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December 2, 2008

FILED/ACCEPTED

DEC - 2 2008

Federal Communications Commission
Office of the Secretary

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Petition for Rulemaking to Assign Channel 32 to WFQX-DT

Dear Ms. Dortch:

Transmitted herewith are the original and four copies of a Petition for Rulemaking to assign Channel 32 to WFQX-DT in MM Docket No. 87-268. This petition was originally filed with the Media Bureau. Bureau staff has requested that it be filed with the Office of the Secretary. Accordingly, we respectfully request that it be forwarded to the Media Bureau immediately so that processing may be completed.

Attached to the petition are additional supplemental materials previously supplied to the Commission's staff. They include a memorandum to Nazifa Sawez dated November 5, 2008 and a supplemental engineering statement dated November, 2008. Please associate these documents with the Petition for Rulemaking referenced above.

Should any questions arise concerning this matter, please contact the undersigned.

Sincerely,



Gregg P. Skall

Enclosure

No. of Copies rec'd 0+4
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MB 08-114

STAMP & RETURN

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

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Federal Communications Commission
Bureau / Office

In the Matter of)
)
Amendment of Section 73.622) MM Docket No. 87-268
Of the Commission's Rules)
Digital Television Table of Allotments) RM No. _____
(Cadillac, Michigan))

To: The Chief, Allocations Branch

PETITION FOR RULEMAKING

Cadillac Telecasting Co. ("CTC"), licensee of television station WFQX-TV, Cadillac, 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 substitute DTV Channel 32 in lieu of Channel 47, Cadillac, Michigan, as the digital television allotment to be used by WFQX-DT, and to take all other steps necessary to enable WFQX-TV to apply to construct and ultimately operate its digital facilities on Channel 32, as described in the engineering material submitted herewith.

Attached hereto as Exhibit A is an Engineering Statement of Khanna & Guill, Inc., confirming that the proposed allotment change is consistent with the Commission's technical rules. The Engineering Statement further demonstrates that the allotment change will enable WFQX-TV to change site so as to better serve its market, both on its own and in conjunction

with a related allotment being requested for CTC's WFUP, Vanderbilt, Michigan.

By way of background, we respectfully note that CTC became licensee of WFQX-TV on October 31, 2007. The prior licensee had intended to move the station about 40 miles north to a site near Kalkaska, Michigan, ostensibly to serve the geographic center of the large Traverse City-Cadillac market. The prior licensee had also notified the Commission that it would not construct digital facilities for its co-owned WFUP(TV), Vanderbilt, Michigan, which it had operated as a satellite to serve the northern portion of the market, intending instead to forfeit coverage both to the south (formerly served by WFQX-TV) and to the north by operating only a single facility near Kalkaska. Exhibit B hereto is a map that compares the analog and digital coverage areas relative to the market. It clearly demonstrates that the prior licensee's plan was ill-conceived and would disserve the public interest, as it would sacrifice significant coverage in the market, leaving many off-the-air viewers and cable systems without access to WFQX-DT's local and network programming. Having also acquired WFUP, CTC intends to restore the lost coverage so as to replicate the full analog service area of both stations, and thereby avoid the significant loss of coverage that the former licensee had planned. (In a concurrent petition for rulemaking, CTC seeks to substitute a viable digital channel for WFUP that will provide coverage of the entire market in combination with WFQX-DT.)

WFQX-TV is currently licensed pursuant to BLCDDT-20070214ACF to operate on channel 47. It will be necessary to change to channel 32 in order to accommodate the use of channel 49 by a restored WFUP, as well as to return to the station's analog transmitter site, from which substantially all of its analog service may be replicated. By moving back to Cadillac,

WFQX-TV will be able to serve its city of license, as well as the surrounding area, with a far better signal than would be possible from the Kalkaska site. Indeed, the theoretical coverage maps of channel 47 do not depict the significant loss of actual coverage on the south side of Cadillac, due to terrain factors not revealed in theoretical studies.

Exhibit 2 of the attached Engineering Statement depicts the superior population coverage – an additional 134,923 persons (512,923 v. 378,000) – which will be achieved just by returning to the Cadillac tower site using channel 32. That move alone makes the channel change worthwhile. Yet, to that must be added the coverage of WFUP on DT channel 49 as requested in the WFUP petition, resulting in service to an additional population of 215,234. Consequently, the total improvement in the stations' combined reach will be a population of 350,257 and their total reach will be 690,198 (after subtracting from their respective coverages the 37,959 people in the relatively small overlap area, as depicted on Figure 4 of the Engineering Statement). Even then, in all likelihood the actual overlap area will be reduced by a directionalized antenna.

Exhibit B documents both the shortfall of coverage of the entire market that will result from operation of WFQX-DT at Kalkaska and the vastly improved market coverage that will result from CTC's proposed solution. As shown therein, the single signal of WFQX-DT fails to cover the entire southern portion of the market, as well as much of the northern area. The combined signals of WFUP (as proposed to be restored) and WFQX-TV (when moved back to Cadillac on channel 32) will cover nearly the entire market. (Actually, despite considerable geographic separation, 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.)

The relief requested herein and in the related WFUP petition makes economic, competitive and public policy sense. Not only will it enable the stations to serve nearly the entire large geographic market of which they are an essential part, but the stations are the only Fox affiliates in the market. Thus, extending service to a vastly greater portion of the total population in the market, in turn, will ensure that viewers outside the coverage of WFXQ-TV (as relocated to Kalkaska) will continue to receive the programming of that important network.

The relief requested herein will advance essential FCC policies. 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 move of WFQX-TV to Kalkaska and thereby deprive nearly 135,000 people of existing service. On the contrary, 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 in MB Docket 88-268*, 22 FCC Rcd 15581 (2007) ("*Advanced Television Systems and their Impact Upon the Existing Television Broadcast Service*") at ¶ 45. That goal will be amply served by restoring the coverage of WFQX-TV to its pre-digital scope (as well as by enabling WFUP to continue service into the digital era).

The use of WFQX-TV's analog site promises to simplify the impact of the conversion

process for consumers. It is 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).

CTC submits that it has fully analyzed the engineering proposed for this facility and is ready to file its application for construction permit as is demonstrated by the engineering portion of its FCC form 301, fully prepared and ready to be filed as soon as permitted, a copy of which is appended hereto with appropriate engineering statements as Exhibit C.¹

Wherefore, the premises considered, CTC respectfully requests that the Commission adopt a rulemaking to substitute Channel 32 for Channel 47 at Vanderbilt, Michigan, as the digital television allotment to be used by WFQX-DT, and to take any other steps necessary to enable WFQX-TV to apply to construct and ultimately operate its digital facilities on Channel 32.

Respectfully submitted,

CADILLAC TELECASTING CO.

By: 
Gregg P. Skall
Peter Gutmann

Its Attorneys

Womble Carlyle Sandridge & Rice, PLLC
1401 I Street, NW
Seventh Floor
Washington, DC 20005

(202) 857-4441

June 20, 2008

¹ Note that we have not included Exhibit 46 to the draft application, as it is identical to Exhibit A hereto.

Exhibit A

KHANNA & GULL, Inc. - Consulting Engineers

**ENGINEERING STATEMENT
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
JUNE 2008**

This engineering statement has been prepared on behalf of Cadillac Telecasting Co. ("CTC"), 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 as explained below in more detail. Therefore, CTC is filing a Rule Making petition 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.

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

Name of the Licensee:	Cadillac Telecasting Co.
Station Location:	MI-Cadillac
Channel:	32
Hours of Operation:	Unlimited
Transmitter:	Type Accepted
Antenna Type:	DIE, TLP-24B(C)

Beam Tilt: 1.0 degrees

Antenna Coordinates: North Latitude: 44 deg 08 min 12 sec
West Longitude: 85 deg 20 min 33 sec

Transmitter output power: As required to achieve authorized ERP

Maximum effective radiated power (Average): 175 kW
22.43 dBk

Elevation of site above mean sea level: 519.5 meters

Overall height of the tower above ground: 393.3 meters

Height of radiation center above ground (meters): 305 meters

Height of radiation center above mean sea level (meters): 824.5 meters

Height of radiation center above average terrain (meters): 426 meters

Antenna Structure Registration No.: 1002422

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

Engineering

Question 1. (a)

WFQX-TV is currently allotted a TV channel 47 for its DTV operation. WFQX-TV is proposing to substitute TV Channel 32 for Channel 47 and is filing this Petition for Rule Making to allot DTV Channel 32 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 WFQX-DT operation would not cause any interference to other DTV stations exceeding the Commission's guidelines.

Question 1. (e)

The proposed DTV operation on Channel 32 would serve 512,933 people within the noise limited service area as compared to 378,000 predicted population defined in the new DTV Table in Appendix B for Channel 47. As such, the proposed DTV Channel 32 operation would serve 134,933 more people than listed in the new DTV Table in Appendix B for Channel 47.

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 WFQX-DT 48 dBu contour will encompass the allotted principal community of Cadillac, Michigan (see Figure 1).

Question 4.

The proposed WFQX-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.

WFQX-DT would be operating from the existing tower which is registered (ASR No. 1002422) by the Commission and no changes are proposed to require a change in the registration.

Reasons for the substitution of TV Channel 32 for Channel 47

As indicated earlier the proposed DTV Channel 32 is superior to the allotted DTV Channel 45 for the following reasons.

1. It would enable WFQX-DT serve 134,933 more people on TV Channel 32 than on Channel 47.
2. The proposed WFQX-DT site is located much closer to the principal community of license, Cadillac, Michigan than the allotted Channel 47 (see Figure 2) which will result in stronger RF signals in Cadillac for better digital TV reception.
3. The proposed Channel 32 operation would result in lesser overlap with its sister DTV station WFUP, Vanderbilt, Michigan than overlap between the allotted DTV Channel 47 and WFUP-DT (see Figures 3 & 4). Such arrangement would result in more coverage of the TV Market.

Table I

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

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 06-16-2008 Time: 18:26:30

Record Selected for Analysis

WFQX USERRECORD-01 CADILLAC MI US
 Channel 32 ERP 175. kW HAAT 422. m RCAMSL 00825 m
 Latitude 044-08-12 Longitude 0085-20-33
 Status APP Zone 2 Border
 Dir Antenna Make usr Model wfqxpnt Beam tilt N Ref Azimuth 135.
 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	59.992	390.9	83.3
45.0	73.937	422.1	86.5
90.0	139.085	435.5	91.6
135.0	175.000	441.8	93.7
180.0	141.121	407.9	90.2
225.0	76.461	434.8	87.4
270.0	58.566	436.9	85.7
315.0	72.804	407.3	85.6

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

Class A Evaluation Complete

SPACING VIOLATION FOUND BETWEEN STATION

WFQX 32 CADILLAC MI USERRECORD01

and station

SHORT TO: WGTU 29 TRAVERSE CITY MI BLCT 20041012AIJ
 044-44-53 0085-04-8
 Req. separation => 24.1 <= 96.6 Actual separation 71.3 Short 25.3(47.2) km

SHORT TO: WACY 32 APPLETON WI BMLCT 19990831LF
 044-21-30 0087-58-48
 Req. separation 244.6 Actual separation 212.1 Short 32.5 km

KHANNA & GULL, Inc. - Consulting Engineers

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 = 232.5km

Proposed facility is beyond the Mexican coordination distance

Proposed station is OK toward AM broadcast stations

Start of Interference Analysis

Channel	Proposed Station Call	City/State	ARN
32	WPQX	CADILLAC MI	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
29	WOMS-CA	MUSKEGON MI	113.6	LIC	BLTTA	-20060926AEA
31	WPXD	ANN ARBOR MI	221.4	CP	BPCDT	-20080305ABI
31	WPXD	ANN ARBOR MI	221.4	PLN	DTVPLN	-DTVP1147
32	WBWU	JANESVILLE WI	354.7	LIC	BLCDT	-20040930BHL
32	WBWU	JANESVILLE WI	354.7	PLN	DTVPLN	-DTVP1204
33	WOHO-CA	HOLLAND MI	154.9	CP	BDFCDTA	-20060330AMP

Analysis of Interference to Affected Station 1

Channel	Call	City/State	Application	Ref. No.
29	WOMS-CA	MUSKEGON MI	BLTTA	-20060926AEA

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
21	WCMW	MANISTEE MI	91.6	CP	BPEDT	-20080222ABG
21	WCMW	MANISTEE MI	91.6	PLN	DTVPLN	-DTVP0769
26	WCMU-TV	MOUNT PLEASANT MI	88.5	CP	BPEDT	-20080222ABE
26	WCMU-TV	MOUNT PLEASANT MI	88.5	PLN	DTVPLN	-DTVP0959
29	960920IP	DUBUQUE IA	389.7	APP	BPET	-19960920IP
29	WMAQ-TV	CHICAGO IL	199.9	LIC	BLCDT	-20010531ACY
29	WMAQ-TV	CHICAGO IL	199.9	PLN	DTVPLN	-DTVP1069
29	WTTK	KOKOMO IN	375.1	CP	BPCDT	-20080430ACQ
29	WTTK	KOKOMO IN	375.1	PLN	DTVPLN	-DTVP1070
29	WTTK	KOKOMO IN	325.1	LIC	BLCT	-19880523KI
29	WUHQ-LP	GRAND RAPIDS MI	46.0	LIC	BLTTL	-20030404AAA
29	WGTU	TRAVERSE CITY MI	183.7	LIC	BLCT	-20041012AIJ
29	WGTU	TRAVERSE CITY MI	183.7	PLN	DTVPLN	-DTVP1074
29	WGTE-TV	TOLEDO OH	280.8	LIC	BLEDT	-20031110AKO
29	WGTE-TV	TOLEDO OH	280.8	PLN	DTVPLN	-DTVP1086
29	W29DJ	SHEBOYGAN WI	149.3	CP	BPTTL	-20080311ABX
43	WZPX	BATTLE CREEK MI	104.7	LIC	BLCT	-19961017KE
44	WZPX	BATTLE CREEK MI	104.7	LIC	BLCDT	-20020510AAG
44	WZPX	BATTLE CREEK MI	104.7	PLN	DTVPLN	-DTVP1580

KHANNA & GULL, Inc. - Consulting Engineers

32 WFQX CADILLAC MI 113.6 APP USERRECORD-01

Proposed station is beyond the site to nearest cell evaluation distance

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Analysis of Interference to Affected Station 2

Analysis of current record

Channel	Call	City/State	Application Ref. No.
31	WPXD	ANN ARBOR MI	BPCDT -20080305ABI

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
30	WEYI-TV	SAGINAW MI	97.9	LIC	BLCDT -20040123ASH
30	WEYI-TV	SAGINAW MI	97.9	PLN	DTVPLN -DTVP1111
30	WBNX-TV	AKRON OH	225.1	LIC	BLCDT -20070430AXX
30	WBNX-TV	AKRON OH	225.1	PLN	DTVPLN -DTVP1116
31	WFLD	CHICAGO IL	299.1	LIC	BLCDT -20050606ABF
31	WFLD	CHICAGO IL	299.1	PLN	DTVPLN -DTVP1142
31	WANE-TV	FORT WAYNE IN	169.5	CP MOD	BMPCDT -20021002ACJ
31	WANE-TV	FORT WAYNE IN	169.5	PLN	DTVPLN -DTVP1143
31	WANE-TV	FORT WAYNE IN	169.5	CP MOD	BMPCDT -20080313AAW
32	WFQX	CADILLAC MI	221.4	APP	USERRECORD-01

Proposed station is beyond the site to nearest cell evaluation distance

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Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application Ref. No.
31	WPXD	ANN ARBOR MI	DTVPLN -DTVP1147

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
30	WEYI-TV	SAGINAW MI	97.9	LIC	BLCDT -20040123ASH
30	WEYI-TV	SAGINAW MI	97.9	PLN	DTVPLN -DTVP1111
30	WBNX-TV	AKRON OH	225.1	LIC	BLCDT -20070430AXX
30	WBNX-TV	AKRON OH	225.1	PLN	DTVPLN -DTVP1116
31	WFLD	CHICAGO IL	299.1	LIC	BLCDT -20050606ABF
31	WFLD	CHICAGO IL	299.1	PLN	DTVPLN -DTVP1142
31	WANE-TV	FORT WAYNE IN	169.5	CP MOD	BMPCDT -20021002ACJ
31	WANE-TV	FORT WAYNE IN	169.5	PLN	DTVPLN -DTVP1143
31	WANE-TV	FORT WAYNE IN	169.5	CP MOD	BMPCDT -20080313AAW
32	WFQX	CADILLAC MI	221.4	APP	USERRECORD-01

Proposed station is beyond the site to nearest cell evaluation distance

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Analysis of Interference to Affected Station 4

Analysis of current record

Channel	Call	City/State	Application Ref. No.
32	WBUW	JANESVILLE WI	BLCDT -20040930BHL

Stations Potentially Affecting This Station

KHANNA & GULL, Inc. - Consulting Engineers

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
31	WFLD	CHICAGO IL	200.0	LIC	BLCDDT	-20050606ABF
31	WFLD	CHICAGO IL	200.0	PLN	DTVPLN	-DTVP1142
32	WTJR	QUINCY IL	374.9	CP MOD	BMPCDDT	-20080522ABM
32	WTJR	QUINCY IL	375.0	PLN	DTVPLN	-DTVP1180
32	WCCO-TV	MINNEAPOLIS MN	367.5	LIC	BLCDDT	-20010921ABB
32	WCCO-TV	MINNEAPOLIS MN	367.5	PLN	DTVPLN	-DTVP1184
33	WITI	MILWAUKEE WI	129.2	CP MOD	BMPCDDT	-20080122AOP
33	WITI	MILWAUKEE WI	129.2	PLN	DTVPLN	-DTVP1236
32	WFQX	CADILLAC MI	354.7	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.
32	WBUW	JANESVILLE WI	DTVPLN	-DTVP1204

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
31	WFLD	CHICAGO IL	200.0	LIC	BLCDDT	-20050606ABF
31	WFLD	CHICAGO IL	200.0	PLN	DTVPLN	-DTVP1142
32	WTJR	QUINCY IL	374.9	CP MOD	BMPCDDT	-20080522ABM
32	WTJR	QUINCY IL	375.0	PLN	DTVPLN	-DTVP1180
32	WCCO-TV	MINNEAPOLIS MN	367.5	LIC	BLCDDT	-20010921ABB
32	WCCO-TV	MINNEAPOLIS MN	367.5	PLN	DTVPLN	-DTVP1184
33	WITI	MILWAUKEE WI	129.2	CP MOD	BMPCDDT	-20080122AOP
33	WITI	MILWAUKEE WI	129.2	PLN	DTVPLN	-DTVP1236
32	WFQX	CADILLAC MI	354.7	APP	USERRECORD-01	

Proposal causes no interference

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Analysis of Interference to Affected Station 6

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
33	WOHO-CA	HOLLAND MI	BDFCDTA	-20060330AMF

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
33	WSTR-TV	CINCINNATI OH	419.5	CP MOD	BMPCDDT	-20070720AAM
33	WSTR-TV	CINCINNATI OH	419.5	PLN	DTVPLN	-DTVP1224
33	WITI	MILWAUKEE WI	160.9	CP MOD	BMPCDDT	-20080122AOP
33	WITI	MILWAUKEE WI	160.8	PLN	DTVPLN	-DTVP1236
34	WHTV	JACKSON MI	129.7	CP MOD	BMPCDDT	-20070125ACI
34	WHTV	JACKSON MI	125.1	PLN	DTVPLN	-DTVP1255
34	WISN-TV	MILWAUKEE WI	163.8	LIC	BLCDDT	-20050412ADP
34	WISN-TV	MILWAUKEE WI	163.8	PLN	DTVPLN	-DTVP1278
32	WFQX	CADILLAC MI	154.9	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.
32	WFQX	CADILLAC MI	USERRECORD-01	

KHANNA & GULL, Inc. - Consulting Engineers

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
31	WPXD	ANN ARBOR MI	221.4	CP	BPCDT	-20080305ABI
31	WPXD	ANN ARBOR MI	221.4	PLN	DTVPLN	-DTVP1147
32	WBUW	JANESVILLE WI	354.7	LIC	BLCDT	-20040930BHL
32	WBUW	JANESVILLE WI	354.7	PLN	DTVPLN	-DTVP1204

Total scenarios = 2

Result key: 1
 Scenario 1 Affected station 7
 Before Analysis

Results for: 32A MI CADILLAC USERRECORD01 APP
 HAAT 422.0 m, ATV ERP 175.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	517143	24743.2
not affected by terrain losses	512953	24599.1
lost to NTSC IX	0	0.0
lost to additional IX by ATV	20	4.0
lost to ATV IX only	20	4.0
lost to all IX	20	4.0

Potential Interfering Stations Included in above Scenario 1

32A WI JANESVILLE BLCDT 20040930BHL LIC

Result key: 2
 Scenario 2 Affected station 7
 Before Analysis

Results for: 32A MI CADILLAC USERRECORD01 APP
 HAAT 422.0 m, ATV ERP 175.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	517143	24743.2
not affected by terrain losses	512953	24599.1
lost to NTSC IX	0	0.0
lost to additional IX by ATV	20	4.0
lost to ATV IX only	20	4.0
lost to all IX	20	4.0

Potential Interfering Stations Included in above Scenario 2

32A WI JANESVILLE DTVPLN DTVP1204 PLN

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FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED

ENVIRONMENTAL PROTECTION ACT

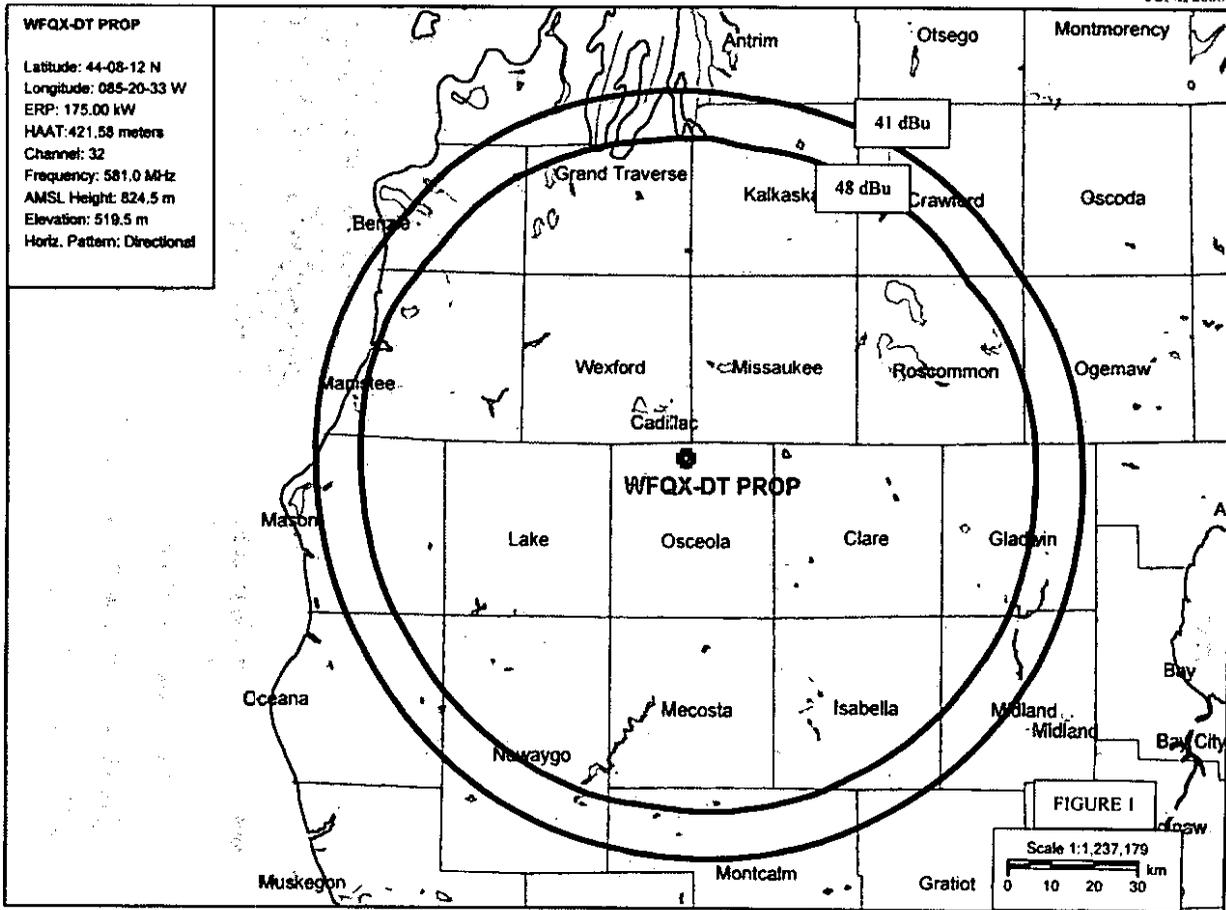
Since WFQX-DT will be using its currently licensed tower (ASR No. 1002422), for the DTV operation the environmental concerns listed in Section 1.1307(a) of the Commission's rules are not pertinent; therefore, those issues have not been addressed.

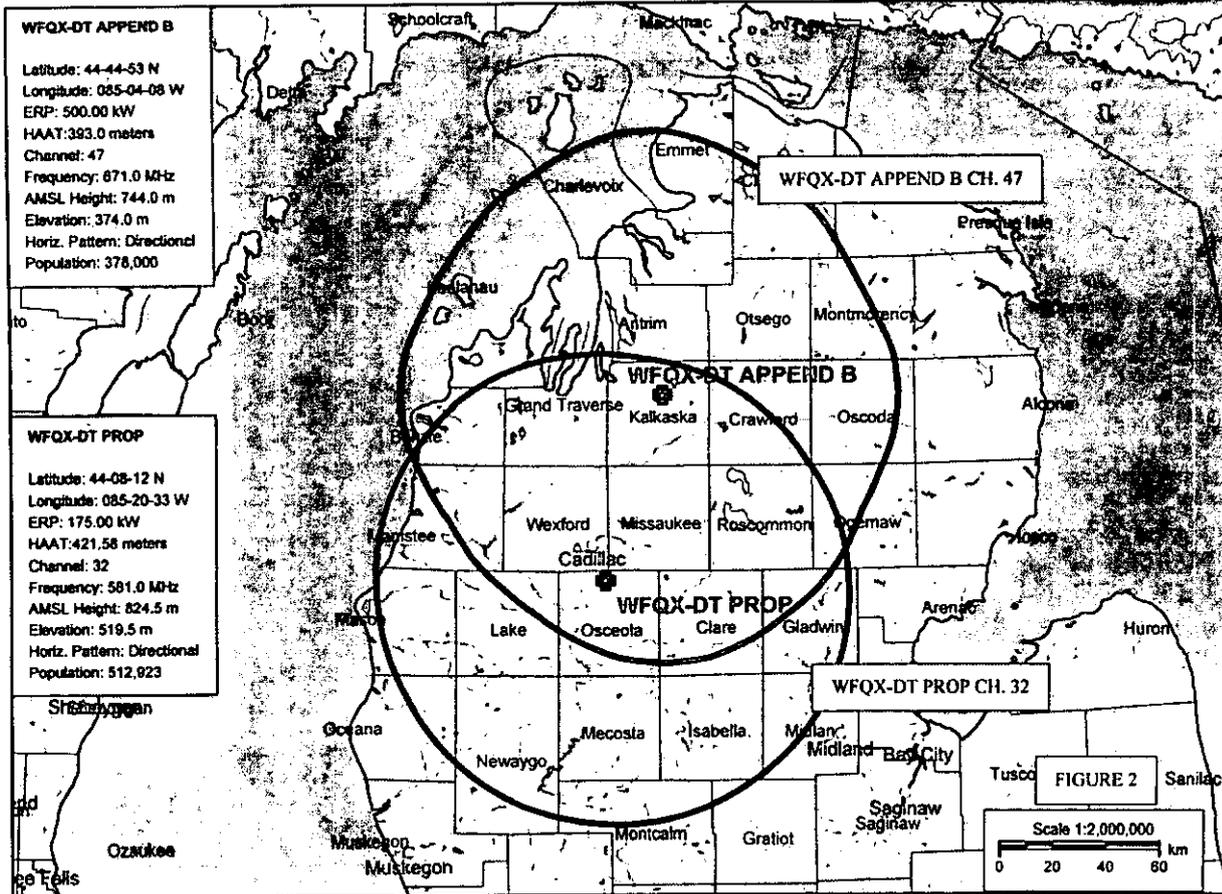
An evaluation has been made to determine compliance with the Commission's specified standards for human exposure to RF fields as set forth in the OET Bulletin No. 65 dated August 1997. For a maximum effective radiated power of 175 kW and a radiation center of 305 meters above ground level, the proposed Channel 32 DTV operation would have a maximum of 2.5 microwatts per square centimeter ($\mu\text{W}/\text{cm}^2$) RF field at 2 meters above the base of tower assuming an antenna field factor of 0.2 in the downward direction.

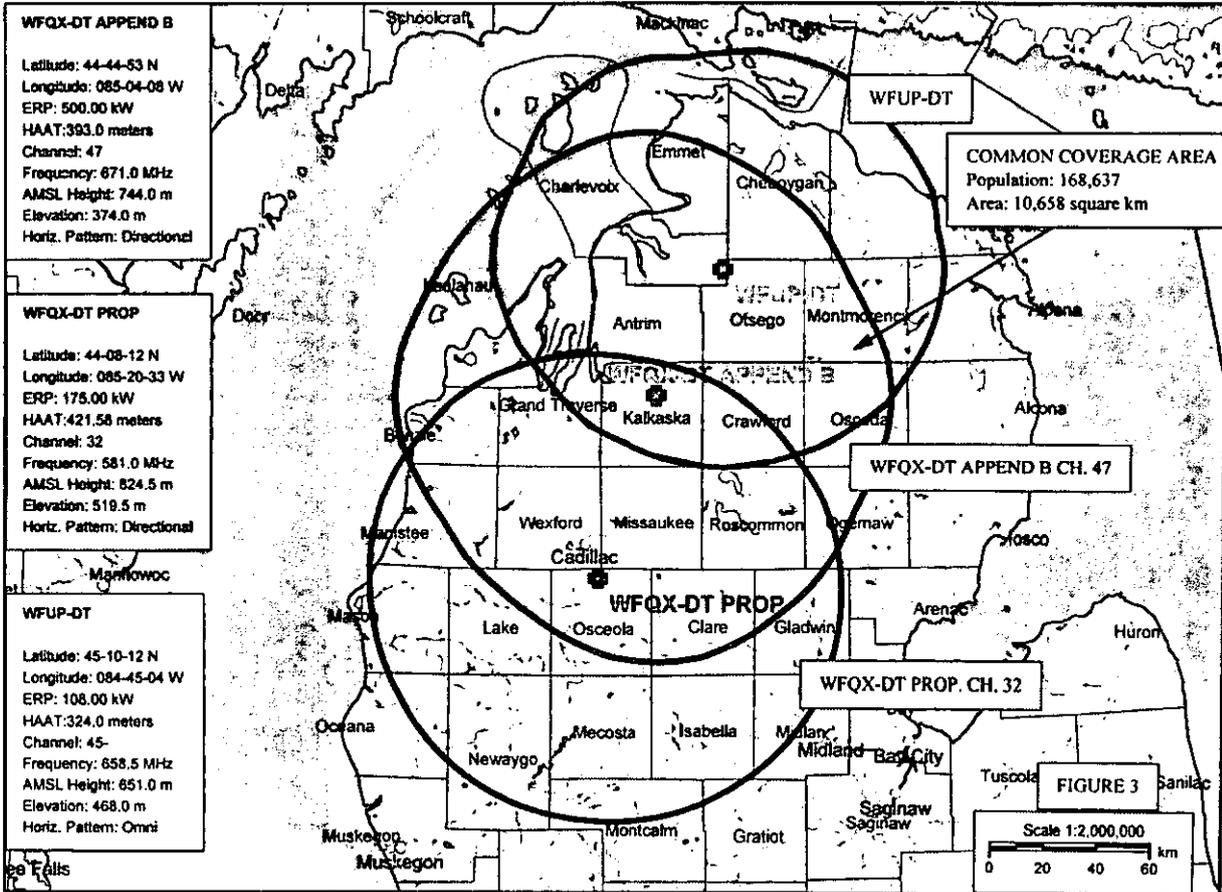
The Commission's guidelines for Channel 32 are $1,927 \mu\text{W}/\text{cm}^2$ for the occupational/controlled, and $385 \mu\text{W}/\text{cm}^2$ for the general population/uncontrolled environment.

The above analysis indicates that members of the public and personnel working around the WFQX-DT tower would not be exposed to RF fields exceeding the Commission's guidelines. With respect to work performed on the tower, WFQX-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.







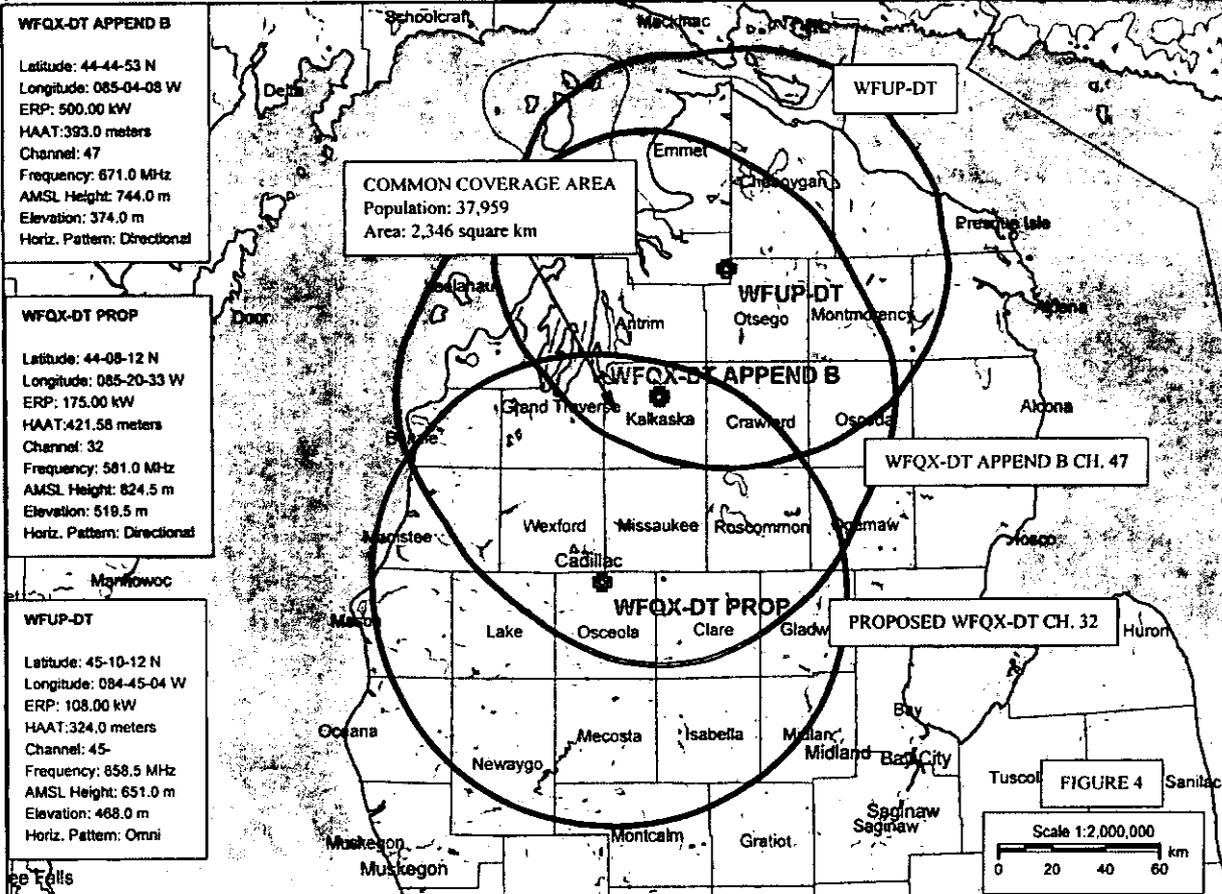


Exhibit B

WFQX-DT APPEND B
 Latitude: 44-44-53 N
 Longitude: 085-04-08 W
 ERP: 500.00 kW
 HAAT: 393.0 meters
 Channel: 47
 Frequency: 671.0 MHz
 AMSL Height: 744.0 m
 Elevation: 374.0 m
 Horiz. Pattern: Directional

WFQX-DT PROP
 Latitude: 44-08-12 N
 Longitude: 085-20-33 W
 ERP: 175.00 kW
 HAAT: 421.58 meters
 Channel: 32
 Frequency: 681.0 MHz
 AMSL Height: 824.5 m
 Elevation: 519.5 m
 Horiz. Pattern: Directional

WFUP-DT
 Latitude: 45-10-12 N
 Longitude: 084-45-04 W
 ERP: 108.00 kW
 HAAT: 324.0 meters
 Channel: 45
 Frequency: 658.5 MHz
 AMSL Height: 651.0 m
 Elevation: 468.0 m
 Horiz. Pattern: Omni

COMMON COVERAGE AREA
 Population: 37,959
 Area: 2,346 square km

WFUP-DT

WFUP-DT

WFQX-DT APPEND B

WFQX-DT APPEND B CH. 47

WFQX-DT PROP

PROPOSED WFQX-DT CH. 32

