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August 11, 2014

VIA COURIER

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

ACCEPTED/FILED

AUG 11 2014

Federal Communications Commission  
Office of the Secretary

Attention: Video Division  
Media Bureau

Re: WPXA-TV, Rome, Georgia  
Facility I.D. No. 51969  
Petition to Amend the DTV Table of Allotments

Dear Ms. Dortch:

On behalf of ION Media Atlanta License, Inc., licensee of commercial television station WPXA-TV, Rome, Georgia, we hereby transmit an original and four copies of a *Petition for Rule Making* requesting the substitution of Channel 31 for Channel 51 at Rome, Georgia in the DTV Table of Allotments.

If any additional information is needed in connection with this matter, please contact me.

Respectfully submitted,



John R. Feore, Jr.

Enclosure

cc: Ms. Joyce Bernstein (via e-mail)

No. of Copies rec'd 0+4  
List ABCDE

MB-Video 14-22

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

In the Matter of )  
)  
Amendment of Section 73.622(i) )  
Post-Transition Table of Allotments, )  
Digital Television Broadcast Stations )  
(Rome, Georgia) )  
)

MB Docket No. \_\_\_\_\_  
RM- \_\_\_\_\_

**ACCEPTED/FILED**

**AUG 11 2014**

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

Federal Communications Commission  
Office of the Secretary

**PETITION FOR RULE MAKING  
TO AMEND THE DTV TABLE OF ALLOTMENTS**

By its attorneys and pursuant to Sections 1.401, 73.616, and 73.622(a) of the Commission's Rules,<sup>1</sup> ION Media Atlanta License, Inc. ("Licensee"), licensee of WPXA-TV, Rome, Georgia (the "Station"), hereby respectfully petitions the Commission to institute a rulemaking to amend Section 73.622(i), the Post-Transition DTV Table of Allotments, by substituting Channel 31 as the Station's post-transition DTV channel in lieu of Channel 51. This instant petition is submitted in accordance with the Commission's announcement that it would lift the freeze on channel change petitions filed by parties relocating from Channel 51 pursuant to a voluntary relocation agreement.<sup>2</sup>

<sup>1</sup> 47 C.F.R. §§ 1.401, 73.616, 73.622(a).

<sup>2</sup> See General Freeze on the Filing and Processing of Applications for Channel 51 Effective Immediately and Sixty (60) Day Amendment Window for Pending Channel 51 Low Power Television, TV Translator and Class A Applications, *Public Notice*, 26 FCC Rcd 11409 (Med. Bur. 2011). Licensee has entered into a voluntary relocation agreement regarding the Station with T-Mobile USA, Inc.

Specifically, the Post-Transition DTV Table of Allotments would be amended as follows:

	<u>Present</u>	<u>Proposed</u>
Rome, GA	<u>51</u>	<u>31</u>

The proposed amendment would be in the public interest. Licensee is seeking the channel substitution because the cessation of operations on Channel 51 would eliminate potential interference with wireless operations in the adjacent Lower 700 MHz A Block.<sup>3</sup>

As the attached Technical Exhibit demonstrates, the proposed facility complies with the Commission's rules for post-transition DTV operation. The Station's proposed service area encompasses its community of license, and the proposed parameters comply with the Commission's interference standards.<sup>4</sup> The proposed facility would essentially replicate the coverage of its licensed digital facility.<sup>5</sup>

For the convenience of the Commission, we hereby provide the present and proposed parameters:

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<sup>3</sup> See, e.g., *Lincoln, Nebraska*, 27 FCC Rcd 433 (Med. Bur 2012) (public interest served by clearing DTV broadcaster from Channel 51); *Jackson, Mississippi*, 26 FCC Rcd 3935 (Med. Bur 2011) (same); see also *Reallocation and Service Rules for the 698-746 MHz Spectrum Band (Television Channels 52-59)*, *Report and Order*, 17 FCC Rcd 1022, 1096, n.549 (2002) (public interest served by making new or advanced wireless services available to consumers).

<sup>4</sup> See Attachment A, Technical Exhibit at 2, 3; 47 C.F.R. §§ 73.616(b),(e), 73.623(d), 73.625(a).

<sup>5</sup> Attachment A, Technical Exhibit at 2.

Present:

Facility ID	State and City		NTSC	DTV					
			Ch	Ch	ERP kW	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)
51969	GA	ROME	--	51	1000	622		341848	843855

Proposed:

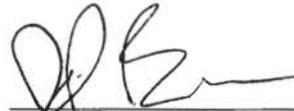
Facility ID	State and City		NTSC	DTV					
			Ch	Ch	ERP kW	HAAT (m)	Antenna ID	Latitude (DDMMSS)	Longitude (DDMMSS)
51969	GA	ROME	--	<b>31</b>	<b>691.8</b>	622		341848	843855

For the foregoing reasons, Licensee respectfully requests that the Commission amend the Post-Transition DTV Table of Allotments as proposed. Adoption would serve the public interest by permitting the Station to serve more viewers than it could reach on its current channel.

Respectfully submitted,

ION MEDIA ATLANTA LICENSE, INC.

By:

  
\_\_\_\_\_  
John R. Feore, Jr.  
Derek Teslik

Its Attorneys

Cooley LLP  
1299 Pennsylvania Avenue, N.W.  
Suite 700  
Washington, D.C. 20004  
(202) 842-7800

Dated: August 11, 2014

**ATTACHMENT A**

**Technical Exhibit**

TECHNICAL EXHIBIT  
IN SUPPORT OF PETITION FOR RULEMAKING  
TELEVISION STATION WPXA-TV  
ROME, GEORGIA

August 6, 2014

TECHNICAL EXHIBIT  
IN SUPPORT OF PETITION FOR RULEMAKING  
TELEVISION STATION WPXA-TV  
ROME, GEORGIA

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TECHNICAL EXHIBIT  
IN SUPPORT OF PETITION FOR RULEMAKING  
TELEVISION STATION WPXA-TV  
ROME, GEORGIA

Technical Statement

This Technical Statement was prepared on behalf of television broadcast station WPXA-TV, Rome, Georgia (Channel 51), in support of a Petition for Rulemaking to amend Section 73.622(i) of the FCC Rules to change the WPXA-TV post-transition digital television channel. WPXA-TV is an ION Media Network station that broadcasts the ION Television Network.

WPXA-TV is authorized for operation on Channel 51 with a maximum directional effective radiated power (ERP) of 1000 kW and antenna height above average terrain (HAAT) of 622 m.\* WPXA-TV has entered into a voluntary agreement with the licensee of the lower 700-MHz Block A spectrum (T-Mobile) that contemplates the migration of WPXA-TV from Channel 51 to Channel 31. Accordingly the licensee of WPXA-TV is proposing the substitution of Channel 31 for Channel 51 at Rome, Georgia in its Petition for Rulemaking.

The FCC has recognized the significant public interest benefits of clearing Channel 51 to the extent possible prior to the auction and repacking plan. In 2011, the FCC lifted the freeze on channel substitution rulemaking petitions to allow channel changes to Channel 51 stations.† The FCC has also stated in its recent *Report and Order (R&O)* in the auction and repacking plan, that such petitions are exempt from

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\* See FCC File No. BLCDDT-20020510AAN.

† *Public Notice*, "General Freeze on the Filing and Processing of Applications for Channel 51 Effective Immediately and Sixty (60) Day Amendment Window for Pending Channel 51 Low Power Television, TV Translator and Class A Applications," 26 FCC Rcd 11409 (MB 2011).

the Media Bureau's April 5, 2013 freeze on the filing of certain facilities modifications.<sup>‡</sup> In its *R&O* the Commission stated that it would continue to allow Petitions to reallocate stations from Channel 51 provided that the subject facilities are licensed by the Pre-Auction Licensing Deadline, which is expected to be set by the FCC toward the end of the first quarter of 2015.

The reallocation of WPXA-TV to Channel 31 would serve the public interest since it will allow for T-Mobile to launch advanced wireless services on the Lower 700 MHz Block A spectrum. The operation of WPXA-TV on Channel 31 would remove any potential interference with a wireless operation located directly adjacent to Channel 51 in Rome and the greater Atlanta, Georgia market.

WPXA-TV proposes to operate on UHF Channel 31 with a maximum ERP of 691.8 kW (28.4 dBk) employing a directional antenna with an overall HAAT of 622 meters. The proposal is specified with facilities that will essentially replicate the coverage of its licensed digital facility.<sup>§</sup> Specifications for the proposal are included herein at Figure 1.<sup>\*\*</sup>

#### Community of License Coverage Compliance

The proposed WPXA-TV allotment facility complies with the coverage requirements of Section 73.625 of the FCC Rules. A map showing the predicted coverage contours is included herein at Figure 2. As indicated, the predicted 48 dBu, f(50,90) contour encompasses the entire community of Rome as required.

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<sup>‡</sup> *Report and Order*, "In the Matter of Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions," GN Docket No. 12-268, Released: June 2, 2014.

<sup>§</sup> There is a slight change in the proposed azimuth pattern due to the mechanical differences in the replacement antenna due to the change in frequency. However, taking into consideration the predicted service losses due to terrain attenuation and interference received, the proposed facility will provide service to 99.2% of the population of the licensed WPXA-TV facility.

<sup>\*\*</sup> It is noted that the proposal is compliant with Section 73.622(f) of the FCC Rules in regard to the maximum ERP and HAAT proposed and the largest station with the market determined by geographic coverage area.

Allocation Concerns

The proposed Channel 31 facility meets the requirements of Section 73.616 of the FCC Rules concerning predicted interference to other DTV allotments and assignment records. Longley-Rice interference analyses were conducted pursuant to the requirements of the FCC Rules and FCC OET Bulletin No. 69<sup>††</sup>. The results of the interference analyses for the proposed facility are summarized herein at Figure 3. As indicated therein, the proposed facility will meet the 0.5% *de minimis* interference criterion outlined in the FCC Rules to all pertinent allotments and assignments. It is requested that a higher resolution grid size of 1.6 km and a higher resolution terrain increment of 0.10 km be employed in the Commission's interference analysis as was done for the instant analysis.

With respect to Class A TV station protection, the proposal has been evaluated according to the requirements of the FCC Rules. The analysis reveals predicted contour overlap with Class A station WDMA-CA, Macon, GA. However, as demonstrated at Figure 3, the Longley-Rice interference analysis conducted according to OET Bulletin No. 69 indicates that the proposal will meet the 0.5% *de minimis* interference protection requirements with respect to WDMA-CA. A waiver of the FCC Rules is not believed to be necessary in regard to the WDMA-CA facilities. However, a waiver of the contour overlap provision is requested with respect to WDMA-CA to the extent necessary based on the demonstration of compliance with the FCC's *de minimis* interference criteria in Figure 3 and given the public interest factors that would accrue from the instant proposal.<sup>‡‡</sup>

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<sup>††</sup> See *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, OET Bulletin 69, Federal Communications Commission (February 6, 2004).

<sup>‡‡</sup> There is an application for license pending for the WDMA-CA digital flash-cut facility on Channel 31. See FCC File No. BLDTA-20140602AAA. Because this indicates that WDMA-CA will have ceased analog operation and commenced with its digital flash-cut facility, the analog license of WDMA-CA should no longer require consideration in the interference analysis. However, it is included in the interference analysis study at Figure 3 herein for reference.

Conclusion

The instant proposal was designed to meet the FCC's *de minimis* interference requirements for protection to other facilities and the coverage requirements of the WPXA-TV community of license of Rome, GA. In addition, the proposal was designed to provide replication of the interference-free noise-limited service area of WPXA-TV. In view of the forgoing, it is concluded that the instant proposal meets the FCC's requirements and that its approval would serve the public interest.



Louis R. du Treil, Jr.

du Treil, Lundin & Rackley, Inc.  
201 Fletcher Ave.  
Sarasota, FL 34237

August 6, 2014

TECHNICAL EXHIBIT  
IN SUPPORT OF PETITION FOR RULEMAKING  
TELEVISION STATION WPXA-TV  
ROME, GEORGIA

Technical Specifications

Channel / Frequency Band	31 / 572-578 MHz
Zone	II
Reference Coordinates (NAD 27):	
Latitude	34°18'48" North
Longitude	84°38'55" West
Height of Radiation Center Above Mean Sea Level	949 m
Height of Radiation Center Above Ground Level	247 m
Height of Radiation Center Above Average Terrain (HAAT)	622 m
Maximum Effective Radiated Power (ERP)	691.8 kW (28.4 dBk)

Directional Antenna Relative Field Values (See Sheet 2 for Polar Graph)					
Degrees	Value	Degrees	Value	Degrees	Value
0	0.857	120	0.857	240	0.857
10	0.962	130	0.962	250	0.962
20	1.000	140	1.000	260	1.000
30	0.962	150	0.962	270	0.962
40	0.857	160	0.857	280	0.857
50	0.716	170	0.716	290	0.716
60	0.576	180	0.576	300	0.576
70	0.474	190	0.474	310	0.474
80	0.437	200	0.437	320	0.437
90	0.474	210	0.474	330	0.474
100	0.576	220	0.576	340	0.576
110	0.716	230	0.716	350	0.716
<b>Antenna Rotation : none</b>					

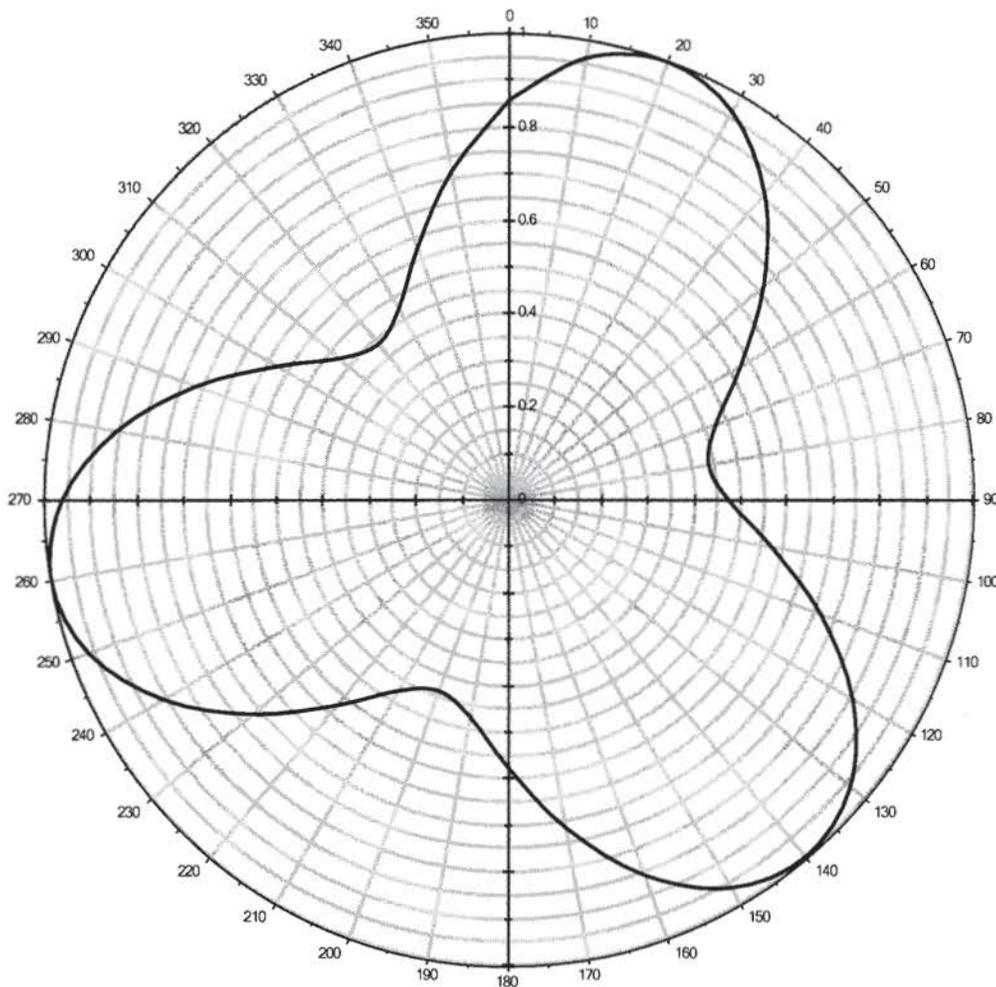
# DA Inquiry

du Treil, Lundin, & Rackley, Inc., Sarasota, Florida



Antenna ID: 800571

WPXA-TV  
Rome, GA  
Channel 31



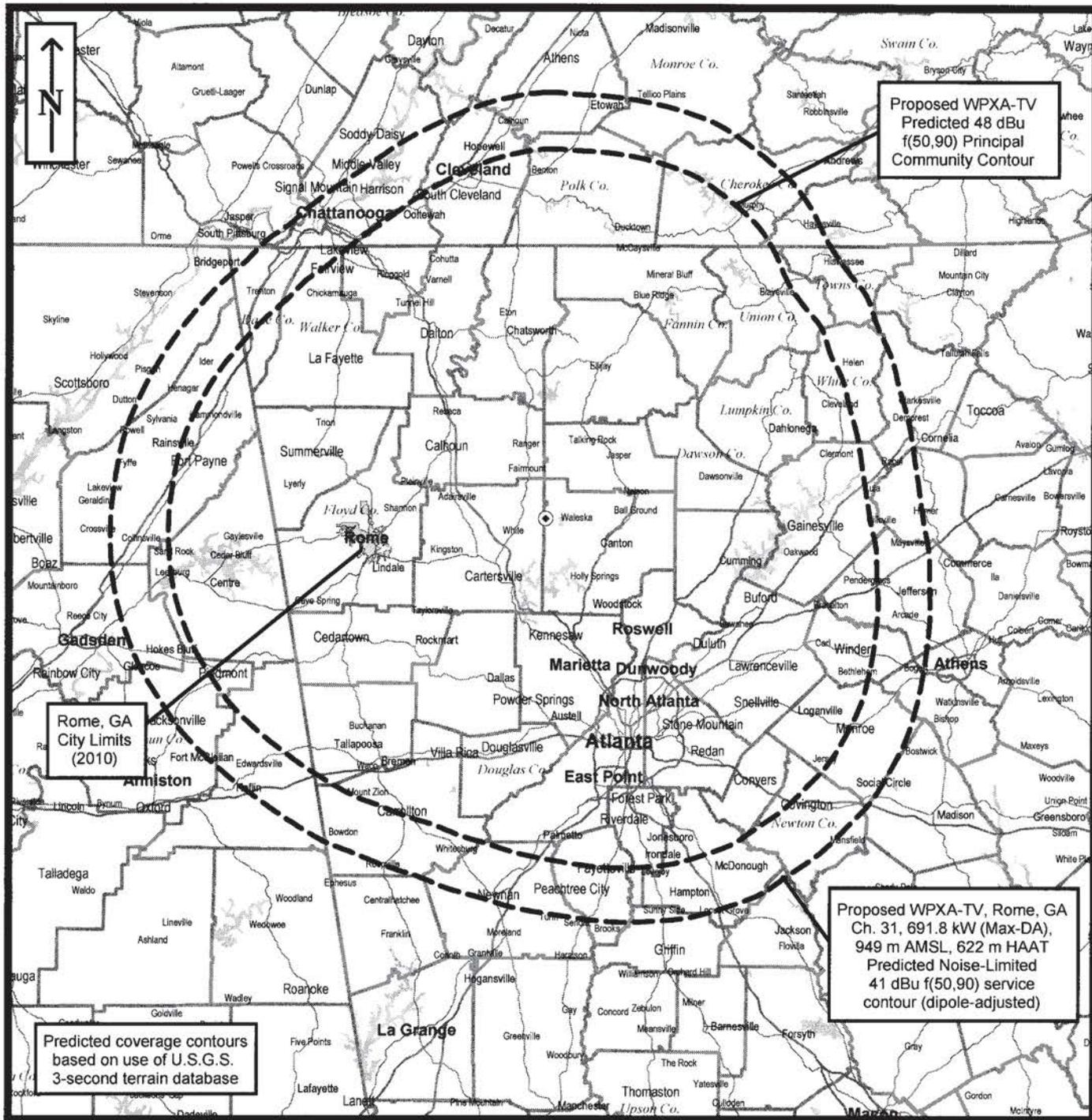
Note: display reflects rotation of 0.00°

0°	0.857	60°	0.576	120°	0.857	180°	0.576	240°	0.857	300°	0.576
10°	0.962	70°	0.474	130°	0.962	190°	0.474	250°	0.962	310°	0.474
20°	1.000	80°	0.437	140°	1.000	200°	0.437	260°	1.000	320°	0.437
30°	0.962	90°	0.474	150°	0.962	210°	0.474	270°	0.962	330°	0.474
40°	0.857	100°	0.576	160°	0.857	220°	0.576	280°	0.857	340°	0.576
50°	0.716	110°	0.716	170°	0.716	230°	0.716	290°	0.716	350°	0.716

Antenna: WPXA-CH31

Standard Pattern:

Last Change Date:



## PREDICTED COVERAGE CONTOURS

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

TECHNICAL EXHIBIT  
IN SUPPORT OF PETITION FOR RULEMAKING  
TELEVISION STATION WPXA-TV  
ROME, GEORGIA

Interference Analysis Pursuant to  
Office of Engineering and Technology Bulletin No. 69

(16 pages follow)

OET-69 Interference Analysis (WPXA-TV, Rome, GA, Channel 31)(Worst-Case Scenarios)

Percent allowed new interference: 0.500  
Percent allowed new interference to non Class A LPTV: 2.000  
TW Census data selected 2000  
Data Base Selected  
/export/home/cdbs/pt\_tvdb.sff  
TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 08-06-2014

Record Selected for Analysis

WPXA-TV USERRECORD-01 ROME GA US  
Channel 31 ERP 691.79 kW HAAT 620. m RCAMSL 00949 m  
Latitude 034-18-48 Longitude 0084-38-55  
Status APP Zone 2 Border Site number: 01  
Dir Antenna Make usr Model WPXA-CH31 Beam tilt N Ref Azimuth 0.  
Last update Cutoff date Docket  
Comments  
Applicant

NOTE: A HIGHER RESOLUTION CELL SIZE OF 1.6 KM WITH A DISTANCE INCREMENT OF 0.10 KM WAS EMPLOYED FOR THE INTERFERENCE ANALYSIS.

Cell Size for Service Analysis 1.6 km/side

Distance Increments for Longley-Rice Analysis 0.10 km

Facility (site # 01) does not meet maximum height/power limits  
Channel 31 ERP = 691.79 HAAT = 620.

Site number	1			
Azimuth	ERP	HAAT	41.0 dBu F(50,90)	
(Deg)	(kW)	(m)	(km)	
0.0	508.084	637.1	115.949	
45.0	427.929	518.1	107.771	
90.0	155.429	593.6	103.513	
135.0	665.752	629.8	118.173	
180.0	229.519	612.3	107.722	
225.0	288.695	610.6	109.652	
270.0	640.213	654.7	119.045	
315.0	143.533	701.6	107.303	

Evaluation toward Class A Stations from site # 01

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

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 beyond the Canadian coordination distance

Proposed facility is beyond the Mexican coordination distance

OET-69 Interference Analysis (WPXA-TV, Rome, GA, Channel 31)(Worst-Case Scenarios)

Proposed station is OK toward AM broadcast stations

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

Channel	Proposed Station	ARN
31	Call WPXA-TV City/State ROME GA	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
27	WTNB-CA	CLEVELAND TN	101.0	LIC	BLTT	19971027JD
30	WIAT	BIRMINGHAM AL	219.4	LIC	BLCDDT	20021219AAV
30	WLGA	OPELIKA AL	221.8	APP	BPCDDT	20140313AAP
30	WLGA-DR	OPELIKA AL	221.8	APP	BPRM	20090722ACP
30	WLGA	OPELIKA AL	221.8	LIC	BLCDDT	20130222ABT
30	WVLT-TV	KNOXVILLE TN	197.3	LIC	BLCDDT	20120103ABR
31	WNCF	MONTGOMERY AL	311.7	LIC	BLCDDT	20121004AAI
31	WNCF-DR	MONTGOMERY AL	311.7	APP	BPRM	20110531ATU
31	WNCF	MONTGOMERY AL	311.6	APP	BPCDDT	20140411AAH
31	WFXG	AUGUSTA GA	278.1	CP	BPCDDT	20090303ABA
31	WFXG-DR	AUGUSTA GA	278.1	APP	BPRM	20080620AON
31	WRDW-DR	AUGUSTA GA	277.7	APP	BPRM	20110503AER
31	WDMA-CA	MACON GA	186.9	LIC	BLTTA	20060321ABK
31	WDMA-CA	MACON GA	187.0	CP	BDISDTA	20110826ADW
31	WDKY-DR	DANVILLE KY	397.6	APP	BPRM	20080620AOU
31	WDKY-TV	DANVILLE KY	397.6	LIC	BLCDDT	20120308AAK
31	WJDE-LD	NASHVILLE TN	282.3	LIC	BLDTA	20110627AAU
31	WAPW-CA	ABINGDON VA	362.9	LIC	BLTTA	20030618AAZ
32	WAAY-TV	HUNTSVILLE AL	178.9	LIC	BLCDDT	20050701ABO
32	WPGA-TV	PERRY GA	200.9	CP	BPCDDT	20111125IEF
32	WPGA-TV	PERRY GA	200.9	LIC	BLCDDT	20071213AAD

\*\*\*\*\*

Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
27	WTNB-CA	CLEVELAND TN	BLTT	-19971027JD

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
20	WBXX-TV	CROSSVILLE TN	112.4	LIC	BLCDDT	-20090619ABD
23	WPXK-TV	JELICO TN	123.3	LIC	BLCDDT	-20140702ABN
25	WUNF-TV	ASHEVILLE NC	144.7	LIC	BLEDT	-20120615ACE
26	WATE-TV	KNOXVILLE TN	123.3	LIC	BMLCDDT	-20041203AEG
27	WAIQ	MONTGOMERY AL	339.3	LIC	BLEDT	-20060706ACK
27	WAGA-TV	ATLANTA GA	163.9	LIC	BLCDDT	-20060728AEL
27	WCCB	CHARLOTTE NC	376.7	LIC	BLCDDT	-20020227AAZ
27	WKPT-TV	KINGSPORT TN	282.8	LIC	BMLCDDT	-20110914ABI
27	WKRN-TV	NASHVILLE TN	199.4	LIC	BLCDDT	-20090624ABO
28	WRNG-LP	CHATTANOOGA TN	53.0	CP	BDFCDDL	-20090820ACX
29	WTCI	CHATTANOOGA TN	36.1	LIC	BLEDT	-20060629ACO
30	WVLT-TV	KNOXVILLE TN	121.8	LIC	BLCDDT	-20120103ABR
34	WTNZ	KNOXVILLE TN	123.3	LIC	BMLCDDT	-20040706ABG
41	WATC-DT	ATLANTA GA	132.1	LIC	BLEDT	-20120404AAX
42	WFLI-TV	CLEVELAND TN	35.8	LIC	BLCDDT	-20050808AGH
31	WPXA-TV	ROME GA	101.0	APP	USERRECORD-01	
25	WUNF-TV	ASHEVILLE NC		LIC	BLEDT	-20120615ACE

Proposed station is beyond the site to nearest cell evaluation distance

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Analysis of Interference to Affected Station 2

OET-69 Interference Analysis (WPXA-TV, Rome, GA, Channel 31)(Worst-Case Scenarios)

Analysis of current record

Channel	Call	City/State	Application Ref. No.
30	WIAT	BIRMINGHAM AL	BLCDT -20021219AAV

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
29	WBIH	SELMA AL	105.0	LIC	BLCDT -20090619AAY
30	WLGA	OPELIKA AL	228.2	APP	BPCDT -20140313AAP
30	WLGA-DR	OPELIKA AL	228.3	APP	BPRM -20090722ACP
30	WLGA	OPELIKA AL	228.2	LIC	BLCDT -20130222ABT
30	WLBT-DR	JACKSON MS	362.5	APP	BPRM -20090813ADM
30	WLBT	JACKSON MS	362.5	LIC	BLCDT -20100119AEE
30	WVLT-TV	KNOXVILLE TN	381.7	LIC	BLCDT -20120103ABR
31	WNCF	MONTGOMERY AL	148.4	LIC	BLCDT -20121004AAI
31	WNCF-DR	MONTGOMERY AL	148.4	APP	BPRM -20110531ATU
31	WNCF	MONTGOMERY AL	148.4	APP	BPCDT -20140411AAH
31	WGBC	MERIDIAN MS	217.9	LIC	BLCDT -20071024AAK
31	WPXA-TV	ROME GA	219.4	APP	USERRECORD-01

Proposed station is beyond the site to nearest cell evaluation distance

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Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application Ref. No.
30	WLGA	OPELIKA AL	BPCDT -20140313AAP

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
29	WBIH	SELMA AL	194.0	LIC	BLCDT -20090619AAY
30	WIAT	BIRMINGHAM AL	228.2	LIC	BLCDT -20021219AAV
30	WLGA-DR	OPELIKA AL	0.0	APP	BPRM -20090722ACP
30	WAGT	AUGUSTA GA	301.3	LIC	BLCDT -20030530AON
30	WVLT-TV	KNOXVILLE TN	415.6	LIC	BLCDT -20120103ABR
31	WNCF	MONTGOMERY AL	188.0	LIC	BLCDT -20121004AAI
31	WNCF-DR	MONTGOMERY AL	188.0	APP	BPRM -20110531ATU
31	WNCF	MONTGOMERY AL	187.8	APP	BPCDT -20140411AAH
31	WPXA-TV	ROME GA	221.8	APP	USERRECORD-01

Proposed station is beyond the site to nearest cell evaluation distance

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Analysis of Interference to Affected Station 4

Analysis of current record

Channel	Call	City/State	Application Ref. No.
30	WLGA-DR	OPELIKA AL	BPRM -20090722ACP

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
29	WBIH	SELMA AL	194.0	LIC	BLCDT -20090619AAY
30	WIAT	BIRMINGHAM AL	228.3	LIC	BLCDT -20021219AAV
30	WLGA	OPELIKA AL	0.0	APP	BPCDT -20140313AAP
30	WLGA	OPELIKA AL	0.0	LIC	BLCDT -20130222ABT
30	WAGT	AUGUSTA GA	301.3	LIC	BLCDT -20030530AON
30	WVLT-TV	KNOXVILLE TN	415.6	LIC	BLCDT -20120103ABR
31	WNCF	MONTGOMERY AL	188.0	LIC	BLCDT -20121004AAI
31	WNCF-DR	MONTGOMERY AL	188.0	APP	BPRM -20110531ATU
31	WNCF	MONTGOMERY AL	187.8	APP	BPCDT -20140411AAH
31	WPXA-TV	ROME GA	221.8	APP	USERRECORD-01

Proposed station is beyond the site to nearest cell evaluation distance

OET-69 Interference Analysis (WPXA-TV, Rome, GA, Channel 31)(Worst-Case Scenarios)

#####

Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
30	WLGA	OPELIKA AL	BLCDT	-20130222ABT

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
29	WBIH	SELMA AL	194.0	LIC	BLCDT	-20090619AAV
30	WIAT	BIRMINGHAM AL	228.2	LIC	BLCDT	-20021219AAV
30	WLGA-DR	OPELIKA AL	0.0	APP	BPRM	-20090722ACP
30	WAGT	AUGUSTA GA	301.3	LIC	BLCDT	-20030530AON
30	WVLT-TV	KNOXVILLE TN	415.6	LIC	BLCDT	-20120103ABR
31	WNCF	MONTGOMERY AL	188.0	LIC	BLCDT	-20121004AAI
31	WNCF-DR	MONTGOMERY AL	188.0	APP	BPRM	-20110531ATU
31	WNCF	MONTGOMERY AL	187.8	APP	BPCDT	-20140411AAH
31	WPXA-TV	ROME GA	221.8	APP	USERRECORD-01	

Proposed station is beyond the site to nearest cell evaluation distance

#####

Analysis of Interference to Affected Station 6

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
30	WVLT-TV	KNOXVILLE TN	BLCDT	-20120103ABR

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
29	WTCI	CHATTANOOGA TN	148.4	LIC	BLEDT	-20060629ACO
29	WCYB-DR	BRISTOL VA	173.2	APP	BPRM	-20110526AJ0
30	WIAT	BIRMINGHAM AL	381.7	LIC	BLCDT	-20021219AAV
30	WLGA	OPELIKA AL	415.6	APP	BPCDT	-20140313AAP
30	WLGA-DR	OPELIKA AL	415.6	APP	BPRM	-20090722ACP
30	WLGA	OPELIKA AL	415.6	LIC	BLCDT	-20130222ABT
30	WAGT	AUGUSTA GA	347.1	LIC	BLCDT	-20030530AON
30	WKOH	OWENSBORO KY	363.8	LIC	BLEDT	-20020304ALJ
30	WRGT-TV	DAYTON OH	415.3	CP	BPCDT	-20110610ACR
30	WRGT-TV	DAYTON OH	415.3	LIC	BLCDT	-20050621AAU
30	WSLS-TV	ROANOKE VA	365.2	LIC	BLCDT	-20110615ABO
31	WDKY-DR	DANVILLE KY	212.0	APP	BPRM	-20080620AOU
31	WDKY-TV	DANVILLE KY	212.0	LIC	BLCDT	-20120308AAK
31	WPXA-TV	ROME GA	197.3	APP	USERRECORD-01	

Proposal causes no interference

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Analysis of Interference to Affected Station 7

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
31	WNCF	MONTGOMERY AL	BLCDT	-20121004AAI

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
30	WIAT	BIRMINGHAM AL	148.4	LIC	BLCDT	-20021219AAV
30	WLGA	OPELIKA AL	188.0	APP	BPCDT	-20140313AAP
30	WLGA-DR	OPELIKA AL	188.0	APP	BPRM	-20090722ACP
30	WLGA	OPELIKA AL	188.0	LIC	BLCDT	-20130222ABT
31	WNCF-DR	MONTGOMERY AL	0.0	APP	BPRM	-20110531ATU
31	WSRE	PENSACOLA FL	188.1	LIC	BLEDT	-20060621AAS

OET-69 Interference Analysis (WPXA-TV, Rome, GA, Channel 31)(Worst-Case Scenarios)

31	WLAE-TV	NEW ORLEANS LA	386.2	LIC	BLEDT	-20090205AAL
31	WGBC	MERIDIAN MS	180.8	LIC	BLCDT	-20071024AAK
31	WPXA-TV	ROME GA	311.7	APP	USERRECORD-01	

Total scenarios = 3

Result key: 1  
 Scenario 1 Affected station 7  
 Before Analysis

Results for: 31A AL MONTGOMERY BLCDT 20121004AAI LIC  
 HAAT 473.0 m, ATV ERP 720.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	639712	32187.3
not affected by terrain losses	634235	31821.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	24640	1956.9
lost to ATV IX only	24640	1956.9
lost to all IX	24640	1956.9

Potential Interfering Stations Included in above Scenario 1

30A AL BIRMINGHAM	BLCDT	20021219AAV	LIC
31A FL PENSACOLA	BLEDT	20060621AAS	LIC
31A MS MERIDIAN	BLCDT	20071024AAK	LIC

After Analysis

Results for: 31A AL MONTGOMERY BLCDT 20121004AAI LIC  
 HAAT 473.0 m, ATV ERP 720.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	639712	32187.3
not affected by terrain losses	634235	31821.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	24758	1964.5
lost to ATV IX only	24758	1964.5
lost to all IX	24758	1964.5

Potential Interfering Stations Included in above Scenario 1

30A AL BIRMINGHAM	BLCDT	20021219AAV	LIC
31A FL PENSACOLA	BLEDT	20060621AAS	LIC
31A MS MERIDIAN	BLCDT	20071024AAK	LIC
31A GA ROME	USERRECORD01		APP

Percent new IX = 0.0194%

Worst case new IX 0.0194% Scenario 1

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Analysis of Interference to Affected Station 8

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
31	WNCF-DR	MONTGOMERY AL	BPRM	-20110531ATU

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
30	WIAT	BIRMINGHAM AL	148.4	LIC	BLCDT	-20021219AAV
30	WLGA	OPELIKA AL	188.0	APP	BPCDT	-20140313AAP
30	WLGA-DR	OPELIKA AL	188.0	APP	BPRM	-20090722ACP
30	WLGA	OPELIKA AL	188.0	LIC	BLCDT	-20130222ABT
31	WNCF	MONTGOMERY AL	0.0	LIC	BLCDT	-20121004AAI
31	WNCF	MONTGOMERY AL	0.2	APP	BPCDT	-20140411AAH
31	WSRE	PENSACOLA FL	188.1	LIC	BLEDT	-20060621AAS
31	WLAE-TV	NEW ORLEANS LA	386.2	LIC	BLEDT	-20090205AAL
31	WGBC	MERIDIAN MS	180.8	LIC	BLCDT	-20071024AAK
31	WPXA-TV	ROME GA	311.7	APP	USERRECORD-01	

Total scenarios = 2

OET-69 Interference Analysis (WPXA-TV, Rome, GA, Channel 31)(Worst-Case Scenarios)

Result key: 4  
 Scenario 1 Affected station 8  
 Before Analysis

Results for: 31A AL MONTGOMERY BPRM 20110531ATU APP  
 HAAT 473.0 m, ATV ERP 720.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	639712	32187.3
not affected by terrain losses	634235	31821.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	563850	25577.4
lost to ATV IX only	563850	25577.4
lost to all IX	563850	25577.4

Potential Interfering Stations Included in above Scenario 1

30A AL BIRMINGHAM	BLCDT	20021219AAV	LIC
31A AL MONTGOMERY	BLCDT	20121004AAI	LIC
31A FL PENSACOLA	BLEDT	20060621AAS	LIC
31A MS MERIDIAN	BLCDT	20071024AAK	LIC

After Analysis

Results for: 31A AL MONTGOMERY BPRM 20110531ATU APP  
 HAAT 473.0 m, ATV ERP 720.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	639712	32187.3
not affected by terrain losses	634235	31821.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	563850	25577.4
lost to ATV IX only	563850	25577.4
lost to all IX	563850	25577.4

Potential Interfering Stations Included in above Scenario 1

30A AL BIRMINGHAM	BLCDT	20021219AAV	LIC
31A AL MONTGOMERY	BLCDT	20121004AAI	LIC
31A FL PENSACOLA	BLEDT	20060621AAS	LIC
31A MS MERIDIAN	BLCDT	20071024AAK	LIC
31A GA ROME	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 9

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
31	WNCF	MONTGOMERY AL	BPCDT	-20140411AAH

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
30	WIAT	BIRMINGHAM AL	148.4	LIC	BLCDT	-20021219AAV
30	WLGA	OPELIKA AL	187.8	APP	BPCDT	-20140313AAP
30	WLGA-DR	OPELIKA AL	187.8	APP	BPRM	-20090722ACP
30	WLGA	OPELIKA AL	187.8	LIC	BLCDT	-20130222ABT
31	WNCF-DR	MONTGOMERY AL	0.2	APP	BPRM	-20110531ATU
31	WSRE	PENSACOLA FL	188.2	LIC	BLEDT	-20060621AAS
31	WLAE-TV	NEW ORLEANS LA	386.4	LIC	BLEDT	-20090205AAL
31	WGBC	MERIDIAN MS	181.0	LIC	BLCDT	-20071024AAK
31	WPXA-TV	ROME GA	311.6	APP	USERRECORD-01	

Total scenarios = 5

Result key: 8  
 Scenario 3 Affected station 9  
 Before Analysis

OET-69 Interference Analysis (WPXA-TV, Rome, GA, Channel 31)(Worst-Case Scenarios)

Results for: 31A AL MONTGOMERY BPCDT 20140411AAH APP  
 HAAT 478.0 m, ATV ERP 720.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	639913	32184.1
not affected by terrain losses	633918	31787.6
lost to NTSC IX	0	0.0
lost to additional IX by ATV	26099	1933.8
lost to ATV IX only	26099	1933.8
lost to all IX	26099	1933.8

Potential Interfering Stations Included in above Scenario 3

30A AL BIRMINGHAM	BLCDT	20021219AAV	LIC
30A AL OPELIKA	BPRM	20090722ACP	APP
31A FL PENSACOLA	BLEDT	20060621AAS	LIC
31A MS MERIDIAN	BLCDT	20071024AAK	LIC

After Analysis

Results for: 31A AL MONTGOMERY BPCDT 20140411AAH APP  
 HAAT 478.0 m, ATV ERP 720.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	639913	32184.1
not affected by terrain losses	633918	31787.6
lost to NTSC IX	0	0.0
lost to additional IX by ATV	26338	1954.3
lost to ATV IX only	26338	1954.3
lost to all IX	26338	1954.3

Potential Interfering Stations Included in above Scenario 3

30A AL BIRMINGHAM	BLCDT	20021219AAV	LIC
30A AL OPELIKA	BPRM	20090722ACP	APP
31A FL PENSACOLA	BLEDT	20060621AAS	LIC
31A MS MERIDIAN	BLCDT	20071024AAK	LIC
31A GA ROME	USERRECORD01		APP

Percent new IX = 0.0393%

Worst case new IX 0.0393% Scenario 3

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Analysis of Interference to Affected Station 10

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
31	WFXG	AUGUSTA GA	BPCDT	-20090303ABA

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
30	WAGT	AUGUSTA GA	1.2	LIC	BLCDT	-20030530AON
31	WFXG-DR	AUGUSTA GA	0.0	APP	BPRM	-20080620AON
31	WRDW-DR	AUGUSTA GA	1.1	APP	BPRM	-20110503AER
31	WUNU	LUMBERTON NC	299.1	LIC	BLEDT	-20091113ABG
31	WXII-TV	WINSTON-SALEM NC	354.8	LIC	BLCDT	-20050627AAU
32	WPGA-TV	PERRY GA	176.6	CP	BPCDT	-20111125IEF
32	WPGA-TV	PERRY GA	176.6	LIC	BLCDT	-20071213AAD
32	WRLK-TV	COLUMBIA SC	113.9	LIC	BLEDT	-20090622ADI
31	WPXA-TV	ROME GA	278.1	APP	USERRECORD-01	

Total scenarios = 5

Result key: 14  
 Scenario 4 Affected station 10  
 Before Analysis

Results for: 31A GA AUGUSTA BPCDT 20090303ABA CP

	POPULATION	AREA (sq km)
within Noise Limited Contour	1023723	30193.3

OET-69 Interference Analysis (WPXA-TV, Rome, GA, Channel 31)(Worst-Case Scenarios)

not affected by terrain losses	1014308	29965.0
lost to NTSC IX	0	0.0
lost to additional IX by ATV	918861	26370.4
lost to ATV IX only	918861	26370.4
lost to all IX	918861	26370.4

Potential Interfering Stations Included in above Scenario 4

30A GA AUGUSTA	BLCDT	20030530AON	LIC
31A GA AUGUSTA	BPRM	20110503AER	APP
31A NC LUMBERTON	BLEDT	20091113ABG	LIC
31A NC WINSTON-SALEM	BLCDT	20050627AAU	LIC
32A GA PERRY	BPCDT	20111125IEF	CP
32A SC COLUMBIA	BLEDT	20090622ADI	LIC

After Analysis

Results for: 31A GA AUGUSTA BPCDT 20090303ABA CP

HAAT 384.0 m, ATV ERP 413.0 kW		
	POPULATION	AREA (sq km)
within Noise Limited Contour	1023723	30193.3
not affected by terrain losses	1014308	29965.0
lost to NTSC IX	0	0.0
lost to additional IX by ATV	918940	26378.1
lost to ATV IX only	918940	26378.1
lost to all IX	918940	26378.1

Potential Interfering Stations Included in above Scenario 4

30A GA AUGUSTA	BLCDT	20030530AON	LIC
31A GA AUGUSTA	BPRM	20110503AER	APP
31A NC LUMBERTON	BLEDT	20091113ABG	LIC
31A NC WINSTON-SALEM	BLCDT	20050627AAU	LIC
32A GA PERRY	BPCDT	20111125IEF	CP
32A SC COLUMBIA	BLEDT	20090622ADI	LIC
31A GA ROME	USERRECORD01		APP

Percent new IX = 0.0828%

Worst case new IX 0.0828% Scenario 4

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Analysis of Interference to Affected Station 11

Analysis of current record

Channel	Call	City/State	Application Ref. No.
31	WFXG-DR	AUGUSTA GA	BPRM -20080620AON

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
30	WAGT	AUGUSTA GA	1.2	LIC	BLCDT -20030530AON
31	WFXG	AUGUSTA GA	0.0	CP	BPCDT -20090303ABA
31	WRDW-DR	AUGUSTA GA	1.1	APP	BPRM -20110503AER
31	WUNU	LUMBERTON NC	299.1	LIC	BLEDT -20091113ABG
31	WXII-TV	WINSTON-SALEM NC	354.8	LIC	BLCDT -20050627AAU
32	WPGA-TV	PERRY GA	176.6	CP	BPCDT -20111125IEF
32	WPGA-TV	PERRY GA	176.6	LIC	BLCDT -20071213AAD
32	WRLK-TV	COLUMBIA SC	113.9	LIC	BLEDT -20090622ADI
31	WPXA-TV	ROME GA	278.1	APP	USERRECORD-01

Total scenarios = 3

Result key: 16  
 Scenario 1 Affected station 11  
 Before Analysis

Results for: 31A GA AUGUSTA BPRM 20080620AON APP

HAAT 383.0 m, ATV ERP 413.0 kW		
	POPULATION	AREA (sq km)
within Noise Limited Contour	1021827	30142.0

OET-69 Interference Analysis (WPXA-TV, Rome, GA, Channel 31)(Worst-Case Scenarios)

not affected by terrain losses	1012463	29916.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	925272	26526.9
lost to ATV IX only	925272	26526.9
lost to all IX	925272	26526.9

Potential Interfering Stations Included in above Scenario 1

30A GA AUGUSTA	BLCDT	20030530AON	LIC
31A GA AUGUSTA	BPCDT	20090303ABA	CP
31A NC LUMBERTON	BLEDT	20091113ABG	LIC
31A NC WINSTON-SALEM	BLCDT	20050627AAU	LIC
32A GA PERRY	BPCDT	20111125IEF	CP
32A SC COLUMBIA	BLEDT	20090622ADI	LIC

After Analysis

Results for: 31A GA AUGUSTA BPRM 20080620AON APP

HAAT 383.0 m, ATV ERP 413.0 kW		
	POPULATION	AREA (sq km)
within Noise Limited Contour	1021827	30142.0
not affected by terrain losses	1012463	29916.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	925272	26526.9
lost to ATV IX only	925272	26526.9
lost to all IX	925272	26526.9

Potential Interfering Stations Included in above Scenario 1

30A GA AUGUSTA	BLCDT	20030530AON	LIC
31A GA AUGUSTA	BPCDT	20090303ABA	CP
31A NC LUMBERTON	BLEDT	20091113ABG	LIC
31A NC WINSTON-SALEM	BLCDT	20050627AAU	LIC
32A GA PERRY	BPCDT	20111125IEF	CP
32A SC COLUMBIA	BLEDT	20090622ADI	LIC
31A GA ROME	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 12

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
31	WRDW-DR	AUGUSTA GA	BPRM	-20110503AER

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
30	WAGT	AUGUSTA GA	1.1	LIC	BLCDT	-20030530AON
31	WFXG	AUGUSTA GA	1.1	CP	BPCDT	-20090303ABA
31	WFXG-DR	AUGUSTA GA	1.1	APP	BPRM	-20080620AON
31	WUNU	LUMBERTON NC	300.2	LIC	BLEDT	-20091113ABG
31	WXII-TV	WINSTON-SALEM NC	355.8	LIC	BLCDT	-20050627AAU
32	WPGA-TV	PERRY GA	175.6	CP	BPCDT	-20111125IEF
32	WPGA-TV	PERRY GA	175.6	LIC	BLCDT	-20071213AAD
32	WRLK-TV	COLUMBIA SC	115.0	LIC	BLEDT	-20090622ADI
31	WPXA-TV	ROME GA	277.7	APP	USERRECORD-01	

Total scenarios = 3

Result key: 19  
 Scenario 1 Affected station 12  
 Before Analysis

Results for: 31A GA AUGUSTA BPRM 20110503AER APP

HAAT 469.0 m, ATV ERP 751.0 kW		
	POPULATION	AREA (sq km)
within Noise Limited Contour	1398881	38534.5

OET-69 Interference Analysis (WPXA-TV, Rome, GA, Channel 31)(Worst-Case Scenarios)

not affected by terrain losses	1381938	38211.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	1213208	33184.3
lost to ATV IX only	1213208	33184.3
lost to all IX	1213208	33184.3

Potential Interfering Stations Included in above Scenario 1

31A GA AUGUSTA	BPCDT	20090303ABA	CP
31A NC LUMBERTON	BLEDT	20091113ABG	LIC
31A NC WINSTON-SALEM	BLCDT	20050627AAU	LIC
32A GA PERRY	BPCDT	20111125IEF	CP
32A SC COLUMBIA	BLEDT	20090622ADI	LIC

After Analysis

Results for: 31A GA AUGUSTA BPRM 20110503AER APP  
 HAAT 469.0 m, ATV ERP 751.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1398881	38534.5
not affected by terrain losses	1381938	38211.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	1213235	33194.5
lost to ATV IX only	1213235	33194.5
lost to all IX	1213235	33194.5

Potential Interfering Stations Included in above Scenario 1

31A GA AUGUSTA	BPCDT	20090303ABA	CP
31A NC LUMBERTON	BLEDT	20091113ABG	LIC
31A NC WINSTON-SALEM	BLCDT	20050627AAU	LIC
32A GA PERRY	BPCDT	20111125IEF	CP
32A SC COLUMBIA	BLEDT	20090622ADI	LIC
31A GA ROME	USERRECORD01		APP

Percent new IX = 0.0160%

Worst case new IX 0.0160% Scenario 1

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Analysis of Interference to Affected Station 13

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	OPELIKA AL	119.8	APP	BPCDT	-20140313AAP
30	WLGA-DR	OPELIKA AL	119.7	APP	BPRM	-20090722ACP
30	WLGA	OPELIKA AL	119.8	LIC	BLCDT	-20130222ABT
31	WNCF	MONTGOMERY AL	301.4	LIC	BLCDT	-20121004AAI
31	WNCF-DR	MONTGOMERY AL	301.4	APP	BPRM	-20110531ATU
31	WNCF	MONTGOMERY AL	301.2	APP	BPCDT	-20140411AAH
31	WSB-TV	ATHENS GA	121.5	LIC	BLCDT	-20100429ADZ
31	WANN-LP	ATLANTA GA	123.9	CP	BDISTTL	-20091125AFY
31	WANN-LP	ATLANTA GA	123.9	APP	BDISDTL	-20091015ABG
31	WFXG	AUGUSTA GA	182.5	CP	BPCDT	-20090303ABA
31	WFXG-DR	AUGUSTA GA	182.5	APP	BPRM	-20080620AON
31	WRDW-DR	AUGUSTA GA	181.5	APP	BPRM	-20110503AER
32	WPGA-TV	PERRY GA	14.7	CP	BPCDT	-20111125IEF
32	WPGA-TV	PERRY GA	14.7	LIC	BLCDT	-20071213AAD
35	WLTZ	COLUMBUS GA	121.3	LIC	BLCDT	-20060627ABT
39	WSB-TV	ATLANTA GA	120.9	LIC	BLCDT	-20100129ADE
45	WGNM	MACON GA	13.6	LIC	BLCDT	-20050621CRQ
31	WPXA-TV	ROME GA	186.9	APP	USERRECORD-01	

Total scenarios = 10