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Federal Communications Commission
Office of the Secretary

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DOCKET FILE COPY ORIGINAL

VIA COURIER

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

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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 *Supplement to Petition for Rule Making* regarding 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 1
List ABCDE

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

In the Matter of)
)
Amendment of Section 73.622(i)) MB Docket No. _____
Post-Transition Table of Allotments,) RM- _____
Digital Television Broadcast Stations)
(Rome, Georgia))
)

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

**SUPPLEMENT TO 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,¹ ION Media Atlanta License, Inc. ("Licensee"), licensee of WPXA-TV, Rome, Georgia (the "Station"), hereby supplements the *Petition for Rule Making* it filed on August 11, 2014 regarding the amendment of Section 73.622(i), the Post-Transition DTV Table of Allotments, to substitute Channel 31 as the Station's post-transition DTV channel in lieu of Channel 51 (the "Petition") by providing a supplemental engineering statement.

As demonstrated in the supplemental engineering statement attached hereto as Attachment A, the proposed Channel 31 noise limited service contour of the Station would be

¹ 47 C.F.R. §§ 1.401, 73.616, 73.622(a).

fully within the Station's existing Channel 51 contour.² Thus, grant of the Petition would not affect the Commission's repacking flexibility.³

For the reasons set forth herein and in the Petition, 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
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(202) 842-7800

Dated: August 19, 2014

² See Attachment A, Technical Statement at 1-2.

³ See *Expanding the Economic and Innovation Opportunities of Spectrum through Incentive Auctions*, Report and Order, 29 FCC Rcd 6567, 6659, n.658 (2014). The supplemental engineering statement also includes a revised interference analysis conducted using a 2.0 km cell size.

ATTACHMENT A

Technical Exhibit

License Search

Search Results

Specified Search

FRN like **0002627016**

Matches **1 - 7** (of **7**)

PA = Pending Application(s)
TP = Termination Pending
L = Lease

Call Sign/Lease ID	Name	FRN	Radio Service	Status	Expiration Date
1 KAM863	KBJR LICENSE, INC.	0002627016	RP	Canceled	12/01/2013
2 KDZ69	KBJR LICENSE, INC.	0002627016	TS	Active	12/01/2021
3 KY7794	KBJR LICENSE, INC.	0002627016	TP	Active	12/01/2021
4 WCG661	KBJR LICENSE, INC.	0002627016	TI	Active	12/01/2021
5 WPTK303	KBJR LICENSE, INC.	0002627016	TI	Canceled	12/01/2013
6 WPTL894	KBJR LICENSE, INC.	0002627016	TI	Active	12/01/2021
7 WQKI406	KBJR LICENSE, INC.	0002627016	TI	Canceled	12/01/2013

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

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. This statement was prepared to provide additional information related to the interference analysis and the repacking flexibility analysis.

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. A Longley-Rice interference analysis was conducted pursuant to the requirements of the FCC Rules and FCC OET Bulletin No. 69*. The results of the interference analysis for the proposed facility are summarized herein at Figure 1. 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 terrain increment of 0.10 km be employed in the Commission's interference analysis as was done for the instant analysis.†

In order to evaluate the effect of this proposal on the repacking flexibility in the auction and repacking process, a comparison of the predicted 41 dBu noise-

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

† It is noted that 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 does not require consideration in the interference analysis.

limited service contour coverage was prepared. As indicated in the attached Figure 2, the proposal will not result in any increase in the predicted 41 dBu noise-limited service contour in any direction relative to the licensed Channel 51 facility.

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 18, 2014

Figure 1

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

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

(14 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: 08-18-2014 Time: 10:43:28

Record Selected for Analysis

WPXA-DR BPRM -20140811ACP ROME GA US
Channel 31 ERP 691.8 kW HAAT 00622 m RCAMSL 00949 m
Latitude 034-18-48 Longitude 0084-38-55
Status APP Zone 2 Border Site number: 01
Dir Antenna Make CDB Model 00000000119394 Beam tilt N Ref Azimuth 0.0
Last update 00000000 Cutoff date 00000000 Docket
Comments
Applicant ION MEDIA ATLANTA LICENSE, INC.

NOTE: A HIGHER RESOLUTION TERRAIN INCREMENT OF 0.10 KM WAS EMPLOYED FOR THE INTERFERENCE ANALYSIS.

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 0.10 km

Facility (site # 01) does not meet maximum height/power limits
Channel 31 ERP = 691.80 HAAT = 622.

Site number	1			
Azimuth	ERP	HAAT	41.0 dBu F(50,90)	
(Deg)	(kW)	(m)	(km)	
0.0	508.092	637.1	115.949	
45.0	427.935	518.1	107.771	
90.0	155.431	593.6	103.513	
135.0	665.761	629.8	118.173	
180.0	229.523	612.3	107.723	
225.0	288.699	610.6	109.652	
270.0	640.222	654.7	119.045	
315.0	143.535	701.6	107.303	

Database HAAT does not agree with computed HAAT
Database HAAT: 622 Computed HAAT: 620

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 Call	City/State	ARN
31	WPXA-DR	ROME GA	BPRM 20140811ACP

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	BLCDT	20021219AAV
30	WLGA	OPELIKA AL	221.8	APP	BPCDT	20140313AAP
30	WLGA	OPELIKA AL	221.8	LIC	BLCDT	20130222ABT
30	WLGA-DR	OPELIKA AL	221.8	APP	BPRM	20090722ACP
30	WVLT-TV	KNOXVILLE TN	197.3	LIC	BLCDT	20120103ABR
31	WNCF	MONTGOMERY AL	311.7	LIC	BLCDT	20121004AAI
31	WNCF-DR	MONTGOMERY AL	311.7	APP	BPRM	20110531ATU
31	WNCF	MONTGOMERY AL	311.6	APP	BPCDT	20140411AAH
31	WRDW-DR	AUGUSTA GA	277.7	APP	BPRM	20110503AER
31	WFXG-DR	AUGUSTA GA	278.1	APP	BPRM	20080620AON
31	WFXG	AUGUSTA GA	278.1	CP	BPCDT	20090303ABA
31	WDMA-CA	MACON GA	187.0	CP	BDISDTA	20110826ADW
31	WDMA-CA	MACON GA	186.9	LIC	BLTTA	20060321ABK
31	WDKY-DR	DANVILLE KY	397.6	APP	BPRM	20080620AOU
31	WDKY-TV	DANVILLE KY	397.6	LIC	BLCDT	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	BLCDT	20050701ABO
32	WPGA-TV	PERRY GA	200.9	LIC	BLCDT	20071213AAD
32	WPGA-TV	PERRY GA	200.9	CP	BPCDT	20111125IEF

Analysis of Interference to Affected Station 1

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

Stations Potentially Affecting This Station

Proposed station is beyond the site to nearest cell evaluation distance

Analysis of Interference to Affected Station 2

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

Stations Potentially Affecting This Station

Proposed station is beyond the site to nearest cell evaluation distance

Analysis of Interference to Affected Station 3

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

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

Stations Potentially Affecting This Station

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	OPELIKA AL	BLCDT	-20130222ABT

Stations Potentially Affecting This Station

Proposed station is beyond the site to
nearest cell evaluation distance

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Analysis of Interference to Affected Station 5

Analysis of current record

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

Stations Potentially Affecting This Station

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	OPELIKA AL	415.6	LIC	BLCDT	-20130222ABT
30	WLGA-DR	OPELIKA AL	415.6	APP	BPRM	-20090722ACP
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	LIC	BLCDT	-20050621AAU
30	WRGT-TV	DAYTON OH	415.3	CP	BPCDT	-20110610ACR
30	WLSL-TV	ROANOKE VA	365.2	LIC	BLCDT	-20110615ABO
31	WPXA-DR	ROME GA	197.3	APP	BPRM	-20140811ACP
31	WDKY-DR	DANVILLE KY	212.0	APP	BPRM	-20080620AOU
31	WDKY-TV	DANVILLE KY	212.0	LIC	BLCDT	-20120308AAK

Total scenarios = 3

Result key: 2
Scenario 2 Affected station 6
Before Analysis

Results for: 30A TN KNOXVILLE BLCDT 20120103ABR LIC
HAAT 551.0 m, ATV ERP 870.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1688051	43708.3
not affected by terrain losses	1476835	36619.5

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

lost to NTSC IX	0	0.0
lost to additional IX by ATV	13823	365.1
lost to ATV, IX only	13823	365.1
lost to all IX	13823	365.1

Potential Interfering Stations Included in above Scenario 2

29A TN CHATTANOOGA	BLEDT	20060629ACO	LIC
29A VA BRISTOL	BPRM	20110526AJO	APP
30A AL BIRMINGHAM	BLCDT	20021219AAV	LIC
30A KY OWENSBORO	BLEDT	20020304ALJ	LIC
30A VA ROANOKE	BLCDT	20110615ABO	LIC

After Analysis

Results for: 30A TN KNOXVILLE BLCDT 20120103ABR LIC
 HAAT 551.0 m, ATV ERP 870.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1688051	43708.3
not affected by terrain losses	1476835	36619.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	14124	373.1
lost to ATV IX only	14124	373.1
lost to all IX	14124	373.1

Potential Interfering Stations Included in above Scenario 2

29A TN CHATTANOOGA	BLEDT	20060629ACO	LIC
29A VA BRISTOL	BPRM	20110526AJO	APP
30A AL BIRMINGHAM	BLCDT	20021219AAV	LIC
30A KY OWENSBORO	BLEDT	20020304ALJ	LIC
30A VA ROANOKE	BLCDT	20110615ABO	LIC
31A GA ROME	BPRM	20140811ACP	APP

Percent new IX = 0.0206%

Worst case new IX 0.0206% Scenario 2

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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	OPELIKA AL	188.0	LIC	BLCDT -20130222ABT
30	WLGA-DR	OPELIKA AL	188.0	APP	BPRM -20090722ACP
31	WNCF-DR	MONTGOMERY AL	0.0	APP	BPRM -20110531ATU
31	WSRE	PENSACOLA FL	188.1	LIC	BLEDT -20060621AAS
31	WPXA-DR	ROME GA	311.7	APP	BPRM -20140811ACP
31	WLAE-TV	NEW ORLEANS LA	386.2	LIC	BLEDT -20090205AAL
31	WGBC	MERIDIAN MS	180.8	LIC	BLCDT -20071024AAK

Total scenarios = 3

Result key: 4
 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	642358	32253.1
not affected by terrain losses	636303	31885.9
lost to NTSC IX	0	0.0
lost to additional IX by ATV	29918	2006.0

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

lost to ATV IX only 29918 2006.0
 lost to all IX 29918 2006.0

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	642358	32253.1
not affected by terrain losses	636303	31885.9
lost to NTSC IX	0	0.0
lost to additional IX by ATV	30002	2014.1
lost to ATV IX only	30002	2014.1
lost to all IX	30002	2014.1

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 BPRM 20140811ACP APP

Percent new IX = 0.0139%

Worst case new IX 0.0139% Scenario 1

#####

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	OPELIKA AL	188.0	LIC	BLCDT -20130222ABT
30	WLGA-DR	OPELIKA AL	188.0	APP	BPRM -20090722ACP
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	WPXA-DR	ROME GA	311.7	APP	BPRM -20140811ACP
31	WLAE-TV	NEW ORLEANS LA	386.2	LIC	BLEDT -20090205AAL
31	WGBC	MERIDIAN MS	180.8	LIC	BLCDT -20071024AAK

Total scenarios = 3

Result key: 7
 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	642358	32253.1
not affected by terrain losses	636303	31885.9
lost to NTSC IX	0	0.0
lost to additional IX by ATV	560302	25593.4
lost to ATV IX only	560302	25593.4
lost to all IX	560302	25593.4

Potential Interfering Stations Included in above Scenario 1

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

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	642358	32253.1
not affected by terrain losses	636303	31885.9
lost to NTSC IX	0	0.0
lost to additional IX by ATV	560302	25593.4
lost to ATV IX only	560302	25593.4
lost to all IX	560302	25593.4

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	BPRM	20140811ACP	APP

Percent new IX = 0.0000%

Worst case new IX 0.0000% Scenario 1

#####

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	OPELIKA AL	187.8	LIC	BLCDT -20130222ABT
30	WLGA-DR	OPELIKA AL	187.8	APP	BPRM -20090722ACP
31	WNCF-DR	MONTGOMERY AL	0.2	APP	BPRM -20110531ATU
31	WSRE	PENSACOLA FL	188.2	LIC	BLEDT -20060621AAS
31	WPXA-DR	ROME GA	311.6	APP	BPRM -20140811ACP
31	WLAE-TV	NEW ORLEANS LA	386.4	LIC	BLEDT -20090205AAL
31	WGBC	MERIDIAN MS	181.0	LIC	BLCDT -20071024AAK

Total scenarios = 5

Result key: 12
 Scenario 3 Affected station 9
 Before 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	641607	32208.1
not affected by terrain losses	635231	31800.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	29953	2066.5
lost to ATV IX only	29953	2066.5
lost to all IX	29953	2066.5

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

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

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	641607	32208.1
not affected by terrain losses	635231	31800.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	30045	2078.6
lost to ATV IX only	30045	2078.6
lost to all IX	30045	2078.6

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	BPRM	20140811ACP	APP

Percent new IX = 0.0152%

Worst case new IX 0.0152% Scenario 3

#####

Analysis of Interference to Affected Station 10

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-DR	AUGUSTA GA	1.1	APP	BPRM	-20080620AON
31	WFXG	AUGUSTA GA	1.1	CP	BPCDT	-20090303ABA
31	WPXA-DR	ROME GA	277.7	APP	BPRM	-20140811ACP
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	LIC	BLCDT	-20071213AAD
32	WPGA-TV	PERRY GA	175.6	CP	BPCDT	-20111125IEF
32	WRLK-TV	COLUMBIA SC	115.0	LIC	BLEDT	-20090622ADI

Total scenarios = 3

Result key: 15
 Scenario 1 Affected station 10
 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	1398317	38521.3
not affected by terrain losses	1386883	38218.6
lost to NTSC IX	0	0.0
lost to additional IX by ATV	1218196	33356.1
lost to ATV IX only	1218196	33356.1
lost to all IX	1218196	33356.1

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

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

HAAT 469.0 m, ATV ERP 751.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1398317	38521.3
not affected by terrain losses	1386883	38218.6
lost to NTSC IX	0	0.0
lost to additional IX by ATV	1218212	33360.1
lost to ATV IX only	1218212	33360.1
lost to all IX	1218212	33360.1

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	BPRM	20140811ACP	APP

Percent new IX = 0.0095%

Worst case new IX 0.0095% Scenario 1

#####

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	WRDW-DR	AUGUSTA GA	1.1	APP	BPRM -20110503AER
31	WFXG	AUGUSTA GA	0.0	CP	BPCDT -20090303ABA
31	WPXA-DR	ROME GA	278.1	APP	BPRM -20140811ACP
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	LIC	BLCDT -20071213AAD
32	WPGA-TV	PERRY GA	176.6	CP	BPCDT -20111125IEF
32	WRLK-TV	COLUMBIA SC	113.9	LIC	BLEDT -20090622ADI

Total scenarios = 3

Result key: 18

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	1014878	30192.3
not affected by terrain losses	1003859	30002.7
lost to NTSC IX	0	0.0
lost to additional IX by ATV	905379	26629.6
lost to ATV IX only	905379	26629.6
lost to all IX	905379	26629.6

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

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

	POPULATION	AREA (sq km)
within Noise Limited Contour	1014878	30192.3
not affected by terrain losses	1003859	30002.7
lost to NTSC IX	0	0.0
lost to additional IX by ATV	905379	26629.6
lost to ATV IX only	905379	26629.6
lost to all IX	905379	26629.6

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	BPRM	20140811ACP	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	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	WRDW-DR	AUGUSTA GA	1.1	APP	BPRM	-20110503AER
31	WFXG-DR	AUGUSTA GA	0.0	APP	BPRM	-20080620AON
31	WPXA-DR	ROME GA	278.1	APP	BPRM	-20140811ACP
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	LIC	BLCDT	-20071213AAD
32	WPGA-TV	PERRY GA	176.6	CP	BPCDT	-20111125IEF
32	WRLK-TV	COLUMBIA SC	113.9	LIC	BLEDT	-20090622ADI

Total scenarios = 5

Result key: 21
 Scenario 1 Affected station 12
 Before 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	1017677	30232.7
not affected by terrain losses	1006936	30043.0
lost to NTSC IX	0	0.0
lost to additional IX by ATV	103965	738.4
lost to ATV IX only	103965	738.4
lost to all IX	103965	738.4

Potential Interfering Stations Included in above Scenario 1

30A GA AUGUSTA	BLCDT	20030530AON	LIC
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)

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

within Noise Limited Contour	1017677	30232.7
not affected by terrain losses	1006936	30043.0
lost to NTSC IX	0	0.0
lost to additional IX by ATV	104274	879.6
lost to ATV IX only	104274	879.6
lost to all IX	104274	879.6

Potential Interfering Stations Included in above Scenario 1

30A GA AUGUSTA	BLCDT	20030530AON	LIC
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	BPRM	20140811ACP	APP

Percent new IX = 0.0342%

Worst case new IX 0.0342% Scenario 1

#####

Analysis of Interference to Affected Station 13

Analysis of current record

Channel	Call	City/State	Application Ref. No.
31	WDMA-CA	MACON GA	BDISDTA -20110826ADW

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application Ref. No.
30	WLGA	OPELIKA AL	119.7	APP	BPCDT -20140313AAP
30	WLGA	OPELIKA AL	119.7	LIC	BLCDT -20130222ABT
30	WLGA-DR	OPELIKA AL	119.7	APP	BPRM -20090722ACP
31	WAXC-LD	ALEXANDER CITY AL	212.3	LIC	BLDTL -20110329ABN
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	W31DS-D	ASHBURN GA	122.1	CP	BNPDTL -20100510ABE
31	WSB-TV	ATHENS GA	121.6	LIC	BLCDT -20100429ADZ
31	WANN-LP	ATLANTA GA	124.0	CP	BDISDTL -20091125AFY
31	WANN-LP	ATLANTA GA	124.0	APP	BDISDTL -20091015ABG
31	WRDW-DR	AUGUSTA GA	181.5	APP	BPRM -20110503AER
31	WFXG-DR	AUGUSTA GA	182.5	APP	BPRM -20080620AON
31	WFXG	AUGUSTA GA	182.5	CP	BPCDT -20090303ABA
31	W48DR-D	GAINESVILLE GA	172.7	APP	BDISDTL -20140610ACW
31	WPXA-DR	ROME GA	187.0	APP	BPRM -20140811ACP
32	WPGA-TV	PERRY GA	14.6	LIC	BLCDT -20071213AAD
32	WPGA-TV	PERRY GA	14.6	CP	BPCDT -20111125IEF

Total scenarios = 18

Result key: 26
 Scenario 1 Affected station 13
 Before Analysis

Results for: 31A GA MACON BDISDTA 20110826ADW CP
 HAAT 211.0 m, ATV ERP 15.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	378691	6529.7
not affected by terrain losses	378597	6525.7
lost to NTSC IX	48	8.0
lost to additional IX by ATV	5534	268.6
lost to ATV IX only	5582	272.6
lost to all IX	5582	276.6

Potential Interfering Stations Included in above Scenario 1

31N GA ATLANTA	BDISDTL	20091125AFY	CP
31A GA ATHENS	BLCDT	20100429ADZ	LIC
31A GA AUGUSTA	BPCDT	20090303ABA	CP
32A GA PERRY	BLCDT	20071213AAD	LIC

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

After Analysis

Results for: 31A GA MACON BDISTDA 20110826ADW CP

	POPULATION	AREA (sq km)
HAAT 211.0 m, ATV ERP 15.0 kW		
within Noise Limited Contour	378691	6529.7
not affected by terrain losses	378597	6525.7
lost to NTSC IX	48	8.0
lost to additional IX by ATV	7202	332.7
lost to ATV IX only	7250	340.7
lost to all IX	7250	340.7

Potential Interfering Stations Included in above Scenario 1

31N GA ATLANTA	BDISTTL	20091125AFY	CP
31A GA ATHENS	BLCDF	20100429ADZ	LIC
31A GA AUGUSTA	BPCDT	20090303ABA	CP
32A GA PERRY	BLCDF	20071213AAD	LIC
31A GA ROME	BPRM	20140811ACP	APP

Percent new IX = 0.4472%

Worst case new IX 0.4472% Scenario 1

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Analysis of Interference to Affected Station 14

Analysis of current record

Channel	Call	City/State	Application Ref. No.
31	WDMA-CA	MACON GA	BLTTA -20060321AHK

NOTE: There is an application for license pending for the WDMA-CA digital flash-cut facility on Channel 31. See above for interference analysis results. 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 no longer requires consideration in the interference analysis.

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Analysis of Interference to Affected Station 15

Analysis of current record

Channel	Call	City/State	Application Ref. No.
31	WDKY-DR	DANVILLE KY	BPRM -20080620AOU

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application Ref. No.
30	WRGT-TV	DAYTON OH	205.0	LIC	BLCDF -20050621AAU
30	WRGT-TV	DAYTON OH	205.0	CP	BPCDT -20110610ACR
30	WVLT-TV	KNOXVILLE TN	212.0	LIC	BLCDF -20120103ABR
31	WPXA-DR	ROME GA	397.6	APP	BPRM -20140811ACP
31	WANE-TV	FORT WAYNE IN	364.6	LIC	BLCDF -20090622ACE
31	WDKY-TV	DANVILLE KY	0.0	LIC	BLCDF -20120308AAK
31	WXII-TV	WINSTON-SALEM NC	387.7	LIC	BLCDF -20050627AAU
32	WSBN-TV	NORTON VA	185.6	LIC	BLEDT -20030428ABR

Proposal causes no interference

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Analysis of Interference to Affected Station 16

Analysis of current record

Channel	Call	City/State	Application Ref. No.
31	WDKY-TV	DANVILLE KY	BLCDF -20120308AAK

Stations Potentially Affecting This Station

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

Chan	Call	City/State	Dist (km)	Status	Application	Ref. No.
30	WRGT-TV	DAYTON OH	205.0	LIC	BLCDDT	-20050621AAU
30	WRGT-TV	DAYTON OH	205.0	CP	BPCDDT	-20110610ACR
30	WVLT-TV	KNOXVILLE TN	212.0	LIC	BLCDDT	-20120103ABR
31	WPXA-DR	ROME GA	397.6	APP	BPRM	-20140811ACP
31	WANE-TV	FORT WAYNE IN	364.6	LIC	BLCDDT	-20090622ACE
31	WDKY-DR	DANVILLE KY	0.0	APP	BPRM	-20080620AOU
31	WXII-TV	WINSTON-SALEM NC	387.7	LIC	BLCDDT	-20050627AAU
32	WSBN-TV	NORTON VA	185.6	LIC	BLEDDT	-20030428ABR

Proposal causes no interference

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Analysis of Interference to Affected Station 17

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
31	WJDE-LD	NASHVILLE TN	BLDDTA	-20110627AAU

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application	Ref. No.
30	WCKV-LD	CLARKSVILLE TN	65.8	LIC	BLDDTL	-20131213AAA
30	WCKV-LD	CLARKSVILLE TN	65.5	CP	BPDDTL	-20131230AQQ
31	WNAL-LD	HUNTSVILLE AL	160.2	CP	BPDDTL	-20130201BDU
31	WPXA-DR	ROME GA	282.3	APP	BPRM	-20140811ACP
31	NEW	EVANSVILLE IN	193.9	APP	BNPDDTL	-20090825AXM
31	WDKY-DR	DANVILLE KY	289.8	APP	BPRM	-20080620AOU
31	WDKY-TV	DANVILLE KY	289.8	LIC	BLCDDT	-20120308AAK
31	DWOOT-LD	CHATTANOOGA TN	173.5	APP	BSTA	-20121012AAB
31	WLMT	MEMPHIS TN	288.0	LIC	BLCDDT	-20050427ABN

Total scenarios = 5

Result key: 55
 Scenario 2 Affected station 17
 Before Analysis

Results for: 31A TN NASHVILLE BLDTA 20110627AAU LIC

HAAT	170.0 m, ATV ERP	5.3 kW	POPULATION	AREA (sq km)
within Noise Limited Contour			997077	5554.2
not affected by terrain losses			995753	5522.2
lost to NTSC IX			0	0.0
lost to additional IX by ATV			5007	16.0
lost to ATV IX only			5007	16.0
lost to all IX			5007	16.0

Potential Interfering Stations Included in above Scenario 2

31A AL HUNTSVILLE	BPDDTL	20130201BDU	CP
31A IN EVANSVILLE	BNPDDTL	20090825AXM	APP
31A KY DANVILLE	BPRM	20080620AOU	APP

After Analysis

Results for: 31A TN NASHVILLE BLDTA 20110627AAU LIC

HAAT	170.0 m, ATV ERP	5.3 kW	POPULATION	AREA (sq km)
within Noise Limited Contour			997077	5554.2
not affected by terrain losses			995753	5522.2
lost to NTSC IX			0	0.0
lost to additional IX by ATV			7191	20.0
lost to ATV IX only			7191	20.0
lost to all IX			7191	20.0

Potential Interfering Stations Included in above Scenario 2

31A AL HUNTSVILLE	BPDDTL	20130201BDU	CP
31A IN EVANSVILLE	BNPDDTL	20090825AXM	APP
31A KY DANVILLE	BPRM	20080620AOU	APP
31A GA ROME	BPRM	20140811ACP	APP

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

Percent new IX = 0.2204%

Worst case new IX 0.2204% Scenario 2

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Analysis of Interference to Affected Station 18

Analysis of current record

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

Stations Potentially Affecting This Station

Proposal causes no interference

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Analysis of Interference to Affected Station 19

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
32	WAAW-TV	HUNTSVILLE AL	BLCDT	-20050701ABO

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
31	WPXA-DR	ROME GA	178.9	APP	BPRM	-20140811ACP
32	WPGA-TV	PERRY GA	352.6	LIC	BLCDT	-20071213AAD
32	WPGA-TV	PERRY GA	352.6	CP	BPCDT	-20111125IEF
32	WPSD-TV	PADUCAH KY	350.7	LIC	BLCDT	-20040227ABD
32	WABG-TV	GREENWOOD MS	398.9	LIC	BLCDT	-20051024ABR
32	WSBN-TV	NORTON VA	426.5	LIC	BLEDT	-20030428ABR
33	WCFT-TV	TUSCALOOSA AL	162.3	LIC	BLCDT	-20091106ABO
33	WNGH-TV	CHATSWORTH GA	166.1	LIC	BLEDT	-20080509AAN
33	WPGD-TV	HENDERSONVILLE TN	171.9	LIC	BMLCDT	-20131125BGF
33	WPGD-DR	HENDERSONVILLE TN	171.9	APP	BPRM	-20080620AIV

Total scenarios = 2

Result key: 59
 Scenario 1 Affected station 19
 Before Analysis

Results for: 32A AL HUNTSVILLE BLCDT 20050701ABO LIC
 HAAT 538.0 m, ATV ERP 468.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1390447	35120.9
not affected by terrain losses	1304841	32932.6
lost to NTSC IX	0	0.0
lost to additional IX by ATV	11010	269.5
lost to ATV IX only	11010	269.5
lost to all IX	11010	269.5

Potential Interfering Stations Included in above Scenario 1

32A GA PERRY	BPCDT	20111125IEF	CP
32A KY PADUCAH	BLCDT	20040227ABD	LIC
32A MS GREENWOOD	BLCDT	20051024ABR	LIC
33A AL TUSCALOOSA	BLCDT	20091106ABO	LIC
33A GA CHATSWORTH	BLEDT	20080509AAN	LIC

After Analysis

Results for: 32A AL HUNTSVILLE BLCDT 20050701ABO LIC
 HAAT 538.0 m, ATV ERP 468.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1390447	35120.9
not affected by terrain losses	1304841	32932.6

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

lost to NTSC IX	0	0.0
lost to additional IX by ATV	13820	350.0
lost to ATV IX only	13820	350.0
lost to all IX	13820	350.0

Potential Interfering Stations Included in above Scenario 1

32A GA PERRY	BPCDT	2011125IEF	CP
32A KY PADUCAH	BLCDT	20040227ABD	LIC
32A MS GREENWOOD	BLCDT	20051024ABR	LIC
33A AL TUSCALOOSA	BLCDT	20091106ABO	LIC
33A GA CHATSWORTH	BLEDT	20080509AAN	LIC
31A GA ROME	BPRM	20140811ACP	APP

Percent new IX = 0.2172%

Worst case new IX 0.2172% Scenario 1

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Analysis of Interference to Affected Station 20

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
32	WPGA-TV	PERRY GA	BLCDT	-20071213AAD

Stations Potentially Affecting This Station

Proposed station is beyond the site to nearest cell evaluation distance

#####

Analysis of Interference to Affected Station 21

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
32	WPGA-TV	PERRY GA	BPCDT	-2011125IEF

Stations Potentially Affecting This Station

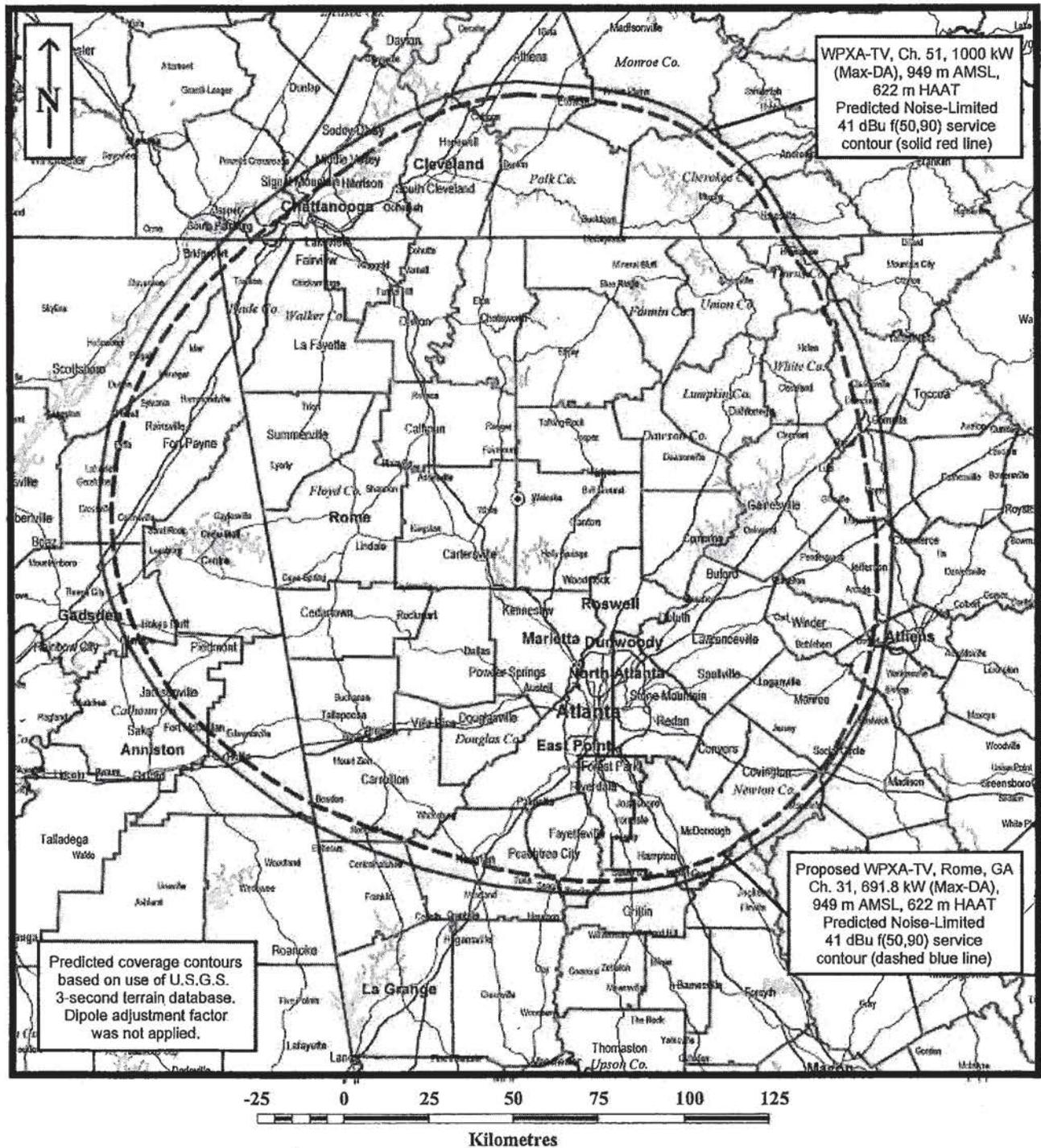
Proposal causes no interference

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FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED

Figure 2



COMPARISON OF PREDICTED 41 DBU COVERAGE CONTOURS

duTreil, Lundin & Rackley, Inc. Sarasota, Florida