

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554**

In the Matter of:)
)
Southern Media Holdings, Inc.) MB Docket No. 11-54
)
Petition for Rulemaking to Amend) Rulemaking No. 11624
the DTV Table of Allotments for)
Station WFXG(TV), Augusta, Georgia)

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

FILED/ACCEPTED
MAY - 4 2011
Federal Communications Commission
Office of the Secretary

COMMENTS OF GRAY TELEVISION, LLC

Gray Television Licensee, LLC (“Gray”), by counsel, hereby submits these comments in support of the Notice of Proposed Rule Making filed by Southern Media Holdings, Inc. (“SMH”) requesting the amendment of the Table of DTV Allotments to substitute channel 51 for channel 31 at Augusta, Georgia (the “SMH Petition”).

Gray is the licensee of WRDW(TV), Augusta, Georgia (“WRDW”). WRDW recently filed a Petition for Rule Making to modify its allotment to specify channel 31 in Augusta, Georgia (the “WRDW Petition”) should the Commission grant SMH’s request.¹

The grant of the SMH Petition would result in a preferential arrangement of allotments by allowing SMH to continue to operate on its already constructed and operating channel 51 facility without interruption to viewers and by allowing WRDW’s Petition for the channel 31 allotment to proceed. As Gray explained in the WRDW Petition, following the digital transition some of WRDW’s viewers have struggled to receive WRDW’s digital signal on its current channel 12 allotment. Based on its

¹ A copy of WRDW’s Petition is provided at Attachment 1.

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experience with other VHF and UHF digital facilities, Gray is confident that moving WRDW from its current VHF allotment to a UHF allotment on channel 31 will improve Augusta residents' ability to receive the station's over-the-air digital signal. Moreover, because WRDW operated on channel 31 as its interim digital channel, the station is well positioned to quickly and efficiently to resume digital operations on channel 31 if the Commission grants the WRDW Petition.

Accordingly, for the reasons set forth above, Gray supports the Commission's proposal to amend the DTV Table of Allotments to specify channel 51 at Augusta, Georgia.

Respectfully submitted,

GRAY TELEVISION LICENSEE, LLC



Joan Stewart
Wiley Rein LLP
1776 K Street NW
Washington DC 20006
202.719.7000
Its Attorney

Dated: May 4, 2011

Certificate of Service

I, Gina Stuart, a secretary for the law firm Wiley Rein LLP, hereby certify that on this 4th day of May 2011, caused copies of the foregoing “Comments of Gray Television, LLC” to be mailed via first class postage prepaid mail to the following:

Harry C. Martin, Esq.
Fletcher, Heald & Hildreth, PLC
1300 N. 17th Street, 11th Floor
Arlington, VA 22209


Gina Stuart

Attachment 1

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

In re:)
)
Gray Television Licensee, LLC)
)
Petition for Rulemaking to Amend)
the DTV Table of Allotments for)
Station WRDW-TV, Augusta, Georgia)
(Facility 73937))

MB Docket No. _____

Rulemaking No. _____

FILED/ACCEPTED

MAY - 3 2011

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

Federal Communications Commission
Office of the Secretary

PETITION FOR RULEMAKING

Gray Television Licensee, LLC ("Gray"), licensee of Station WRDW-TV ("WRDW"), Augusta, Georgia, by counsel, hereby requests that the post-transition DTV Table of Allotments (the "DTV Table")¹ be amended to change WRDW's digital allotment from VHF Channel 12 to UHF Channel 31 with the technical parameters as set forth in the attached Engineering Statement. Channel 31 is currently allotted to WFXG(TV), Augusta, Georgia (Facility 3228); however, WFXG recently filed a petition for rulemaking seeking to return to its original digital channel 51 ("WFXG Petition").² Upon grant of the WFXG Petition, Gray requests that the channel 31 allotment currently assigned to WFXG(TV) be assigned to WRDW.

This channel substitution serves the public interest by i) resolving significant over-the-air reception problems in certain areas of WRDW's predicted service area and ii) improving the possibility for service to viewers using hand-held and mobile devices.

¹ 47 C.F.R. §73.622(i).

² *Amendment of Section 73.622(i), Post-Transition Table of DTV Allotments, Television Broadcast Stations (Augusta, Georgia)*, MB Docket No. 11-54, RM 11624, DA 11-499, released March 16, 2011. Gray plans to file comments in support of WFXG's petition.

Indeed, since WRDW ended analog broadcasts in February 2009, certain viewers have struggled to receive the station's over-the-air digital signal. The problems with reception of digital VHF channels have been well documented with real world experience showing that; overall, UHF channels are received better by indoor antennas. Although WRDW staff has worked diligently with its viewers to resolve complaints concerning its digital signal, it is clear that the only solution that will resolve the majority of viewer problems is moving to a UHF channel. Moreover, WRDW broadcast on channel 31 for over five years during the pre-digital transition period and has retained the channel 31 equipment. With minor upgrades to its pre-transition equipment, WRDW could immediately and efficiently commence broadcast operations on channel 31.

Attached is an Engineering Statement of Chesapeake RF Consultants, LLC,³ which sets forth in detail the specifications of WRDW's proposal to modify the DTV Table to allot channel 31 to Augusta, Georgia. This proposal complies with all relevant technical requirements for amendment of the post-transition DTV Table. As further reflected in the Engineering Statement, the proposed Channel 31 facility will provide full principal community coverage to Augusta, Georgia.

The proposed channel 31 facility specifies a non-directional antenna and 751kW power level. The proposed channel 31 facility's contour provides coverage that matches the station's analog, pre-transition digital and post-transition digital service areas. While the population match of the proposed facility is 106.8 percent of the legacy analog service population, because of incoming interference (primarily from channel 32 in Columbia, SC), the population match of the proposed facility is 79.1 percent of WRDW's existing Appendix B facility. As noted in the attached Engineering Statement, however,

³ See Exhibit 1 ("Engineering Statement").

the population predicted to receive interference is located outside the Augusta DMA and is well-served by a CBS-affiliate in the adjacent market. Therefore, no viewer will lose CBS Network programming as a result of the proposed channel substitution.

Moreover, UHF channels provide better coverage for hand-held and mobile devices. While WRDW's primary concern is restoring service to its analog viewers, the station would embrace the opportunity to bring over-the-air mobile video to Augusta.

Accordingly, WRDW requests the channel 31 allotment, a UHF channel that would restore over-the-air service to its viewers, once WFXG is authorized to return to channel 51. For the foregoing reasons, the proposed amendment to the DTV Table of Allotments will clearly serve the public interest. Gray therefore respectfully requests that the DTV Table be amended in accordance with the specifications set forth in the attached Engineering Statement.

Respectfully submitted,

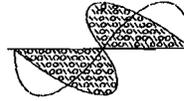
GRAY TELEVISION LICENSEE, LLC



Joan Stewart
Wiley Rein LLP
1776 K Street NW
Washington DC 20006
202.719.7000
Its Attorneys

Dated: May 3, 2011

EXHIBIT 1



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

Engineering Statement
Digital Television Channel Change
prepared for
Gray Television Licensee, LLC
WRDW-TV Augusta, GA
Facility ID 73937
Ch. 31 751 kW 469 m

This engineering statement has been prepared on behalf of *Gray Television Licensee, LLC* ("*Gray*"), licensee of WRDW-TV (Facility ID 73937, Augusta, GA) in support of a *Petition for Rulemaking* to change the WRDW-TV digital television post-transition channel assignment. WRDW-TV's pre-transition operations were on analog VHF Channel 12 and digital UHF Channel 31. WRDW-TV is currently licensed as digital on VHF Channel 12 (BLCDT-20090227ABQ) as established in Appendix B of the Seventh Report and Order in MB Docket 87-268. *Gray* herein requests a channel substitution for the post-transition WRDW-TV.

Gray proposes herein to substitute digital Channel 31, its pre-transition digital channel, in lieu of the current VHF Channel 12 digital allotment. The substitution is intended to aid in recovering viewers that were lost when WRDW-TV ceased analog operation on the transition date. Since the transition to digital, many viewers continue to experience significant difficulty in receiving WRDW-TV's digital signal as described elsewhere in the *Petition for Rulemaking*. Problems with digital VHF reception by stations in many markets have been widely publicized since the transition date. It has been found that indoor reception is difficult for digital VHF stations such as WRDW-TV due to the longer wavelength signal's inability to readily pass through buildings (the windows are smaller than the wavelength size), the ineffectiveness of many indoor antennas many of which were designed to emphasize the shorter wavelengths for UHF reception, and issues regarding manmade and environmental noise. *Gray* believes that changing to a UHF channel will substantially restore service and especially improve indoor reception as well as offer better reception by mobile/handheld

devices. *Gray's* stations WKYT-TV Lexington, Kentucky and KKTV(DT) Colorado Springs, Colorado have made post-transition channel changes from VHF to UHF¹ with good success.

Channel 31 at Augusta is currently allotted to WFXG (Facility ID 3228), pursuant to a post-transition channel change that station's licensee requested (MB Docket 08-103). More recently, in response to a subsequent petition for rulemaking filed by WFXG's licensee, the Commission has released a Notice of Proposed Rulemaking in MB Docket 11-54² proposing to change WFXG back to its original Channel 51. Therefore, should WFXG's proposed reallocation from Channel 31 at Augusta be ordered by the Commission, *Gray* requests herein that Channel 31 at Augusta be allotted to WRDW-TV.

As described in BLCDDT-20041020ACM, WRDW-TV's pre-transition Channel 31 facility was licensed to operate at 751 kW effective radiated power ("ERP") with a nondirectional antenna at 469 meters height above average terrain ("HAAT"). The antenna and transmitter associated with that operation are currently de-energized but remain in place and WRDW-TV digital operation on Channel 31 can be resumed following minor equipment updates.

The proposal specifies use of the pre-transition replication WRDW-TV site location³ and facilities as summarized in the following.

Present Channel 12 Parameters (Appendix B)

Facility ID	State and City		NTSC	DTV								
			Chan	Chan	ERP (kW)	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)	Area (sq km)	Population (thous)	% Interf. Received
73937	GA	AUGUSTA	12	12	20.2	485	74489	33-24-29	81-50-36	37025	1357	0.6

Antenna C/R AMSL: 555 meters

¹See MB Docket 09-163 (changed WKYT-TV from Channel 13 to Channel 36) and MM Docket 09-111 (changed KKCO from Channel 10 to Channel 49).

²*Amendment of Section 73.622(i), Post-Transition Table of DTV Allotments, Television Broadcast Stations (Augusta, Georgia)*, MB Docket No. 11-54, RM 11624, DA 11-499, released March 16, 2011.

³Updated geographic coordinates (seven-second change in Latitude, one-second change in Longitude) are specified in order to conform to the WRDW-TV tower's Antenna Structure Registration data (#1059411).

Proposed Channel 31 Parameters

Facility ID	State and City		NTSC	DTV								
			Chan	Chan	ERP (kW)	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)	Area (sq km)	Population (thous)	% Interf. Received
73937	GA	AUGUSTA	12	31	751	469	Non-d	33-24-36	81-50-37	36722	1074	22.5

Antenna C/R AMSL: 547 meters

Population and Coverage

A map is supplied as Figure 1, which depicts the standard predicted coverage contours. This map includes the boundaries of Augusta, GA, WRDW-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.

Figure 2 provides a coverage contour comparison, demonstrating that the channel substitution would not result in any contour loss area from the pre-transition analog and digital facilities as well as the post-transition Channel 12 Appendix B facility. The proposed WRDW-TV allotment's predicted service population provides a 79.1 percent match of the current Appendix B facility, as detailed in the following table.

Digital Television Population Summary

Population Summary (2000 Census) OET Bulletin 69 method	Appendix B	Proposed
Within Noise Limited Contour	1,401,492	1,398,317
Not affected by terrain losses	1,365,521	1,385,500
Lost to all Interference	8,412	311,879
Net DTV Service	1,357,109	1,073,621
Match of Appendix B	---	79.11%

Although the proposed Channel 31 coverage contour matches all of the pre-transition analog and digital contour areas and that of the post-transition Appendix B facility, the population match to Appendix B is 79.1 percent. This is due the impact of incoming interference affecting Channel 31. Figure 3 depicts an OET Bulletin 69 analysis⁴ for the proposed WRDW-TV Channel 31 operation.

⁴FCC Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004. The implementation of OET Bulletin 69 for these studies followed the guidelines of OET-69 as specified therein. A standard cell size of 2 km was employed. Comparisons of various results of this computer program (run on a Sun Sparc processor) to the Commission's implementation of OET-69 show excellent correlation.

Nearly all of the incoming interference is from first-adjacent station WRLK-TV (Ch. 32, Columbia, SC) located 115.0 km distant. As demonstrated on Figure 3, all areas of predicted interference are beyond the Augusta DMA and the vast majority of the interference occurs in the vicinity of Columbia, SC. The areas near Columbia subject to interference are well within the service contour of another station of the same network affiliation (CBS). As shown on Figure 3, WLTX(DT) (Ch. 17, Columbia SC) provides CBS Network service to the Columbia market with substantial overlap to WRDW-TV. Therefore, persons subject to interference on WRDW-TV's proposed Channel 31 are located in a different market and receive CBS Network service from a local affiliate station in that market.

The proposal seeks to restore the pre-transition situation for WRDW-TV which operated on Channel 31 with the facilities proposed herein. The pre-transition Channel 31 facility was at parameters which replicated the underlying analog Channel 12 facility. By way of background, WRDW-TV's previous digital Channel 31 allotment for the transition was for 716.9 kW ERP at 485 meters HAAT in MB Docket 87-268⁵. WRDW-TV's implementation of that allotment during the transition involved a side-mount antenna, where the ERP and HAAT were adjusted to 750.8 kW and 469 meters pursuant to §73.622(f)(3)(ii) to maintain replication parameters with a nondirectional antenna (see BLCDDT-20041020ACM).

WRDW-TV's former analog facility on Channel 12 (BMLCT-557) provided an interference-free service population of 1,005,177 persons based on OET Bulletin 69 analysis. The proposed Channel 31 allotment's interference-free population of 1,073,621 persons achieves a 106.8 percent match of that legacy analog service population.

Allocation and Interference

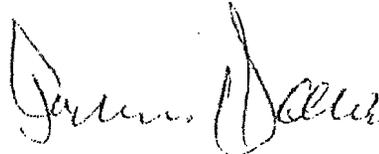
A detailed interference study per OET Bulletin 69 shows that the proposal complies with the 0.5 percent limit of new interference caused to pertinent nearby stations. The interference study output report is provided as Table 1. Protection requirements towards authorized Class A stations are also satisfied.

⁵*Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service*, MB Docket No. 87-268, FCC 98-24, released February 23, 1998.

The proposed 751 kW ERP exceeds the maximum allowed for the proposed antenna HAAT of 469 meters currently permitted by §73.622(f)(8)(i). Section 73.622(f)(5) permits the maximum ERP to be exceeded in order to provide the same geographic coverage area as the largest station within the same market. The total area within the proposed WRDW-TV 41 dBμ contour is 37,545 square kilometers, which does not exceed the 41,432 square kilometers within the 41 dBμ service contour for station WJBF(DT) (Ch. 42, Augusta, GA, BLCDT-20060615AAV). Figure 4 depicts these coverage contours. Thus, the ERP specified herein is in compliance with §73.622(f)(5) of the Commission's Rules.

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.
April 1, 2011

Chesapeake RF Consultants, LLC
207 Old Dominion Road
Yorktown, VA 23692
703-650-9600

List of Attachments

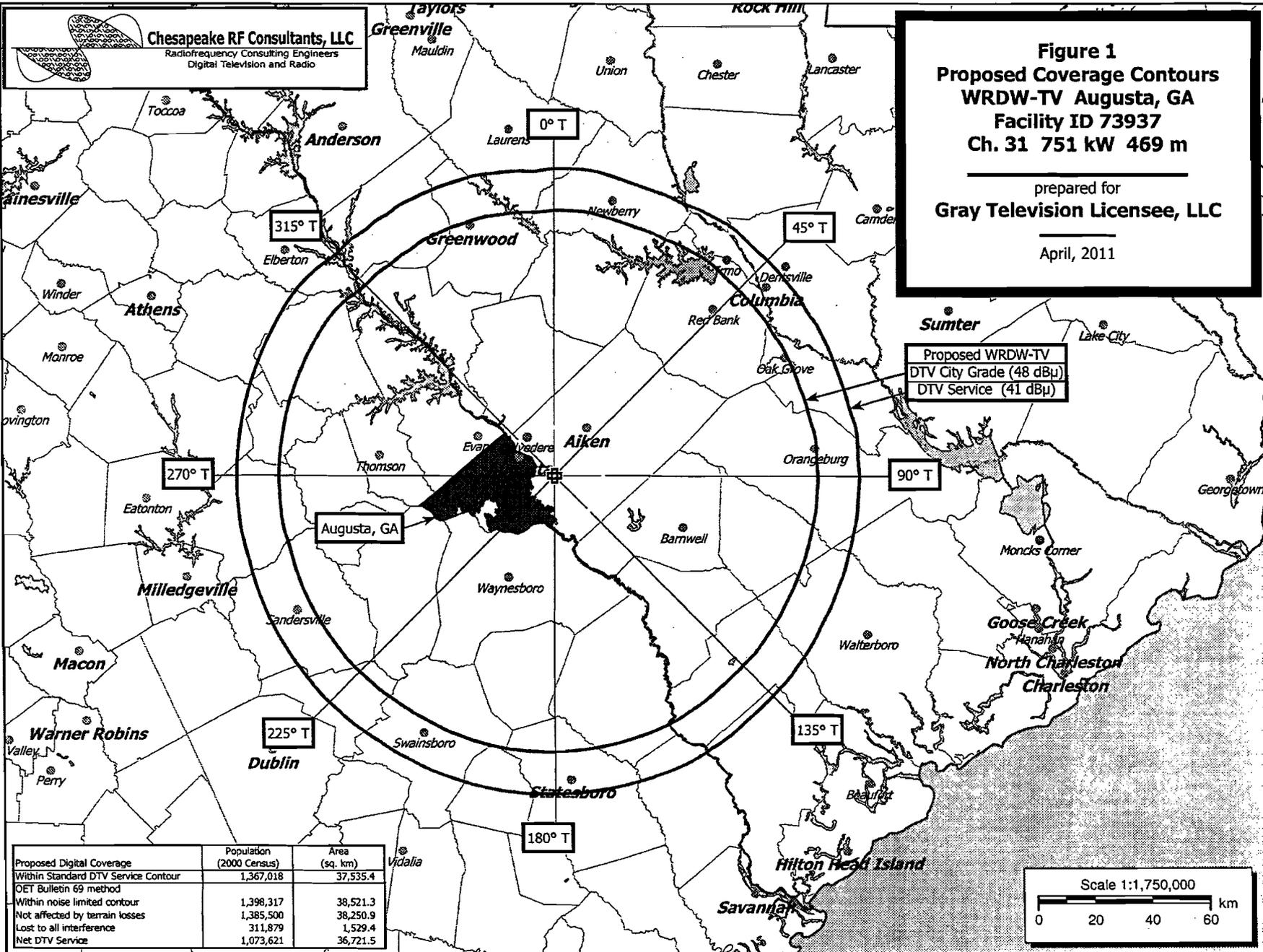
Figure 1	Proposed Coverage Contours
Figure 2	Coverage Contour Comparison
Figure 3	Predicted Coverage and Interference
Figure 4	Maximum ERP per §73.622(f)
Table 1	OET Bulletin 69 Interference Study



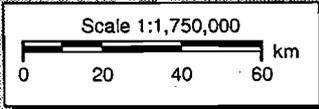
Figure 1
Proposed Coverage Contours
WRDW-TV Augusta, GA
Facility ID 73937
Ch. 31 751 kW 469 m

prepared for
Gray Television Licensee, LLC

April, 2011



Proposed Digital Coverage	Population (2000 Census)	Area (sq. km)
Within Standard DTV Service Contour	1,367,018	37,535.4
OET Bulletin 69 method		
Within noise limited contour	1,398,317	38,521.3
Not affected by terrain losses	1,385,500	38,250.9
Lost to all interference	311,879	1,529.4
Net DTV Service	1,073,621	36,721.5





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

Figure 2
Coverage Contour Comparison
WRDW-TV Augusta, GA
Facility ID 73937
Ch. 31 751 kW 469 m

prepared for
Gray Television Licensee, LLC

April, 2011

Proposed Digital Ch. 31
 751 kW 469 m
 Identical to Pre-Transition
 Former License BLCDT-20041020ACM
 Service Contour 40.42 dBu
 (With dipole factor)

Former Analog Ch. 12
 BMLCT-557
 Grade B Contour 56 dBu
 Identical to
 Digital Ch. 12 Appendix B
 Service Contour 36 dBu

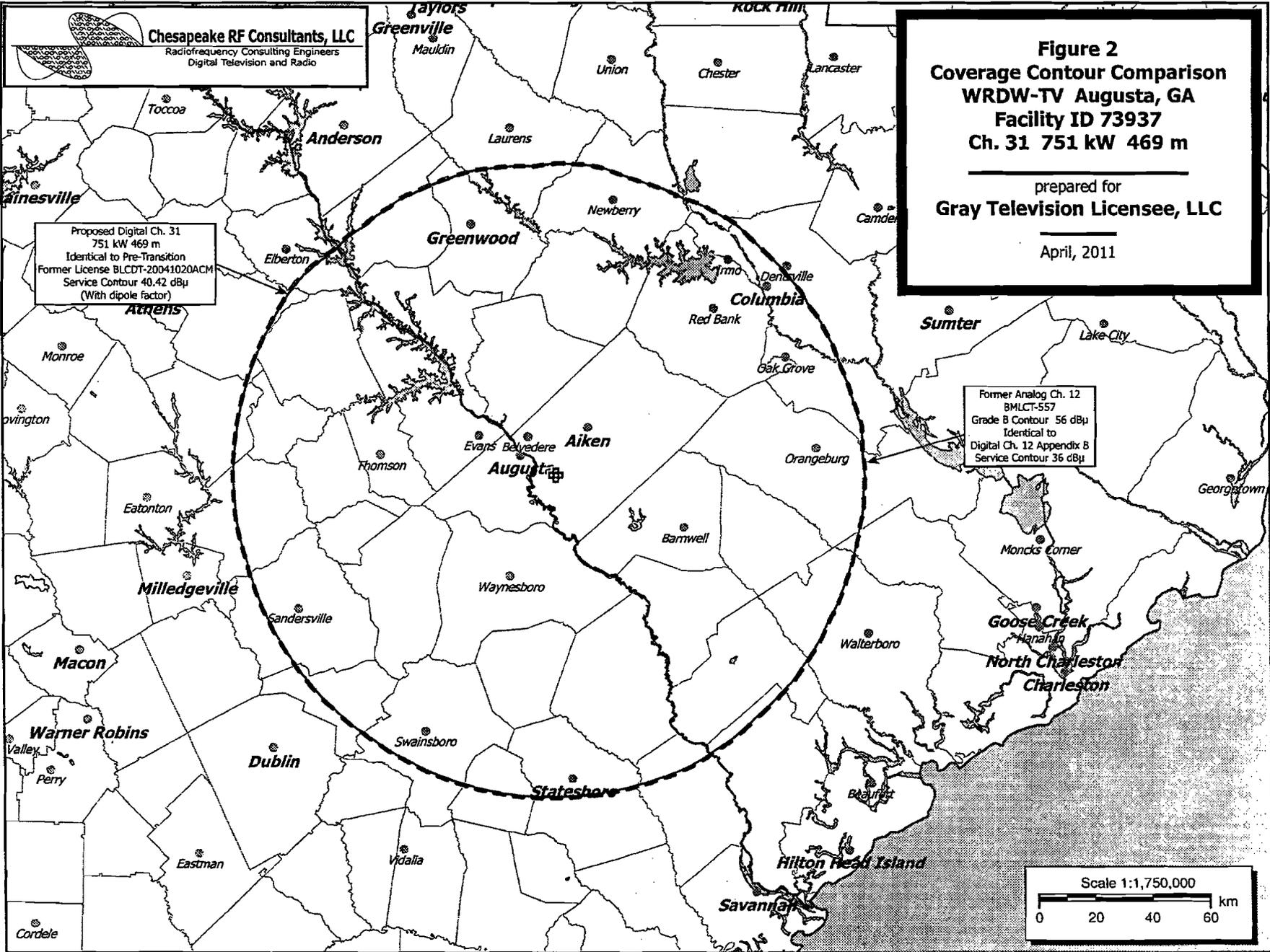
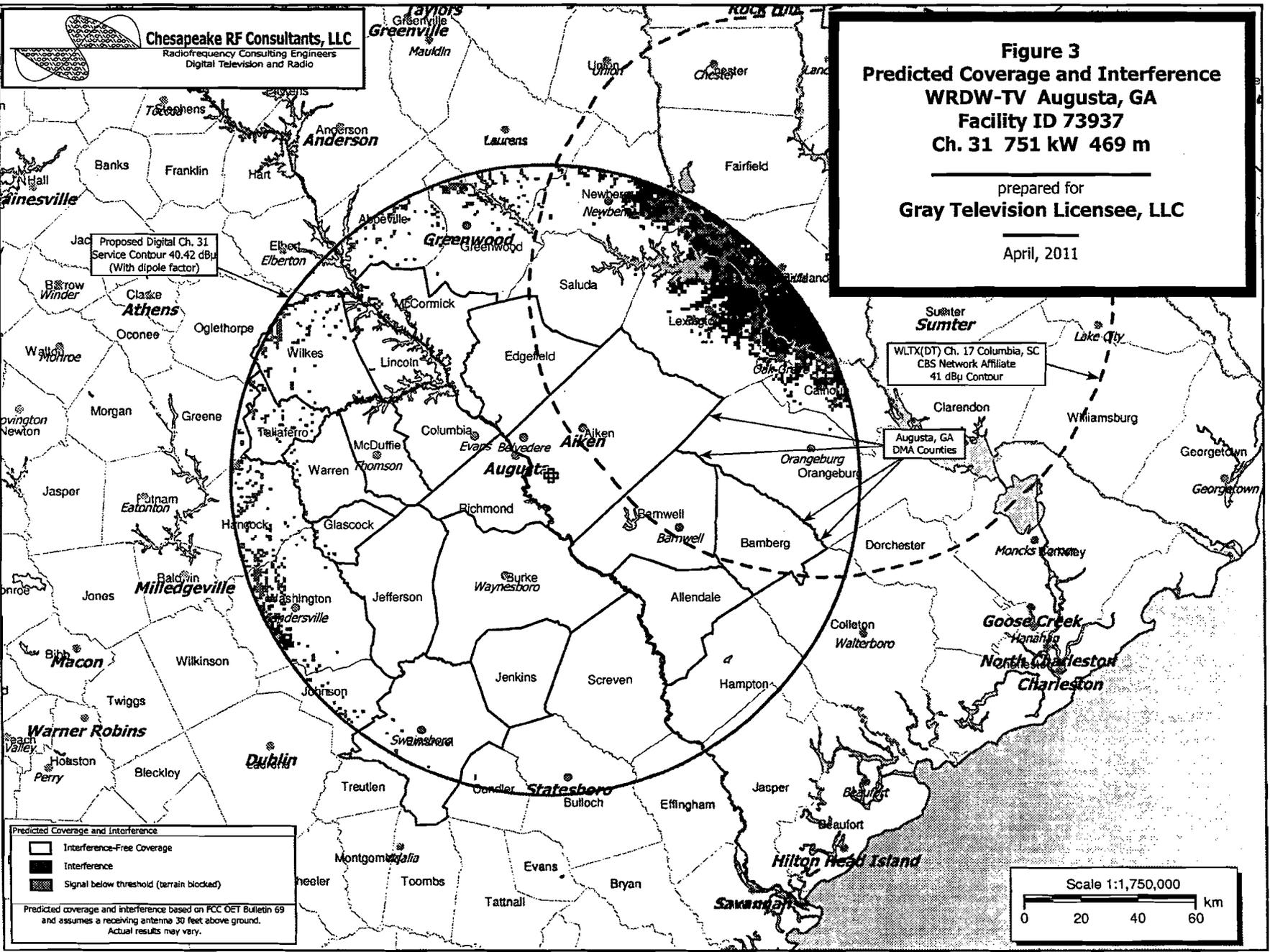


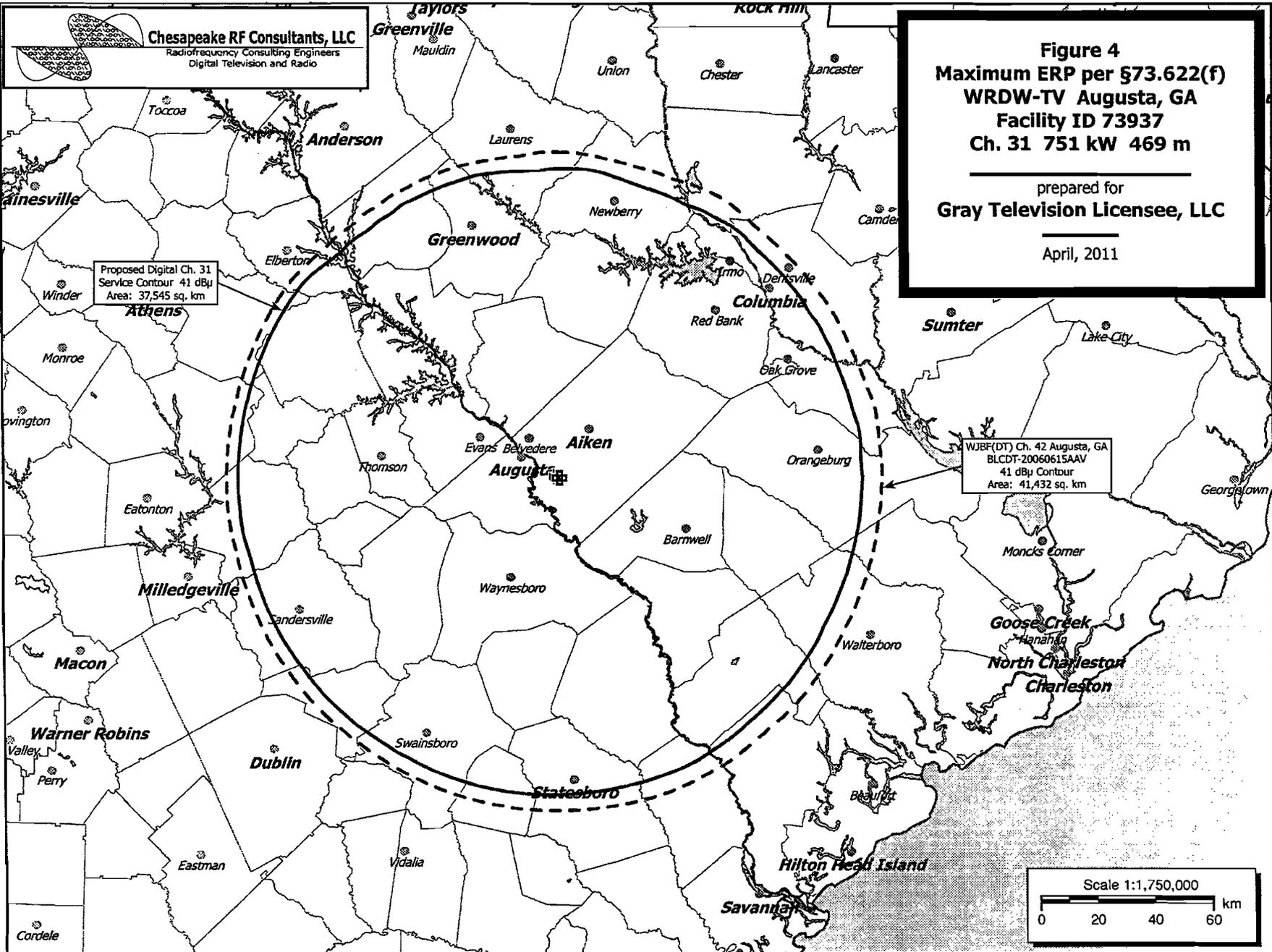


Figure 3
Predicted Coverage and Interference
WRDW-TV Augusta, GA
Facility ID 73937
Ch. 31 751 kW 469 m

prepared for
Gray Television Licensee, LLC

April, 2011





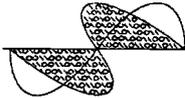

Chesapeake RF Consultants, LLC
 Radiofrequency Consulting Engineers
 Digital Television and Radio

Figure 4
Maximum ERP per §73.622(f)
WRDW-TV Augusta, GA
Facility ID 73937
Ch. 31 751 kW 469 m

prepared for
Gray Television Licensee, LLC

April, 2011

Proposed Digital Ch. 31
 Service Contour 41 dBu
 Area: 37,545 sq. km

WJBF(DT) Ch. 42 Augusta, GA
 BLCDT-20060615AAV
 41 dBu Contour
 Area: 41,432 sq. km

Scale 1:1,750,000
 0 20 40 60 km

Table 1 WRDW-TV OET Bulletin 69 Interference Study
(worst-case scenarios shown page 1 of 10)

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

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 03-30-2011 Time: 11:58:09

Record Selected for Analysis

WRDW-TV USERRECORD-01 AUGUSTA GA US
Channel 31 ERP 751 kW HAAT 470. m RCAMSL 00547 m
Latitude 033-24-36 Longitude 0081-50-37
Status APP Zone 2 Border Site number: 01
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 (site # 01) does not meet maximum height/power limits
Channel 31 ERP = 751.00 HAAT = 470.

Site number	ERP	HAAT	41.0 dBu F(50,90)
Azimuth (Deg)	(kW)	(m)	(km)
0.0	751.000	444.9	107.2
45.0	751.000	433.2	106.2
90.0	751.000	447.9	107.5
135.0	751.000	459.2	108.5
180.0	751.000	500.3	111.8
225.0	751.000	507.0	112.3
270.0	751.000	504.7	112.1
315.0	751.000	461.8	108.7

Evaluation toward Class A Stations from site # 01

Contour overlap to Class A station
WBK-CA 16 AUGUSTA GA BLTTL 20001215AAV

Contour overlap to Class A station
WDM-CA 31 MACON GA BLTTA 20060321ABK

Class A Evaluation Complete

Checks to Site Number 01

Proposed facility OK to FCC Monitoring Stations

Table 1 WRDW-TV OET Bulletin 69 Interference Study
(worst-case scenarios shown page 2 of 10)

Proposed facility OK toward West Virginia quiet zone
Proposed facility OK toward Table Mountain
Proposed facility is beyond the Canadian coordination distance
Proposed facility is beyond the Mexican coordination distance
Proposed station is OK toward AM broadcast stations

Start of Interference Analysis

Channel	Call	Proposed Station City/State	ARN
31	WRDW-TV	AUGUSTA GA	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
16	WBK-CA	AUGUSTA GA	19.1	LIC	BLTTL	20001215AAV
30	WAGT	AUGUSTA GA	1.1	LIC	BLCDD	20030530AON
31	WDM-CA	MACON GA	181.5	LIC	BLTTA	20060321ABK
31	WUNU	LUMBERTON NC	300.2	LIC	BLEDT	20091113ABG
31	WXII-TV	WINSTON-SALEM NC	355.8	LIC	BLCDD	20050627AAU
31	WAPN-CA	ABINGDON VA	379.7	LIC	BLTTA	20030618AAZ
32	WFGA-TV	FERRY GA	175.7	LIC	BLCDD	20030717AAA
32	WFGA-TV	FERRY GA	175.6	CP MOD	BMPDDT	20080619AER
32	WRLK-TV	COLUMBIA SC	115.0	LIC	BLEDT	20090622ADI

Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
16	WBK-CA	AUGUSTA GA	BLTTL	-20001215AAV

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
14	WMYA-TV	ANDERSON SC	132.3	CP MOD	BMPDDT	-20080620ADM
15	NEW	AUGUSTA GA	23.0	APP	BNPDTL	-20100128AGB
16	W16DD-D	ATHENS GA	107.2	CP	BNPDTL	-20100420AAH
16	WELF-TV	DALTON GA	348.8	LIC	BLCDD	-20060301ADC
16	WELF-TV	DALTON GA	345.5	CP	BPCDD	-20101214ACB
16	WGKA	MACON GA	163.2	LIC	BLCDD	-20070501AAI
16	WFDE-TV	FLORENCE SC	268.5	LIC	BLCDD	-20080815ABI
16	WGS-TV	GREENVILLE SC	166.7	CP MOD	BMPDDT	-20080619AAM
16	WGS-TV	GREENVILLE SC	166.7	LIC	BLCDD	-20090612ABO
18	WNEH	GREENWOOD SC	100.6	LIC	BLEDT	-20090622ADL
30	WAGT	AUGUSTA GA	20.1	LIC	BLCDD	-20030530AON
31	WFXG	AUGUSTA GA	19.6	PLN	DTVPLN	-DTVPL1126
31	WRDW-TV	AUGUSTA GA	19.1	APP	USERRECORD-01	

Proposal causes no interference

Table 1 WRDW-TV OET Bulletin 69 Interference Study
(worst-case scenarios shown page 3 of 10)

Analysis of Interference to Affected Station 2

Analysis of current record
Channel Call City/State Application Ref. No.
30 WAGT AUGUSTA GA BLCDT -20030530AON

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
30	WLGA-DR	OPELIKA AL	301.3	APP	BPRM -2009072ZACP
30	WLGA	OPELIKA AL	301.3	CP	BPCDT -20091105ADF
30	WSFX-TV	WILMINGTON NC	346.3	LIC	BLCDT -20070213AAS
30	WSFX-TV	WILMINGTON NC	346.3	CP	BPCDT -20080929AGO
30	WVLT-TV	KNOXVILLE TN	347.1	CP	BPCDT -20080618AAM
30	WVLT-TV	KNOXVILLE TN	347.1	LIC	BLCDT -20040420AAF
31	WFXG	AUGUSTA GA	1.2	PLN	DTVPLN -DTVPL126
31	WRDW-TV	AUGUSTA GA	1.1	APP	USERRECORD-01

Total scenarios = 3

Result key: 1
Scenario 1 Affected station 2
Before Analysis

Results for: 30A GA AUGUSTA BLCDT 20030530AON LIC
HAAT 483.0 m, ATV ERP 400.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1278653	35210.0
not affected by terrain losses	1261605	35012.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	1890	298.6
lost to ATV IX only	1890	298.6
lost to all IX	1890	298.6

Potential Interfering Stations Included in above Scenario 1

30A AL OPELIKA	BPCDT	20091105ADF	CP
30A NC WILMINGTON	BPCDT	20080929AGO	CP

After Analysis

Results for: 30A GA AUGUSTA BLCDT 20030530AON LIC
HAAT 483.0 m, ATV ERP 400.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1278653	35210.0
not affected by terrain losses	1261605	35012.3
lost to NTSC IX	0	0.0
lost to additional IX by ATV	2761	314.8
lost to ATV IX only	2761	314.8
lost to all IX	2761	314.8

Potential Interfering Stations Included in above Scenario 1

30A AL OPELIKA	BPCDT	20091105ADF	CP
30A NC WILMINGTON	BPCDT	20080929AGO	CP
31A GA AUGUSTA	USERRECORD01		APP

Percent new IX = 0.0691%

Worst case new IX 0.0691% Scenario 1

Table 1 WRDW-TV OET Bulletin 69 Interference Study
(worst-case scenarios shown page 4 of 10)

Analysis of Interference to Affected Station 3

Analysis of current record
Channel Call City/State Application Ref. No.
31 WDMA-CA MACON GA BLTTA -20060321ABK

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
23	WJSP-TV	COLUMBUS GA	96.1	LIC	BLEDT -20080521AAH
27	WAGA-TV	ATLANTA GA	122.7	LIC	BLCDT -20060728AEL
30	WLGA-DR	OPELIKA AL	119.7	APP	BPRM -20090722ACP
30	WLGA	OPELIKA AL	119.7	CP	BPCDT -20091105ADF
31	WSB-TV	ATHENS GA	121.5	LIC	BLCDT -20100429ADZ
31	WANN-CA	ATLANTA GA	123.9	APP	BDISDTL -20091015ABG
31	WANN-CA	ATLANTA GA	123.9	APP	BDISDTL -20091125AFY
31	WFXG	AUGUSTA GA	182.5	PLN	DTVPLN -DTVPL126
31	WCGT-LP	COLUMBUS GA	130.6	CP	BDISDTL -20090629AAC
32	WPGA-TV	PERRY GA	14.4	LIC	BLCDT -20030717AAA
32	WPGA-TV	PERRY GA	14.7	CP MOD	BMPCDT -20080619AER
35	WLTX	COLUMBUS GA	121.3	LIC	BLCDT -20060627ABT
39	WSB-TV	ATLANTA GA	120.9	CP	BPCDT -20080619ACR
39	WSB-TV	ATLANTA GA	120.9	LIC	BLCDT -20041020ADC
45	WGNM	MACON GA	13.6	LIC	BLCDT -20050621CRQ
31	WRDW-TV	AUGUSTA GA	181.5	APP	USERRECORD-01

Total scenarios = 2

Result key: 4
Scenario 1 Affected station 3
Before Analysis

Results for: 31N GA MACON BLTTA 20060321ABK LIC

	POPULATION	AREA (sq km)
within Noise Limited Contour	250065	1964.3
not affected by terrain losses	250065	1960.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	122	40.1
lost to all IX	122	40.1

Potential Interfering Stations Included in above Scenario 1

31A GA ATHENS	BLCDT	20100429ADZ	LIC
32A GA PERRY	BLCDT	20030717AAA	LIC
31A GA AUGUSTA	DTVPLN	DTVPL126	PLN

After Analysis

Results for: 31N GA MACON BLTTA 20060321ABK LIC

	POPULATION	AREA (sq km)
within Noise Limited Contour	250065	1964.3
not affected by terrain losses	250065	1960.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	274	64.1
lost to all IX	274	64.1

Table 1 WRDW-TV OET Bulletin 69 Interference Study
(worst-case scenarios shown page 5 of 10)

Potential Interfering Stations Included in above Scenario 1

31A GA ATHENS	BLCDT	20100429ADZ	LIC
32A GA PERRY	BLCDT	20030717AAA	LIC
31A GA AUGUSTA	USERRECORD01		APP

Percent new IX = 0.0608%

Worst case new IX 0.0608% Scenario 1

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Analysis of Interference to Affected Station 4

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
31	WUNU	LUMBERTON NC	BLEDT	-20091113ABG

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
30	WSFX-TV	WILMINGTON NC	107.9	LIC	BLCDT	-20070213AAS
30	WSFX-TV	WILMINGTON NC	107.9	CP	BPCDT	-20080929AGO
31	WFXG	AUGUSTA GA	299.1	PLN	DTVPLN	-DTVPL1126
31	WXII-TV	WINSTON-SALEM NC	212.6	LIC	BLCDT	-20050627AAU
31	WAVY-TV	PORTSMOUTH VA	320.5	LIC	BLCDT	-20010409ABP
32	WITN-TV	WASHINGTON NC	162.9	CP	BPCDT	-19990825LC
32	WUNL-TV	WINSTON-SALEM NC	212.5	LIC	BLEDT	-20091112ABR
32	WRLK-TV	COLUMBIA SC	189.1	LIC	BLEDT	-20090622ADI
32	WMBF-TV	MYRTLE BEACH SC	118.6	LIC	BLCDT	-20091105AAP
31	WRDW-TV	AUGUSTA GA	300.2	APP	USERRECORD-01	

Total scenarios = 2

Result key: 6
Scenario 1 Affected station 4
Before Analysis

Results for: 31A NC LUMBERTON BLEDT 20091113ABG LIC
HAAT 319.0 m, ATV ERP 175.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1017732	22633.2
not affected by terrain losses	1017169	22556.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	32393	888.4
lost to ATV IX only	32393	888.4
lost to all IX	32393	888.4

Potential Interfering Stations Included in above Scenario 1

30A NC WILMINGTON	BLCDT	20070213AAS	LIC
31A NC WINSTON-SALEM	BLCDT	20050627AAU	LIC
31A VA PORTSMOUTH	BLCDT	20010409ABP	LIC
31A GA AUGUSTA	DTVPLN	DTVPL1126	PLN

After Analysis

Results for: 31A NC LUMBERTON BLEDT 20091113ABG LIC
HAAT 319.0 m, ATV ERP 175.0 kW

Table 1 WRDW-TV OET Bulletin 69 Interference Study
(worst-case scenarios shown page 6 of 10)

	POPULATION	AREA (sq km)
within Noise Limited Contour	1017732	22633.2
not affected by terrain losses	1017169	22556.8
lost to NTSC IX	0	0.0
lost to additional IX by ATV	32393	888.4
lost to ATV IX only	32393	888.4
lost to all IX	32393	888.4

Potential Interfering Stations Included in above Scenario 1

30A NC WILMINGTON	BLCDT	20070213AAS	LIC
31A NC WINSTON-SALEM	BLCDT	20050627AAU	LIC
31A VA PORTSMOUTH	BLCDT	20010409ABP	LIC
31A GA AUGUSTA	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 5

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
31	WKII-TV	WINSTON-SALEM NC	BLCDT	-20050627AAU

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
30	WSLS-TV	ROANOKE VA	93.9	CP	BPCDT	-20080619ABS
31	WFXG	AUGUSTA GA	354.8	PLN	DTVPLN	-DTVPL1126
31	WDKY-DR	DANVILLE KY	387.7	APP	BPRM	-20080620AOU
31	WDKY-TV	DANVILLE KY	387.7	CP	BPCDT	-20090323AEA
31	WUNU	LUMBERTON NC	212.6	LIC	BLEDT	-20091113ABG
31	WAVY-TV	PORTSMOUTH VA	348.2	LIC	BLCDT	-20010409ABP
32	WUNL-TV	WINSTON-SALEM NC	0.2	LIC	BLEDT	-20091112ABR
32	WSBN-TV	NORTON VA	208.8	LIC	BLEDT	-20030428ABR
31	WRDW-TV	AUGUSTA GA	355.8	APP	USERRECORD-01	

Total scenarios = 3

Result key: 8
Scenario 1 Affected station 5
Before Analysis

Results for: 31A NC WINSTON-SALEM BLCDT 20050627AAU LIC
HAAT 572.0 m, ATV ERP 815.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3060732	43960.0
not affected by terrain losses	2739929	40084.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	128490	2742.0
lost to ATV IX only	128490	2742.0
lost to all IX	128490	2742.0

Potential Interfering Stations Included in above Scenario 1

30A VA ROANOKE	BPCDT	20080619ABS	CP
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Table 1 WRDW-TV OET Bulletin 69 Interference Study
(worst-case scenarios shown page 7 of 10)

31A KY DANVILLE	BPCDT	20090323AEA	CP
31A NC LUMBERTON	BLEDT	20091113ABG	LIC
31A VA PORTSMOUTH	BLCDD	20010409ABP	LIC
32A NC WINSTON-SALEM	BLEDT	20091112ABR	LIC
31A GA AUGUSTA	DTVPLN	DTVP1126	PLN

After Analysis

Results for: 31A NC WINSTON-SALEM BLCDD 20050627AAU LIC
HAAT 572.0 m, ATV ERP 815.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3060732	43960.0
not affected by terrain losses	2739929	40084.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	134429	2785.9
lost to ATV IX only	134429	2785.9
lost to all IX	134429	2785.9

Potential Interfering Stations Included in above Scenario 1

30A VA ROANOKE	BPCDT	20080619ABS	CP
31A KY DANVILLE	BPCDT	20090323AEA	CP
31A NC LUMBERTON	BLEDT	20091113ABG	LIC
31A VA PORTSMOUTH	BLCDD	20010409ABP	LIC
32A NC WINSTON-SALEM	BLEDT	20091112ABR	LIC
31A GA AUGUSTA	USERRECORD01	APP	

Percent new IX = 0.2274%

Worst case new IX 0.2274% Scenario 1

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Analysis of Interference to Affected Station 6

Analysis of current record

Channel	Call	City/State	Application Ref. No.
31	WAPW-CA	ABINGDON VA	BLTTA -20030618AAZ

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application Ref. No.
24	WKPI-TV	PIKEVILLE KY	65.1	LIC	BLEDT -20020313AEL
27	WKPT-TV	KINGSPORT TN	43.6	CP MOD	BMPCDT -20050303AAJ
31	WFXG	AUGUSTA GA	379.0	PLN	DTVPLN -DTVP1126
31	WDKY-DR	DANVILLE KY	230.6	APP	BPRM -20080620AOU
31	WDKY-TV	DANVILLE KY	230.6	CP	BPCDD -20090323AEA
31	W31AZ	HENDERSONVILLE NC	178.3	LIC	BLTTL -19940525J
31	WUNU	LUMBERTON NC	354.0	LIC	BLEDT -20091113ABG
31	W31DI-D	SPRUCE PINE NC	104.6	LIC	BLDTT -20090506ABZ
31	WXII-TV	WINSTON-SALEM NC	159.9	LIC	BLCDD -20050627AAU
32	WSSN-TV	NORTON VA	49.2	LIC	BLEDT -20030428ABR
38	WENT	GREENEVILLE TN	105.4	LIC	BLCDD -20050606AHR
38	WENT	GREENEVILLE TN	41.4	CP	BPCDD -20090521ADA
46	WVVA	BLUEFIELD WV	93.1	CP MOD	BMPCDT -20060707ABJ
31	WRDW-TV	AUGUSTA GA	379.7	APP	USERRECORD-01

Proposed station is beyond the site to nearest cell evaluation distance

Table 1 WRDW-TV OET Bulletin 69 Interference Study
(worst-case scenarios shown page 8 of 10)

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Analysis of Interference to Affected Station 7

Analysis of current record

Channel	Call	City/State	Application Ref. No.
32	WPGA-TV	PERRY GA	BLCDD -20030717AAA

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application Ref. No.
31	WFXG	AUGUSTA GA	176.8	PLN	DTVPLN -DTVP1126
32	WAAY-TV	HUNTSVILLE AL	352.3	LIC	BLCDD -20050701ABO
32	WNCV	MONTGOMERY AL	306.4	CP MOD	BMPCDT -20080619AHK
32	WNCV	MONTGOMERY AL	306.4	LIC	BLCDD -20090428ABG
32	WAVS	JACKSONVILLE FL	333.2	LIC	BLCDD -20030328ANQ
32	WFSU-TV	TALLAHASSEE FL	284.1	LIC	BLEDT -20030730ACW
32	WRLK-TV	COLUMBIA SC	286.7	LIC	BLEDT -20090622ADI
33	WEBA-TV	ALLENDALE SC	207.4	LIC	BLEDT -20050915AAV
31	WRDW-TV	AUGUSTA GA	175.7	APP	USERRECORD-01

Proposed station is beyond the site to nearest cell evaluation distance

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Analysis of Interference to Affected Station 8

Analysis of current record

Channel	Call	City/State	Application Ref. No.
32	WPGA-TV	PERRY GA	BMPCDT -20080619AER

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application Ref. No.
31	WFXG	AUGUSTA GA	176.6	PLN	DTVPLN -DTVP1126
32	WAAY-TV	HUNTSVILLE AL	352.6	LIC	BLCDD -20050701ABO
32	WNCV	MONTGOMERY AL	306.5	CP MOD	BMPCDT -20080619AHK
32	WNCV	MONTGOMERY AL	306.5	LIC	BLCDD -20090428ABG
32	WAVS	JACKSONVILLE FL	332.9	LIC	BLCDD -20030328ANQ
32	WFSU-TV	TALLAHASSEE FL	284.0	LIC	BLEDT -20030730ACW
32	WRLK-TV	COLUMBIA SC	286.7	LIC	BLEDT -20090622ADI
33	WEBA-TV	ALLENDALE SC	207.2	LIC	BLEDT -20050915AAV
31	WRDW-TV	AUGUSTA GA	175.6	APP	USERRECORD-01

Proposal causes no interference

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Analysis of Interference to Affected Station 9

Analysis of current record

Channel	Call	City/State	Application Ref. No.
32	WRLK-TV	COLUMBIA SC	BLEDT -20090622ADI

Stations Potentially Affecting This Station

Table 1 WRDW-TV OET Bulletin 69 Interference Study
(worst-case scenarios shown page 9 of 10)

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
31	WFXG	AUGUSTA GA	113.9	PLN	DTVPLN	-DTVPL126
31	WUNU	LUMBERTON NC	189.1	LIC	BLEDT	-20091113ABG
32	WPGA-TV	PERRY GA	286.7	LIC	BLCDDT	-20030717AAA
32	WPGA-TV	PERRY GA	286.7	CP MOD	BMPCDT	-20080619AER
32	WITN-TV	WASHINGTON NC	352.0	CP	BPCDT	-19990825LC
32	WUNL-TV	WINSTON-SALEM NC	256.1	LIC	BLEDT	-20091112ABR
32	WMBF-TV	MYRTLE BEACH SC	177.0	LIC	BLCDDT	-20091105AAP
32	WSBN-TV	NORTON VA	344.5	LIC	BLEDT	-20030428ABR
33	WYV	GREENSBORO NC	219.2	LIC	BLCDDT	-20020430ABD
33	WEBA-TV	ALLENDALE SC	111.9	LIC	BLEDT	-20050915AAV
31	WRDW-TV	AUGUSTA GA	115.0	APP	USERRECORD-01	

Total scenarios = 1

Result key: 11
Scenario 1 Affected station 9
Before Analysis

Results for: 32A SC COLUMBIA BLEDT 20090622ADI LIC
HAAT 316.0 m, ATV ERP 250.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1077051	23962.1
not affected by terrain losses	1076684	23934.0
lost to NTSC IX	0	0.0
lost to additional IX by ATV	12502	672.4
lost to ATV IX only	12502	672.4
lost to all IX	12502	672.4

Potential Interfering Stations Included in above Scenario 1

32A GA PERRY	BMPCDT	20080619AER	CP
32A NC WASHINGTON	BPCDT	19990825LC	CP
32A NC WINSTON-SALEM	BLEDT	20091112ABR	LIC
32A SC MYRTLE BEACH	BLCDDT	20091105AAP	LIC
33A SC ALLENDALE	BLEDT	20050915AAV	LIC
31A GA AUGUSTA	DTVPLN	DTVPL126	PLN

After Analysis

Results for: 32A SC COLUMBIA BLEDT 20090622ADI LIC
HAAT 316.0 m, ATV ERP 250.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1077051	23962.1
not affected by terrain losses	1076684	23934.0
lost to NTSC IX	0	0.0
lost to additional IX by ATV	16326	996.6
lost to ATV IX only	16326	996.6
lost to all IX	16326	996.6

Potential Interfering Stations Included in above Scenario 1

32A GA PERRY	BMPCDT	20080619AER	CP
32A NC WASHINGTON	BPCDT	19990825LC	CP
32A NC WINSTON-SALEM	BLEDT	20091112ABR	LIC
32A SC MYRTLE BEACH	BLCDDT	20091105AAP	LIC
33A SC ALLENDALE	BLEDT	20050915AAV	LIC
31A GA AUGUSTA	USERRECORD01		APP

Percent new IX = 0.3593%

Table 1 WRDW-TV OET Bulletin 69 Interference Study
(worst-case scenarios shown page 10 of 10)

Worst case new IX 0.3593% Scenario 1

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Analysis of Interference to Affected Station 10

Analysis of current record
Channel Call City/State Application Ref. No.
31 WRDW-TV AUGUSTA GA USERRECORD-01

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
30	WAGT	AUGUSTA GA	1.1	LIC	BLCDDT	-20030530AON
31	WUNU	LUMBERTON NC	300.2	LIC	BLEDT	-20091113ABG
31	WXII-TV	WINSTON-SALEM NC	355.8	LIC	BLCDDT	-20050627AAU
32	WPGA-TV	PERRY GA	175.7	LIC	BLCDDT	-20030717AAA
32	WPGA-TV	PERRY GA	175.6	CP MOD	BMPCDT	-20080619AER
32	WRLK-TV	COLUMBIA SC	115.0	LIC	BLEDT	-20090622ADI

Total scenarios = 1

Result key: 12
Scenario 1 Affected station 10
Before Analysis

Results for: 31A GA AUGUSTA USERRECORD01 APP
HAAT 470.0 m, ATV ERP 751.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1398317	38521.3
not affected by terrain losses	1385500	38250.9
lost to NTSC IX	0	0.0
lost to additional IX by ATV	311879	1529.4
lost to ATV IX only	311879	1529.4
lost to all IX	311879	1529.4

Potential Interfering Stations Included in above Scenario 1

30A GA AUGUSTA	BLCDDT	20030530AON	LIC
31A NC LUMBERTON	BLEDT	20091113ABG	LIC
31A NC WINSTON-SALEM	BLCDDT	20050627AAU	LIC
32A GA PERRY	BMPCDT	20080619AER	CP
32A SC COLUMBIA	BLEDT	20090622ADI	LIC

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