

ENGINEERING STATEMENT
TO PROVIDE ADDITIONAL INFORMATION
IN SUPPORT OF A PETITION FOR RULEMAKING
TO SUBSTITUTE TV CHANNEL 32 FOR CHANNEL 47
FOR THE PROPOSED DIGITAL TV OPERATION OF
WFQX-DT, CADILLAC, MICHIGAN
NOVEMBER 2008

This engineering statement has been prepared on behalf of Cadillac Telecasting Co. (“CTC”), to provide additional information in support of a Rulemaking Petition (“RM”) to substitute TV Channel 32 (578-584 MHz) for the allotted TV Channel 47 (668-674 MHz) for the digital television (DTV) operation of WFQX-TV, Cadillac, Michigan.

At present WFQX-TV, Facility ID Number 25396, is authorized to operate its analog TV facilities on Channel 33 with 776 kW effective radiated power (ERP) and 297 meters antenna height above average terrain (HAAT) using a non-directional TV antenna. The Commission has allotted TV Channel 47 for the DTV operation of WFQX-DT with 500 kW ERP and 393 meters HAAT. Cadillac believes TV Channel 32 is superior to Channel 47 for the station’s DTV coverage and is in the public interest. Therefore, CTC has filed a Rule Making petition (BPRM-20080620) to substitute TV Channel 32 for Channel 47 in the DTV Table of Allotments, Section 73.622 of the Commission’s rules. It is proposed to operate DTV Channel 32 with 175 kW ERP and 426 meters HAAT using a directional TV antenna.

CTC is providing additional information in support of its Rule Making petition to allot TV Channel 32 for the digital television operation WFQX-DT.

The attached map (Figure 11) shows the noise limited contours of WFQX-DT on Channel 47 and the proposed DTV Channel 32. Figure 11 also shows the noise limited contour of WFUP-DT, the sister station of WFQX-DT on Channel 45. Figure 11 indicates there are two small areas east and west (Area A and B) of the Channel 47

contour which would not be covered by either WFQX-DT on Channel 32 or WFUP-DT on Channel 45.

The noise limited contours of some of the DTV stations authorized near WFQX-DT and WFUP-DT have been computed and are shown on Figure 11. The authorized facilities of these DTV stations are listed in the attached Table I. All noise limited contours were computed according to Section 73.625 of the Commission's rules using computerized 3-second terrain database.

Figure 11 indicates there are two DTV stations (WBKB-DT and WCML-DT) which provide full coverage of Area A and three other DTV stations (WWTU-DT-90%, WCMV-DT-85% and WGTU-DT-30%) that serve part of Area A. Similarly, two DTV stations (WCMV-DT and WPBN-DT) serve all of Area B with two other DTV stations (WWTU-DT-90% and WGTU-DT-75%) serve part of Area B. The partial estimates of coverage are approximate.

As is the trend in the digital television industry, most of the DTV stations are providing multiple programming on their allotted TV channel. Therefore, it is highly likely that Areas A and B would have multiple choice of programming available from DTV stations other than WFQX-DT or WFUP-DT.

TABLE I

WGTO	8	0	DT	CP MOD	SAULT STE. MARIE	MI US	BMPCDT-
20080619AJZ	-			59279	15. kW	288. m	163.21 km 101.42 mi
26.95° TUCKER BROADCASTING OF TRAVERSE CITY, INC.							
WWTV	9	0	DT	CP MOD	CADILLAC	MI US	BMPCDT-
20080616ABO	-			26994	30. kW	497. m	71.34 km 44.33 mi
197.82° HERITAGE BROADCASTING COMPANY OF MICHIGAN							
WWUP-TV	10	0	DT	CP	SAULT STE. MARIE	MI US	BPCDT-
20080728ABV	-			26993	16.3 kW	370. m	164.39 km 102.15 mi
27.08° HERITAGE BROADCASTING COMPANY OF MICHIGAN							
WWUP-TV	10	0	DT	CP MOD	SAULT STE. MARIE	MI US	BMPCDT-
20080328ADZ	-			26993	20.7 kW	370. m	164.39 km 102.15 mi
27.08° HERITAGE BROADCASTING COMPANY OF MICHIGAN							
WBKB-TV	11	0	DT	CP MOD	ALPENA	MI US	BMPCDT-
20080521AAC	-			67048	20. kW	201.8 m	122.50 km 76.12 mi
91.80° THUNDER BAY BROADCASTING CORPORATION.							
WJRT-TV	12	0	DT	CP	FLINT	MI US	BPCDT-
20080610AAJ	-			21735	18.2 kW	286. m	187.10 km 116.26 mi
154.06° FLINT LICENSE SUBSIDIARY CORP.							
WZZM-TV	13	0	DT	CP	GRAND RAPIDS	MI US	BPCDT-
20080325AFK	-			49713	13. kW	324.3 m	173.54 km 107.83 mi
203.16° COMBINED COMMUNICATIONS CORP. OF OKLAHOMA, INC.							
WDCQ-TV	15	0	DT	LIC	BAD AXE	MI US	BLEDT-
20030922ABG	-			16530	200. kW	309. m	175.06 km 108.78 mi
139.53° DELTA COLLEGE							
WSMH	16	0	DT	CP	FLINT	MI US	BPCDT-
20051115ADO	-			21737	19.3 kW	348.1 m	187.02 km 116.21 mi
154.52° WSMH LICENSEE, LLC							
WSMH	16	0	DT	CP	FLINT	MI US	BPCDT-
19991028ACK	-			21737	895. kW	287. m	188.14 km 116.90 mi
154.08° WSMH LICENSEE, LLC							
WSMH	16	0	DT	CP MOD	FLINT	MI US	BMPCDT-
20080620AKL	-			21737	245. kW	365.5 m	187.02 km 116.21 mi
154.52° WSMH LICENSEE, LLC							
WCMV	17	0	DT	LIC	CADILLAC	MI US	BLEDT-
20050914AAI	-			9922	338. kW	393. m	0.00 km 0.00 mi
0.00° CENTRAL MICHIGAN UNIVERSITY							
WDCP-TV	18	0	DT	CP	UNIVERSITY CENTER	MI US	BPEDT-
20000217ABB	-			16528	50. kW	141. m	157.96 km 98.15 mi
146.28° DELTA COLLEGE							
WCMW	21	0	DT	CP	MANISTEE	MI US	BPEDT-
20080222ABG	-			9913	50. kW	93. m	126.03 km 78.31 mi
233.37° CENTRAL MICHIGAN UNIVERSITY							

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WNEM-TV	22 0	DT	CP MOD	BAY CITY		MI US	BMPCDT-
20040721AMM	-		41221	1000. kW	275.3 m	172.60 km	107.25 mi
145.01° MEREDITH CORPORATION							
WCML	24 0	DT	CP	ALPENA		MI US	BPEDT-
20080222ABH	-		9917	106. kW	393. m	83.66 km	51.98 mi
58.37° CENTRAL MICHIGAN UNIVERSITY							
WCMU-TV	26 0	DT	CP MOD	MOUNT PLEASANT		MI US	BMPEdT-
20080619AFX	-		9908	450. kW	299. m	111.14 km	69.06 mi
185.90° CENTRAL MICHIGAN UNIVERSITY							
WGTU	29 0	DT	CP	TRAVERSE CITY		MI US	BPCDT-
20080619AJY	-		59280	68.4 kW	393. m	0.00 km	0.00 mi
0.00° TUCKER BROADCASTING OF TRAVERSE CITY, INC.							
WGTU	31 0	DT	LIC	TRAVERSE CITY		MI US	BLCDT-
20070821ADQ	-		59280	64.8 kW	393. m	0.00 km	0.00 mi
0.00° TUCKER BROADCASTING OF TRAVERSE CITY, INC.							
WTOM-TV	35 0	DT	LIC	CHEBOYGAN		MI US	BLCDT-
20040420AAI	-		21254	78. kW	168. m	115.33 km	71.66 mi
29.27° BARRINGTON TRAVERSE CITY LICENSE LLC							
WJRT-TV	36 0	DT	LIC	FLINT		MI US	BLCDT-
20020429AAZ	-		21735	860. kW	248. m	187.10 km	116.26 mi
154.06° FLINT LICENSE SUBSIDIARY CORP.							
WZZM-TV	39 0	DT	LIC	GRAND RAPIDS		MI US	BLCDT-
20050628AAD	-		49713	1000. kW	305.4 m	173.54 km	107.83 mi
203.16° COMBINED COMMUNICATIONS CORP. OF OKLAHOMA, INC.							
WBSF	46 0	DT	CP MOD	BAY CITY		MI US	BMPCDT-
20080620AGE	-		82627	70. kW	306. m	172.12 km	106.95 mi
144.99° BARRINGTON BAY CITY LICENSE LLC							
WFOX-TV	47 0	DT	LIC	CADILLAC		MI US	BLCDT-
20070214ACF	-		25396	500. kW	393. m	0.00 km	0.00 mi
0.00° CADILLAC TELECASTING CO.							
WAQP	48 0	DT	LIC	SAGINAW		MI US	BLCDT-
20060824ADS	-		67792	851. kW	287. m	188.14 km	116.90 mi
154.08° TCT OF MICHIGAN, INC.							
WPBN-TV	50 0	DT	LIC	TRAVERSE CITY		MI US	BLCDT-
20030721ACJ	-		21253	78. kW	230. m	48.80 km	30.32 mi
273.97° BARRINGTON TRAVERSE CITY LICENSE LLC							
WCMU-TV	56 0	DT	LIC	MOUNT PLEASANT		MI US	BLEDT-
20050914AAC	-		9908	400. kW	299. m	111.14 km	69.06 mi
185.90° CENTRAL MICHIGAN UNIVERSITY							
WCML	57 0	DT	LIC	ALPENA		MI US	BLEDT-
20050914AAF	-		9917	200. kW	393. m	83.66 km	51.98 mi
58.37° CENTRAL MICHIGAN UNIVERSITY							
WCMW	58 0	DT	LIC	MANISTEE		MI US	BLEDT-
20050914ABJ	-		9913	25. kW	93. m	126.03 km	78.31 mi
233.37° CENTRAL MICHIGAN UNIVERSITY							

