e.g., Hall v. FCC*, 237 F. 2d 567, 572, (DC Cir, 1956) and *Television Corporation of Michigan v. FCC*, 294 F. 2d 730, 732 (DC Cir 1961). Here, there are no countervailing public interest factors that would offset the demise of WFUP, which will lose service next February unless CTC is provided the means to operate a digital facility, as proposed herein.

The relief requested herein and in the related WFQX-TV petition makes economic, competitive and public policy sense, as it will enable the stations to serve nearly the entire large geographic market of which they are an essential part. As depicted in Exhibit A, the market extends from Mecosta County to the south to Lakes Huron and Michigan to the north. (Actually, the market also comprises three counties north of the Great Lakes, but they are sufficiently isolated as to discourage attempts to provide service from stations located on the Michigan peninsula itself.) Only as a result of the requested relief will CTC be able to serve significant areas of the market that otherwise would be deprived of service. Since WFXQ-TV and WFUP are the only Fox affiliates in the market, that, in turn, will ensure that viewers outside the coverage of WFXQ-TV (as relocated to Kalkasta) will continue to receive the programming of that important network. The attached declaration of Lowell Shore (Exhibit D) raises a further concern – if WFUP terminates service, numerous cable systems will no longer be able to carry that station (and therefore the Fox network), as they depend upon off-air pickup of the signal, which will no longer be possible from WFQX-TV, even when relocated to Kalkaska.

The Engineering Statement confirms that the proposed allotment change is consistent

with the Commission's technical rules. The use of WFQX-TV's analog site and flash-cutting on the same channel currently used for analog broadcasts promise to simplify the impact of the conversion process for consumers. It is further clear that, in effecting the transition, the use of existing transmitting locations is environmentally preferable. *See* Section 1.1306 (Note 1) of the Commission's rules, 47 C.F.R. § 1.1306 (Note 1).

The public interest clearly would be served by adoption of CTC's proposal. The Commission has repeatedly emphasized that the primary goal of the digital transition is to replicate analog service. *See, e.g., Seventh Report and Order, supra* at ¶ 45. That goal will be frustrated by the demise of WFUP in a matter of months.

Wherefore, the premises considered, CTC respectfully requests that the Commission adopt rulemaking that designates DTV Channel 45, Vanderbilt, Michigan, as the digital television allotment to be used by WFUP-DT, and to take any other steps necessary to enable WFUP to apply to construct and ultimately operate its digital facilities on Channel 45.

Respectfully submitted,

CADILLAC TELECASTING CO.

By: _____

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June 20, 2008

Exhibit A

KHANNA & GUILL, Inc. - Consulting Engineers

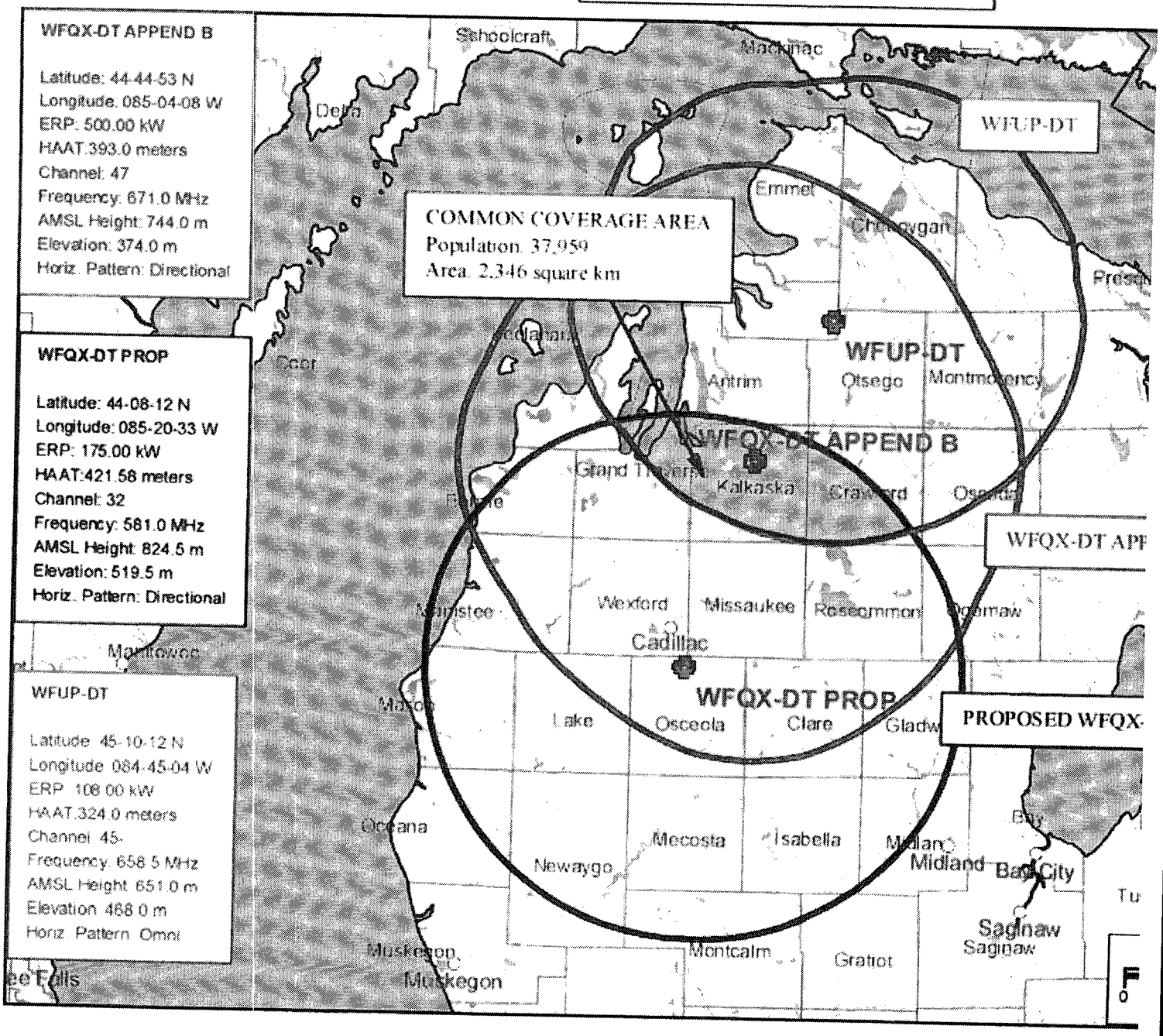

Exhibit B

ENGINEERING STATEMENT
IN SUPPORT OF A PETITION FOR RULEMAKING
TO ALLOT TV CHANNEL 45
FOR THE PROPOSED DIGITAL TV OPERATION OF
WFUP-DT, VANDERBILT, MICHIGAN

JUNE 2008

This engineering statement has been prepared on behalf of Cadillac Telecasting Co., in support of a Rulemaking Petition ("RM") to allot TV Channel 45 (656-662 MHz) for the proposed digital television (DTV) operation of WFUP, Vanderbilt, Michigan.

At present WFUP, Facility ID Number 25395, is authorized to operate its analog TV facilities on Channel 45 with 851 kW effective radiated power (ERP) and 324 meters antenna height above average terrain (HAAT) using a non-directional TV antenna. No TV Channel has been allotted to WFUP for its DTV operation. WFUP is filing a petition for rulemaking to "flash-cut" its analog TV operation to digital TV operation on Channel 45 with 108 kW ERP and 324 meters HAAT from its currently licensed analog TV site.

The following information provides pertinent data for the proposed WFUP-DT operation.

Name of the Licensee:	Cadillac Telecasting Co.			
Station Location:	MI-Vanderbilt			
Channel:	45			
Hours of Operation:	Unlimited			
Transmitter:	Type Accepted			
Antenna Type:	AND, ALP24M3-HSOC-45			
Beam Tilt:	0.75 degrees			
Antenna Coordinates:	North Latitude:	45 deg	10 min	12 sec
	West Longitude:	84 deg	45 min	04 sec
Transmitter output power:	As required to achieve authorized ERP			
Maximum effective radiated power (Average):	108 kW			

	20.33 dBk
Elevation of site above mean sea level:	467.6 meters
Overall height of the tower above ground:	193 meters
Height of radiation center above ground (meters):	183 meters
Height of radiation center above mean sea level (meters):	650.6 meters
Height of radiation center above average terrain (meters):	324 meters
Antenna Structure Registration No.:	1000438

Response to questions listed on the FCC Form 301, Section III-D-DTV Engineering

Question 1. (a)

WFUP currently is not allotted a TV channel for its DTV operation. WFUP is proposing to "flash-cut" its operation to DTV Channel 45 and is filing this Petition for Rule Making to allot DTV Channel 45 in the Table of Allotments, Section 73.622 of the Commission's rules.

Question 1. (d)

An interference study conducted (see attached Table I) according to the FCC OET Bulletin 69 indicates the proposed WFUP-DT operation would not cause any interference to other DTV stations exceeding the Commission's guidelines.

Question 1. (e)

The proposed DTV operation would serve 215,234 people and 20,149 square km area within the noise limited contour.

Question 2.

The attached environmental statement demonstrates that there will not be any significant environmental impact from the proposed DTV operation in accordance with 47 C.F.R. Section 73.1307.

Question 3.

The attached map shows the proposed WFUP-DT 48 dBu contour will encompass the allotted principal community of Vanderbilt, Michigan (see Figure 1).

Question 4.

The proposed WFUP-DT facility complies with Section 73.1030 of the Commission's rules; therefore, notification to radio astronomy installations, radio receiving installations and FCC monitoring stations is not required.

Question 5.

WFUP-DT would be operating from the existing tower which is registered (ASR No. 100438) by the Commission and no changes are proposed to require a change in the registration.

Table I

TW Census data selected 2000
Post Transition Data Base Selected /space/software/cdbs/pt_tvdb.sff

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 06-16-2008 Time: 18:15:18

Record Selected for Analysis

WFUP USERRECORD-01 VANDERBILT MI US
Channel 45 ERP 108. kW HAAT 322. m RCAMSL 00651 m
Latitude 045-10-12 Longitude 0084-45-04
Status APP Zone 2 Border
Last update Cutoff date Docket
Comments
Applicant

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Facility meets maximum height/power limits

Azimuth (Deg)	ERP (kW)	HAAT (m)	41.0 dBu F(50,90) (km)
0.0	108.000	312.8	80.1
45.0	108.000	345.7	83.5
90.0	108.000	335.6	82.5
135.0	108.000	285.5	77.5
180.0	108.000	243.2	74.2
225.0	108.000	276.6	76.7
270.0	108.000	375.8	86.3
315.0	108.000	402.4	88.1

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

Class A Evaluation Complete

SPACING VIOLATION FOUND BETWEEN STATION

WFUP 45 VANDERBILT MI USERRECORD01

and station

SHORT TO: WFUP 45 VANDERBILT MI BLCT 19970626KE
045-10-12 0084-45- 4
Req. separation 244.6 Actual separation 0.0 Short 244.6 km

LANDMOBILE SPACING VIOLATIONS FOUND

NONE

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quiet zone

Proposed facility OK toward Table Mountain

Proposed facility is within the Canadian coordination distance
Distance to border = 115.7km

Proposed facility is beyond the Mexican coordination distance

Proposed station is OK toward AM broadcast stations

****

Start of Interference Analysis

Proposed Station

Channel	Call	City/State	ARN
45	WFUP	VANDERBILT MI	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
45	WDIV-TV	DETROIT MI	323.4	LIC	BLCDT	-19990429KX
45	WDIV-TV	DETROIT MI	323.4	PLN	DTVPLN	-DTVP1617
45	WLLA	KALAMAZOO MI	295.1	LIC	BLCDT	-20070529AEA
45	WLLA	KALAMAZOO MI	295.1	PLN	DTVPLN	-DTVP1618
46	WBSF	BAY CITY MI	201.8	PLN	DTVPLN	-DTVP1648
46	WBSF	BAY CITY MI	201.8	APP	BPCDT	-20080317AHM

%%%

Analysis of Interference to Affected Station 2

Analysis of current record

Channel	Call	City/State	Application Ref. No.	
45	WDIV-TV	DETROIT MI	DTVPLN	-DTVP1617

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.	
44	WZPX	BATTLE CREEK MI	153.8	LIC	BLCDT	-20020510AAG
44	WZPX	BATTLE CREEK MI	153.8	PLN	DTVPLN	-DTVP1580
44	WWJ-TV	DETROIT MI	4.7	APP	BPCDT	-20040803AAX
44	WWJ-TV	DETROIT MI	4.7	PLN	DTVPLN	-DTVP1581
44	WWJ-TV	DETROIT MI	4.7	LIC	BLCDT	-19990720LH
44	WWJ-TV	DETROIT MI	4.7	CP	BPCDT	-20080130AOM
44	WTLW	LIMA OH	207.7	PLN	DTVPLN	-DTVP1591
44	WTLW	LIMA OH	207.7	CP	BPCDT	-20080402AAC
45	WSNS-TV	CHICAGO IL	371.0	LIC	BLCDT	-20010612AIB
45	WSNS-TV	CHICAGO IL	371.0	PLN	DTVPLN	-DTVP1611
45	WXIN	INDIANAPOLIS IN	382.0	LIC	BLCDT	-20031003ABM
45	WXIN	INDIANAPOLIS IN	382.0	PLN	DTVPLN	-DTVP1613
45	WLLA	KALAMAZOO MI	184.8	LIC	BLCDT	-20070529AEA
45	WLLA	KALAMAZOO MI	184.8	PLN	DTVPLN	-DTVP1618
45	WNEO	ALLIANCE OH	258.8	PLN	DTVPLN	-DTVP1626
45	WNEO	ALLIANCE OH	258.7	CP	BPEDT	-20080317AGT
46	WBSF	BAY CITY MI	121.8	PLN	DTVPLN	-DTVP1648
46	WBSF	BAY CITY MI	121.9	APP	BPCDT	-20080317AHM
46	WUPW	TOLEDO OH	94.0	LIC	BLCDT	-20030411AAF
46	WUPW	TOLEDO OH	94.0	PLN	DTVPLN	-DTVP1653
45	WFUP	VANDERBILT MI	323.4	APP	USERRECORD-01	

Proposal causes no interference

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Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application Ref. No.	
45	WLLA	KALAMAZOO MI	BLCDT	-20070529AEA

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.	
44	WZPX	BATTLE CREEK MI	34.6	LIC	BLCDT	-20020510AAG
44	WZPX	BATTLE CREEK MI	34.6	PLN	DTVPLN	-DTVP1580
44	WWJ-TV	DETROIT MI	187.7	APP	BPCDT	-20040803AAX
44	WWJ-TV	DETROIT MI	187.7	PLN	DTVPLN	-DTVP1581
44	WWJ-TV	DETROIT MI	187.7	LIC	BLCDT	-19990720LH
44	WWJ-TV	DETROIT MI	187.7	CP	BPCDT	-20080130AOM
44	WTLW	LIMA OH	226.5	PLN	DTVPLN	-DTVP1591
44	WTLW	LIMA OH	226.5	CP	BPCDT	-20080402AAC
45	WSNS-TV	CHICAGO IL	194.8	LIC	BLCDT	-20010612AIB
45	WSNS-TV	CHICAGO IL	194.8	PLN	DTVPLN	-DTVP1611
45	WXIN	INDIANAPOLIS IN	303.8	LIC	BLCDT	-20031003ABM
45	WXIN	INDIANAPOLIS IN	303.8	PLN	DTVPLN	-DTVP1613
45	WDIV-TV	DETROIT MI	184.8	LIC	BLCDT	-19990429KX
45	WDIV-TV	DETROIT MI	184.8	PLN	DTVPLN	-DTVP1617
45	WNEO	ALLIANCE OH	419.7	PLN	DTVPLN	-DTVP1626
45	WNEO	ALLIANCE OH	419.7	CP	BPEDT	-20080317AGT
46	WBSF	BAY CITY MI	165.5	PLN	DTVPLN	-DTVP1648
46	WBSF	BAY CITY MI	165.5	APP	BPCDT	-20080317AHM
46	WUPW	TOLEDO OH	194.3	LIC	BLCDT	-20030411AAF
46	WUPW	TOLEDO OH	194.3	PLN	DTVPLN	-DTVP1653
46	WDJT-TV	MILWAUKEE WI	210.4	CP MOD	BMPCDT	-20000419ABR
46	WDJT-TV	MILWAUKEE WI	210.4	PLN	DTVPLN	-DTVP1664
45	WFUP	VANDERBILT MI	295.1	APP	USERRECORD-01	

Total scenarios = 8

Result key: 1
Scenario 1 Affected station 3
Before Analysis

Results for: 45A MI KALAMAZOO BLCDT 20070529AEA LIC
HAAT 331.0 m, ATV ERP 440.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1954242	20304.3
not affected by terrain losses	1954175	20300.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	227727	1403.1
lost to ATV IX only	227727	1403.1
lost to all IX	227727	1403.1

Potential Interfering Stations Included in above Scenario 1

44A MI BATTLE CREEK	BLCDT	20020510AAG	LIC
45A IL CHICAGO	BLCDT	20010612AIB	LIC
45A MI DETROIT	BLCDT	19990429KX	LIC

After Analysis

Results for: 45A MI KALAMAZOO BLCDT 20070529AEA LIC
HAAT 331.0 m, ATV ERP 440.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1954242	20304.3
not affected by terrain losses	1954175	20300.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	227727	1403.1
lost to ATV IX only	227727	1403.1
lost to all IX	227727	1403.1

Potential Interfering Stations Included in above Scenario 1

44A MI BATTLE CREEK	BLCDT	20020510AAG	LIC
45A IL CHICAGO	BLCDT	20010612AIB	LIC
45A MI DETROIT	BLCDT	19990429KX	LIC
45A MI VANDERBILT	USERRECORD01		APP

Percent new IX = 0.0000%

Result key: 2
Scenario 2 Affected station 3
Before Analysis

Results for: 45A MI KALAMAZOO BLCDT 20070529AEA LIC
HAAT 331.0 m, ATV ERP 440.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1954242	20304.3
not affected by terrain losses	1954175	20300.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	227727	1403.1
lost to ATV IX only	227727	1403.1
lost to all IX	227727	1403.1

Potential Interfering Stations Included in above Scenario 2

44A MI BATTLE CREEK	BLCDT	20020510AAG	LIC
45A IL CHICAGO	BLCDT	20010612AIB	LIC
45A MI DETROIT	DTVPLN	DTVP1617	PLN

After Analysis

Results for: 45A MI KALAMAZOO BLCDT 20070529AEA LIC
HAAT 331.0 m, ATV ERP 440.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1954242	20304.3
not affected by terrain losses	1954175	20300.3

```
   lost to NTSC IX                          0          0.0
   lost to additional IX by ATV        227727       1403.1
   lost to ATV IX only                 227727       1403.1
   lost to all IX                      227727       1403.1

 Potential Interfering Stations Included in above Scenario     2

44A MI BATTLE CREEK          BLCDT     20020510AAG  LIC
45A IL CHICAGO               BLCDT     20010612AIB  LIC
45A MI DETROIT               DTVPLN    DTVP1617     PLN
45A MI VANDERBILT            USERRECORD01           APP

Percent new IX =     0.0000%

Result key:        3
Scenario        3  Affected station        3
Before Analysis

Results for: 45A MI KALAMAZOO            BLCDT     20070529AEA  LIC
   HAAT  331.0 m, ATV ERP  440.0 kW
                                     POPULATION   AREA (sq km)
   within Noise Limited Contour       1954242      20304.3
   not affected by terrain losses     1954175      20300.3
   lost to NTSC IX                          0          0.0
   lost to additional IX by ATV        227727       1403.1
   lost to ATV IX only                 227727       1403.1
   lost to all IX                      227727       1403.1

 Potential Interfering Stations Included in above Scenario     3

44A MI BATTLE CREEK          BLCDT     20020510AAG  LIC
45A IL CHICAGO               DTVPLN    DTVP1611     PLN
45A MI DETROIT               BLCDT     19990429KX   LIC

After Analysis

Results for: 45A MI KALAMAZOO            BLCDT     20070529AEA  LIC
   HAAT  331.0 m, ATV ERP  440.0 kW
                                     POPULATION   AREA (sq km)
   within Noise Limited Contour       1954242      20304.3
   not affected by terrain losses     1954175      20300.3
   lost to NTSC IX                          0          0.0
   lost to additional IX by ATV        227727       1403.1
   lost to ATV IX only                 227727       1403.1
   lost to all IX                      227727       1403.1

 Potential Interfering Stations Included in above Scenario     3

44A MI BATTLE CREEK          BLCDT     20020510AAG  LIC
45A IL CHICAGO               DTVPLN    DTVP1611     PLN
45A MI DETROIT               BLCDT     19990429KX   LIC
45A MI VANDERBILT            USERRECORD01           APP

Percent new IX =     0.0000%

Result key:        4
Scenario        4  Affected station        3
Before Analysis

Results for: 45A MI KALAMAZOO            BLCDT     20070529AEA  LIC
   HAAT  331.0 m, ATV ERP  440.0 kW
                                     POPULATION   AREA (sq km)
   within Noise Limited Contour       1954242      20304.3
   not affected by terrain losses     1954175      20300.3
   lost to NTSC IX                          0          0.0
   lost to additional IX by ATV        227727       1403.1
   lost to ATV IX only                 227727       1403.1
   lost to all IX                      227727       1403.1

 Potential Interfering Stations Included in above Scenario     4
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44A MI BATTLE CREEK          BLCDT      20020510AAG  LIC
45A IL CHICAGO               DTVPLN     DTVP1611     PLN
45A MI DETROIT               DTVPLN     DTVP1617     PLN

After Analysis

Results for: 45A MI KALAMAZOO            BLCDT      20070529AEA  LIC
   HAAT  331.0 m, ATV ERP  440.0 kW
                                   POPULATION   AREA (sq km)
   within Noise Limited Contour      1954242      20304.3
   not affected by terrain losses    1954175      20300.3
   lost to NTSC IX                         0          0.0
   lost to additional IX by ATV       227727       1403.1
   lost to ATV IX only                227727       1403.1
   lost to all IX                     227727       1403.1

 Potential Interfering Stations Included in above Scenario     4

44A MI BATTLE CREEK          BLCDT      20020510AAG  LIC
45A IL CHICAGO               DTVPLN     DTVP1611     PLN
45A MI DETROIT               DTVPLN     DTVP1617     PLN
45A MI VANDERBILT            USERRECORD01            APP

Percent new IX =     0.0000%

Result key:          5
Scenario         5  Affected station        3
Before Analysis

Results for: 45A MI KALAMAZOO            BLCDT      20070529AEA  LIC
   HAAT  331.0 m, ATV ERP  440.0 kW
                                   POPULATION   AREA (sq km)
   within Noise Limited Contour      1954242      20304.3
   not affected by terrain losses    1954175      20300.3
   lost to NTSC IX                         0          0.0
   lost to additional IX by ATV       227727       1403.1
   lost to ATV IX only                227727       1403.1
   lost to all IX                     227727       1403.1

 Potential Interfering Stations Included in above Scenario     5

44A MI BATTLE CREEK          DTVPLN     DTVP1580     PLN
45A IL CHICAGO               BLCDT      20010612AIB  LIC
45A MI DETROIT               BLCDT      19990429KX   LIC

After Analysis

Results for: 45A MI KALAMAZOO            BLCDT      20070529AEA  LIC
   HAAT  331.0 m, ATV ERP  440.0 kW
                                   POPULATION   AREA (sq km)
   within Noise Limited Contour      1954242      20304.3
   not affected by terrain losses    1954175      20300.3
   lost to NTSC IX                         0          0.0
   lost to additional IX by ATV       227727       1403.1
   lost to ATV IX only                227727       1403.1
   lost to all IX                     227727       1403.1

 Potential Interfering Stations Included in above Scenario     5

44A MI BATTLE CREEK          DTVPLN     DTVP1580     PLN
45A IL CHICAGO               BLCDT      20010612AIB  LIC
45A MI DETROIT               BLCDT      19990429KX   LIC
45A MI VANDERBILT            USERRECORD01            APP

Percent new IX =     0.0000%

Result key:          6
Scenario         6  Affected station        3
Before Analysis

Results for: 45A MI KALAMAZOO            BLCDT      20070529AEA  LIC
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HAAT 331.0 m, ATV ERP 440.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1954242	20304.3
not affected by terrain losses	1954175	20300.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	227727	1403.1
lost to ATV IX only	227727	1403.1
lost to all IX	227727	1403.1

Potential Interfering Stations Included in above Scenario 6

44A MI BATTLE CREEK	DTVPLN	DTVP1580	PLN
45A IL CHICAGO	BLCDT	20010612AIB	LIC
45A MI DETROIT	DTVPLN	DTVP1617	PLN

After Analysis

Results for: 45A MI KALAMAZOO BLCDT 20070529AEA LIC
HAAT 331.0 m, ATV ERP 440.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1954242	20304.3
not affected by terrain losses	1954175	20300.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	227727	1403.1
lost to ATV IX only	227727	1403.1
lost to all IX	227727	1403.1

Potential Interfering Stations Included in above Scenario 6

44A MI BATTLE CREEK	DTVPLN	DTVP1580	PLN
45A IL CHICAGO	BLCDT	20010612AIB	LIC
45A MI DETROIT	DTVPLN	DTVP1617	PLN
45A MI VANDERBILT	USERRECORD01		APP

Percent new IX = 0.0000%

Result key: 7
Scenario 7 Affected station 3
Before Analysis

Results for: 45A MI KALAMAZOO BLCDT 20070529AEA LIC
HAAT 331.0 m, ATV ERP 440.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1954242	20304.3
not affected by terrain losses	1954175	20300.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	227727	1403.1
lost to ATV IX only	227727	1403.1
lost to all IX	227727	1403.1

Potential Interfering Stations Included in above Scenario 7

44A MI BATTLE CREEK	DTVPLN	DTVP1580	PLN
45A IL CHICAGO	DTVPLN	DTVP1611	PLN
45A MI DETROIT	BLCDT	19990429KX	LIC

After Analysis

Results for: 45A MI KALAMAZOO BLCDT 20070529AEA LIC
HAAT 331.0 m, ATV ERP 440.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1954242	20304.3
not affected by terrain losses	1954175	20300.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	227727	1403.1
lost to ATV IX only	227727	1403.1
lost to all IX	227727	1403.1

Potential Interfering Stations Included in above Scenario 7

44A MI BATTLE CREEK DTVPLN DTVP1580 PLN

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45A IL CHICAGO              DTVPLN    DTVP1611     PLN
45A MI DETROIT              BLCDT     19990429KX   LIC
45A MI VANDERBILT           USERRECORD01           APP

Percent new IX =    0.0000%

Result key:         8
Scenario        8  Affected station        3
Before Analysis

Results for: 45A MI KALAMAZOO            BLCDT     20070529AEA  LIC
   HAAT  331.0 m, ATV ERP  440.0 kW
                                   POPULATION   AREA (sq km)
   within Noise Limited Contour     1954242      20304.3
   not affected by terrain losses   1954175      20300.3
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV      227727       1403.1
   lost to ATV IX only               227727       1403.1
   lost to all IX                    227727       1403.1

 Potential Interfering Stations Included in above Scenario     8

44A MI BATTLE CREEK         DTVPLN    DTVP1580     PLN
45A IL CHICAGO              DTVPLN    DTVP1611     PLN
45A MI DETROIT              DTVPLN    DTVP1617     PLN

After Analysis

Results for: 45A MI KALAMAZOO            BLCDT     20070529AEA  LIC
   HAAT  331.0 m, ATV ERP  440.0 kW
                                   POPULATION   AREA (sq km)
   within Noise Limited Contour     1954242      20304.3
   not affected by terrain losses   1954175      20300.3
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV      227727       1403.1
   lost to ATV IX only               227727       1403.1
   lost to all IX                    227727       1403.1

 Potential Interfering Stations Included in above Scenario     8

44A MI BATTLE CREEK         DTVPLN    DTVP1580     PLN
45A IL CHICAGO              DTVPLN    DTVP1611     PLN
45A MI DETROIT              DTVPLN    DTVP1617     PLN
45A MI VANDERBILT           USERRECORD01           APP

Percent new IX =    0.0000%

Worst case new IX    0.0000% Scenario      1

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     Analysis of Interference to Affected Station   4

Analysis of current record
Channel     Call          City/State        Application Ref. No.
   45       WLLA       KALAMAZOO MI            DTVPLN    -DTVP1618

     Stations Potentially Affecting This Station

Chan   Call      City/State          Dist(km) Status  Application Ref. No.
 44    WZPX     BATTLE CREEK MI        34.6   LIC     BLCDT     -20020510AAG
 44    WZPX     BATTLE CREEK MI        34.6   PLN     DTVPLN    -DTVP1580
 44    WWJ-TV   DETROIT MI            187.7   APP     BPCDT     -20040803AAX
 44    WWJ-TV   DETROIT MI            187.7   PLN     DTVPLN    -DTVP1581
 44    WWJ-TV   DETROIT MI            187.7   LIC     BLCDT     -19990720LH
 44    WWJ-TV   DETROIT MI            187.7   CP      BPCDT     -20080130AOM
 44    WTLW     LIMA OH               226.5   PLN     DTVPLN    -DTVP1591
 44    WTLW     LIMA OH               226.5   CP      BPCDT     -20080402AAC
 45    WSNS-TV  CHICAGO IL            194.8   LIC     BLCDT     -20010612AIB
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45	WSNS-TV	CHICAGO IL	194.8	PLN	DTVPLN	-DTVP1611
45	WXIN	INDIANAPOLIS IN	303.8	LIC	BLCDT	-20031003ABM
45	WXIN	INDIANAPOLIS IN	303.8	PLN	DTVPLN	-DTVP1613
45	WDIV-TV	DETROIT MI	184.8	LIC	BLCDT	-19990429KX
45	WDIV-TV	DETROIT MI	184.8	PLN	DTVPLN	-DTVP1617
45	WNEO	ALLIANCE OH	419.7	PLN	DTVPLN	-DTVP1626
45	WNEO	ALLIANCE OH	419.7	CP	BPEDT	-20080317AGT
46	WBSF	BAY CITY MI	165.5	PLN	DTVPLN	-DTVP1648
46	WBSF	BAY CITY MI	165.5	APP	BPCDT	-20080317AHM
46	WUPW	TOLEDO OH	194.3	LIC	BLCDT	-20030411AAF
46	WUPW	TOLEDO OH	194.3	PLN	DTVPLN	-DTVP1653
46	WDJT-TV	MILWAUKEE WI	210.4	CP MOD	BMPCDT	-20000419ABR
46	WDJT-TV	MILWAUKEE WI	210.4	PLN	DTVPLN	-DTVP1664
45	WFUP	VANDERBILT MI	295.1	APP	USERRECORD	-01

Proposal causes no interference

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Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
46	WBSF	BAY CITY MI	DTVPLN	-DTVP1648

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
45	WDIV-TV	DETROIT MI	121.8	LIC	BLCDT	-19990429KX
45	WDIV-TV	DETROIT MI	121.8	PLN	DTVPLN	-DTVP1617
45	WLLA	KALAMAZOO MI	165.5	LIC	BLCDT	-20070529AEA
45	WLLA	KALAMAZOO MI	165.5	PLN	DTVPLN	-DTVP1618
46	WUPW	TOLEDO OH	204.7	LIC	BLCDT	-20030411AAF
46	WUPW	TOLEDO OH	204.7	PLN	DTVPLN	-DTVP1653
46	WDJT-TV	MILWAUKEE WI	332.9	CP MOD	BMPCDT	-20000419ABR
46	WDJT-TV	MILWAUKEE WI	332.9	PLN	DTVPLN	-DTVP1664
47	WFQX-TV	CADILLAC MI	172.0	LIC	BLCDT	-20070214ACF
47	WFQX-TV	CADILLAC MI	172.0	PLN	DTVPLN	-DTVP1679
45	WFUP	VANDERBILT MI	201.8	APP	USERRECORD	-01

Proposed station is beyond the site to
nearest cell evaluation distance

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Analysis of Interference to Affected Station 6

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
46	WBSF	BAY CITY MI	BPCDT	-20080317AHM

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
45	WDIV-TV	DETROIT MI	121.9	LIC	BLCDT	-19990429KX
45	WDIV-TV	DETROIT MI	121.9	PLN	DTVPLN	-DTVP1617
45	WLLA	KALAMAZOO MI	165.5	LIC	BLCDT	-20070529AEA
45	WLLA	KALAMAZOO MI	165.5	PLN	DTVPLN	-DTVP1618
46	WUPW	TOLEDO OH	204.7	LIC	BLCDT	-20030411AAF
46	WUPW	TOLEDO OH	204.7	PLN	DTVPLN	-DTVP1653
46	WDJT-TV	MILWAUKEE WI	332.9	CP MOD	BMPCDT	-20000419ABR
46	WDJT-TV	MILWAUKEE WI	332.9	PLN	DTVPLN	-DTVP1664
47	WFQX-TV	CADILLAC MI	172.0	LIC	BLCDT	-20070214ACF
47	WFQX-TV	CADILLAC MI	172.0	PLN	DTVPLN	-DTVP1679
45	WFUP	VANDERBILT MI	201.8	APP	USERRECORD	-01

Proposed station is beyond the site to
nearest cell evaluation distance

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     Analysis of Interference to Affected Station   7

Analysis of current record
Channel      Call            City/State          Application Ref. No.
   45       WFUP        VANDERBILT MI              USERRECORD-01

     Stations Potentially Affecting This Station

Chan   Call       City/State            Dist(km) Status  Application Ref. No.
 45   WDIV-TV  DETROIT MI                 323.4  LIC    BLCDT      -19990429KX
 45   WDIV-TV  DETROIT MI                 323.4  PLN    DTVPLN     -DTVP1617
 45   WLLA     KALAMAZOO MI               295.1  LIC    BLCDT      -20070529AEA
 45   WLLA     KALAMAZOO MI               295.1  PLN    DTVPLN     -DTVP1618
 46   WBSF     BAY CITY MI                201.8  PLN    DTVPLN     -DTVP1648
 46   WBSF     BAY CITY MI                201.8  APP    BPCDT      -20080317AHM

 Total scenarios =   4


Result key:         9
Scenario        1  Affected station        7
Before Analysis

Results for: 45A MI VANDERBILT           USERRECORD01           APP
   HAAT  322.0 m, ATV ERP  108.0 kW
                                     POPULATION   AREA (sq km)
   within Noise Limited Contour        215902       20297.1
   not affected by terrain losses      215394       20164.5
   lost to NTSC IX                          0           0.0
   lost to additional IX by ATV           281          20.1
   lost to ATV IX only                    281          20.1
   lost to all IX                         281          20.1

 Potential Interfering Stations Included in above Scenario     1

45A MI DETROIT               BLCDT     19990429KX   LIC
45A MI KALAMAZOO             BLCDT     20070529AEA  LIC

Result key:        10
Scenario        2  Affected station        7
Before Analysis

Results for: 45A MI VANDERBILT           USERRECORD01           APP
   HAAT  322.0 m, ATV ERP  108.0 kW
                                     POPULATION   AREA (sq km)
   within Noise Limited Contour        215902       20297.1
   not affected by terrain losses      215394       20164.5
   lost to NTSC IX                          0           0.0
   lost to additional IX by ATV           160          16.1
   lost to ATV IX only                    160          16.1
   lost to all IX                         160          16.1

 Potential Interfering Stations Included in above Scenario     2

45A MI DETROIT               BLCDT     19990429KX   LIC
45A MI KALAMAZOO             DTVPLN    DTVP1618     PLN

Result key:        11
Scenario        3  Affected station        7
Before Analysis

Results for: 45A MI VANDERBILT           USERRECORD01           APP
   HAAT  322.0 m, ATV ERP  108.0 kW
                                     POPULATION   AREA (sq km)
   within Noise Limited Contour        215902       20297.1
   not affected by terrain losses      215394       20164.5
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   lost to NTSC IX                          0          0.0
   lost to additional IX by ATV           281         20.1
   lost to ATV IX only                    281         20.1
   lost to all IX                         281         20.1

 Potential Interfering Stations Included in above Scenario     3

45A MI DETROIT              DTVPLN    DTVP1617      PLN
45A MI KALAMAZOO            BLCDT     20070529AEA   LIC

Result key:        12
Scenario        4  Affected station        7
Before Analysis

Results for: 45A MI VANDERBILT          USERRECORD01          APP
   HAAT  322.0 m, ATV ERP  108.0 kW
                                   POPULATION   AREA (sq km)
   within Noise Limited Contour      215902      20297.1
   not affected by terrain losses    215394      20164.5
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV         160         16.1
   lost to ATV IX only                  160         16.1
   lost to all IX                       160         16.1

 Potential Interfering Stations Included in above Scenario     4

45A MI DETROIT              DTVPLN    DTVP1617      PLN
45A MI KALAMAZOO            DTVPLN    DTVP1618      PLN

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FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED
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ENVIRONMENTAL PROTECTION ACT

Since WFUP-DT will be using its currently licensed tower (ASR No. 1000438), for the DTV operation the environmental concerns listed in Section 1.1307(a) of the Commission's rules are not pertinent; therefore, those issues have not been addressed.

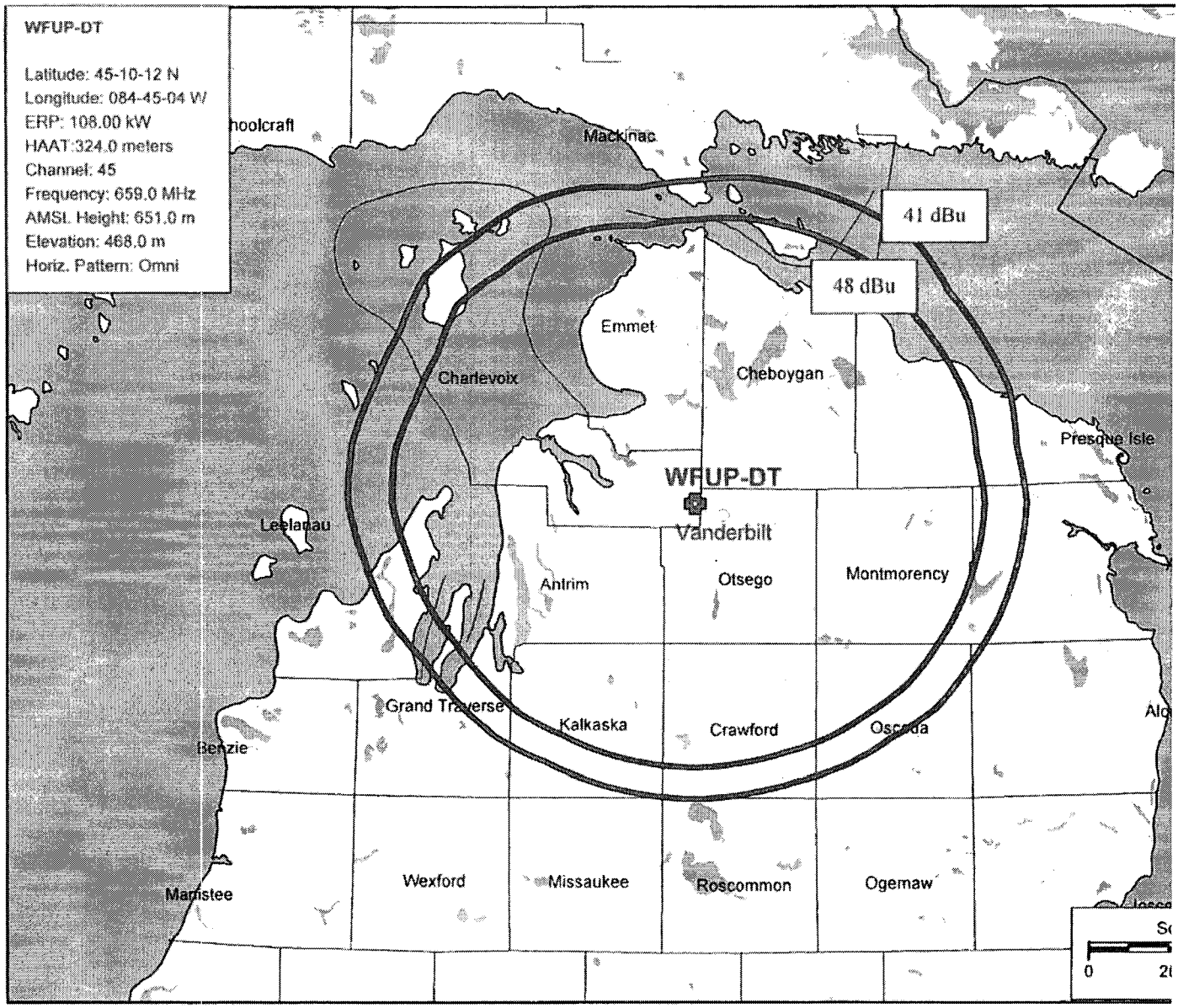
An evaluation has been made to determine compliance with the Commission's specified standards for human exposure to RF fields as set forth in the OET Bulletin No. 65 dated August 1997. For a maximum effective radiated power of 108 kW and a radiation center of 183 meters above ground level, the proposed Channel 45 DTV operation would have a maximum of 4.4 microwatts per square centimeter ($\mu W/cm^2$) RF field at 2 meters above the base of tower assuming an antenna field factor of 0.2 in the downward direction.

The Commission's guidelines for Channel 45 are 2,187 $\mu W/cm^2$ for the occupational/controlled, and 437 $\mu W/cm^2$ for the general population/uncontrolled environment.

The above analysis indicates that members of the public and personnel working around the WFUP-DT tower would not be exposed to RF fields exceeding the Commission's guidelines. With respect to work performed on the tower, WFUP-DT will establish procedures to ensure that workers are not exposed to RF fields above the Commission's guidelines, by reducing or turning off the power, as appropriate.

For the reasons stated above, it is believed this proposal complies with Section 1.1307(a) and (b) of the Commission's Rules; therefore, under Section 1.1306, it is categorically excluded from environmental processing.

KHANNA & GUILL, Inc. - Consulting Engineers



COMPUTED COVERAGE CONTOURS FOR THE PROPOSED DTV OPERATION OF WFUP-DT, VANDERBI