ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

In re:	)	
	)	
Gray Television Licensee, LLC	)	MB Docket No. _____
	)	
Petition for Rulemaking to Amend	)	Rulemaking No. _____
the DTV Table of Allotments for	)	
Station WEAU-TV, Eau Claire, Wisconsin	)	
(Facility 7893)	)	

FILED/ACCEPTED

MAY 13 2011

Federal Communications Commission
Office of the Secretary

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

PETITION FOR RULEMAKING

Gray Television Licensee, LLC ("Gray"), licensee of Station WEAU-TV ("WEAU"), Eau Claire, Wisconsin, by counsel, hereby requests an amendment of the post-transition DTV Table of Allotments (the "DTV Table")[1] to change WEAU's digital allotment from VHF Channel 13 to UHF Channel 38 at Eau Claire, Wisconsin, with the technical parameters as set forth in the attached Engineering Statement.

Since the March 22, 2011 collapse of the tower holding its main antenna, WEAU has been silent.[2] Gray is moving quickly to rebuild the tower in order to resume WEAU's full power operations. In addition to rebuilding WEAU's tower, Gray must also replace the station's transmission equipment—including the antenna—that was destroyed in the tower's collapse. WEAU therefore requests this channel substitution so that it can leverage this significant, unplanned cost in a way that best serves the public interest. Specifically, Gray submits that moving WEAU to a UHF channel would benefit the public by resolving significant over-the-air reception problems in certain portions of

[1] 47 C.F.R. §73.622(i).

[2] Notification of Silent Status (FCC File No. BLSTA-20110331ABR). WEAU's programming is being carried temporarily on a multicast stream of WQOW(DT).

No. of Copies rec'd 0+4
List A B C D E
MB Video 11-24

WEAU's predicted service area and by improving the station's ability to provide service to viewers using hand-held and mobile devices in the future. WEAU requests expedited action on this petition so that it can quickly order the necessary equipment to rebuild its broadcast facility and resume full power operations.

Since the end of the digital transition, viewers in pockets of WEAU's service area have reported difficulty receiving the station's digital signal on Channel 13. The problems with indoor reception of digital VHF channels have been well documented through the real-world experiences of many stations. On balance, when using an indoor antenna, over-the-air viewers receive DTV signals better on UHF channels than on VHF channels. Since the DTV transition, WEAU's staff have worked diligently with viewers to resolve reception complaints; however, the only long-term solution is to move to a UHF channel.

The attached Engineering Statement of Chesapeake RF Consultants, LLC[3] sets forth in detail the specifications of WEAU's proposal to modify the DTV Table to substitute Channel 38 for Channel 13 at Eau Claire, Wisconsin. The Engineering Statement demonstrates that the proposed Channel 38 facility will provide full principal community coverage to Eau Claire, Wisconsin and that this proposal complies with all relevant technical requirements for amendment of the post-transition DTV Table. As further explained in the Engineering Statement, while the WEAU transmitter site is located within the zone that requires coordination with Canada, it is believed that this allotment complies with the U.S. – Canada allotment procedures.

The proposed Channel 38 facility specifies a non-directional antenna and 1000kW power level. This proposed power level exceeds the maximum allowed for the proposed

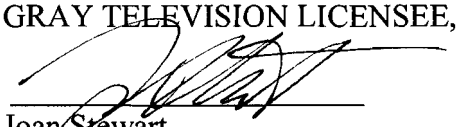
[3] *See* Exhibit 1 ("Engineering Statement").

HAAT. However, this the power level complies with Section 73.622(f)(5), which permits the maximum power level to be exceed in order to provide the same geographic coverage area as the largest station within the market. The proposed facility provides a 103.2 percent match to the licensed WEAU Channel 13 facility and increases the net total population serviced by 28,352 persons.

Moreover, UHF channels provide better coverage for hand-held and mobile devices in the future. While WEAU's primary concern is building a facility that brings the best service to its viewers and returns service to those viewers lost after the digital transition, the station would embrace the opportunity to enhance its ability to bring over-the-air mobile video to Eau Claire. Accordingly, WEAU requests the Commission authorize it to rebuild its facilities on Channel 38, a UHF channel that would provide the best service to its over-the-air service to its viewers.

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 Commission amend the DTV Table to substitute Channel 38 for Channel 13 at Eau Claire, Wisconsin using 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 13, 2011

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

Engineering Statement

Digital Television Channel Change

prepared for

Gray Television Licensee, LLC
WEAU-TV Eau Claire, WI
Facility ID 7893
Ch. 38 1000 kW 616 m

This engineering statement has been prepared on behalf of *Gray Television Licensee, LLC ("Gray")*, licensee of WEAU-TV (Facility ID 7893, Eau Claire, WI) in support of a *Petition for Rulemaking* to change the WEAU-TV digital television post-transition channel assignment and related technical parameters. WEAU-TV's pre-transition operations were on analog VHF Channel 13 and digital UHF Channel 39. Post-transition, WEAU-TV is licensed to operate as digital on VHF Channel 13 as established in Appendix B of the Seventh Report and Order in MB Docket 87-268 (license file number BLCDT-20090622ACW). *Gray* herein requests a channel substitution for WEAU-TV.

The tower structure supporting the WEAU-TV main antenna collapsed on March 22, 2011 during an ice storm and WEAU-TV is presently silent. The FCC was notified of the silent status (BLSTA-20110331ABR) and advised that WEAU-TV's programming is temporarily being carried on a multicast stream of WQOW(DT), (Ch. 15, Eau Claire, WI). *Gray* intends to rebuild the WEAU-TV tower structure at Fairchild, WI, the location of the tower collapse. Meanwhile, to resume operation on Channel 13, *Gray* is making expedited arrangements to install an emergency antenna on a separate tower located behind the WEAU-TV studio facility at Eau Claire, WI (42.7 km from the licensed site at Fairchild).

Gray proposes herein to substitute UHF Channel 38 in lieu of the current VHF Channel 13 digital allotment. It is desired to rebuild the main WEAU-TV tower structure and implement a UHF transmission system such that operation on Channel 38 may commence as soon as possible.[1] The channel substitution is intended to aid in recovering viewers that were lost when WEAU-TV ceased analog operation on the transition date.

Since the transition to digital and up to the point of the tower collapse, many viewers continued to experience significant difficulty in receiving WEAU-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 WEAU-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 and use of elliptical polarization will substantially restore service and especially improve indoor reception as well as offer better reception for 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 UHF[2] with good success.

[1] *Gray* is taking immediate steps to rebuild the tower structure at Fairchild, WI. The tower structure will be designed to support the worst-case load of a Channel 38 top-mount antenna or a Channel 13 top-mount antenna, to allow for operation on Channel 13 should the proposed Channel 38 change not be adopted.

[2] See 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).

The proposal specifies use of the licensed WEAU-TV site location[3] and facilities as summarized in the following.

Present Channel 13 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
7893	WI	EAU CLAIRE	13	13	22.9	607	74548	44-39-51	90-57-41	43031	858	2

Antenna C/R AMSL: 924 meters

Proposed Channel 38 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
7893	WI	EAU CLAIRE	13	38	1000	616	Non-D	44-39-50	90-57-40	45222	912	0.0

Antenna C/R AMSL: 933 meters

A map is supplied as Figure 1 which depicts the standard predicted coverage contours. This map includes the boundaries of Eau Claire WI, WEAU-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 loss area from the digital Channel 13 Appendix B facilities and former analog operations. The proposed WEAU-TV allotment's predicted service population provides a 106.3 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	925,833	940,414
Not affected by terrain losses	875,916	912,045
Lost to all interference	17,858	349
Net DTV Service	**858,058**	**911,696**
Match of Appendix B	---	**106.25%**

[3]Updated geographic coordinates (one-second change in Latitude, one-second change in Longitude) are specified in order to conform to the WEAU-TV tower's Antenna Structure Registration data (#1033664).

Moreover, the proposed Channel 38 allotment's service population of 911,696 persons provides a 103.2 percent match of the 883,344 service population achieved by the licensed WEAU-TV Channel 13 facility.

A detailed interference study per OET Bulletin 69[4] 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.

The proposed 1000 kW ERP exceeds the maximum allowed for the proposed antenna HAAT of 616 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 Channel 38 WEAU-TV 41 dBμ contour is 46,359 square kilometers, which does not exceed the 47,721 square kilometers within the licensed WEAU-TV digital Channel 13 facility (BLCDT-20090622ACW) 36 dBμ service contour. Thus, the ERP specified herein is in compliance with §73.622(f)(5) of the Commission's Rules.

The WEAU-TV transmitter site is located 377 km from the U.S. - Canadian border and is thus within the 400 km coordination zone that triggers international coordination. Figure 3 supplies a depiction of a "Step 2" contour protection analysis of the proposed Channel 38 allotment, based on the procedures stated in the *Letter of Understanding*[5] regarding digital television along the U.S. - Canadian Border. The closest[6] Canadian digital allotments on Channel 38 are located over 560 km from the WEAU-TV site, based on CDBS data and the allotments contained within Table A as

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[4]FCC Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 ("OET-69"). The implementation of OET-69 for this study 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.

[5]*Letter of Understanding Between the Federal Communications Commission of the United States of America and Industry Canada Related to the Use of the 54-72 MHz, 76-88 MHz, 174-216 MHz, and 470-806 MHz Bands for the Digital Television Broadcasting Service Along the Common Border*, September 2000.

[6]CHCH-TV-5 (Ch. 38, Sault Ste Marie, ON, 0.25 kW ERP at 112.5 m HAAT) is 563.5 km from WEAU-TV and assumed to be Class B having a protected radius of 45 km. A vacant allotment on Ch. 38 (Kenora, ON, 6 kW ERP at 150 m HAAT) is 626.9 km from WEAU-TV and assumed to be Class C having a protected radius of 70 km.

referenced in the U.S. - Canada Post-Transition Allotment Plan letter exchange made effective December 15, 2008. As shown on Figure 3, the worst-case interfering contour from the proposed WEAU-TV Channel 38 allotment is far from overlap to the protected service radius of the two nearest identifiable Channel 38 Canadian allotments. The U.S. - Canada border is sufficiently distant to WEAU-TV such that Canadian allotments first adjacent to the proposed Channel 38 need not be considered. Thus it is believed that the proposal complies with the U.S. - Canada allotment procedures.

Certification

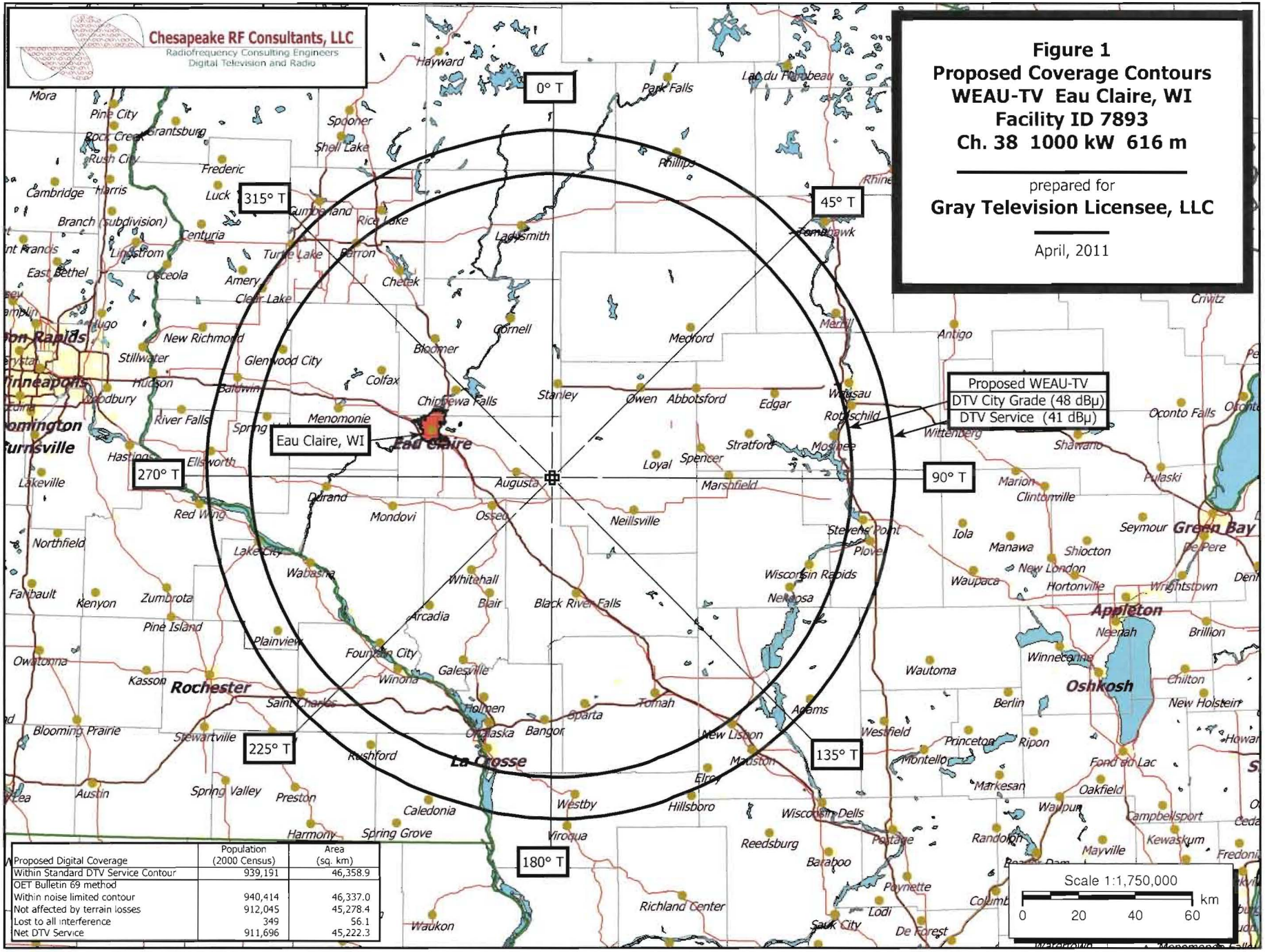
The undersigned hereby certifies that the foregoing statement was prepared by him or under his direction, and that it is true and correct to the best of his knowledge and belief.

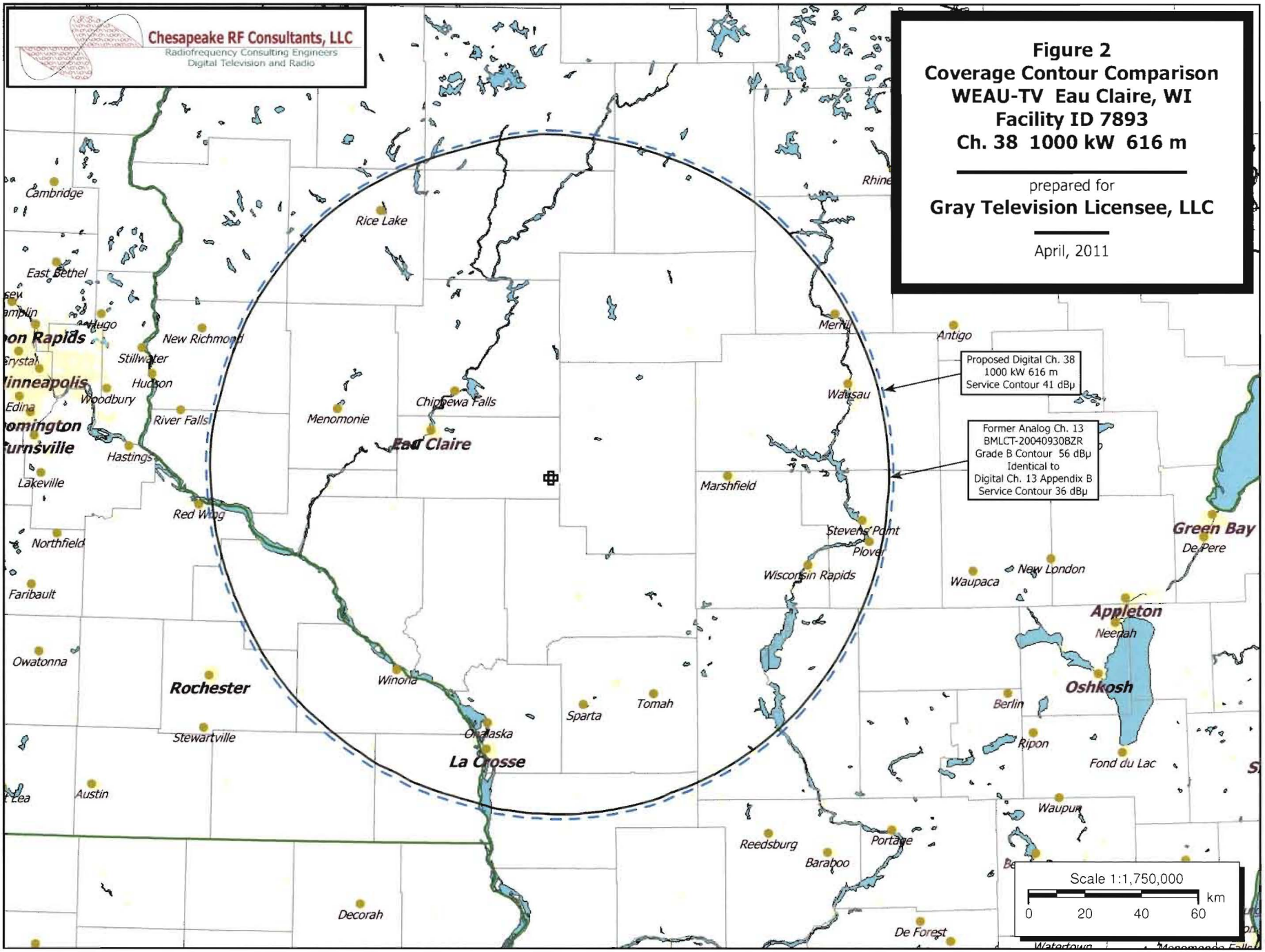
Joseph M. Davis, P.E.
April 27, 2011

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	Protection of Canada Allotments
Table 1	OET Bulletin 69 Interference Study


Chesapeake RF Consultants, LLC
Radiofrequency Consulting Engineers
Digital Television and Radio
Figure 1
Proposed Coverage Contours
WEAU-TV Eau Claire, WI
Facility ID 7893
Ch. 38 1000 kW 616 m
prepared for
Gray Television Licensee, LLC
April, 2011
0° T
45° T
90° T
135° T
180° T
225° T
270° T
315° T
Eau Claire, WI
Proposed WEAU-TV
DTV City Grade (48 dBµ)
DTV Service (41 dBµ)
Scale 1:1,750,000
0 20 40 60 km
Proposed Digital Coverage | Population (2000 Census) | Area (sq. km)
Within Standard DTV Service Contour | 939,191 | 46,358.9
OET Bulletin 69 method
Within noise limited contour | 940,414 | 46,337.0
Not affected by terrain losses | 912,045 | 45,278.4
Lost to all interference | 349 | 56.1
Net DTV Service | 911,696 | 45,222.3


Chesapeake RF Consultants, LLC
Radiofrequency Consulting Engineers
Digital Television and Radio
Figure 2
Coverage Contour Comparison
WEAU-TV Eau Claire, WI
Facility ID 7893
Ch. 38 1000 kW 616 m
prepared for
Gray Television Licensee, LLC
April, 2011
Proposed Digital Ch. 38
1000 kW 616 m
Service Contour 41 dBµ
Former Analog Ch. 13
BMLCT-20040930BZR
Grade B Contour 56 dBµ
Identical to
Digital Ch. 13 Appendix B
Service Contour 36 dBµ
Scale 1:1,750,000
km
0 20 40 60
Cambridge
Rice Lake
East Bethel
Hugo
New Richmond
Stillwater
Hudson
Woodbury
Edina
River Falls
Hastings
Lakeville
Red Wing
Northfield
Faribault
Owatonna
Rochester
Stewartville
Austin
Decorah
Menomonie
Chippewa Falls
Eau Claire
Winona
Sparta
Tomah
Onalaska
La Crosse
Merrill
Antigo
Wausau
Marshfield
Stevens Point
Plover
Wisconsin Rapids
Waupaca
New London
Green Bay
De Pere
Appleton
Neenah
Oshkosh
Berlin
Ripon
Fond du Lac
Waupun
Portage
Reedsburg
Baraboo
De Forest

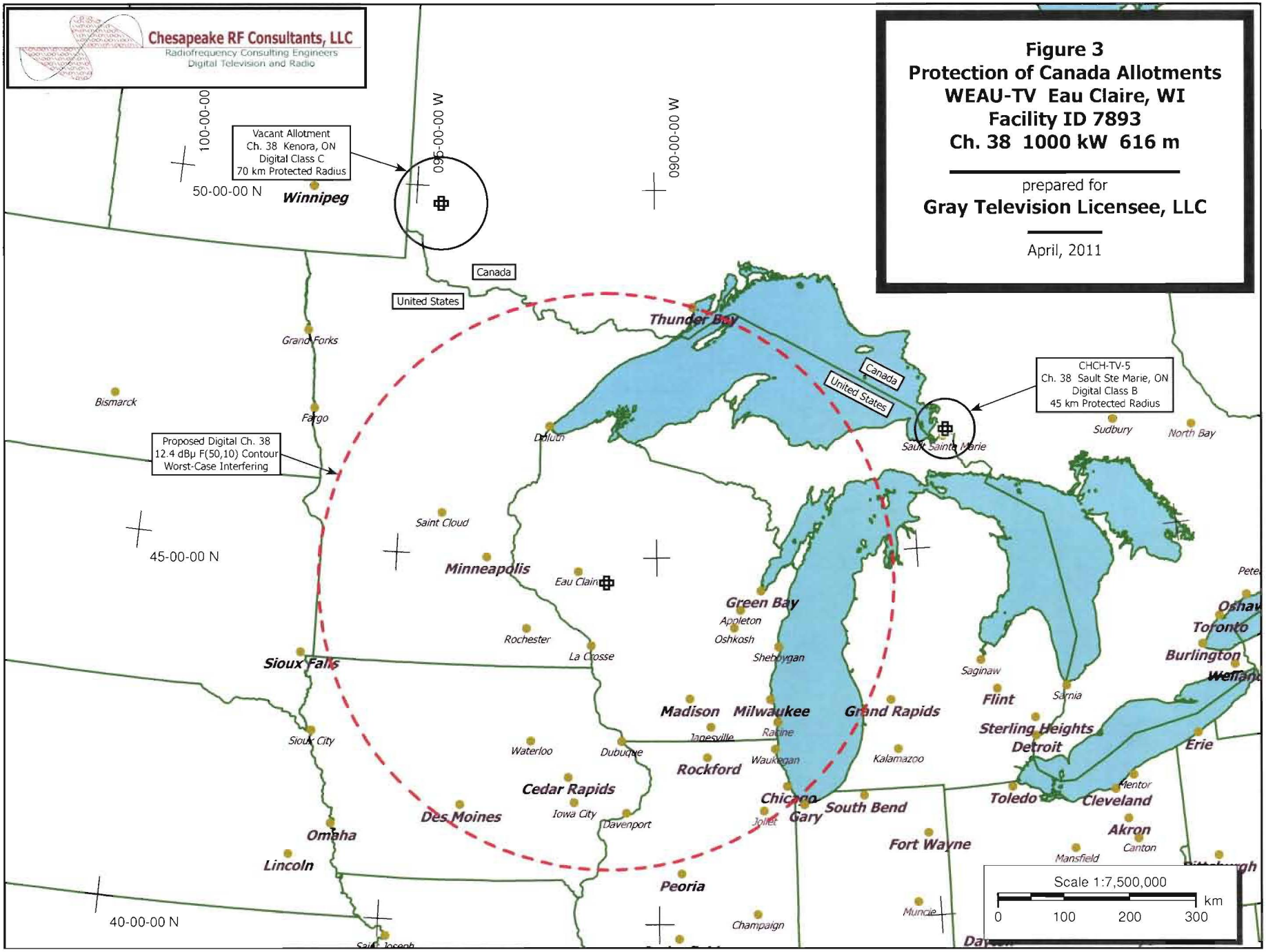

Chesapeake RF Consultants, LLC
Radiofrequency Consulting Engineers
Digital Television and Radio
Figure 3
Protection of Canada Allotments
WEAU-TV Eau Claire, WI
Facility ID 7893
Ch. 38 1000 kW 616 m
prepared for
Gray Television Licensee, LLC
April, 2011
Vacant Allotment
Ch. 38 Kenora, ON
Digital Class C
70 km Protected Radius
Proposed Digital Ch. 38
12.4 dBμ F(50,10) Contour
Worst-Case Interfering
CHCH-TV-5
Ch. 38 Sault Ste Marie, ON
Digital Class B
45 km Protected Radius
100-00-00
095-00-00 W
090-00-00 W
50-00-00 N
45-00-00 N
40-00-00 N
Canada
United States
Winnipeg
Thunder Bay
Grand Forks
Bismarck
Fargo
Duluth
Sault Sainte Marie
Sudbury
North Bay
Saint Cloud
Minneapolis
Eau Claire
Green Bay
Appleton
Oshkosh
Sheboygan
Rochester
La Crosse
Sioux Falls
Sioux City
Waterloo
Dubuque
Madison
Milwaukee
Racine
Kenosha
Waukegan
Grand Rapids
Kalamazoo
Saginaw
Flint
Sarnia
Sterling Heights
Detroit
Erie
Toronto
Burlington
Rockford
Cedar Rapids
Iowa City
Davenport
Des Moines
Chicago
Gary
South Bend
Toledo
Cleveland
Mentor
Akron
Canton
Mansfield
Fort Wayne
Omaha
Lincoln
Peoria
Champaign
Muncie
Scale 1:7,500,000
km
0
100
200
300

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

```
TW Census data selected 2000
 Data Base Selected
 /space/software/cdbs/pt_tvdb.sff
             TV INTERFERENCE and SPACING ANALYSIS PROGRAM


 Date: 04-25-2011    Time: 18:01:16

 Record Selected for Analysis

 WEAU-TV  USERRECORD-01              EAU CLAIRE           WI US
 Channel 38 ERP 1000.  kW   HAAT  616. m  RCAMSL 00933 m
 Latitude 044-39-50  Longitude 0090-57-40
 Status APP       Zone 2    Border      Site number: 01
 Last update          Cutoff date          Docket


 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 38  ERP = 1000.00  HAAT =  616.

    Site number  1
    Azimuth      ERP        HAAT   41.0 dBu F(50,90)
     (Deg)       (kW)       (m)        (km)
      0.0      1000.000     631.5      122.3
     45.0      1000.000     620.0      121.7
     90.0      1000.000     608.4      121.1
    135.0      1000.000     610.5      121.2
    180.0      1000.000     596.2      120.4
    225.0      1000.000     595.6      120.3
    270.0      1000.000     625.7      122.0
    315.0      1000.000     641.1      122.9



           Evaluation toward Class A Stations from site # 01

No Spacing violations or contour overlap
to Class A stations from site # 01


                 Class A Evaluation Complete



                 Checks to Site Number 01

 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 =   377.0km
```

Table 1 WEAU-TV OET Bulletin 69 Interference Study
(worst-case scenarios shown page 2 of 4)

```
 Proposed facility is beyond the Mexican coordination distance

 Proposed station is OK toward AM broadcast stations

**************************************************************************
                     Start of Interference Analysis

              Proposed Station
Channel     Call         City/State              ARN
   38       WEAU-TV    EAU CLAIRE    WI          USERRECORD01

     Stations Potentially Affected by  Proposed Station

Chan   Call       City/State           Dist(km) Status  Application Ref. No.
 23    KQEG-CA   LA CRESCENT MN          105.3  LIC     BLTTA      20040602ABA
 38    WGBO-DT   JOLIET IL               409.1  CP MOD  BMPCDT     20080618AEI
 38    WGBO-DT   JOLIET IL               409.1  LIC     BLCDT      20090618ACD
 38    WQAD-TV   MOLINE IL               375.5  LIC     BLCDT      20031014AEO

%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%%

     Analysis of Interference to Affected Station   1

Analysis of current record
Channel     Call          City/State        Application Ref. No.
   23       KQEG-CA    LA CRESCENT MN          BLTTA      -20040602ABA

     Stations Potentially Affecting This Station

Chan   Call       City/State           Dist(km) Status  Application Ref. No.
 15    WQOW      EAU CLAIRE WI          117.7  CP MOD  BMPCDT     -20041001AOM
 20    KSMQ-TV   AUSTIN MN               99.4  LIC     BLEDT      -20081223AAK
 23    KCWI-TV   AMES IA                284.9  LIC     BLCDT      -20090612AIO
 23    WQPT-TV   MOLINE IL              281.0  LIC     BLEDT      -20030702AAR
 23    KTCI-TV   ST. PAUL MN            205.5  CP MOD  BMPEDT     -20100225ABK
 23    KTCI-DR   ST. PAUL MN            205.5  APP     BPRM       -20090424ADI
 23    KTCI-TV   ST. PAUL MN            205.5  APP     BPEDT      -20100505AHS
 23    WBAY-TV   GREEN BAY WI           273.2  LIC     BMLCDT     -20040723ADS
 24    K24JA-D   WINONA MN               33.1  CP      BNPDTL     -20090825BYM
 30    WHLA-TV   LA CROSSE WI             8.5  LIC     BMLEDT     -20041013AAL
 38    WEAU-TV   EAU CLAIRE    WI       105.3  APP     USERRECORD-01

 Proposed station is beyond the site to
 nearest cell evaluation distance

##########################################################################

     Analysis of Interference to Affected Station   2

Analysis of current record
Channel     Call          City/State        Application Ref. No.
   38       WGBO-DT    JOLIET IL               BMPCDT     -20080618AEI

     Stations Potentially Affecting This Station

Chan   Call       City/State           Dist(km) Status  Application Ref. No.
 38    WQAD-TV   MOLINE IL              238.2  LIC     BLCDT      -20031014AEO
 38    WKMJ-TV   LOUISVILLE KY          421.0  LIC     BLEDT      -20030410AAK
 38    WSYM-TV   LANSING MI             252.7  LIC     BLCDT      -20061107ADX
 39    WAOE      PEORIA IL              213.9  CP      BPCDT      -20080620AFR
 39    WAOE      PEORIA IL              213.9  LIC     BLCDT      -20070801EOU
```

Table 1 WEAU-TV OET Bulletin 69 Interference Study
(worst-case scenarios shown page 3 of 4)

```
 38   WEAU-TV  EAU CLAIRE    WI          409.1  APP    USERRECORD-01
 Proposal causes no interference

################################################################################

     Analysis of Interference to Affected Station   3

Analysis of current record
Channel     Call          City/State        Application Ref. No.
   38      WGBO-DT    JOLIET IL               BLCDT     -20090618ACD

     Stations Potentially Affecting This Station

Chan   Call      City/State           Dist(km) Status  Application Ref. No.
 38   WQAD-TV  MOLINE IL               238.2  LIC    BLCDT     -20031014AEO
 38   WKMJ-TV  LOUISVILLE KY           421.0  LIC    BLEDT     -20030410AAK
 38   WSYM-TV  LANSING MI              252.7  LIC    BLCDT     -20061107ADX
 39   WAOE     PEORIA IL               213.9  CP     BPCDT     -20080620AFR
 39   WAOE     PEORIA IL               213.9  LIC    BLCDT     -20070801EOU
 38   WEAU-TV  EAU CLAIRE    WI        409.1  APP    USERRECORD-01
 Proposal causes no interference

################################################################################

     Analysis of Interference to Affected Station   4

Analysis of current record
Channel     Call          City/State        Application Ref. No.
   38      WQAD-TV    MOLINE IL               BLCDT     -20031014AEO

     Stations Potentially Affecting This Station

Chan   Call      City/State           Dist(km) Status  Application Ref. No.
 38   WGBO-DT  JOLIET IL               238.2  CP MOD BMPCDT    -20080618AEI
 38   WGBO-DT  JOLIET IL               238.2  LIC    BLCDT     -20090618ACD
 39   WAOE     PEORIA IL               103.1  CP     BPCDT     -20080620AFR
 39   WAOE     PEORIA IL               103.1  LIC    BLCDT     -20070801EOU
 38   WEAU-TV  EAU CLAIRE    WI        375.5  APP    USERRECORD-01

 Total scenarios =   4


Result key:        1
Scenario        1  Affected station        4
Before Analysis

Results for: 38A IL MOLINE              BLCDT     20031014AEO  LIC
   HAAT  334.0 m, ATV ERP 1000.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour     1080059      31437.1
   not affected by terrain losses   1069235      31209.0
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV      149196        784.4
   lost to ATV IX only               149196        784.4
   lost to all IX                    149196        784.4

 Potential Interfering Stations Included in above Scenario     1

38A IL JOLIET               BMPCDT    20080618AEI  CP
39A IL PEORIA               BPCDT     20080620AFR  CP

After Analysis
```

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

```
Results for: 38A IL MOLINE              BLCDT     20031014AEO  LIC
   HAAT  334.0 m, ATV ERP 1000.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour     1080059      31437.1
   not affected by terrain losses   1069235      31209.0
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV      149394        792.4
   lost to ATV IX only               149394        792.4
   lost to all IX                    149394        792.4

 Potential Interfering Stations Included in above Scenario     1

38A IL JOLIET               BMPCDT    20080618AEI  CP
39A IL PEORIA               BPCDT     20080620AFR  CP
38A WI EAU CLAIRE           USERRECORD01           APP

Percent new IX =    0.0215%

Worst case new IX    0.0215% Scenario      1

################################################################################

     Analysis of Interference to Affected Station   5


Analysis of current record
Channel     Call          City/State        Application Ref. No.
   38      WEAU-TV    EAU CLAIRE    WI          USERRECORD-01

     Stations Potentially Affecting This Station

Chan   Call      City/State           Dist(km) Status  Application Ref. No.
 38   WGBO-DT  JOLIET IL               409.1  CP MOD BMPCDT    -20080618AEI
 38   WGBO-DT  JOLIET IL               409.1  LIC    BLCDT     -20090618ACD
 38   WQAD-TV  MOLINE IL               375.5  LIC    BLCDT     -20031014AEO

 Total scenarios =   1


Result key:        5
Scenario        1  Affected station        5
Before Analysis

Results for: 38A WI EAU CLAIRE          USERRECORD01           APP
   HAAT  616.0 m, ATV ERP 1000.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour      940414      46337.0
   not affected by terrain losses    912045      45278.4
   lost to NTSC IX                        0          0.0
   lost to additional IX by ATV         349         56.1
   lost to ATV IX only                  349         56.1
   lost to all IX                       349         56.1

 Potential Interfering Stations Included in above Scenario     1

38A IL MOLINE               BLCDT     20031014AEO  LIC

################################################################################

FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED
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