

COVINGTON & BURLING LLP

1201 PENNSYLVANIA AVENUE NW
WASHINGTON, DC 20004-2401
TEL 202.662.6000
FAX 202.662.6291
WWW.COV.COM

BEIJING
BRUSSELS
LONDON
NEW YORK
SAN DIEGO
SAN FRANCISCO
SILICON VALLEY
WASHINGTON

June 8, 2012

BY FIRST CLASS MAIL AND ELECTRONIC MAIL

Ms. Barbara Kreisman
Chief, Video Division, Media Bureau
Federal Communications Commission
P.O. Box 979089
St. Louis, MO 63197-9000

**Re: Request for Special Temporary Authority and Waiver
of § 73.735(b)(1) of the FCC's Rules
WTVF, Nashville, Tennessee (Facility ID No. 36504)**

Dear Ms. Kreisman:

NewsChannel 5 Network, LLC, licensee of WTVF, Nashville, Tennessee (Facility ID No. 36504), a CBS television network affiliate, respectfully requests Special Temporary Authority ("STA") and a waiver of Section 74.735(b)(1) of the Commission's rules¹ in order to operate a replacement digital translator on Channel 5 with an effective radiated power ("ERP") of 22 kW. Operation of the proposed high-powered translator will serve the public interest by preventing widespread and substantial service losses. Specifically, without the STA, 159,100 viewers around the outside of the station's service area will lose access to WTVF's free, over-the-air signal, including CBS network programming and local news programming, when WTVF moves its primary operations from Channel 5 to Channel 25 this summer. Accordingly, a waiver of the maximum power limit for high-powered translators is warranted and in the public interest.

Expedited Processing Requested. WTVF respectfully requests expedited processing of this STA and waiver request. The station intends to transition its primary operations to Channel 25 this summer. The Channel 25 operations will entail a new, top-mounted UHF antenna, displacing the top-mounted VHF antenna currently being used for the station's Channel 5 operations. Accordingly, operating a Channel 5 translator will require the purchase and installation of a new, side-mount VHF antenna. Prompt consideration and grant of

¹ 47 C.F.R. § 74.735(b)(1).

Ms. Barbara Kreisman
June 8, 2012

the instant waiver request is requested in order to allow sufficient time to order and install the new side-mount antenna in time to seamlessly provide service to the 159,100 viewers who otherwise would lose service when the station commences its primary operations on Channel 25.

Waiver Request. Section 1.3 of the Rules provides for waiver of a rule “for good cause shown.”² The Commission has recognized that “a rule may be waived where the particular facts make strict compliance inconsistent with the public interest.”³ In this case, strict compliance with the power limit set forth in Section 74.735(b)(1) would be inconsistent with the public interest because it would suddenly deprive an extraordinary number of viewers of continued access to WTVF’s free, over-the-air television signal. For the reasons set forth below, there is good cause to waive Section 74.735(b)(1).

As the Commission is aware from the station’s prior filings and discussions with the staff, the station’s current Channel 5 digital facility is unable to provide a reliable signal to numerous viewers in the close-in areas surrounding the station’s transmitter. A large percentage of the reception problems are centered within a 15-mile radius of station’s transmitter, where approximately 573,000 individuals reside.⁴ Accordingly, the station requested and received a new allotment on Channel 25.

While the Channel 25 digital facility will serve the over half a million viewers in the *inner* “doughnut hole” area that has experienced reception problems with respect to Channel 5, the change-over to Channel 25 will cause many of the station’s existing viewers who reside furthest from the station’s transmitter — those in the “doughnut” itself — to suddenly lose access to the station’s signal. The number of viewers in the loss area is approximately 190,600. (As described below, the proposed replacement translator will maintain service to approximately 159,100 of these viewers. The proposed facility has been designed to avoid causing any interference to a Memphis full-power station, WMC-TV, that also operates on Channel 5.)⁵

² See 47 C.F.R. § 1.3. See also *WAIT Radio v. FCC*, 418 F.2d 1153, 1157 (D.C. Cir. 1969).

³ See *Request for Waiver of the Decision of the Universal Service Administrator by Douglas-Omaha Tech. Comm’n, Omaha, Nebraska*, Order, File No. SLD 427054, 21 FCC Rcd 9277, at para. 5 (2006). See also 47 C.F.R. § 1.925(b)(3) (permitting waiver where “[t]he underlying purpose of the rule(s) would not be served or would be frustrated by application to the instant case, and that a grant of the requested waiver would be in the public interest” or where “[i]n view of unique or unusual factual circumstances of the instant case, application of the rule(s) would be inequitable, unduly burdensome or contrary to the public interest, or the applicant has no reasonable alternative”).

⁴ See FCC Form 346, BMPCDT-20090714ACS, Exhibit 1, at 1; see also *id.* at 2-3 (describing service losses concentrated around transmitter site in an area populated by 573,000 individuals).

⁵ See Technical Exhibit at 2 and Fig. 2. The loss figure in the outer “doughnut” of 190,600 is larger than the estimated loss figure of 182,000 viewers cited in WTVF’s application for a (continued...)

Ms. Barbara Kreisman
June 8, 2012

The Commission has emphasized the importance of ensuring that “all Americans continue to receive the television broadcast service that they are accustomed to receiving to the greatest extent feasible.”⁶ Thus, it created the replacement digital television translator service “for the purpose of maintaining broadcast service that the public has come to depend upon and enjoy.”⁷ Strict compliance with Section 74.735(b)(1) would be inconsistent with the public interest because it would cause an extraordinary number of the station’s viewers to suddenly lose access to the station’s signal, including its local news programming, CBS network programming, emergency information and alerts, and other entertainment and informational programming. The proposed power level of 22 kW is necessary in order for the proposed replacement translator to serve as many of WTVF’s existing viewers as possible. Further, in the outlying rural areas that are in the loss areas with respect to the station’s switch to Channel 25, cable penetration is very low, which makes the over-the-air signal all the more important.⁸

The station has considered other alternatives, but none of them provide reasonable or viable means of solving the problem. In addition, the solution proposed here is both efficient and practical, and would not result in new interference to other stations. The proposed facility has been engineered so as to avoid causing any interference to WMC-TV, Memphis, Tennessee.⁹ In addition, while the facility is “predicted” to cause 25.2% interference to analog translator station WRTN-LP, Alexandria, Tennessee, such interference should not be treated as new, or even actual, interference. First, WRTN-LP appears to be off-the-air.¹⁰ Second, even if the station were on the air today, the facility proposed by WTVF would simply maintain the *status quo* with respect to WTVF-to-WRTN-LP interference, and thus would not be “new”

construction permit for the Channel 25 facility. See footnote 2 to Technical Exhibit submitted with the station’s FCC Form 301 for the Channel 25 construction permit, FCC File No. BPCDT-20110824ACF. This is because the prior estimated loss figure relied on the 2000 Census, while the figure cited in the instant waiver request uses the 2010 Census.

⁶ *Amendment of Parts 73 and 74 of the Commission’s Rules to Establish Rules for Replacement Digital Low Power Television Translator Stations*, Report and Order, 24 FCC Rcd 5931, para 4 (2009).

⁷ *Id.*

⁸ Seventeen of the 21 affected counties have cable penetration below 60 percent. Of these counties, 14 have cable penetration below 40 percent.

⁹ Technical Exhibit at 2.

¹⁰ See Declarations of Richard Eller and Gibson Prichard, attached hereto (describing reception tests on April 27, May 1, May 4, and May 16, 2012, indicating that the analog low power station was off the air).

Ms. Barbara Kreisman
June 8, 2012

interference.¹¹ Moreover, all of the loss areas for WRTN-LP are encompassed by the much larger area served by its digital companion channel, WRTN-LD.

Other approaches that WTVF has considered are not viable, and even if they were, they would be less efficient than the proposed high powered translator. For example, WTVF operates a high-powered translator on Channel 50, but increasing its power would not provide service to the viewers in the rural loss areas. Moreover, once WTVF transitions to Channel 25, it actually will be able to turn off the Channel 50 translator, freeing up desirable UHF spectrum and facilitating a “repacking” of the television spectrum. Also, given the large and dispersed nature of the loss area, providing service to the loss area through a series of lower-powered replacement translators would not be a viable solution. That alternative would require the construction of numerous new facilities, entailing the need to obtain numerous FCC approvals, local zoning and construction permits, and possibly FAA authorizations. It also would not be spectrally efficient to operate the many translators that would be required, and would entail lengthy delays during which the viewers in the loss area would go unserved. Given the fact that the null towards the southwest (to avoid interference to WMC) will prevent approximately 31,500 viewers in the loss area from receiving service, however, WTVF is exploring options for restoring service to such viewers.

Conclusion. As the Commission stated in establishing the replacement translator service, it is in the public interest to ensure that “all Americans continue to receive the television broadcast service that they are accustomed to receiving to the greatest extent feasible.” Operation of the proposed translator on Channel 5 represents the optimal means of providing continued service to 159,100 viewers. Accordingly, WTVF respectfully requests expedited grant of this STA request and the waiver sought herein.

¹¹ See Technical Exhibit at 3 (noting that today, WTVF causes interference of 25.3% to WRTN-LP — 0.1% *more* interference than would be caused by proposed STA facility). See *Second Periodic Review of the Commission’s Rules and Policies Affecting the Conversion to Digital Television*, Report and Order, 9 FCC Rcd 18279, para. 37 (2004) (defining new interference as “interference beyond that caused by NTSC and DTV operations, as described by the table of station information”); *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Memorandum Opinion and Order on Reconsideration of the Seventh Report and Order and Eighth Report and Order, 23 FCC Rcd. 4220, n.22 (2008) (in developing DTV table, “new interference to post-transition DTV operations was considered interference beyond that caused by existing analog and DTV operations.... Service coverage and interference conflicts were based only on the populations determined to be receiving service and new interference.”); *id.* at paras. 119-120 (in case where a station would cause 14.9% interference to another station, not disagreeing with station’s argument that it would not be causing any *new* interference, because the station would use the same antenna and antenna pattern as the station which would be vacating that channel).

Ms. Barbara Kreisman
June 8, 2012

Respectfully submitted,



Jennifer A. Johnson
Eve R. Pogoriler
*Counsel to NewsChannel 5
Network, LLC*


Attachments:
Technical Exhibit
Declaration of Richard Eller
Declaration of Gibson Prichard

cc: Hossein Hashemzadeh (by e-mail)

CERTIFICATE OF SERVICE

I, Kathryn Bowers, a secretary at the law firm of Covington & Burling LLP, do hereby certify that on this 8th day of June, 2012, I caused a copy of the instant "Request for Special Temporary Authority and Waiver of § 73.735(b)(1) of the FCC's Rules" to be sent via first-class U.S. Mail, postage prepaid, to the following:

Richard C. & Lisa A. Goetz
Licensees of WRTN-LP
116 Beaumont Drive
Hendersonville, TN 37075



Kathryn Bowers

TECHNICAL EXHIBIT
WTVF REPLACEMENT SERVICE TRANSLATOR
NASHVILLE, TENNESSEE
CH 5 22 KW (MAX-DA)

Technical Exhibit

This technical exhibit supports an application for a replacement service translator for WTVF in Nashville, Tennessee. WTVF is moving its primary service from Channel 5 to Channel 25. Therefore, WTVF seeks to replace its current Channel 50 replacement service translator, operating with an effective radiated power of 100 kW, with this Channel 5 replacement service translator operating with 22 kilowatts. As this proposed effective radiated power exceeds the FCC maximum permitted value of 3 kW for a VHF digital translator, a continued waiver of TV Translator power limitations defined in Section 74.735 of the Commission's Rules is hereby requested.

Summary of Proposed Facilities

Below is a tabulation of the proposed paired digital facility:

Channel:	5
Geographic Coordinates:	36° 16' 05" North Latitude 86° 47' 16" West Longitude
Antenna Structure Registration:	1041373
Overall Tower Height:	359 meters
Ground Elevation:	261 meters
Radiation Center:	603 meters AMSL 338 meters (1110 feet) AGL
Antenna Type:	ERI, ESR-3L2 Directional
Transmitter Power Output:	7 kilowatts
Emission Mask:	Full Service
Transmission Line:	Dielectric 4-1/16" (1200 ft)
Maximum Effective Radiated Power:	22 kilowatts

Loss Area Analysis

Figure 1 is a coverage map showing the predicted noise-limited and protected contours for current full-service Channel 5 facility and its replacement full-service Channel 25 facility. As can be calculated, using the FCC OET-69 model, 190,600 persons are predicted to lose service when WTVF transitions from low-VHF (Channel 5) to UHF (Channel 25) service. The 2010 Census is used to characterize the affected population.

In an attempt to recover this lost service, WTVF is replacing its full-service Channel 5 facility with this herein proposed replacement service translator. While the same effective radiated power as used by the main facility, 22 kilowatts, the Channel 5 replacement service translator will have to employ a directional antenna to provide allocation protection the co-channel Channel 5 WMC in Memphis, Tennessee.

Therefore, using the herein proposed facilities, the WTVF Channel 5 replacement service translator will be able to provide replacement service to 159,100 of the 190,600 persons predicted to lose service when WTVF transitions from Channel 5 to Channel 25 full-service operation. A map showing this area is provided in Figure 2.

Allocation Considerations

A study has been conducted to assure that the proposal will not create prohibited interference with other post-transition licensed, authorized or pending analog or digital TV, LPTV/translator and Class A TV stations. Using the procedures outlined in the FCC's OET-69 Bulletin, no prohibitive interference is predicted to be caused to any other station as shown by the results provided in Figure 3 except to WRTN-LP on Channel 6 at Alexandria, Tennessee.

WRTN-LP is licensed on Channel 6 at Alexandria, Tennessee. WRTN-LP is located 38 kilometers from WTVF and on an adjacent channel. Even with WTVF on Channel 5 employing a full-service emission mask, 25.2% interference is predicted from WTVF to WRTN-LP. However, the existing full-service WTVF facility already causes interference of 25.3% to WRTN-LP. Therefore, there is essentially no change in the actual interference that will occur to WRTN-LP from the herein proposed operation.

Radiofrequency Electromagnetic Field Exposure

The proposed facilities were evaluated in terms of potential radio frequency (RF) energy exposure at ground level to workers and the general public. The radiation center for the antenna is located 338 meters above ground level. The proposed ERP of 22 kW is used for the calculations. A conservative relative field value of 0.25 was assumed for the ERI antenna downward radiation. The calculated power density at ground level is less than 0.001 mW/cm². This is less than 5% of the FCC's recommended limit of 0.2 mW/cm² for channel 5 for an "uncontrolled" environment.

Access to the transmitting site will be restricted and appropriately marked with warning signs. In the event that workers or other authorized personnel enter restricted areas or climb the tower, appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure.

It is noted that this statement only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already have been provided to the FCC by the tower owner as part of the tower registration process.

Charles A. Cooper

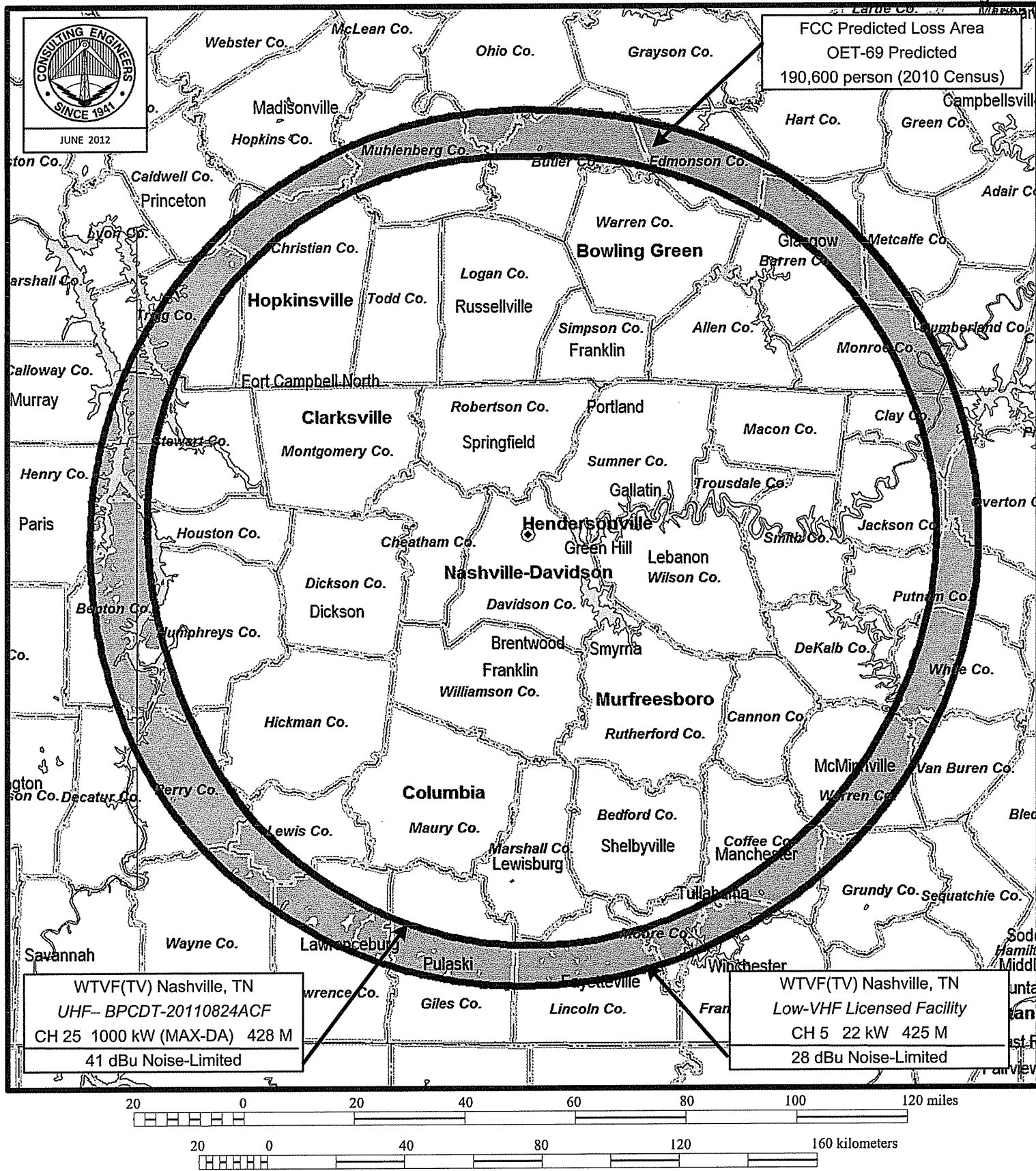
du Treil, Lundin & Rackley, Inc.

201 Fletcher Avenue

Sarasota, Florida 34237

(941) 329-6000

June 1, 2012



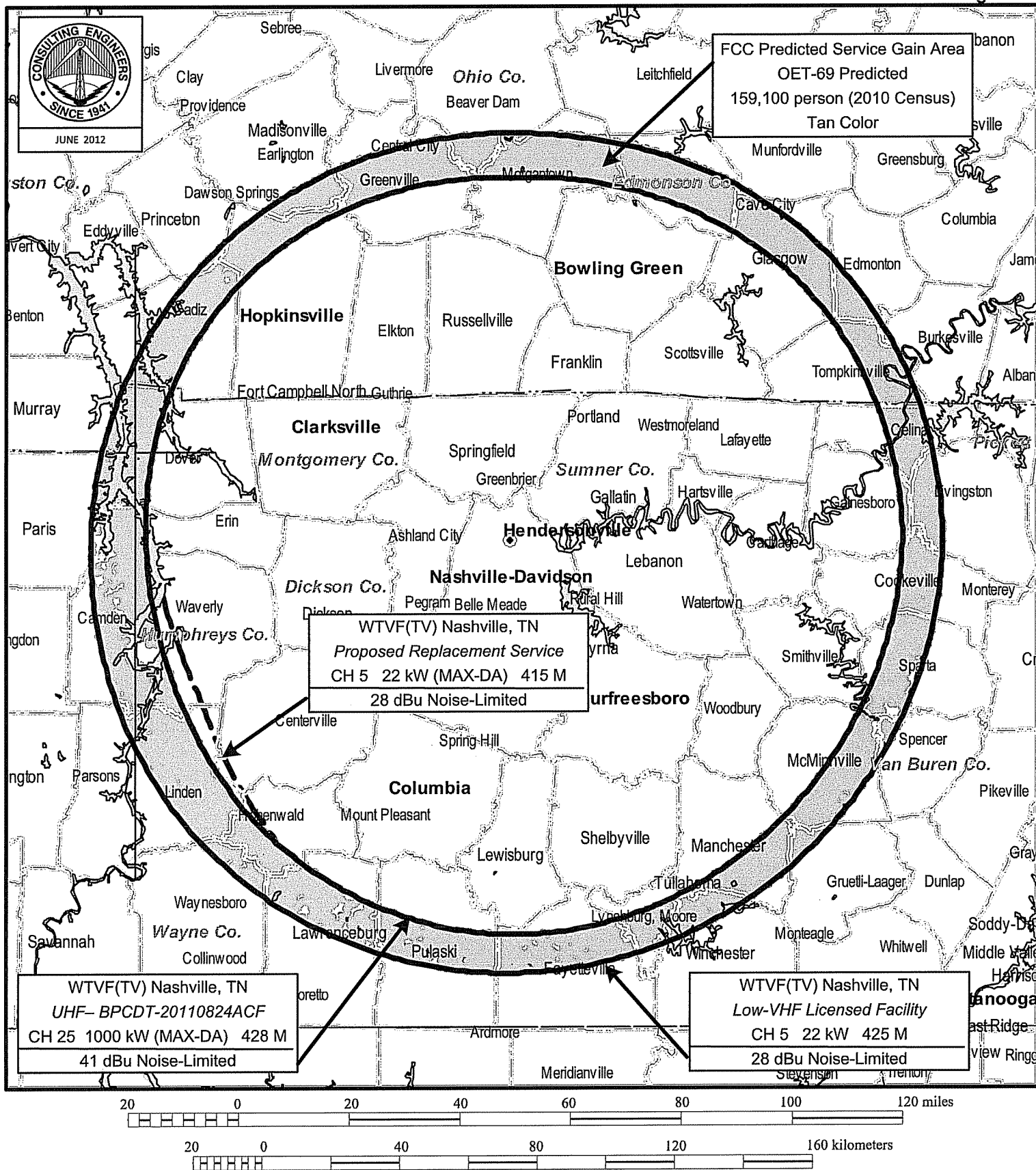
**WTVF LOSS AREA BASED UPON WTVF UHF
CONSTRUCTION PERMIT**

STATION WTVF(TV)

NASHVILLE, TENNESSEE

du Treil, Lundin & Rackley, Inc Sarasota, Florida

Figure 2



WTVF LOSS AREA BASED UPON WTVF PROPOSED CHANNEL 5 REPLACEMENT SERVICE TRANSLATOR

STATION WTVF(TV)

NASHVILLE, TENNESSEE

du Treil, Lundin & Rackley, Inc Sarasota, Florida

TECHNICAL EXHIBIT
 WTVF REPLACEMENT SERVICE TRANSLATOR
 NASHVILLE, TENNESSEE
 CH 5 22 KW (MAX-DA)

Allocation Analysis

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

WARNING WARNING WARNING

The following list of station records has been excluded from the analysis due to the fact that they have the same state, city and channel as the proposed station - This could cause the program to not find a potential fail situation

You can force the program to include these records by setting the state of the proposed record to ZZ and re-running the analysis

WTVF 05 NASHVILLE TN BDRTCDT 20120322ADY

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 06-03-2012 Time: 14:35:06

Record Selected for Analysis

NEW USERRECORD-01 NASHVILLE TN US
 Channel 05 ERP 22. kW HAAT 419. m RCAMSL 00603 m FULL SERVICE MASK
 Latitude 036-16-05 Longitude 0086-47-16
 Status APP Zone 2 Border Site number: 01
 Dir Antenna Make usr Model 00000000006018 Beam tilt N Ref Azimuth 0.
 Last update Cutoff date Docket
 Comments
 Applicant

Cell Size for Service Analysis 1.0 km/side
 Distance Increments for Longley-Rice Analysis 0.50 km

Not full service station
 Service Class = LD
 Maximum height/power limits not checked

Azimuth (Deg)	ERP (kW)	HAAT (m)	43.0 dBu F(50,90) (km)
0.0	21.519	357.3	86.7
45.0	21.258	421.5	90.0
90.0	21.129	447.3	91.4
135.0	21.345	444.4	91.3
180.0	19.028	447.5	90.6
225.0	4.259	452.0	79.3
270.0	4.455	402.3	76.4
315.0	19.212	379.9	87.0

Contour Overlap to Proposed Station

Figure 3

Station
 WRTN-LP 6 ALEXANDRIA TN BLTVL20080530AAC

Station inside contour of Digital LPTV station
 NEW 5 NASHVILLE TN USERRECORD01

Contour Overlap Evaluation to Proposed Station Complete

NO LANDMOBILE SPACING VIOLATIONS FOUND

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
- Proposed station is OK toward AM broadcast stations

Start of Interference Analysis

	Proposed Station		
Channel	Call	City/State	ARN
05	NEW	NASHVILLE TN	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
05	WIKY-LP	EVANSVILLE, ETC. IN	204.3	LIC	BLTVL	-19891114JP
05	W05BV	STARKVILLE MS	362.5	LIC	BLTVL	-19911219JL
05	W05AP	BRASSTOWN, ETC. NC	282.7	LIC	BLTTV	-3796
05	W05AR	BRYSON CITY, ETC. NC	319.6	LIC	BLTTV	-19810409KF
05	W05AR	BRYSON CITY, ETC. NC	319.6	CP	BDFCDTV	-20120215AAJ
05	W05AF	CHEROKEE NC	324.2	LIC	BLTTV	-1180
05	W05AE	SYLVA, ETC. NC	334.7	LIC	BLTTV	-19820607ID
05	W05AC	TRYON, ETC. NC	425.0	LIC	BLTTV	-19791115IW
05	W05AO	PICKENS SC	402.9	LIC	BLTTV	-19821005IG
05	WMC-TV	MEMPHIS TN	305.1	LIC	BLCDDT	-20090622ABL
05	WCYB-TV	BRISTOL VA	419.3	LIC	BLCDDT	-20100629AUD
06	WDDA-LP	DALTON GA	227.6	CP	BPTVL	-20080627ABK
06	W06AY-D	LEBANON KY	203.2	APP	BSTA	-20110627ACM
06	W06AY-D	LEBANON KY	203.2	LIC	BLDVL	-20120103ACV
06	WRTN-LP	ALEXANDRIA TN	38.3	LIC	BLTVL	-20080530AAC
06	WOOT-LP	CHATTANOOGA TN	179.9	LIC	BLTVA	-20070713ADV

Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
05	WIKY-LP	EVANSVILLE, ETC. IN	BLTVL	-19891114JP

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
05	WMC-TV	MEMPHIS TN	374.1	LIC	BLCDDT	-20090622ABL
05	NEW	NASHVILLE TN	204.3	APP	USERRECORD-01	

Proposal causes no interference

#####

Analysis of Interference to Affected Station 2

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
05	W05BV	STARKVILLE MS	BLTVL	-19911219JL

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
05	WMC-TV	MEMPHIS TN	213.5	LIC	BLCDT	-20090622ABL
05	NEW	NASHVILLE TN	362.5	APP	USERRECORD-01	

Proposed station is beyond the site to nearest cell evaluation distance

#####

Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
05	W05AP	BRASSTOWN, ETC. NC	BLTTV	-3796

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
05	W05AR	BRYSON CITY, ETC. NC	63.9	LIC	BLTTV	-19810409KF
05	W05AR	BRYSON CITY, ETC. NC	63.9	CP	BDFCDTV	-20120215AAJ
05	W05AF	CHEROKEE NC	76.2	LIC	BLTTV	-1180
05	W05AE	SYLVA, ETC. NC	80.6	LIC	BLTTV	-19820607ID
05	W05AC	TRYON, ETC. NC	162.5	LIC	BLTTV	-19791115IW
05	W05AO	PICKENS SC	125.2	LIC	BLTTV	-19821005IG
05	WCYB-TV	BRISTOL VA	229.4	LIC	BLCDT	-20100629AUD
06	W06AJ	FRANKLIN, ETC. NC	40.7	CP	BDFCDTV	-20120104AAN
06	W06AJ	FRANKLIN, ETC. NC	40.7	LIC	BLTT	-19820202JP
05	NEW	NASHVILLE TN	282.7	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.
05	W05AR	BRYSON CITY, ETC. NC	BLTTV	-19810409KF

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
05	W05AP	BRASSTOWN, ETC. NC	63.9	LIC	BLTTV	-3796
05	W05AF	CHEROKEE NC	13.1	LIC	BLTTV	-1180
05	W05AE	SYLVA, ETC. NC	17.5	LIC	BLTTV	-19820607ID
05	W05AC	TRYON, ETC. NC	107.2	LIC	BLTTV	-19791115IW
05	W05AO	PICKENS SC	87.0	LIC	BLTTV	-19821005IG
05	WCYB-TV	BRISTOL VA	167.1	LIC	BLCDT	-20100629AUD
06	W06AJ	FRANKLIN, ETC. NC	27.7	APP	BSTA	-20110720ABH
06	W06AJ	FRANKLIN, ETC. NC	27.7	CP	BDFCDTV	-20120104AAN
06	W06AJ	FRANKLIN, ETC. NC	27.7	LIC	BLTT	-19820202JP
06	W06AP	MAGGIE VALLEY, ETC. NC	31.0	LIC	BLTTV	-19791109IC
06	W06AN	SAPPHIRE VALLEY, ETC. NC	47.3	LIC	BLTTV	-19820218ID
05	NEW	NASHVILLE TN	319.6	APP	USERRECORD-01	

Proposal causes no interference

#####

Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
05	W05AR	BRYSON CITY, ETC. NC	BDFCDTV	-20120215AAJ

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
05	W05AP	BRASSTOWN, ETC. NC	63.9	LIC	BLTTV	-3796
05	W05AF	CHEROKEE NC	13.1	LIC	BLTTV	-1180
05	W05AE	SYLVA, ETC. NC	17.5	LIC	BLTTV	-19820607ID
05	W05AC	TRYON, ETC. NC	107.2	LIC	BLTTV	-19791115IW
05	W05AO	PICKENS SC	87.0	LIC	BLTTV	-19821005IG
05	WCYB-TV	BRISTOL VA	167.1	LIC	BLCDT	-20100629AUD
06	W06AE	CLAYTON, ETC. GA	52.8	LIC	BLTTV	-4124
06	W06AJ	FRANKLIN, ETC. NC	27.7	APP	BSTA	-20110720ABH
06	W06AJ	FRANKLIN, ETC. NC	27.7	CP	BDFCDTV	-20120104AAN
06	W06AJ	FRANKLIN, ETC. NC	27.7	LIC	BLTT	-19820202JP
06	W06AP	MAGGIE VALLEY, ETC. NC	31.0	LIC	BLTTV	-19791109IC
06	W06AN	SAPPHIRE VALLEY, ETC. NC	47.3	LIC	BLTTV	-19820218ID
05	NEW	NASHVILLE TN	319.6	APP	USERRECORD-01	

Total scenarios = 1

Result key: 1
 Scenario 1 Affected station 5
 Before Analysis

Results for: 5A NC BRYSON CITY, ETC. BDFCDTV 20120215AAJ CP
 HAAT 754.0 m, ATV ERP 0.1 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	81889	4592.6
not affected by terrain losses	70107	4319.4
lost to NTSC IX	10178	181.8
lost to additional IX by ATV	8627	305.0
lost to ATV IX only	10659	351.7
lost to all IX	18805	486.8

Potential Interfering Stations Included in above Scenario 1

5N NC BRASSTOWN, ETC.	BLTTV	3796	LIC
5N NC CHEROKEE	BLTTV	1180	LIC
5N NC SYLVA, ETC.	BLTTV	19820607ID	LIC
5A VA BRISTOL	BLCDT	20100629AUD	LIC
6A NC FRANKLIN, ETC.	BDFCDTV	20120104AAN	CP

After Analysis

Results for: 5A NC BRYSON CITY, ETC. BDFCDTV 20120215AAJ CP
 HAAT 754.0 m, ATV ERP 0.1 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	81889	4592.6
not affected by terrain losses	70107	4319.4
lost to NTSC IX	10178	181.8
lost to additional IX by ATV	9221	351.7
lost to ATV IX only	11279	399.4
lost to all IX	19399	533.5

Potential Interfering Stations Included in above Scenario 1

5N NC BRASSTOWN, ETC.	BLTTV	3796	LIC
5N NC CHEROKEE	BLTTV	1180	LIC
5N NC SYLVA, ETC.	BLTTV	19820607ID	LIC
5A VA BRISTOL	BLCDT	20100629AUD	LIC
6A NC FRANKLIN, ETC.	BDFCDTV	20120104AAN	CP
5A TN NASHVILLE	USERRECORD01		APP

Percent new IX = 1.1578%

Figure 3

Worst case new IX 1.1578% Scenario 1

#####

Analysis of Interference to Affected Station 6

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
05	W05AF	CHEROKEE NC	BLTTV	-1180

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
05	W05AP	BRASSTOWN, ETC. NC	76.2	LIC	BLTTV	-3796
05	W05AR	BRYSON CITY, ETC. NC	13.1	LIC	BLTTV	-19810409KF
05	W05AR	BRYSON CITY, ETC. NC	13.1	CP	BDFCDTV	-20120215AAJ
05	W05AE	SYLVA, ETC. NC	11.2	LIC	BLTTV	-19820607ID
05	W05AC	TRYON, ETC. NC	101.0	LIC	BLTTV	-19791115IW
05	W05AO	PICKENS SC	87.8	LIC	BLTTV	-19821005IG
05	WCYB-TV	BRISTOL VA	154.1	LIC	BLCDT	-20100629AUD
06	W06AJ	FRANKLIN, ETC. NC	40.7	CP	BDFCDTV	-20120104AAN
06	W06AP	MAGGIE VALLEY, ETC. NC	19.5	LIC	BLTTV	-19791109IC
05	NEW	NASHVILLE TN	324.2	APP	USERRECORD-01	

Proposed station is beyond the site to nearest cell evaluation distance

#####

Analysis of Interference to Affected Station 7

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
05	W05AE	SYLVA, ETC. NC	BLTTV	-19820607ID

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
05	W05AP	BRASSTOWN, ETC. NC	80.6	LIC	BLTTV	-3796
05	W05AR	BRYSON CITY, ETC. NC	17.5	LIC	BLTTV	-19810409KF
05	W05AR	BRYSON CITY, ETC. NC	17.5	CP	BDFCDTV	-20120215AAJ
05	W05AF	CHEROKEE NC	11.2	LIC	BLTTV	-1180
05	W05AC	TRYON, ETC. NC	90.8	LIC	BLTTV	-19791115IW
05	W05AO	PICKENS SC	76.8	LIC	BLTTV	-19821005IG
05	WCYB-TV	BRISTOL VA	152.9	LIC	BLCDT	-20100629AUD
06	W06AJ	FRANKLIN, ETC. NC	42.0	APP	BSTA	-20110720ABH
06	W06AJ	FRANKLIN, ETC. NC	42.0	CP	BDFCDTV	-20120104AAN
06	W06AJ	FRANKLIN, ETC. NC	42.0	LIC	BLTT	-19820202JP
06	W06AP	MAGGIE VALLEY, ETC. NC	15.3	LIC	BLTTV	-19791109IC
06	W06AN	SAPPHIRE VALLEY, ETC. NC	37.8	LIC	BLTTV	-19820218ID
05	NEW	NASHVILLE TN	334.7	APP	USERRECORD-01	

Proposed station is beyond the site to nearest cell evaluation distance

#####

Analysis of Interference to Affected Station 8

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
05	W05AC	TRYON, ETC. NC	BLTTV	-19791115IW

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
05	W05AP	BRASSTOWN, ETC. NC	162.5	LIC	BLTTV	-3796

Figure 3

05	W05AR	BRYSON CITY, ETC. NC	107.2	LIC	BLTTV	-19810409KF
05	W05AR	BRYSON CITY, ETC. NC	107.2	CP	BDFCDTV	-20120215AAJ
05	W05AF	CHEROKEE NC	101.0	LIC	BLTTV	-1180
05	W05AE	SYLVA, ETC. NC	90.8	LIC	BLTTV	-19820607ID
05	W05AO	PICKENS SC	55.3	LIC	BLTTV	-19821005IG
05	WCYB-TV	BRISTOL VA	132.5	LIC	BLCDDT	-20100629AUD
06	W06AQ	BAT CAVE, ETC. NC	18.7	LIC	BLTTV	-19791220IA
06	W06AL	OTEEN, ETC. NC	41.8	LIC	BLTTV	-19850926IA
05	NEW	NASHVILLE TN	425.0	APP	USERRECORD-01	

Proposed station is beyond the site to nearest cell evaluation distance

#####

Analysis of Interference to Affected Station 9

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
05	W05AO	PICKENS SC	BLTTV	-19821005IG

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
05	W05AP	BRASSTOWN, ETC. NC	125.2	LIC	BLTTV	-3796
05	W05AR	BRYSON CITY, ETC. NC	87.0	LIC	BLTTV	-19810409KF
05	W05AR	BRYSON CITY, ETC. NC	87.0	CP	BDFCDTV	-20120215AAJ
05	W05AF	CHEROKEE NC	87.8	LIC	BLTTV	-1180
05	W05AE	SYLVA, ETC. NC	76.8	LIC	BLTTV	-19820607ID
05	W05AC	TRYON, ETC. NC	55.3	LIC	BLTTV	-19791115IW
05	WCYB-TV	BRISTOL VA	179.2	LIC	BLCDDT	-20100629AUD
06	W06AJ	FRANKLIN, ETC. NC	89.2	CP	BDFCDTV	-20120104AAN
05	NEW	NASHVILLE TN	402.9	APP	USERRECORD-01	

Proposed station is beyond the site to nearest cell evaluation distance

#####

Analysis of Interference to Affected Station 10

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
05	WMC-TV	MEMPHIS TN	BLCDDT	-20090622ABL

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
05	NEW	NASHVILLE TN	305.1	APP	USERRECORD-01	

Total scenarios = 1

Result key: 2
 Scenario 1 Affected station 10
 Before Analysis

Results for: 5A TN MEMPHIS BLCDDT 20090622ABL LIC
 HAAT 308.0 m, ATV ERP 34.5 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1920268	45501.8
not affected by terrain losses	1915241	45243.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV-IX only	0	0.0
lost to all IX	0	0.0

Potential Interfering Stations Included in above Scenario 1

After Analysis

Results for: 5A TN MEMPHIS BLCDT 20090622ABL LIC
 HAAT 308.0 m, ATV ERP 34.5 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1920268	45501.8
not affected by terrain losses	1915241	45243.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	7372	301.2
lost to ATV IX only	7372	301.2
lost to all IX	7372	301.2

Potential Interfering Stations Included in above Scenario 1

5A TN NASHVILLE USERRECORD01 APP

Percent new IX = 0.3849%

Worst case new IX 0.3849% Scenario 1

#####

Analysis of Interference to Affected Station 11

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
05	WCYB-TV	BRISTOL VA	BLCDT	-20100629AUD

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
05	WDTV	WESTON WV	352.7	LIC	BLCDT	-20090612AJX
05	NEW	NASHVILLE TN	419.3	APP	USERRECORD-01	

Total scenarios = 1

Result key: 3
 Scenario 1 Affected station 11
 Before Analysis

Results for: 5A VA BRISTOL BLCDT 20100629AUD LIC
 HAAT 743.0 m, ATV ERP 29.9 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2871607	67669.3
not affected by terrain losses	2502274	61285.1
lost to NTSC IX	0	0.0
lost to additional IX by ATV	10330	224.7
lost to ATV IX only	10330	224.7
lost to all IX	10330	224.7

Potential Interfering Stations Included in above Scenario 1

5A WV WESTON BLCDT 20090612AJX LIC

After Analysis

Results for: 5A VA BRISTOL BLCDT 20100629AUD LIC
 HAAT 743.0 m, ATV ERP 29.9 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2871607	67669.3
not affected by terrain losses	2502274	61285.1
lost to NTSC IX	0	0.0
lost to additional IX by ATV	13548	286.5
lost to ATV IX only	13548	286.5
lost to all IX	13548	286.5

Potential Interfering Stations Included in above Scenario 1

5A WV WESTON BLCDT 20090612AJX LIC

Figure 3

5A TN NASHVILLE USERRECORD01 APP

Percent new IX = 0.1291%

Worst case new IX 0.1291% Scenario 1

#####

Analysis of Interference to Affected Station 12

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
06	WDDA-LP	DALTON GA	BPTVL	-20080627ABK

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
06	WUOA	TUSCALOOSA AL	222.2	LIC	BLCDT	-20090612AHT
06	WUOA	TUSCALOOSA AL	222.2	CP	BPCDT	-20100716ADI
06	W06AE	CLAYTON, ETC. GA	145.6	LIC	BLTTV	-4124
06	WCES-TV	WRENS GA	304.9	LIC	BLEDT	-20090612ACF
06	W06AJ	FRANKLIN, ETC. NC	135.7	APP	BSTA	-20110720ABH
06	W06AJ	FRANKLIN, ETC. NC	135.7	CP	BDFCDTV	-20120104AAN
06	W06AJ	FRANKLIN, ETC. NC	135.7	LIC	BLTT	-19820202JJP
06	W06AP	MAGGIE VALLEY, ETC. NC	188.7	LIC	BLTTV	-19791109IC
06	W06AN	SAPPHIRE VALLEY, ETC. NC	186.9	LIC	BLTTV	-19820218ID
06	WRTN-LP	ALEXANDRIA TN	193.4	LIC	BLTVL	-20080530AAC
06	WOOT-LP	CHATTANOOGA TN	49.7	LIC	BLTVA	-20070713ADV
05	NEW	NASHVILLE TN	227.6	APP	USERRECORD-01	

Proposed station is beyond the site to nearest cell evaluation distance

#####

Analysis of Interference to Affected Station 13

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
06	W06AY-D	LEBANON KY	BSTA	-20110627ACM

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
06	WRTN-LP	ALEXANDRIA TN	191.2	LIC	BLTVL	-20080530AAC
05	NEW	NASHVILLE TN	203.2	APP	USERRECORD-01	

Proposed station is beyond the site to nearest cell evaluation distance

#####

Analysis of Interference to Affected Station 14

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
06	W06AY-D	LEBANON KY	BLDVL	-20120103ACV

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
06	WRTN-LP	ALEXANDRIA TN	191.2	LIC	BLTVL	-20080530AAC
05	NEW	NASHVILLE TN	203.2	APP	USERRECORD-01	

Proposed station is beyond the site to nearest cell evaluation distance

#####

Analysis of Interference to Affected Station 15

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
06	WRTN-LP	ALEXANDRIA TN	BLTVL	-20080530AAC

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
06	WUOA	TUSCALOOSA AL	298.8	LIC	BLCDT	-20090612AHT
06	WUOA	TUSCALOOSA AL	298.8	CP	BPCDT	-20100716ADI
06	WDDA-LP	DALTON GA	193.4	CP	BPTVL	-20080627ABK
06	WOOT-LP	CHATTANOOGA TN	144.7	LIC	BLTVL	-20070713ADV
05	NEW	NASHVILLE TN	38.3	APP	USERRECORD-01	

Total scenarios = 1

Result key: 4
 Scenario 1 Affected station 15
 Before Analysis

Results for:	6N TN ALEXANDRIA	BLTVL	20080530AAC	LIC
		POPULATION	AREA (sq km)	
	within Noise Limited Contour	111608	988.7	
	not affected by terrain losses	111608	988.7	
	lost to NTSC IX	0	0.0	
	lost to additional IX by ATV	0	0.0	
	lost to all IX	0	0.0	

Potential Interfering Stations Included in above Scenario 1

After Analysis

Results for:	6N TN ALEXANDRIA	BLTVL	20080530AAC	LIC
		POPULATION	AREA (sq km)	
	within Noise Limited Contour	111608	988.7	
	not affected by terrain losses	111608	988.7	
	lost to NTSC IX	0	0.0	
	lost to additional IX by ATV	28136	66.0	
	lost to all IX	28136	66.0	

Potential Interfering Stations Included in above Scenario 1

5A TN NASHVILLE USERRECORD01 APP

The following station failed the de minimis interference criteria.

5D TN NASHVILLE USERRECORD01
 ERP 22.00 kW HAAT 419.0 m RCAMSL 603.0 m
 Antenna usr 0000000006018

Due to interference to the following station and scenario: 1

6N TN ALEXANDRIA BLTVL 20080530AAC
 ERP 2.00 kW HAAT 160.0 m RCAMSL 322.0 m
 Antenna CDB 0000000085078

Percent new DTV interference from proposal: 25.2097 BLTVL 20080530AAC

Worst case new IX 25.2097% Scenario 1

#####

Analysis of Interference to Affected Station 16

Analysis of current record

Figure 3

Channel Call City/State Application Ref. No.
 06 WOOT-LP CHATTANOOGA TN BLTVA -20070713ADV

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
06	WUOA	TUSCALOOSA AL	237.2	LIC	BLCDDT	-20090612AHT
06	WUOA	TUSCALOOSA AL	237.2	CP	BPCDDT	-20100716ADI
06	W06AE	CLAYTON, ETC. GA	173.0	LIC	BLTTV	-4124
06	WDDA-LP	DALTON GA	49.7	CP	BPTVL	-20080627ABK
06	WCES-TV	WRENS GA	350.2	LIC	BLEDT	-20090612ACF
06	W06AJ	FRANKLIN, ETC. NC	154.4	APP	BSTA	-20110720ABH
06	W06AJ	FRANKLIN, ETC. NC	154.4	CP	BDFCDDT	-20120104AAN
06	W06AJ	FRANKLIN, ETC. NC	154.4	LIC	BLTT	-19820202JF
06	W06AP	MAGGIE VALLEY, ETC. NC	199.3	LIC	BLTTV	-19791109IC
06	W06AN	SAPPHIRE VALLEY, ETC. NC	208.1	LIC	BLTTV	-19820218ID
06	WRTN-LP	ALEXANDRIA TN	144.7	LIC	BLTVL	-20080530AAC
05	NEW	NASHVILLE TN	179.9	APP	USERRECORD-01	

Proposed station is beyond the site to nearest cell evaluation distance

#####

Analysis of Interference to Affected Station 17

Analysis of current record

Channel Call City/State Application Ref. No.
 05 NEW NASHVILLE TN USERRECORD-01

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
05	WIKY-LP	EVANSVILLE, ETC. IN	204.3	LIC	BLTVL	-19891114JP
05	WMC-TV	MEMPHIS TN	305.1	LIC	BLCDDT	-20090622ABL
06	WRTN-LP	ALEXANDRIA TN	38.3	LIC	BLTVL	-20080530AAC

Total scenarios = 1

Result key: 5
 Scenario 1 Affected station 17
 Before Analysis

Results for: 5A TN NASHVILLE USERRECORD01 APP

HAAT 419.0 m, ATV ERP 22.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1716387	23720.3
not affected by terrain losses	1716191	23707.5
lost to NTSC IX	0	0.0
lost to additional IX by ATV	261	14.8
lost to ATV IX only	261	14.8
lost to all IX	261	14.8

Potential Interfering Stations Included in above Scenario 1

5A TN MEMPHIS BLCDDT 20090622ABL LIC

#####

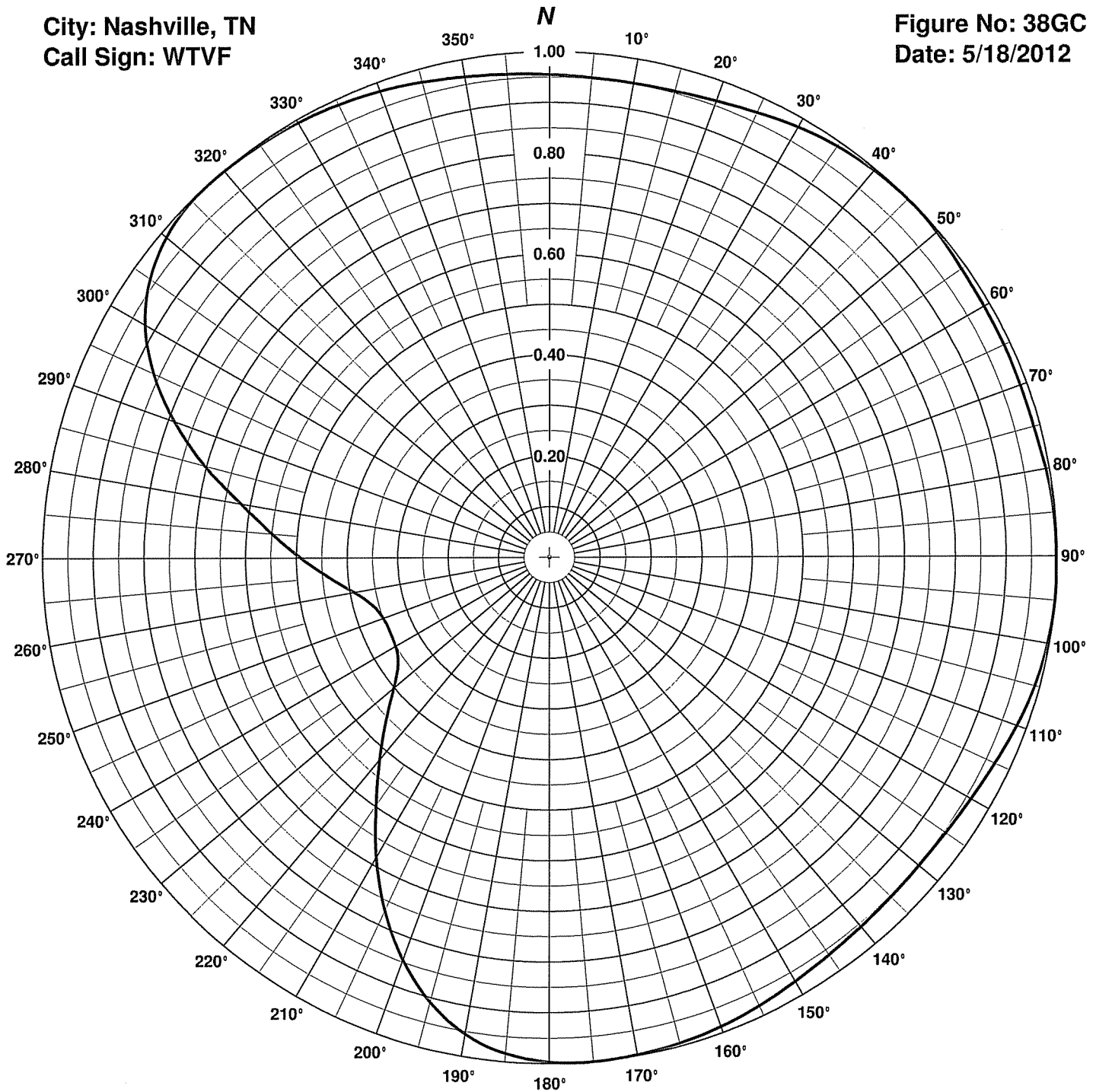
FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED

APPENDIX

DIRECTIONAL ANTENNA PATTERN SPECIFICATIONS

City: Nashville, TN
Call Sign: WTVF

Figure No: 38GC
Date: 5/18/2012



Frequency: 79 MHz
Antenna Type: 1013-4H-SP
Antenna Orientation: 67° True
Antenna Mounting: Custom
Tower Type 48" SQ Lambda Tower

VERTICAL
RMS: .001
Maximum: .002 @ 336°
Minimum: 0 @ 165°

HORIZONTAL
RMS: .884
Maximum: 1 @ 176°
Minimum: .348 @ 247°

1/2 wave vertical spacing. (74.7") Arrowhead elements @ 67°, 157° and 337°. WTVF38G.NEC "Sting Ray"

ERI® *Horizontal Plane Pattern List*

Electronics Research, Inc. 7777 Gardner Rd. Chandler, In 47610 Phone (812) 925-6000 Fax (812) 925-4030 <http://www.ERInc.com/>

Figure #38GC

Station: WTVF

Location: Nashville, TN

Center Frequency: 79 MHz

Date: 6/04/2012

Antenna: CH5HAZ-5GGH

Antenna Orientation: 67° True

Number of Bays: 6

Azimuth	Horizontal			Azimuth	Horizontal		
	% Field	% Power	dB		% Field	% Power	dB
0°	0.955	0.911	-0.403	180°	0.997	0.993	-0.028
5°	0.952	0.906	-0.428	185°	0.984	0.968	-0.141
10°	0.951	0.905	-0.436	190°	0.956	0.915	-0.388
15°	0.953	0.909	-0.415	195°	0.911	0.829	-0.813
20°	0.959	0.920	-0.361	200°	0.848	0.718	-1.437
25°	0.969	0.939	-0.275	205°	0.771	0.595	-2.254
30°	0.981	0.962	-0.168	210°	0.687	0.472	-3.265
35°	0.990	0.981	-0.084	215°	0.599	0.359	-4.448
40°	0.996	0.993	-0.032	220°	0.524	0.274	-5.619
45°	0.999	0.997	-0.013	225°	0.458	0.210	-6.780
50°	0.997	0.994	-0.025	230°	0.402	0.162	-7.913
55°	0.991	0.981	-0.081	235°	0.366	0.134	-8.739
60°	0.988	0.976	-0.105	240°	0.351	0.123	-9.085
65°	0.987	0.975	-0.110	245°	0.348	0.121	-9.168
70°	0.987	0.975	-0.110	250°	0.350	0.123	-9.118
75°	0.988	0.975	-0.109	255°	0.362	0.131	-8.816
80°	0.993	0.986	-0.060	260°	0.392	0.154	-8.129
85°	0.998	0.995	-0.021	265°	0.438	0.192	-7.171
90°	0.999	0.997	-0.012	270°	0.491	0.241	-6.180
95°	1.000	0.999	-0.003	275°	0.550	0.303	-5.186
100°	0.997	0.994	-0.026	280°	0.620	0.384	-4.157
105°	0.990	0.981	-0.083	285°	0.705	0.497	-3.039
110°	0.980	0.961	-0.173	290°	0.788	0.621	-2.071
115°	0.968	0.938	-0.279	295°	0.862	0.743	-1.290
120°	0.959	0.920	-0.363	300°	0.921	0.849	-0.713
125°	0.953	0.909	-0.416	305°	0.962	0.925	-0.338
130°	0.951	0.905	-0.435	310°	0.986	0.973	-0.119
135°	0.952	0.907	-0.425	315°	0.998	0.996	-0.016
140°	0.956	0.913	-0.394	320°	0.999	0.997	-0.012
145°	0.961	0.924	-0.343	325°	0.997	0.994	-0.027
150°	0.969	0.939	-0.273	330°	0.993	0.987	-0.057
155°	0.978	0.957	-0.189	335°	0.988	0.977	-0.102
160°	0.987	0.974	-0.114	340°	0.981	0.963	-0.163
165°	0.993	0.987	-0.057	345°	0.973	0.947	-0.237
170°	0.998	0.995	-0.020	350°	0.965	0.932	-0.307
175°	1.000	1.000	-0.001	355°	0.959	0.920	-0.362

Horizontal Maximum Field: 1.000 @ 176°

Horizontal Minimum Field: 0.348 @ 247°

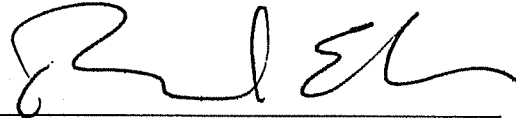
Horizontal RMS: 0.884

DECLARATION OF RICHARD ELLER

I, Richard Eller, hereby declare under penalty of perjury that:

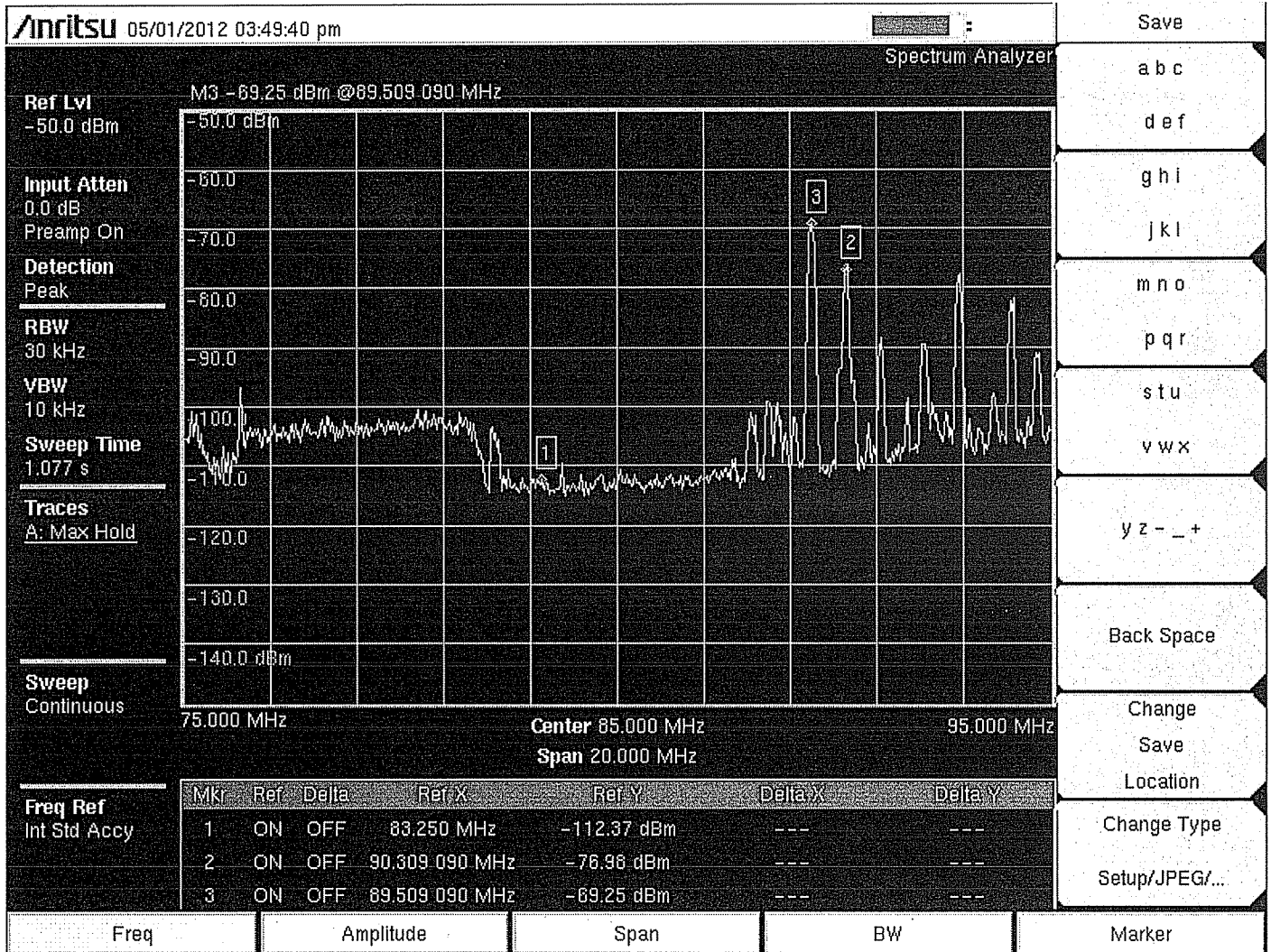
1. I am Senior Operations and Facility Manager at NewsChannel 5 Network, LLC, licensee of WTVF, Nashville, Tennessee.
2. On April 27, 2012, I drove to WRTN's transmitter site at 6000 Franklin Rd. Lebanon, Tn 37087. Using a Philips Magnavox CCZ09AT02 analog television set, I was unable to detect any signal on Channel 6.
3. On May 1, 2012, together with WTVF's Chief Engineer/Chief Technology Officer Gibson Prichard, I drove to Exit No. 232A on Interstate 40E, to the intersection of Highway 109 and Interstate 40. This point is 2.67 miles NNW from WRTN-LP's transmitter site. Using an Anritsu MS2721B spectrum analyzer, we detected no signal on Channel 6 (82-88 MHz). The plot of the spectrum analyzer is attached hereto as Attachment A. Marker point #1 in the plot was placed at 83.250 mHz, where the peak visual carrier would be if the station were on the air on Channel 6.

Executed on May 21st, 2012



Richard Eller

Attachment A

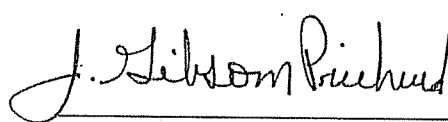


DECLARATION OF GIBSON PRICHARD

I, Gibson Prichard, hereby declare under penalty of perjury that:

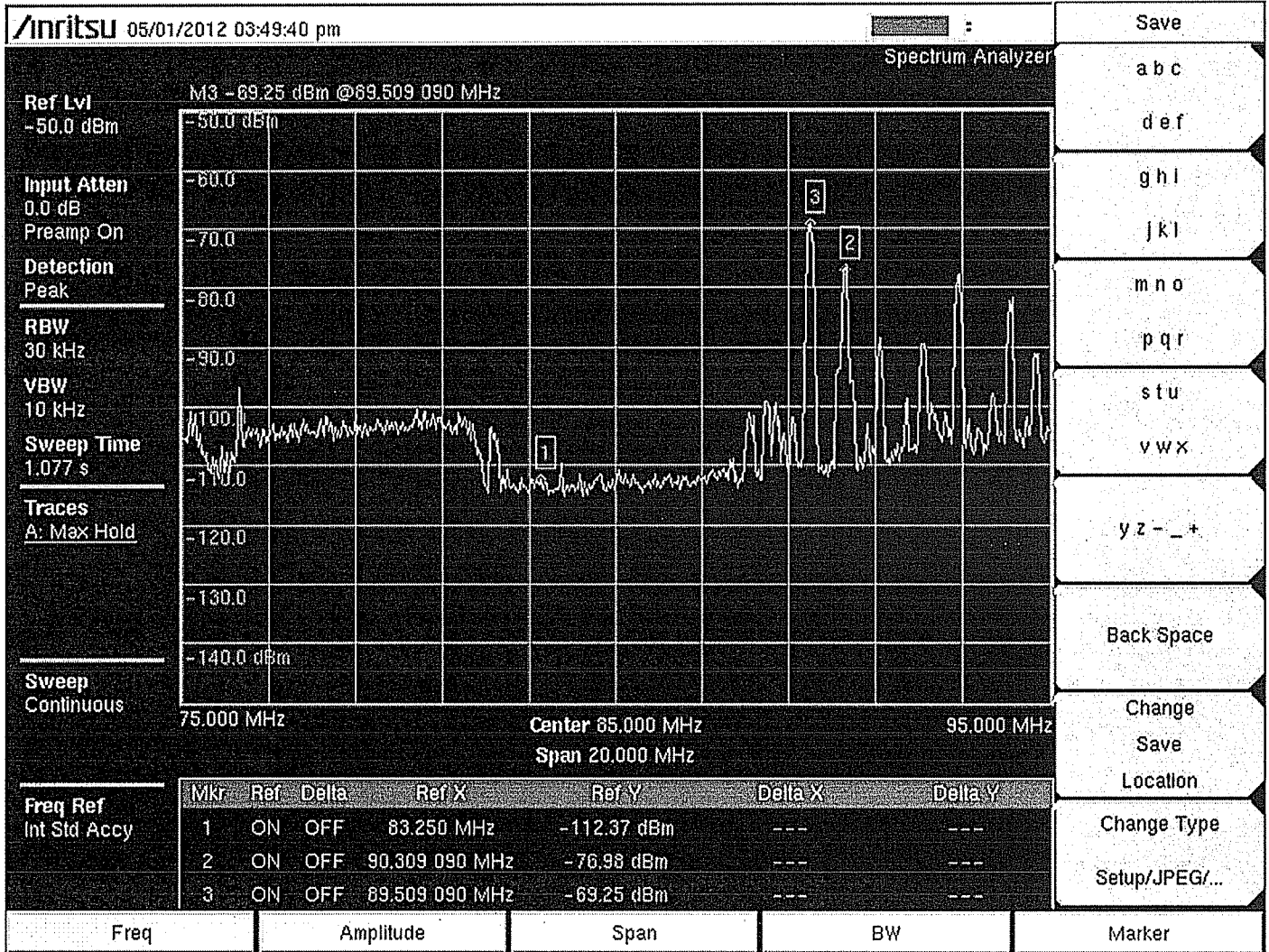
1. I am Chief Engineer/Chief Technology Officer at NewsChannel 5 Network, LLC, licensee of WTVF, Nashville, Tennessee.
2. On May 1, 2012, together with Richard Eller, WTVF's Senior Operations and Facility Manager, I drove to Exit No. 232A on Interstate 40E, to the intersection of Highway 109 and Interstate 40. This point is 2.67 miles NNW from WRTN-LP's transmitter site. Using an Anritsu MS2721B spectrum analyzer, we detected no signal on Channel 6 (82-88 MHz). The plot of the spectrum analyzer is attached hereto as Attachment A. Marker point #1 in the plot was placed at 83.250 MHz, where the peak visual carrier would be if the station were on the air on Channel 6.
3. To best of my knowledge, information, and belief, retired WTVF Operation Director Charles Orr, who resides 6.04 miles SSW of WRTN-LP's tower, used a rooftop aerial on May 4, 2012 to search for any signal from WRTN-LP, and detected no signal.
4. On May 16, 2012, I drove to WRTN-LP's transmitter site. Using an Anritsu MS2721B spectrum analyzer, I found no signal on Channel 6. The plot of the spectrum analyzer is attached hereto as Attachment B. Marker points 2 and 3 were placed at the band edges of Channel 6 — 82 MHz and 88 MHz, respectively.

Executed on May 21, 2012



Gibson Prichard

Attachment A



Attachment B

