

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

In the Matter of)
)
Amendment of Section 73.622(i) of) MB Docket No. _____
the Commission's Rules,)
DTV Table of Allotments) RM No. _____
(Traverse City, Michigan))

To: Office of the Secretary
Attn: Chief, Media Bureau

FILED/ACCEPTED
JUL 24 2009
Federal Communications Commission
Office of the Secretary

PETITION FOR RULEMAKING

Barrington Traverse City License LLC ("Barrington"), licensee of Station WPBN-TV, Traverse City, Michigan, by counsel, hereby requests that the Commission amend the post-transition DTV Table of Allotments to change WPBN's digital allotment from Channel 7 to Channel 47 with the technical parameters set forth in the attached Engineering Statement. This channel substitution is necessary to resolve potential interference that could be caused to and received from Station WOOD-TV, Grand Rapids, Michigan, which has also been assigned post-transition Channel 7. In a concurrently filed application, Barrington also proposes to operate a "replacement translator" on channel 50.¹ The combined Channel 47/50 operations will result in numerous public interest benefits, including service to 101.05 percent of WPBN's pre-transition interference-free analog service population and additional NBC network service by both WPBN-TV and WOOD-TV to more than 233,000 persons. In addition, the proposed facilities can be promptly constructed and service rapidly initiated. In support hereof, Barrington states as follows:

¹ This application is being filed pursuant to the Commission's recent *Replacement Translator Order*. See *Amendment of Parts 73 and 74 of the Commission's Rules to Establish Rules for Replacement Digital Low Power Television Translator Stations, Report and Order*, 24 FCC Rcd 5931 (2009) ("*Replacement Translator Order*").

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1. In the *Eighth R&O* in MM Docket No. 87-268, the Commission allotted Channel 7 to WPBN-TV for post-transition operation with an effective radiated power (ERP) of 19.1 kW.² In this decision, the Commission also denied an opposition filed by Wood License Company, LLC (“Wood License”), licensee of WOOD-TV, which claimed that the post-transition WPBN-TV facilities would cause impermissible interference to the post-transition operation of WOOD-TV on co-channel 7. Wood License subsequently filed a Petition for Reconsideration of the *Eighth R&O* on April 21, 2008, which is pending, and thus the WPBN-TV post-transition facilities are not final.

2. On March 21, 2008, Barrington filed a construction permit application for operation of WPBN-TV on post-transition Channel 7. *See* BPCDT-20080321ACW. WOOD License filed an Informal Objection to this application on March 28, 2008. The FCC has yet to act on the Informal Objection and Barrington’s application to construct its post-transition Channel 7 facilities is pending.³ It is Barrington’s understanding that WPBN-TV is one of very few stations in the country (and perhaps the only station) that does not have a construction permit or license to operate on a post-transition digital channel. It is also unclear when the Commission will act on WPBN-TV’s construction permit application and the associated pleadings filed by WOOD License. Given this uncertainty and to resolve the impasse and move into the digital world on a sure footing, Barrington has diligently and extensively searched for another post-transition channel for WPBN and believes that Channel 47 is the best option.

² *See Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Memorandum Opinion and Order on Reconsideration of the Seventh Report and Order and Eighth Report and Order, 23 FCC Rcd 4220, ¶¶ 49-51 (2008) (“*Eighth R&O*”).

³ WPBN-TV is currently operating with reduced digital coverage on Channels 7 and 50 pursuant to special temporary authority (STA). *See* BDSTA-20081230AAJ; BDSTA-20081230AAK.

3. Channel 47 was the pre- and post-transition digital allotment for Station WFQX-TV, Cadillac, Michigan. WFQX-TV constructed and licensed its digital facilities at a site near Kalkaska, Michigan in 2007. However, on April 21, 2009, the Commission granted WFQX-TV's request to change the station's post-transition digital allotment from Channel 47 to Channel 32. *See Cadillac, Michigan*, 24 FCC Rcd 4760 (2009). On May 6, 2009, the Commission granted WFQX-TV a permit to construct facilities on Channel 32 at a new site south of Cadillac. *See* BPCDT-20090505AAI. Thus, Channel 47 is currently available and Barrington proposes to use this channel, as well as the technical facilities previously approved by the Commission.⁴ Importantly, this allotment has already been approved by Canada and no coordination is necessary.

4. The proposed operation on Channels 47/50 will result in interference-free service to a greater population than was served by the WPBN analog Grade B contour. As explained in more detail in the attached Engineering Statement, the interference-free service population of WPBN-TV's analog operation was 361,244 persons. *See* Engineering Statement, p. 3. The proposed operation on Channels 47/50 will serve 489,538 persons, of which 365,022 persons are within the WPBN analog Grade B contour. *See* Engineering Statement, p. 4. This is 101.05 percent of the population served pre-transition within the WPBN-TV Grade B contour and results from additional service to areas previously unserved due to terrain and interference. As Figure 3 shows, substantial areas in the southern and eastern portions of the WPBN service area did not receive Grade B service due to terrain and interference from other stations.⁵

⁴ Barrington has had preliminary discussions with the licensee of WFQX-TV regarding the purchase and use of the Channel 47 equipment and anticipates that those negotiations can be quickly concluded once Channel 47 is allotted as proposed herein.

⁵ The analysis of gains and losses associated with this proposal must take into account those viewers within the predicted Grade B contour that did not, in fact, receive the analog signal, due to terrain obstructions and

5. As noted above, the proposed operation of WPBN-TV on Channel 47 is at a site near Kalkaska -- north of both the WPBN-TV analog site and the approved WPBN-TV post-transition Channel 7 site. This site change will create a population loss area within the Grade B contour that received interference-free analog service from WPBN-TV. To address this "analog loss area," Barrington proposes to operate a new replacement translator on Channel 50 at the Channel 7 site.⁶ The proposed translator will serve all but 633 persons in this analog loss area, which is 0.18 percent of the pre-transition analog interference-free population. *See* Engineering Statement, p. 5 and Figure 5A.⁷

6. The minimal loss area not served by the proposed replacement translator is far outweighed by gains in NBC service both within and outside of the WPBN-TV Grade B analog contour. Within the Grade B, 37,121 persons who previously did not receive WPBN's analog signal will receive WPBN-TV's digital signal on Channel 47. *See* Engineering Statement, p. 5. Outside of the WPBN-TV Grade B analog contour, 84,236 persons will be served by WPBN-TV. Further, WOOD will be able to serve an additional 112,189 persons.⁸ In total, WPBN-TV's operation on Channels 47/50 will result in additional service to 233,546 persons. *See* Engineering Statement, p. 5.

interference. In the discussion below, loss of service calculations are based, appropriately, on the interference-free service population actually served within the Grade B contour.

⁶ Channel 50 is currently operating under STA at the WPBN-TV pre-transition digital site in Traverse City, Michigan. For the proposed Channel 50 translator, Barrington will repurpose the equipment associated with the Channel 50 facilities in Traverse City.

⁷ This number is based on the use of Longley-Rice to demonstrate coverage to the loss area. Using the standard prediction method, the loss area contains 9,330 persons. *See* Engineering Statement, p. 5 and Figure 6.

⁸ Due to the co-channel relationship of WPBN-TV's and WOOD-TV's Appendix B facilities, these 112,189 persons could not receive service from WOOD-TV or WPBN-TV. The changes proposed herein will permit WOOD-TV to serve these people with an interference-free signal. *See* Engineering Statement, p. 5 and Figures 6 and 7.

7. The attached Engineering Statement sets forth in detail the proposed WPBN-TV Channel 47 DTV specifications. This proposal is in compliance with all relevant technical requirements for amendment of the post-transition DTV Table, including the interference protection requirements of 47 C.F.R. §73.616 and the 0.5% *de minimis* interference standard with respect to all allotments and assignments, existing and proposed. *See Engineering Statement, Table 2.* The proposed Channel 47 facility will also provide full principal community coverage to Traverse City, Michigan. *See Engineering Statement, p. 2 and Figure 1.*⁹

8. In sum, the public interest benefits that result from changing WPBN-TV's allotment from Channel 7 to Channel 47 are substantial. The change will resolve the long-standing proceeding involving WPBN-TV and WOOD-TV over post-transition use of digital Channel 7 in Traverse City and Grand Rapids, Michigan. Channel 47 can be allotted in compliance with all pertinent FCC technical rules and regulations. Canada has approved use of Channel 47 at the site and with the parameters that Barrington proposes to operate. The "pre-constructed" nature of the facilities presents efficiencies that will speed implementation of the proposal and enable prompt construction by Barrington upon issuance of a construction permit. The combined Channel 47/50 operation will result in additional over-the-air NBC service to 233,546 persons, with only *de minimis* loss of service in very limited areas. In total, the proposal will result in service to 101.05 percent of the WPBN-TV pre-transition analog service population.

⁹ Barrington is also the licensee of Station WTOM-TV, Cheboygan, Michigan, which operates as a satellite station of WPBN-TV. Barrington operates these stations pursuant to a satellite waiver granted on June 14, 2006. *See Letter to Barrington Broadcasting LLC, DA 06-1239 (2006).* The change proposed herein will result in minimal city grade overlap that is consistent with precedent and that Barrington believes does not require a new waiver for the combined operation of WTOM-TV and WPBN-TV.

For all the foregoing reasons, the proposed amendment to the DTV Table of Allotments will serve the public interest. Barrington therefore respectfully requests that the DTV Table be amended in accordance with the specifications set forth in the attached Engineering Statement.

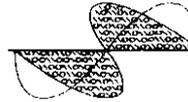
Respectfully submitted,

BARRINGTON TRAVERSE CITY
LICENSE LLC


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Its Attorneys

Dated: July 24, 2009



Engineering Statement
Post Transition Digital Television Channel Change
prepared for
Barrington Traverse City License LLC
WPBN-TV Traverse City, MI
Facility ID 21253
Ch. 47 500 kW 393 m

This engineering statement has been prepared on behalf of *Barrington Traverse City License LLC* (“*Barrington*”), licensee of WPBN-TV (Facility ID 21253, Traverse City, MI) in support of a *Petition for Rulemaking* to change the WPBN-TV digital television post-transition channel assignment. An application for construction permit (BPCDT-20080321 ACW) remains pending for WPBN-TV to operate its post-transition digital facility on Channel 7, its former analog channel. WPBN-TV’s current post-transition operation is with a reduced facility on Channel 7 simultaneously with continued operation of its pre-transition digital Channel 50 facility pursuant to Special Temporary Authorization (BDSTA-20081230AAK and BDSTA-20081230AAJ).

The pending WPBN-TV application for Channel 7 is the subject of an Informal Objection by WOOD License Company, LLC (“*LIN*”), licensee of WOOD-TV, Channel 7, Grand Rapids, MI. *LIN* also filed a *Petition for Reconsideration* regarding the WPBN-TV Channel 7 replication parameters adopted in Appendix B of the Eighth Report and Order (released March 6, 2008) in MB Docket 87-268.

Barrington proposes herein to substitute digital Channel 47 in lieu of the current digital Channel 7 allotment. The proposal will eliminate the predicted interference occurring between the Appendix B parameters for WPBN-TV and WOOD-TV.

The proposal specifies use of the Channel 47 technical parameters that are being vacated by nearby station WFQX-TV (Cadillac, MI). WFQX-TV operated on digital Channel 47 (BLCDT-20070214ACF) during the pre-transition period, and its original post-transition Appendix B allotment was to remain on Channel 47. WFQX-TV’s post-transition allotment was subsequently

changed from Channel 47 to Channel 32 in MB Docket 08-252.¹ Barrington has made preliminary arrangements with the licensee of WFQX-TV to utilize its Channel 47 transmission system. The proposed technical parameters, identical to the licensed WFQX-TV and original WFQX-TV Appendix B facilities, are summarized in the following.

Present Channel 7 Parameters (Appendix B)

Facility ID	State and City		NTSC	DTV								
			Chan	Chan	ERP (kW)	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDDMMSS)	Area (sq km)	Population (thous)	% Interf. Received
21253	MI	TRAVERSE CITY	7	7	19.1	411	84826	441633	854249	30172	393	18.5

Antenna C/R AMSL: 756 meters

Proposed Channel 47 Parameters

Facility ID	State and City		NTSC	DTV								
			Chan	Chan	ERP (kW)	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDDMMSS)	Area (sq km)	Population (thous)	% Interf. Received
21253	MI	TRAVERSE CITY	7	47	500	393	67847	444453	850408	25475	378	0.0

Antenna C/R AMSL: 744 meters

The proposed Channel 47 directional antenna pattern data, corresponding to WFQX-TV's Channel 47 Antenna ID 67847, is provided in **Figure 1**.

Population and Coverage

A map is supplied as **Figure 2**, which depicts the standard predicted coverage contours. This map includes the boundaries of Traverse City, MI, WPBN-TV's principal community. As demonstrated thereon, the proposed facility complies with §73.625(a)(1), as the entire principal community will be encompassed by the 48 dBμ contour.

The proposed WPBN-TV Channel 47 allotment's predicted service population provides a 96.1 percent match of the current Appendix B facility, as detailed in the following table.

¹Amendment of Section 73.622(i), Final DTV Table of Allotments, Television Broadcast Stations (Cadillac, Michigan), MB Docket No. 08-252, RM 11509, DA 09-872, released April 21, 2009.

Post-Transition Population Summary

Population Summary (2000 Census) OET Bulletin 69 method	Ch. 7 Appendix B	Ch. 47 Proposed
Within Noise Limited Contour	494,167	394,726
Not affected by terrain losses	483,269	378,682
Lost to all interference	89,394	48
Net DTV Service	393,875	378,634
Match of Appendix B	---	96.13%

The proposed Channel 47 transmitter site is located 73.4 km from the WPBN-TV Channel 7 Appendix B (replication) site. The site change will result in a shift of the WPBN-TV service area such that it will not cover all of the former analog Grade B contour area. Pursuant to the procedures adopted in MB Docket 08-253² and contemporaneously with filing the channel substitution petition, *Barrington* is also filing an application for a new replacement digital television translator station on Channel 50 to help avoid loss of service to the areas previously receiving WPBN-TV’s analog service. The Channel 50 translator’s antenna will be sited at the tower associated with WPBN-TV’s former analog Channel 7.

The total population within WPBN-TV’s former analog Grade B contour is 494,334 persons. A detailed examination of the actual service provided by WPBN-TV’s former analog facility during the pre-transition period shows that incoming interference was widespread within southern areas of the Grade B contour. **Figure 3** depicts an OET Bulletin 69 analysis³ for the pre-transition analog condition. Considering incoming interference during the transition and terrain losses, the actual interference-free service population achieved by WPBN-TV’s analog facility was 361,244. Nearly all of the incoming interference was from WXYZ-TV (analog Ch. 7, Detroit, MI) and WOOD-TV (digital Ch. 7, Grand Rapids, MI). As demonstrated on **Figure 3**, analog interference-free service was not predicted to occur in substantial areas to the south within the WPBN-TV Grade B contour.

²Report and Order, *Amendment of Parts 73 and 74 of the Commission’s Rules to Establish Rules for Replacement Digital Low Power Television Translator Stations*, MB Docket 08-253, FCC 09-36, released May 8, 2009.

³FCC Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004.

For clarity, an outline of the area of no WPBN-TV analog service within the Grade B contour is carried over to **Figure 4**. This map also provides the WPBN-TV Channel 7 Appendix B facility's contour. The Eighth Report and Order's Appendix B (March, 2008) specified a replication facility for WPBN-TV's digital Channel 7 (19.1 kW / 411 m) having an interference-free service population of 393,875. The prior Appendix B from the Seventh Report and Order (August, 2007) specified reduced parameters and a different transmitting location based on WPBN-TV's pre-transition certification (BCERCT-20041103AHR). The Seventh Report and Order Appendix B facility (3.2 kW / 230 m) had an interference-free service population of 225,099 persons. Thus, **Figure 4** provides an outline of the target areas of concern for WPBN-TV's post-transition facility as reduced by the areas where analog service was not predicted to occur during the transition.

Building on the target areas of **Figure 4**, the proposed WPBN-TV Channel 47 41 dB μ noise limited contour is added on **Figure 5**, along with the 41 dB μ contour corresponding to the proposed Channel 50 translator. This map shows that the proposed Channel 47 WPBN-TV and Channel 50 translator facility contours will encompass nearly all of the former analog Channel 7 interference-free service area, and additionally extend the contour into other portions of the DMA. Since WPBN-TV's predicted analog interference-free service area fell well short of the Grade B contour location to the south, the areas of predicted service loss are minimal despite not filling out the entire Grade B contour area.

The proposed Channel 47 WPBN-TV and Channel 50 translator facilities' composite contour area would cover a total population of 489,538 persons. Of that number, 365,022 are within the replication (analog Grade B) contour area. For the area as bounded by the analog Grade B contour, the proposal would cover 92.67 percent of the Appendix B (March 2008/replication) population (393,875 persons) and 101.05 percent of the pre-transition analog service population (361,244 persons). All of the Seventh Report and Order Appendix B (August 2007 - 3.2 kW / 230 m) contour area would be covered by the composite Channel 47 WPBN-TV and Channel 50 translator contour.

Individually, the proposed Channel 47 facility would cover 237,258 persons that are within the former analog Grade B contour that received interference-free analog service. Adding the

proposed Channel 50 translator (see **Figure 5**), the proposed Channel 47 and Channel 50 contours would cover all of the areas that formerly received interference-free service from the analog WPBN-TV Channel 7 except for three discrete areas in the southern region (tinted orange). These areas contain a total population of 9,330 persons, which is 2.58 percent of the pre-transition analog interference-free population (361,244 persons).

The three loss areas are located just beyond the proposed translator's 41 dB μ contour. Actual coverage in this area may extend beyond the contour location due to the relatively flat terrain and lack of terrain blockage. **Figure 5A** adds the proposed translator's Longley-Rice predicted signal levels to the contour map. This map shows that predicted signal levels exceed the 41 dB μ threshold throughout nearly all of the three loss areas. Analysis of the Longley-Rice predictions shows that the loss population within these three areas is 633 persons, which is 0.18 percent of the pre-transition analog interference-free population.

The proposal will result in substantial gain for NBC Network coverage, of which WPBN-TV is an affiliate. **Figure 6** provides an overview map of NBC Network coverage changes that will result. The only loss areas are associated with the three discrete areas discussed in the preceding paragraphs, affecting 9,330 persons (or only 633 persons considering Longley-Rice predicted coverage beyond the translator's contour). A considerable area of new NBC Network coverage area will be provided within the proposed Channel 47 coverage contour. This area encompasses 121,357 persons, 37,121 of which are within the WPBN-TV former analog Grade B contour but were not predicted to receive interference-free service, and 84,236 are within the Channel 47 contour that covers new areas beyond the analog Grade B. Additionally, predicted interference to 112,189 persons within NBC Network affiliate WOOD-TV's service contour will be eliminated by changing WPBN-TV to an alternate channel.⁴ Summing these numbers, the total NBC Network "gain" population is 233,546 persons.

⁴Figure 7, a predicted coverage and interference map regarding WOOD-TV's digital Channel 7, depicts the areas of unique interference from the WPBN-TV Channel 7 Appendix B (March 2008) facility to WOOD-TV. This is the Appendix B assignment for WPBN-TV which WOOD-TV has disputed.

Allocation and Interference

A detailed interference study per OET Bulletin 69 shows that the proposal complies with the 0.5 percent limit of new interference caused to the Appendix B facilities and current post-transition authorizations of pertinent nearby stations. The interference study output report is provided as **Table 2**. Protection requirements towards authorized Class A stations are also satisfied.

The proposed Channel 47 parameters are identical to the WFQX-TV licensed facility. As such, it is expected that Canadian coordination has already been obtained for use of Channel 47 during the pre-transition period and to establish Appendix B values for post-transition operation.

Certification

The undersigned hereby certifies that the foregoing statement was prepared by him or under his direction, and that it is true and correct to the best of his knowledge and belief.



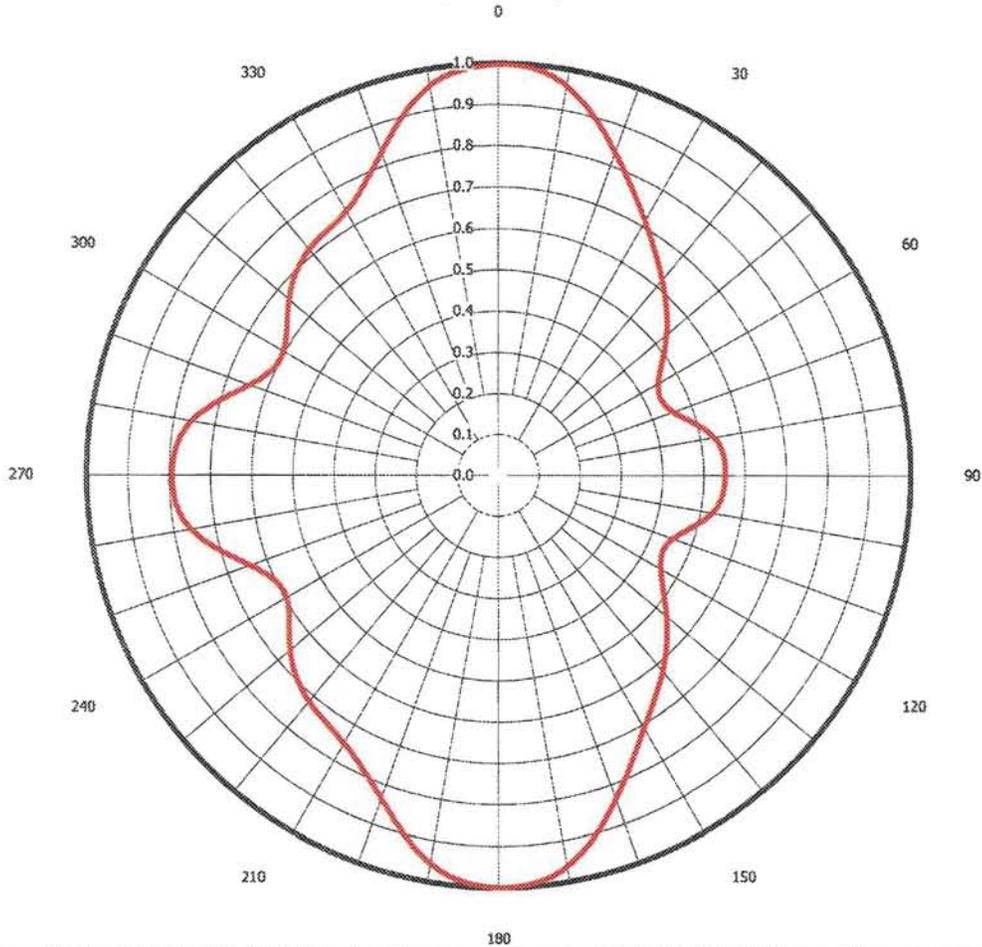
Joseph M. Davis, P.E.
July 24, 2009

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703-650-9600

List of Attachments

Figure 1	Directional Antenna Data
Figure 2	Proposed Coverage Contours
Figure 3	Predicted Coverage and Interference - WPBN-TV Former Analog Facility
Figure 4	Coverage Contours - Ch. 7 Appendix B Facilities
Figure 5	Coverage Contours - Proposed Channel 47 with Ch. 50 Translator
Figure 5A	Longley-Rice Predicted Coverage - Ch. 50 Translator
Figure 6	NBC Network Gain - Loss Areas
Figure 7	Predicted Coverage and Interference - WOOD-TV
Table 1	OET Bulletin 69 Interference Study

**Azimuth Pattern - Relative Field
(True North)**



Azimuth (°T)	Relative Field						
0	0.997	90	0.551	180	1.000	270	0.793
10	0.959	100	0.528	190	0.956	280	0.757
20	0.833	110	0.452	200	0.834	290	0.643
30	0.714	120	0.455	210	0.751	300	0.603
40	0.620	130	0.533	220	0.717	310	0.665
50	0.534	140	0.621	230	0.662	320	0.716
60	0.449	150	0.708	240	0.595	330	0.740
70	0.453	160	0.835	250	0.643	340	0.832
80	0.532	170	0.963	260	0.760	350	0.959



Figure 1
Directional Antenna Data
Antenna ID #67847
WPBN-TV Traverse City, MI
Facility ID 21253
Ch. 47 500 kW 393 m

 prepared for
Barrington Traverse City License LLC

 July, 2009

Chesapeake RF Consultants, LLC
 Radiofrequency Consulting Engineers
 Digital Television and Radio

Figure 2
Proposed Coverage Contours
WPBN-TV Traverse City, MI
Facility ID 21253
Ch. 47 500 kW 393 m

prepared for
Barrington Traverse City License LLC

July, 2009

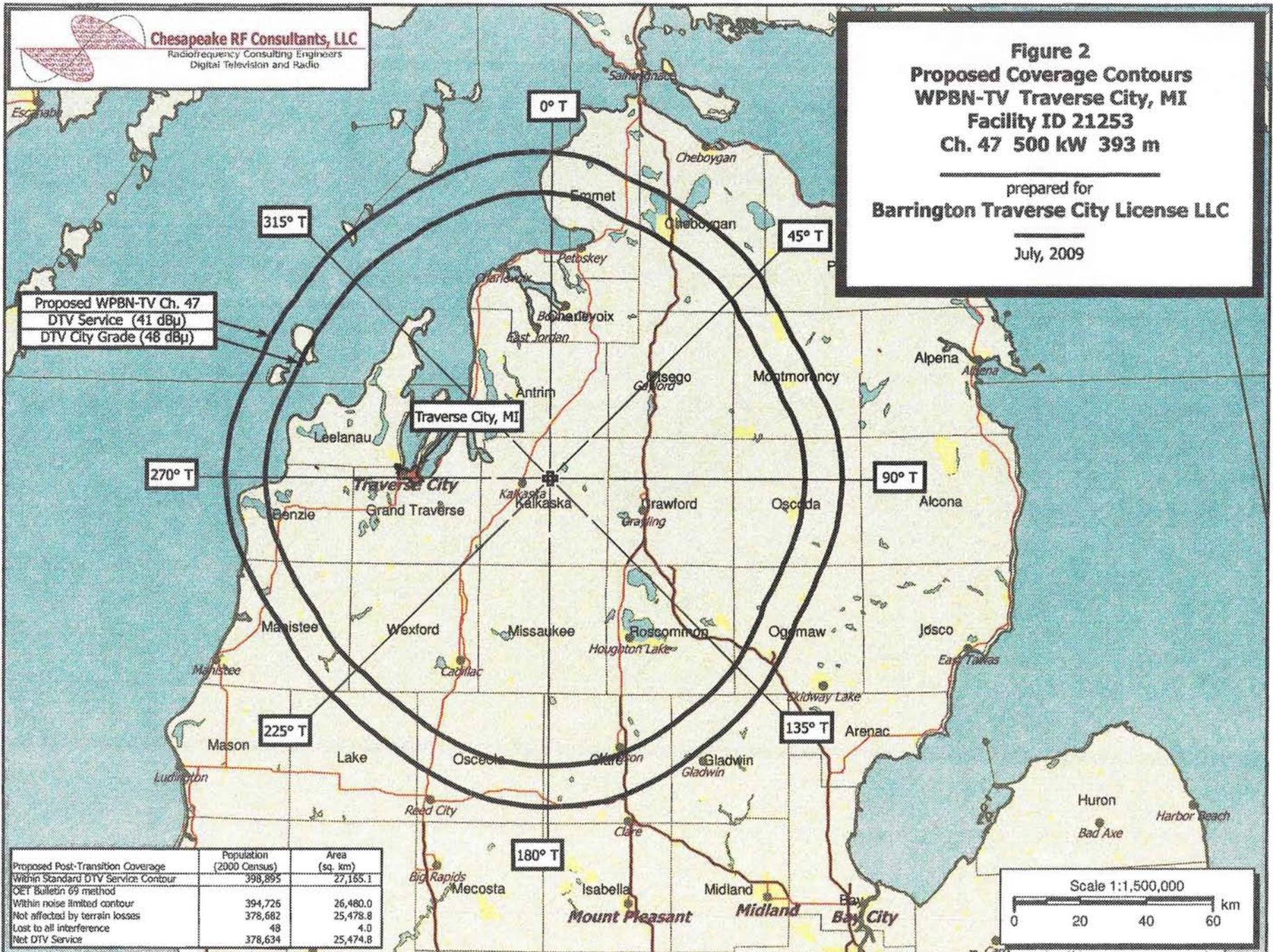
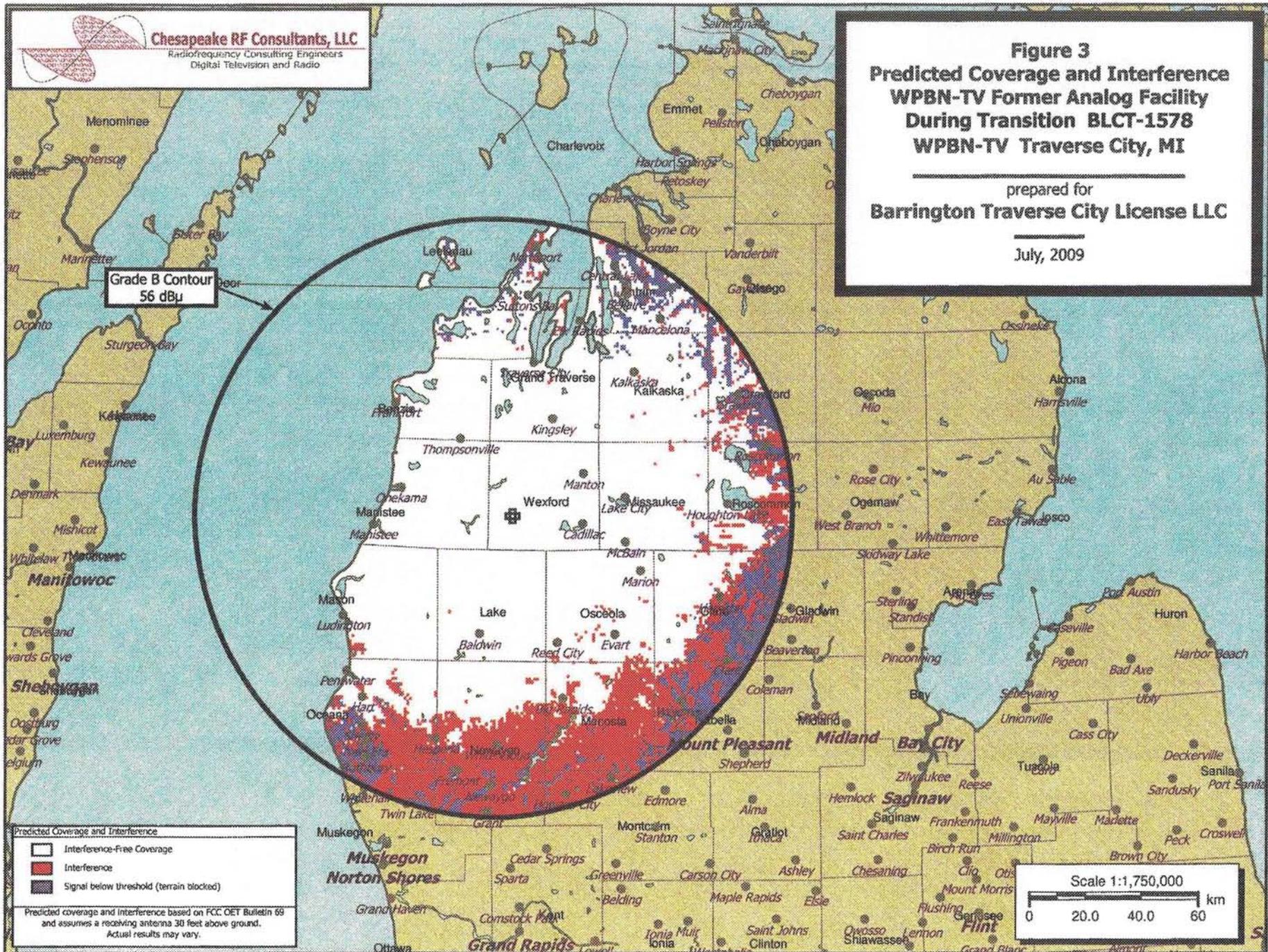


Figure 3
Predicted Coverage and Interference
WPBN-TV Former Analog Facility
During Transition BLCT-1578
WPBN-TV Traverse City, MI

prepared for
Barrington Traverse City License LLC

July, 2009



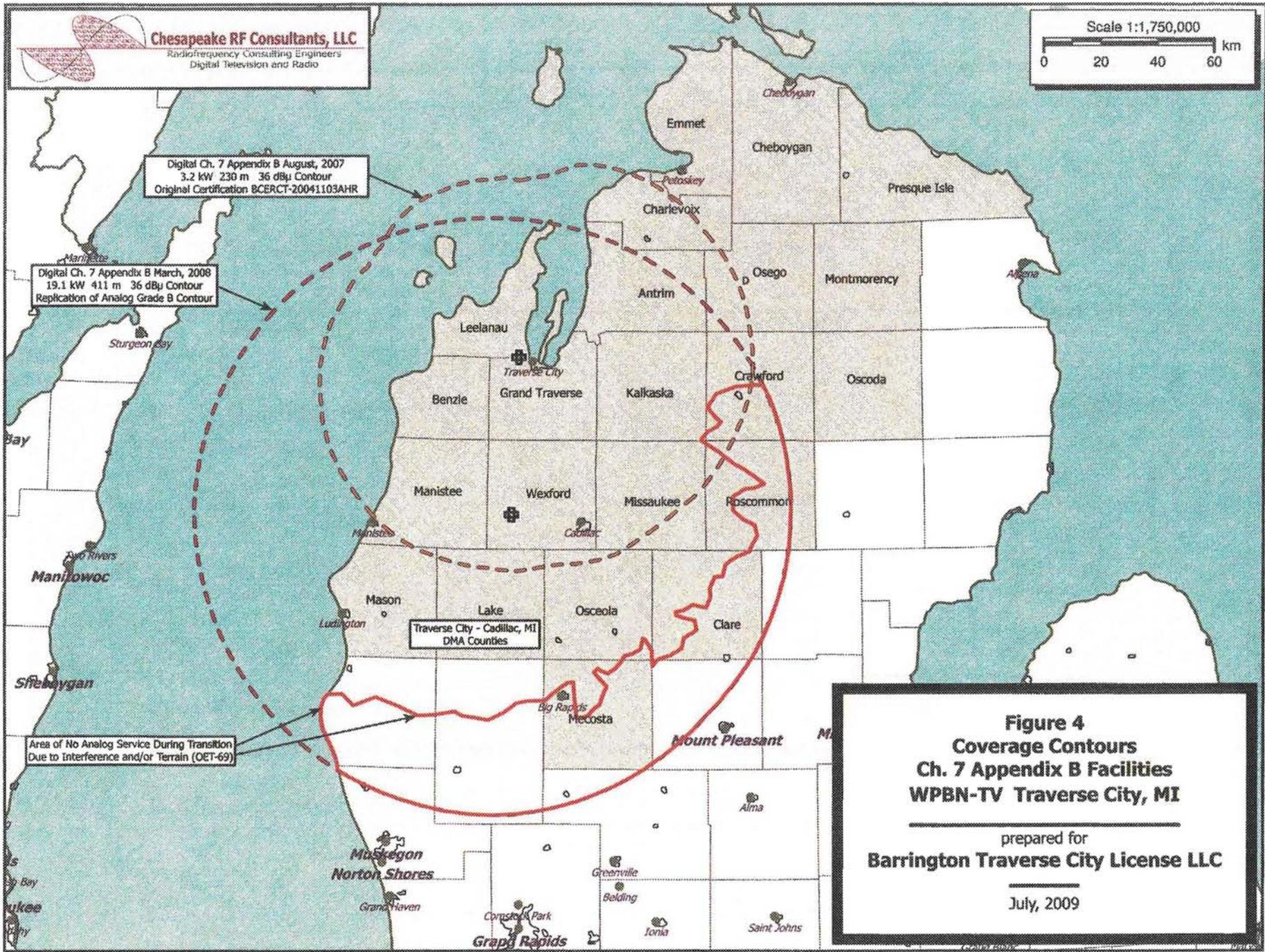
Predicted Coverage and Interference

- Interference-Free Coverage
- Interference
- Signal below threshold (terrain blocked)

Predicted coverage and Interference based on FCC OET Bulletin 69 and assumes a receiving antenna 30 feet above ground. Actual results may vary.

Scale 1:1,750,000

0 20.0 40.0 60 km



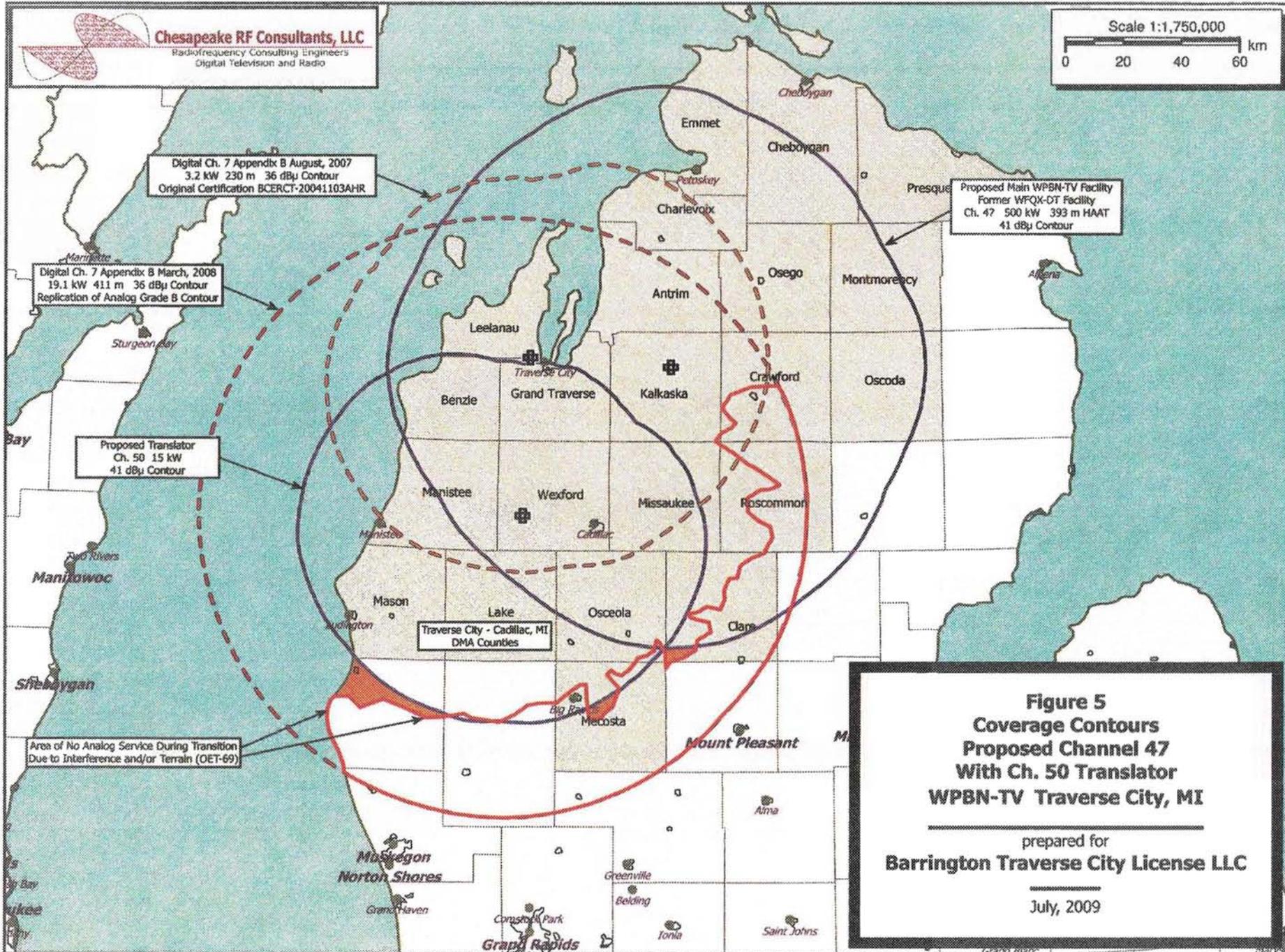


Figure 6
NBC Network Gain-Loss Areas
Proposed Channel 47
With Ch. 50 Translator
WPBN-TV Traverse City, MI

prepared for
Barrington Traverse City License LLC

July, 2009

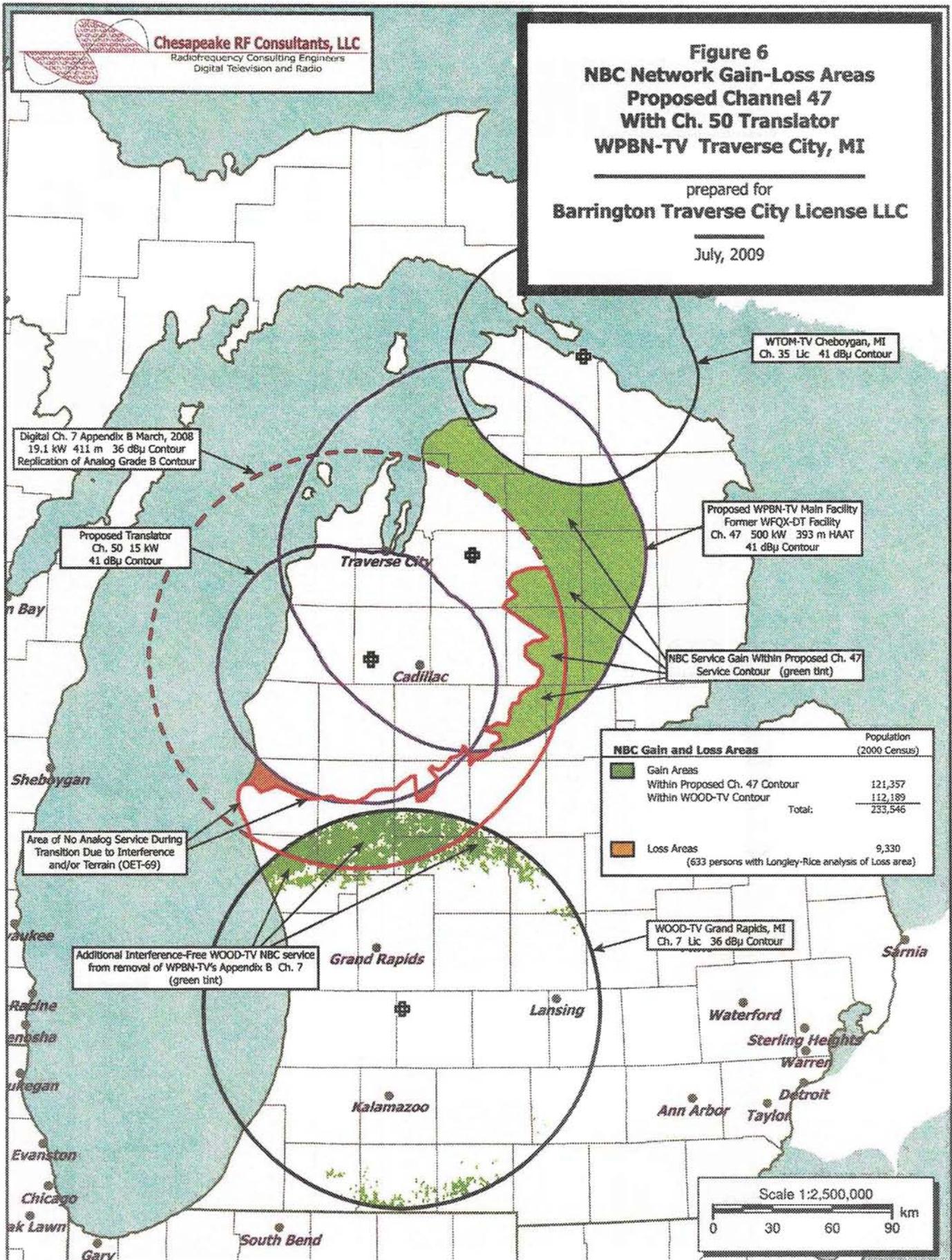
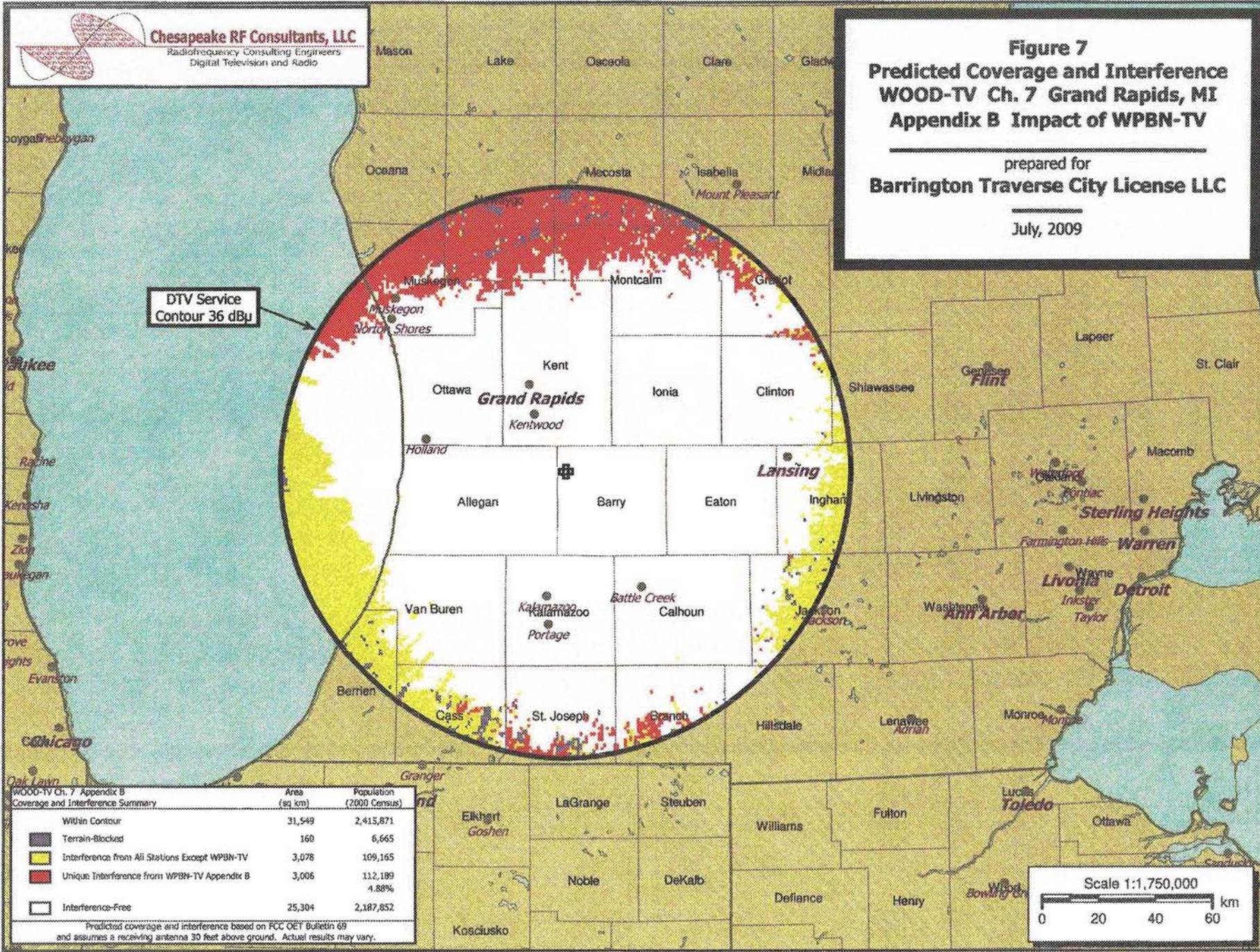


Figure 7
Predicted Coverage and Interference
WOOD-TV Ch. 7 Grand Rapids, MI
Appendix B Impact of WPBN-TV

prepared for
Barrington Traverse City License LLC

July, 2009



DTV Service
 Contour 36 dBu

WOOD-TV Ch. 7 Appendix B
 Coverage and Interference Summary

	Area (sq. km)	Population (2000 Census)
Within Contour	31,549	2,415,871
Terrain-Blockad	160	6,665
Interference from All Stations Except WPBN-TV	3,078	109,165
Unique Interference from WPBN-TV Appendix B	3,006	112,189 4.88%
Interference-Free	25,304	2,187,852

Predicted coverage and interference based on FCC OET Bulletin 69 and assumes a receiving antenna 30 feet above ground. Actual results may vary.

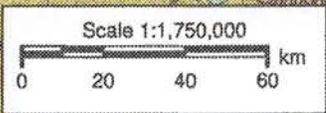


Table 1 WPBN-TV OET Bulletin 69 Interference Study
(worst-case scenarios shown page 1 of 6)

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

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 07-07-2009 Time: 13:56:36

Record Selected for Analysis

WPBN-TV USERRECORD-01 TRAVERSE CITY MI US
Channel 47 ERP 500. kW HAAT 392. m RCAMSL 00744 m
Latitude 044-44-53 Longitude 0085-04-08
Status APP Zone 2 Border
Dir Antenna Make CDB Model 0000000067847 Beam tilt N Ref Azimuth 0.
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	497.004	379.2	98.1
45.0	166.465	358.8	88.0
90.0	151.800	366.6	88.0
135.0	166.465	393.9	90.6
180.0	500.000	391.1	99.0
225.0	237.705	386.2	92.7
270.0	314.424	433.8	98.0
315.0	238.395	424.1	95.1

Evaluation toward Class A Stations

No Spacing violations or contour overlap to Class A stations

Class A Evaluation Complete

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 = 166.1km

Proposed facility is beyond the Mexican coordination distance

Proposed station is OK toward AM broadcast stations

Table 1 WPBN-TV OET Bulletin 69 Interference Study
(worst-case scenarios shown page 2 of 6)

Start of Interference Analysis

Channel	Call	Proposed Station City/State	ARN
47	WPBN-TV	TRAVERSE CITY MI	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
46	WBSF	BAY CITY MI	172.0	PLN	DTVPLN -DTVP1648
46	WBSF	BAY CITY MI	172.0	CP MOD	BMPCDT -20080620AGE
47	WTTW	CHICAGO IL	380.5	LIC	BLEDT -20020408ABK
47	WTTW	CHICAGO IL	380.5	PLN	DTVPLN -DTVP1673
48	WJMN-TV	ESCANABA MI	212.7	APP	BMPCDT -20081023AAF
48	WJMN-TV	ESCANABA MI	212.7	PLN	DTVPLN -DTVP1711
48	WJMN-TV	ESCANABA MI	212.7	CP	BPCDT -19991025ACN
48	WAQP	SAGINAW MI	188.1	LIC	BLCDDT -20060824ADS
48	WAQP	SAGINAW MI	188.1	PLN	DTVPLN -DTVP1712

Analysis of Interference to Affected Station 1

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	APP	BPCDT -20090324ABD
45	WDIV-TV	DETROIT MI	121.8	PLN	DTVPLN -DTVP1617
45	WDIV-TV	DETROIT MI	121.8	LIC	BLCDDT -19990429KX
45	WDIV-TV	DETROIT MI	121.8	CP	BPCDT -20080620AFZ
45	WLLA	KALAMAZOO MI	165.5	LIC	BLCDDT -20070529AEA
45	WLLA	KALAMAZOO MI	165.5	PLN	DTVPLN -DTVP1618
45	WFUP	VANDERBILT MI	201.8	CP	BPCDT -20081119AMT
45	WFUP	Vanderbilt MI	201.8	PLN	DTVPLN -DTVP1619
46	WHME-DR	SOUTH BEND IN	282.0	APP	BPRM -20080619AET
46	WUPW	TOLEDO OH	204.7	LIC	BLCDDT -20030411AAF
46	WUPW	TOLEDO OH	204.7	PLN	DTVPLN -DTVP1653
46	WUPW	TOLEDO OH	204.7	APP	BPCDT -20080619AJB
46	WDJT-TV	MILWAUKEE WI	332.9	CP MOD	BMPCDT -20000419ABR
46	WDJT-TV	MILWAUKEE WI	332.9	PLN	DTVPLN -DTVP1664
47	WPBN-TV	TRAVERSE CITY MI	172.0	APP	USERRECORD-01

Proposal causes no interference

Analysis of Interference to Affected Station 2

Channel	Call	City/State	Application Ref. No.
46	WBSF	BAY CITY MI	BMPCDT -20080620AGE

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
45	WDIV-TV	DETROIT MI	121.9	APP	BPCDT -20090324ABD
45	WDIV-TV	DETROIT MI	121.9	PLN	DTVPLN -DTVP1617

Table 1 WPBN-TV OET Bulletin 69 Interference Study
(worst-case scenarios shown page 3 of 6)

45	WDIV-TV	DETROIT MI	121.9	LIC	BLCDDT	-19990429KX
45	WDIV-TV	DETROIT MI	121.9	CP	BPCDDT	-20080620AFZ
45	WLLA	KALAMAZOO MI	165.5	LIC	BLCDDT	-20070529AEA
45	WLLA	KALAMAZOO MI	165.5	PLN	DTVPLN	-DTVP1618
45	WFUP	VANDERBILT MI	201.8	CP	BPCDDT	-20081119ANT
45	WFUP	Vanderbilt MI	201.8	PLN	DTVPLN	-DTVP1619
46	WHME-DR	SOUTH BEND IN	282.0	APP	BPRM	-20080619AET
46	WUPW	TOLEDO OH	204.7	LIC	BLCDDT	-20030411AAF
46	WUPW	TOLEDO OH	204.7	PLN	DTVPLN	-DTVP1653
46	WUPW	TOLEDO OH	204.7	APP	BPCDDT	-20080619AJB
46	WDJT-TV	MILWAUKEE WI	332.9	CP MOD	BMPDDT	-20000419ABR
46	WDJT-TV	MILWAUKEE WI	332.9	PLN	DTVPLN	-DTVP1664
47	WPBN-TV	TRAVERSE CITY MI	172.0	APP	USERRECORD-01	

Proposal causes no interference

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Analysis of Interference to Affected Station 3

Channel	Call	City/State	Application Ref. No.
47	WTTW	CHICAGO IL	BLEDT -20020409ABK

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
46	WTVP	PEORIA IL	213.1	LIC	BLEDT -20040105ACV
46	WTVP	PEORIA IL	213.1	PLN	DTVPLN -DTVP1645
46	WHME-DR	SOUTH BEND IN	126.4	APP	BPRM -20080619AET
46	WDJT-TV	MILWAUKEE WI	139.1	CP MOD	BMPDDT -20000419ABR
46	WDJT-TV	MILWAUKEE WI	139.1	PLN	DTVPLN -DTVP1664
47	KPXR-TV	CEDAR RAPIDS IA	353.1	LIC	BLCDDT -20020510AAA
47	KPXR	CEDAR RAPIDS IA	353.1	PLN	DTVPLN -DTVP1672
47	WAVE	LOUISVILLE KY	419.2	LIC	BLCDDT -20030306ABQ
47	WAVE	LOUISVILLE KY	419.2	PLN	DTVPLN -DTVP1675
48	WCIA	CHAMPAIGN IL	208.6	CP MOD	BMPDDT -20050701ACC
48	WCIA	CHAMPAIGN IL	208.6	PLN	DTVPLN -DTVP1707
48	WHME-TV	SOUTH BEND IN	126.4	LIC	BLCDDT -20060109ABG
48	WHME-TV	SOUTH BEND IN	126.4	PLN	DTVPLN -DTVP1709
48	WHME-TV	SOUTH BEND IN	126.4	APP	BPCDDT -20080619ABC
48	WBME-TV	RACINE WI	139.1	CP MOD	BMPDDT -20080620ACE
48	WBME-TV	RACINE WI	136.1	PLN	DTVPLN -DTVP1728
48	WBME-TV	RACINE WI	109.8	LIC	BMLCDDT -20070823AED
47	WPBN-TV	TRAVERSE CITY MI	380.5	APP	USERRECORD-01

Proposal causes no interference

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Analysis of Interference to Affected Station 4

Channel	Call	City/State	Application Ref. No.
47	WTTW	CHICAGO IL	DTVPLN -DTVP1673

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
46	WTVP	PEORIA IL	213.1	LIC	BLEDT -20040105ACV
46	WTVP	PEORIA IL	213.1	PLN	DTVPLN -DTVP1645
46	WHME-DR	SOUTH BEND IN	126.4	APP	BPRM -20080619AET

Table 1 WPBN-TV OET Bulletin 69 Interference Study
(worst-case scenarios shown page 4 of 6)

46	WDJT-TV	MILWAUKEE WI	139.1	CP MOD	BMPDDT	-20000419ABR
46	WDJT-TV	MILWAUKEE WI	139.1	PLN	DTVPLN	-DTVP1664
47	KPXR-TV	CEDAR RAPIDS IA	353.1	LIC	BLCDDT	-20020510AAA
47	KPXR	CEDAR RAPIDS IA	353.1	PLN	DTVPLN	-DTVP1672
47	WAVE	LOUISVILLE KY	419.2	LIC	BLCDDT	-20030306ABQ
47	WAVE	LOUISVILLE KY	419.2	PLN	DTVPLN	-DTVP1675
48	WCIA	CHAMPAIGN IL	208.6	CP MOD	BMPDDT	-20050701ACC
48	WCIA	CHAMPAIGN IL	208.6	PLN	DTVPLN	-DTVP1707
48	WHME-TV	SOUTH BEND IN	126.4	LIC	BLCDDT	-20060109ABG
48	WHME-TV	SOUTH BEND IN	126.4	PLN	DTVPLN	-DTVP1709
48	WHME-TV	SOUTH BEND IN	126.4	APP	BPCDDT	-20080619ABC
48	WBME-TV	RACINE WI	139.1	CP MOD	BMPDDT	-20080620ACE
48	WBME-TV	RACINE WI	136.1	PLN	DTVPLN	-DTVP1728
48	WBME-TV	RACINE WI	109.8	LIC	BMLCDDT	-20070823AED
47	WPBN-TV	TRAVERSE CITY MI	380.5	APP	USERRECORD-01	

Proposal causes no interference

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Analysis of Interference to Affected Station 5

Channel	Call	City/State	Application Ref. No.
48	WJMN-TV	ESCANABA MI	BMPDDT -20081023AAF

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
48	WAQP	SAGINAW MI	396.4	LIC	BLCDDT -20060824ADS
48	WAQP	SAGINAW MI	396.4	PLN	DTVPLN -DTVP1712
48	WBME-TV	RACINE WI	344.9	CP MOD	BMPDDT -20080620ACE
48	WBME-TV	RACINE WI	347.0	PLN	DTVPLN -DTVP1728
48	WBME-TV	RACINE WI	371.4	LIC	BMLCDDT -20070823AED
47	WPBN-TV	TRAVERSE CITY MI	212.7	APP	USERRECORD-01

Proposal causes no interference

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Analysis of Interference to Affected Station 6

Channel	Call	City/State	Application Ref. No.
48	WJMN-TV	ESCANABA MI	DTVPLN -DTVP1711

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
48	WAQP	SAGINAW MI	396.4	LIC	BLCDDT -20060824ADS
48	WAQP	SAGINAW MI	396.4	PLN	DTVPLN -DTVP1712
48	WBME-TV	RACINE WI	344.9	CP MOD	BMPDDT -20080620ACE
48	WBME-TV	RACINE WI	347.0	PLN	DTVPLN -DTVP1728
48	WBME-TV	RACINE WI	371.4	LIC	BMLCDDT -20070823AED
47	WPBN-TV	TRAVERSE CITY MI	212.7	APP	USERRECORD-01

Proposal causes no interference

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Table 1 WPBN-TV OET Bulletin 69 Interference Study
 (worst-case scenarios shown page 5 of 6)

Analysis of Interference to Affected Station 7

Channel	Call	City/State	Application	Ref. No.
48	WJMN-TV	ESCANABA MI	BPCDT	-19991025ACN

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
48	WAQP	SAGINAW MI	396.4	LIC	BLCDT	-20060824ADS
48	WAQP	SAGINAW MI	396.4	PLN	DTVPLN	-DTVPI1712
48	WBME-TV	RACINE WI	344.9	CP MOD	BMPCDT	-20080620ACE
48	WBME-TV	RACINE WI	347.0	PLN	DTVPLN	-DTVPI1728
48	WBME-TV	RACINE WI	371.4	LIC	BMLCDT	-20070823AED
47	WPBN-TV	TRAVERSE CITY MI	212.7	APP	USERRECORD-01	

Proposal causes no interference

Analysis of Interference to Affected Station 8

Channel	Call	City/State	Application	Ref. No.
48	WAQP	SAGINAW MI	BLCDT	-20060824ADS

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
48	WHME-TV	SOUTH BEND IN	250.1	LIC	BLCDT	-20060109ABG
48	WHME-TV	SOUTH BEND IN	250.1	PLN	DTVPLN	-DTVPI1709
48	WHME-TV	SOUTH BEND IN	250.1	APP	BPCDT	-20080619ABC
48	WJMN-TV	ESCANABA MI	396.4	APP	BMPCDT	-20081023AAF
48	WJMN-TV	ESCANABA MI	396.4	PLN	DTVPLN	-DTVPI1711
48	WJMN-TV	ESCANABA MI	396.4	CP	BPCDT	-19991025ACN
48	WSYX-DR	COLUMBUS OH	375.0	APP	BPRM	-20080620AOV
48	WBME-TV	RACINE WI	314.5	CP MOD	BMPCDT	-20080620ACE
48	WBME-TV	RACINE WI	312.2	PLN	DTVPLN	-DTVPI1728
48	WBME-TV	RACINE WI	310.6	LIC	BMLCDT	-20070823AED
49	WNWO-TV	TOLEDO OH	182.0	LIC	BLCDT	-20020403AAR
49	WNWO-TV	TOLEDO OH	182.0	PLN	DTVPLN	-DTVPI1750
47	WPBN-TV	TRAVERSE CITY MI	188.1	APP	USERRECORD-01	

Proposal causes no interference

Analysis of Interference to Affected Station 9

Channel	Call	City/State	Application	Ref. No.
48	WAQP	SAGINAW MI	DTVPLN	-DTVPI1712

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
48	WHME-TV	SOUTH BEND IN	250.1	LIC	BLCDT	-20060109ABG
48	WHME-TV	SOUTH BEND IN	250.1	PLN	DTVPLN	-DTVPI1709
48	WHME-TV	SOUTH BEND IN	250.1	APP	BPCDT	-20080619ABC

Table 1 WPBN-TV OET Bulletin 69 Interference Study
 (worst-case scenarios shown page 6 of 6)

48	WJMN-TV	ESCANABA MI	396.4	APP	BMPCDT	-20081023AAF
48	WJMN-TV	ESCANABA MI	396.4	PLN	DTVPLN	-DTVPI1711
48	WJMN-TV	ESCANABA MI	396.4	CP	BPCDT	-19991025ACN
48	WSYX-DR	COLUMBUS OH	375.0	APP	BPRM	-20080620AOV
48	WBME-TV	RACINE WI	314.5	CP MOD	BMPCDT	-20080620ACE
48	WBME-TV	RACINE WI	312.2	PLN	DTVPLN	-DTVPI1728
48	WBME-TV	RACINE WI	310.6	LIC	BMLCDT	-20070823AED
49	WNWO-TV	TOLEDO OH	182.0	LIC	BLCDT	-20020403AAR
49	WNWO-TV	TOLEDO OH	182.0	PLN	DTVPLN	-DTVPI1750
47	WPBN-TV	TRAVERSE CITY MI	188.1	APP	USERRECORD-01	

Proposal causes no interference

Analysis of Interference to Affected Station 10

Channel	Call	City/State	Application	Ref. No.
47	WPBN-TV	TRAVERSE CITY MI	USERRECORD-01	

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
46	WBSF	BAY CITY MI	172.0	PLN	DTVPLN	-DTVPI648
46	WBSF	BAY CITY MI	172.0	CP MOD	BMPCDT	-20080620AGE
47	WTTW	CHICAGO IL	380.5	LIC	BLEDT	-20020408ABK
47	WTTW	CHICAGO IL	380.5	PLN	DTVPLN	-DTVPI673
48	WJMN-TV	ESCANABA MI	212.7	APP	BMPCDT	-20081023AAF
48	WJMN-TV	ESCANABA MI	212.7	PLN	DTVPLN	-DTVPI1711
48	WJMN-TV	ESCANABA MI	212.7	CP	BPCDT	-19991025ACN
48	WAQP	SAGINAW MI	188.1	LIC	BLCDT	-20060824ADS
48	WAQP	SAGINAW MI	188.1	PLN	DTVPLN	-DTVPI1712

Total scenarios = 2

Result key: 1
 Scenario 1 Affected station 10
 Before Analysis

Results for: 47A MI TRAVERSE CITY USERRECORD01 APP

	POPULATION	AREA (sq km)
within Noise Limited Contour	394726	26480.0
not affected by terrain losses	378682	25478.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	48	4.0
lost to ATV IX only	48	4.0
lost to all IX	48	4.0

Potential Interfering Stations Included in above Scenario 1

48A MI SAGINAW BLCDT 20060824ADS LIC

FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED