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

In re Application of	)	
	)	
ENTRAVISION HOLDINGS, LLC	)	File No. BDISDTL-20110329ACN
	)	Facility ID No. 167370
For Displacement Relief for Station WMDO-LD, Washington, D.C.	)	

To: Secretary, Federal Communications Commission
Attn: The Chief, Video Division, Media Bureau

OPPOSITION

Entravision Holdings, LLC ("Entravision"), the licensee of Station WMDO-LD, Washington, D.C., by its attorneys, hereby opposes the Informal Objection submitted by Word of God Fellowship, Inc. ("WOG"), the licensee of Station WDWA-LP, Dale City, Virginia, claiming that the displacement application for Station WMDO-LD, Washington, D.C., should be denied. In support thereof, Entravision states as follows.

In its application, filed on March 29, 2011, Entravision requested displacement relief for Station WMDO-LD, Washington, D.C., which currently operates on Channel 8. The displacement relief being sought would allow WMDO-LD to operate on Channel 22. As evidenced in Entravision's application, Entravision, in operating on Channel 8, has suffered from interference from three co-channel and adjacent channel stations: WJLA-TV, Washington, D.C. on Channel 7, WGAL, Lancaster, Pennsylvania on Channel 8, and WUSA, Washington, D.C. on Channel 9. In order to avoid such interference, Entravision submits that operation on Channel 22 would allow WMDO-LP to operate without such an interference impact.

WOG has operated Station WDWA-LP on Channel 23 as an analog station. In File No. BDFCDTL-20110310ABW, WOG has recently received a construction permit to flash-cut on

Channel 23 in order to operate the Station in the digital mode. WOG now claims that the operation of WMDO-LD on Channel 22 would cause impermissible interference to the digital operation of its Dale City station on Channel 23. As will be shown herein, that claim is wide of the mark.

In the first place, WOG argues that Entravision should be estopped from applying for a construction permit for Channel 22 on the basis that it has heretofore accepted interference on Channel 8. While estoppel may have some value as an equitable argument, WOG has not shown and Entravision cannot locate, any Commission precedent for the claim that a party that has accepted interference has waived its right to displacement relief. In the absence of such a policy, this is neither the time nor place for its application.

The reason that Entravision has not previously sought displacement relief is not that Entravision willingly wished to operate on a low VHF channel surrounded by full-service digital stations, but that it has been unable to locate any available channel to displace to. Now, however, Entravision has determined that Channel 22 is an available channel. Entravision reached this decision after finding that WOG, the permittee of Station WDDN-LD, on Channel 22 at Washington, D.C., had allowed the construction permit for WDDN-LD (File No. BDCCDTL-20060130ABV) to expire as a result of not constructing it during its three-year term. Rather than allow the Channel 22 spectrum to be warehoused and not used in service to the public, Entravision applied for the construction permit that WOG now contests. Clearly, there is no basis upon which to conclude that Entravision, which has constructed and operates its Station, should be estopped from seeking displacement to an available channel.

WOG's other claim is that the WMDO-LD application will violate Section 74.710(a) of the Commission's Rules because the application fails to protect the granted application of WDWA-LD. WOG is simply wrong on this account. Attached hereto, as Exhibit A, is a

Technical Exhibit prepared by Entravision's engineering consultant. In the Technical Exhibit, Entravision's consultant flatly contradicts WOG's claim of interference. It is established therein that WOG has relied on measurement analytics that are not in accord with Commission's OET Bulletin No. 69 procedures for predicting interference.

Instead of there being 11% interference, as alleged by WOG, the Technical Exhibit shows that the potential interference is 0.0349%. The correct calculation of potential interference places the proposed Station well within the Commission's 2% interference limit threshold. Consequently, Section 74.710(a) of the Commission's Rules is complied with and there is no basis for denying Entravision's application.

WHEREFORE, Entravision Holdings, LLC respectfully requests that the Informal Objection filed by Word of God Fellowship, Inc. against the application for displacement relief for Station WMDO-LD, Washington, D.C., be dismissed or denied.

Respectfully submitted,

ENTRAVISION HOLDINGS, LLC

By:_____

Barry A. Friedman
Thompson Hine LLP
1920 N Street, N.W.
Suite 800
Washington, D.C. 20036
(202) 331-8800

Dated: May 10, 2011

TECHNICAL EXHIBIT
PREPARED IN SUPPORT OF AN
OPPOSITION TO THE INFORMAL OBJECTION CONCERNING
DISPLACEMENT RELIEF APPLICATION FOR
STATION WMDO-LD
FCC FILE NO. BDISDTL-20110329ACN
FCC FACILITY ID 167370
WASHINGTON, D.C.
CH 22 8.9 KW (MAX-DA)

This Technical Exhibit was prepared in support of a response to the Informal Objection filed by Word of God Fellowship, Inc. ("WOGF") to the pending displacement relief application (BDISDTL-20110329ACN, Facility ID 167370) of Station WMDO-LD on Channel 22 at Washington, D.C. WOGF's Informal Objection alleges that the WMDO-LD application would cause objectionable interference to the authorized but unbuilt digital operation of Station WDWA-LD on channel 23 at Dale City, Virginia (BDFCDTL-20110310ABW). The purpose of this Technical Exhibit is to demonstrate that, contrary to the allegations of WOGF, the WMDO-LD application complies with the FCC's interference requirements with respect to WDWA-LD.

Figure 1 is the output of an interference study of the proposed WMDO-LD operation. The interference study was based on the provisions of OET Bulletin No. 69 using a 1 km cell size and a 0.1 km terrain increment (as noted in the BDISDTL-20110329ACN). As indicated on Page 13 of Figure 1, the worst case new interference that would be caused by WMDO-LD to WDWA-LD's authorized operation is 0.0349%, which complies with the FCC's 2% interference limit applicable to WDWA-LD. It is noted that this firm's implementation of OET Bulletin No. 69 is identical the FCC's implementation of OET Bulletin No. 69.

Conclusion

As demonstrated above, the WMDO-LD displacement application complies with the FCC's interference criteria with respect to the authorized operation of WDWA-LD.

I hereby declare under penalty of perjury that the forgoing is true and correct to the best of my personal knowledge and belief.

W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 342387
(941) 329-6000
JEFF@DLR.COM

May 10, 2011

OET-69 INTERFERENCE STUDY TO WDWA-LP

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: 05-09-2011 Time: 12:44:57

Record Selected for Analysis

WMDO-LD BDISDTL -20110329ACN WASHINGTON DC US
Channel 22 ERP 8.9 kW HAAT 179 m RCAMSL 00211 m STRINGENT MASK
Latitude 038-56-24 Longitude 0077-04-54
Status APP Zone Border Site number: 01
Dir Antenna Make CDB Model 00000000104568 Beam tilt Y Ref Azimuth 80.0
Last update 00000000 Cutoff date 20110329 Docket
Comments
Applicant ENTRAVISION HOLDINGS, LLC

Cell Size for Service Analysis 1.0 km/side

Distance Increments for Longley-Rice Analysis 0.10 km

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

Site number 1

Azimuth (Deg)	ERP (kW)	HAAT (m)	51.0 dBu F(50,90) (km)
0.0	3.333	119.4	37.0
45.0	6.853	133.1	41.6
90.0	8.688	170.7	45.3
135.0	5.053	179.0	43.0
180.0	2.119	170.3	38.0
225.0	0.389	119.9	25.9
270.0	0.828	126.4	30.3
315.0	0.731	126.2	29.7

Database HAAT does not agree with computed HAAT
Database HAAT: 179 Computed HAAT: 143

Contour Overlap to Proposed Station

Station
W22DA 22 FREDERICK MD BLTTL20050207AEK causes

Contour overlap to Digital LPTV station
WMDO-LD 22 WASHINGTON DC BDISDTL 20110329ACN
D/U ratio at contour -6.40 dB
Required D/U ratio: 2.0
Radial 0.0 degrees
Bearing to point on contour 99.5 degrees
D/U ratio at contour -6.10 dB
Radial 1.0 degrees
Bearing to point on contour 99.3 degrees
D/U ratio at contour -5.88 dB
Radial 2.0 degrees
Bearing to point on contour 99.0 degrees
D/U ratio at contour -5.58 dB
Radial 3.0 degrees
Bearing to point on contour 98.9 degrees
D/U ratio at contour -5.23 dB
Radial 4.0 degrees
Bearing to point on contour 98.8 degrees
D/U ratio at contour -4.90 dB
Radial 5.0 degrees
Bearing to point on contour 98.7 degrees
D/U ratio at contour -4.45 dB
Radial 6.0 degrees
Bearing to point on contour 98.8 degrees
D/U ratio at contour -4.03 dB
Radial 7.0 degrees
Bearing to point on contour 98.9 degrees
D/U ratio at contour -3.63 dB
Radial 8.0 degrees
Bearing to point on contour 98.9 degrees
D/U ratio at contour -3.36 dB
Radial 9.0 degrees
Bearing to point on contour 98.8 degrees
D/U ratio at contour -2.90 dB
Radial 10.0 degrees
Bearing to point on contour 98.9 degrees
D/U ratio at contour -2.43 dB
Radial 11.0 degrees
Bearing to point on contour 99.1 degrees
D/U ratio at contour -2.14 dB
Radial 12.0 degrees
Bearing to point on contour 98.9 degrees
D/U ratio at contour -1.95 dB

Radial 13.0 degrees
Bearing to point on contour 98.5 degrees
D/U ratio at contour -1.68 dB
Radial 14.0 degrees
Bearing to point on contour 98.4 degrees
D/U ratio at contour -1.36 dB
Radial 15.0 degrees
Bearing to point on contour 98.2 degrees
D/U ratio at contour -1.06 dB
Radial 16.0 degrees
Bearing to point on contour 98.0 degrees
D/U ratio at contour -0.67 dB
Radial 17.0 degrees
Bearing to point on contour 98.0 degrees
D/U ratio at contour -0.23 dB
Radial 18.0 degrees
Bearing to point on contour 98.1 degrees
D/U ratio at contour 0.21 dB
Radial 19.0 degrees
Bearing to point on contour 98.2 degrees
D/U ratio at contour 0.71 dB
Radial 20.0 degrees
Bearing to point on contour 98.5 degrees
D/U ratio at contour 1.13 dB
Radial 21.0 degrees
Bearing to point on contour 98.5 degrees
D/U ratio at contour 1.54 dB
Radial 22.0 degrees
Bearing to point on contour 98.5 degrees
D/U ratio at contour 1.92 dB
Radial 23.0 degrees
Bearing to point on contour 98.5 degrees
D/U ratio at contour 1.73 dB
Radial 337.0 degrees
Bearing to point on contour 116.7 degrees
D/U ratio at contour 0.86 dB
Radial 338.0 degrees
Bearing to point on contour 115.8 degrees
D/U ratio at contour 0.15 dB
Radial 339.0 degrees
Bearing to point on contour 114.9 degrees
D/U ratio at contour -0.69 dB
Radial 340.0 degrees
Bearing to point on contour 113.9 degrees
D/U ratio at contour -1.31 dB
Radial 341.0 degrees
Bearing to point on contour 113.0 degrees
D/U ratio at contour -2.08 dB
Radial 342.0 degrees
Bearing to point on contour 112.0 degrees
D/U ratio at contour -2.79 dB
Radial 343.0 degrees

```
Bearing to point on contour 111.0 degrees
D/U ratio at contour  -3.45 dB
Radial 344.0 degrees
Bearing to point on contour 110.0 degrees
D/U ratio at contour  -4.33 dB
Radial 345.0 degrees
Bearing to point on contour 109.1 degrees
D/U ratio at contour  -5.09 dB
Radial 346.0 degrees
Bearing to point on contour 108.2 degrees
D/U ratio at contour  -5.82 dB
Radial 347.0 degrees
Bearing to point on contour 107.1 degrees
D/U ratio at contour  -6.53 dB
Radial 348.0 degrees
Bearing to point on contour 106.0 degrees
D/U ratio at contour  -6.99 dB
Radial 349.0 degrees
Bearing to point on contour 105.0 degrees
D/U ratio at contour  -7.25 dB
Radial 350.0 degrees
Bearing to point on contour 104.2 degrees
D/U ratio at contour  -7.46 dB
Radial 351.0 degrees
Bearing to point on contour 103.3 degrees
D/U ratio at contour  -7.62 dB
Radial 352.0 degrees
Bearing to point on contour 102.5 degrees
D/U ratio at contour  -7.53 dB
Radial 353.0 degrees
Bearing to point on contour 102.0 degrees
D/U ratio at contour  -7.46 dB
Radial 354.0 degrees
Bearing to point on contour 101.5 degrees
D/U ratio at contour  -7.38 dB
Radial 355.0 degrees
Bearing to point on contour 101.0 degrees
D/U ratio at contour  -7.30 dB
Radial 356.0 degrees
Bearing to point on contour 100.5 degrees
D/U ratio at contour  -7.16 dB
Radial 357.0 degrees
Bearing to point on contour 100.1 degrees
D/U ratio at contour  -6.88 dB
Radial 358.0 degrees
Bearing to point on contour  99.9 degrees
D/U ratio at contour  -6.68 dB
Radial 359.0 degrees
Bearing to point on contour  99.6 degrees

        Station
WDDN-LP  23 WASHINGTON          DC BLTTL20080327AAI
```

Station inside contour of Digital LPTV station
WMDO-LD 22 WASHINGTON DC BDISDTL 20110329ACN

Station
WDDN-LP 23 WASHINGTON DC BSTA20110420AAX

Station inside contour of Digital LPTV station
WMDO-LD 22 WASHINGTON DC BDISDTL 20110329ACN

Contour Overlap Evaluation to Proposed Station 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

Proposed station is OK toward AM broadcast stations

****

Start of Interference Analysis

Proposed Station			
Channel	Call	City/State	ARN
22	WMDO-LD	WASHINGTON DC	BDISDTL 20110329ACN

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
14	W14CM	DOVER DE	140.0	LIC	BLTT -20010803AAR
14	W14CY	CHARLOTTESVILLE VA	126.6	LIC	BLTTL -20070523ACY
21	WDDN-LD	WASHINGTON DC	7.0	CP	BDCCDTL -20061030ABV
21	WBOC-TV	SALISBURY MD	133.8	LIC	BLCDT -20090618ABK
21	WHP-TV	HARRISBURG PA	157.3	LIC	BLCDT -20090615ADL
21	WHP-TV	HARRISBURG PA	157.3	CP	BPCDT -20100325ABG
21	WVPY	FRONT ROYAL VA	108.0	LIC	BLEDT -20100209AAB
22	WDDN-LD	WASHINGTON DC	7.0	APP	BSTA -20110224ACD
22	WDDN-LD	WASHINGTON DC	7.0	APP	BDISDTL -20110224ACB
22	W22DA	FREDERICK MD	57.8	LIC	BLTTL -20050207AEK
22	WBLP-LP	OCEAN CITY MD	184.3	LIC	BLTTL -19941114JA
22	WBLP-LP	OCEAN CITY MD	184.3	CP	BPTTL -20080505AAH
22	W22DH-D	SALISBURY MD	141.6	CP	BDCCDTL -20061027AGV

22	NEW	DURHAM NC	366.1	APP	BNPDTL	-20100728ADK
22	W58CD	RALEIGH NC	377.4	CP	BDISTTL	-20060817AEP
22	WNJS	CAMDEN NJ	211.4	CP	BPEDT	-20080620ALH
22	WNJS	CAMDEN NJ	211.4	LIC	BLEDT	-20070611AAY
22	NEW	CORNING NY	355.9	APP	BMJADTL	-20100524AHU
22	WXNY-LD	NEW YORK NY	334.7	CP	BDISDTL	-20100421AAT
22	WCBS-TV	PLAINVIEW NY	371.5	CP	BDRTCDT	-20090630AEB
22	WVEX-LP	MARIETTA OH	383.3	APP	BSTA	-20080430AAA
22	WVEX-LP	MARIETTA OH	383.3	LIC	BLTTL	-20091028ABK
22	WJAC-TV	ALTOONA PA	215.1	LIC	BLCDT	-20110105ABC
22	WTAE-TV	PITTSBURGH PA	298.0	LIC	BLCDT	-20091223AKV
22	WNEP-TV	WAYMART PA	330.5	LIC	BLCDT	-20091216AAH
22	W22DN	CRADDOCKVILLE VA	183.8	CP	BDISTT	-20071130ASG
22	WRIC-TV	PETERSBURG VA	165.0	LIC	BLCDT	-20090209ABZ
22	W22CY	CLARKSBURG WV	279.7	LIC	BLTTL	-20060120ADM
22	W22CV	MOOREFIELD WV	158.0	APP	BDFCDTT	-20110218ABQ
22	W22CV	MOOREFIELD WV	158.0	LIC	BLTT	-20030429AAL
22	NEW	SUTTON WV	315.4	APP	BNPDTL	-20100514AAM
23	WDDN-LP	WASHINGTON DC	7.0	LIC	BLTTL	-20080327AAI
23	WDDN-LP	WASHINGTON DC	7.0	APP	BSTA	-20110420AAX
23	W23CX	SALISBURY MD	173.7	LIC	BLTTL	-20070730AKY
23	W23ED-D	SALISBURY MD	141.6	CP	BNPDTL	-20100204AAT
23	WNAI-LP	SPRINGVILLE NJ	200.1	APP	BDISDTL	-20101206ABZ
23	WLYH-TV	LANCASTER PA	156.2	LIC	BLCDT	-20040922AAC
23	WDWA-LP	CLARKS CORNER VA	68.9	LIC	BLTTL	-20080814AAR
23	WDWA-LP	DALE CITY VA	27.3	CP	BDFCDTL	-20110310ABW
23	NEW	HARRISONBURG VA	162.4	APP	BNPDTL	-20100714AAJ
23	WDWA-LP	LURAY VA	68.9	APP	BSTA	-20080321ACV
23	W23DR-D	ROMNEY WV	146.9	LIC	BLDTT	-20090609AAZ
24	W24DK	WOODSTOCK VA	127.1	CP	BNPTTL	-20000831AOC
25	WZDC-CA	WASHINGTON DC	0.0	LIC	BLTTL	-20070309ADR

%%%

Analysis of Interference to Affected Station 39

Analysis of current record

Channel	Call	City/State	Application Ref. No.	
23	WDWA-LP	DALE CITY VA	BDFCDTL	-20110310ABW

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.	
22	WMDO-LD	WASHINGTON DC	27.3	APP	BDISDTL	-20110329ACN
22	WDDN-LD	WASHINGTON DC	33.3	APP	BSTA	-20110224ACD
22	WDDN-LD	WASHINGTON DC	33.3	APP	BDISDTL	-20110224ACB
23	WDDN-LP	WASHINGTON DC	33.3	LIC	BLTTL	-20080327AAI
23	WDDN-LP	WASHINGTON DC	33.3	APP	BSTA	-20110420AAX
23	W23ED-D	SALISBURY MD	156.1	CP	BNPDTL	-20100204AAT
23	WUNK-TV	GREENVILLE NC	360.4	CP MOD	BMPEDT	-20090831ACZ

23	WUNK-TV	GREENVILLE NC	360.4	LIC	BLEDT	-20021007ABG
23	WLYH-TV	LANCASTER PA	179.9	LIC	BLCDT	-20040922AAC
23	WITD-CA	CHESAPEAKE VA	230.2	LIC	BLTTA	-20060614AAE
23	NEW	HARRISONBURG VA	137.2	APP	BNPDTL	-20100714AAJ
23	W23DR-D	ROMNEY WV	133.1	LIC	BLDTT	-20090609AAZ
24	WNVC	FAIRFAX VA	13.3	LIC	BLEDT	-20090612ACS

Total scenarios = 7

Result key: 1
Scenario 1 Affected station 39
Before Analysis

Results for: 23A VA DALE CITY BDFCDTL 20110310ABW CP
HAAT 190.0 m, ATV ERP 15.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2815849	6440.3
not affected by terrain losses	2815454	6393.3
lost to NTSC IX	1032460	1130.2
lost to additional IX by ATV	47110	85.9
lost to ATV IX only	715720	611.6
lost to all IX	1079570	1216.1

Potential Interfering Stations Included in above Scenario 1

23N DC WASHINGTON	BLTTL	20080327AAI	LIC
23N VA CHESAPEAKE	BLTTA	20060614AAE	LIC
23A PA LANCASTER	BLCDT	20040922AAC	LIC
24A VA FAIRFAX	BLEDT	20090612ACS	LIC

After Analysis

Results for: 23A VA DALE CITY BDFCDTL 20110310ABW CP
HAAT 190.0 m, ATV ERP 15.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2815849	6440.3
not affected by terrain losses	2815454	6393.3
lost to NTSC IX	1032460	1130.2
lost to additional IX by ATV	47716	86.9
lost to ATV IX only	717153	613.6
lost to all IX	1080176	1217.1

Potential Interfering Stations Included in above Scenario 1

23N DC WASHINGTON	BLTTL	20080327AAI	LIC
23N VA CHESAPEAKE	BLTTA	20060614AAE	LIC
23A PA LANCASTER	BLCDT	20040922AAC	LIC
24A VA FAIRFAX	BLEDT	20090612ACS	LIC
22A DC WASHINGTON	BDISDTL	20110329ACN	APP

Percent new IX = 0.0349%

Result key: 2
Scenario 2 Affected station 39
Before Analysis

Results for: 23A VA DALE CITY BDFCDTL 20110310ABW CP
HAAT 190.0 m, ATV ERP 15.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2815849	6440.3
not affected by terrain losses	2815454	6393.3
lost to NTSC IX	1032460	1130.2
lost to additional IX by ATV	47110	85.9
lost to ATV IX only	716547	612.6
lost to all IX	1079570	1216.1

Potential Interfering Stations Included in above Scenario 2

23N DC WASHINGTON	BLTTL	20080327AAI	LIC
23N VA CHESAPEAKE	BLTTA	20060614AAE	LIC
22A DC WASHINGTON	BSTA	20110224ACD	APP
23A PA LANCASTER	BLCDT	20040922AAC	LIC
24A VA FAIRFAX	BLEDT	20090612ACS	LIC

After Analysis

Results for: 23A VA DALE CITY BDFCDTL 20110310ABW CP
HAAT 190.0 m, ATV ERP 15.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2815849	6440.3
not affected by terrain losses	2815454	6393.3
lost to NTSC IX	1032460	1130.2
lost to additional IX by ATV	47716	86.9
lost to ATV IX only	717153	613.6
lost to all IX	1080176	1217.1

Potential Interfering Stations Included in above Scenario 2

23N DC WASHINGTON	BLTTL	20080327AAI	LIC
23N VA CHESAPEAKE	BLTTA	20060614AAE	LIC
22A DC WASHINGTON	BSTA	20110224ACD	APP
23A PA LANCASTER	BLCDT	20040922AAC	LIC
24A VA FAIRFAX	BLEDT	20090612ACS	LIC
22A DC WASHINGTON	BDISDTL	20110329ACN	APP

Percent new IX = 0.0349%

Result key: 3
Scenario 3 Affected station 39
Before Analysis

Results for: 23A VA DALE CITY BDFCDTL 20110310ABW CP
HAAT 190.0 m, ATV ERP 15.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2815849	6440.3
not affected by terrain losses	2815454	6393.3
lost to NTSC IX	1032460	1130.2
lost to additional IX by ATV	47110	85.9
lost to ATV IX only	716547	612.6
lost to all IX	1079570	1216.1

Potential Interfering Stations Included in above Scenario 3

23N DC WASHINGTON	BLTTL	20080327AAI	LIC
23N VA CHESAPEAKE	BLTTA	20060614AAE	LIC
22A DC WASHINGTON	BDISDTL	20110224ACB	APP
23A PA LANCASTER	BLCDT	20040922AAC	LIC
24A VA FAIRFAX	BLEDT	20090612ACS	LIC

After Analysis

Results for: 23A VA DALE CITY BDFCDTL 20110310ABW CP
HAAT 190.0 m, ATV ERP 15.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2815849	6440.3
not affected by terrain losses	2815454	6393.3
lost to NTSC IX	1032460	1130.2
lost to additional IX by ATV	47716	86.9
lost to ATV IX only	717153	613.6
lost to all IX	1080176	1217.1

Potential Interfering Stations Included in above Scenario 3

23N DC WASHINGTON	BLTTL	20080327AAI	LIC
23N VA CHESAPEAKE	BLTTA	20060614AAE	LIC
22A DC WASHINGTON	BDISDTL	20110224ACB	APP
23A PA LANCASTER	BLCDT	20040922AAC	LIC
24A VA FAIRFAX	BLEDT	20090612ACS	LIC
22A DC WASHINGTON	BDISDTL	20110329ACN	APP

Percent new IX = 0.0349%

Result key: 4
Scenario 4 Affected station 39
Before Analysis

Results for: 23A VA DALE CITY BDFCDTL 20110310ABW CP
HAAT 190.0 m, ATV ERP 15.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2815849	6440.3
not affected by terrain losses	2815454	6393.3
lost to NTSC IX	1032460	1130.2
lost to additional IX by ATV	47110	85.9
lost to ATV IX only	715720	611.6
lost to all IX	1079570	1216.1

Potential Interfering Stations Included in above Scenario 4

23N DC WASHINGTON	BLTTL	20080327AAI	LIC
23N VA CHESAPEAKE	BLTTA	20060614AAE	LIC
23A PA LANCASTER	BLCDT	20040922AAC	LIC
24A VA FAIRFAX	BLEDT	20090612ACS	LIC

After Analysis

Results for: 23A VA DALE CITY BDFCDTL 20110310ABW CP
HAAT 190.0 m, ATV ERP 15.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2815849	6440.3
not affected by terrain losses	2815454	6393.3
lost to NTSC IX	1032460	1130.2
lost to additional IX by ATV	47716	86.9
lost to ATV IX only	717153	613.6
lost to all IX	1080176	1217.1

Potential Interfering Stations Included in above Scenario 4

23N DC WASHINGTON	BLTTL	20080327AAI	LIC
23N VA CHESAPEAKE	BLTTA	20060614AAE	LIC
23A PA LANCASTER	BLCDT	20040922AAC	LIC
24A VA FAIRFAX	BLEDT	20090612ACS	LIC
22A DC WASHINGTON	BDISDTL	20110329ACN	APP

Percent new IX = 0.0349%

Result key: 5
Scenario 5 Affected station 39
Before Analysis

Results for: 23A VA DALE CITY BDFCDTL 20110310ABW CP
HAAT 190.0 m, ATV ERP 15.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2815849	6440.3
not affected by terrain losses	2815454	6393.3
lost to NTSC IX	5903	6.0
lost to additional IX by ATV	710644	607.6
lost to ATV IX only	716547	612.6
lost to all IX	716547	613.6

Potential Interfering Stations Included in above Scenario 5

23N DC WASHINGTON	BSTA	20110420AAX	APP
23N VA CHESAPEAKE	BLTTA	20060614AAE	LIC
22A DC WASHINGTON	BSTA	20110224ACD	APP
23A PA LANCASTER	BLCDT	20040922AAC	LIC
24A VA FAIRFAX	BLEDT	20090612ACS	LIC

After Analysis

Results for: 23A VA DALE CITY BDFCDTL 20110310ABW CP
HAAT 190.0 m, ATV ERP 15.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2815849	6440.3
not affected by terrain losses	2815454	6393.3
lost to NTSC IX	5903	6.0
lost to additional IX by ATV	711250	608.6
lost to ATV IX only	717153	613.6
lost to all IX	717153	614.6

Potential Interfering Stations Included in above Scenario 5

23N DC WASHINGTON	BSTA	20110420AAX	APP
23N VA CHESAPEAKE	BLTTA	20060614AAE	LIC
22A DC WASHINGTON	BSTA	20110224ACD	APP
23A PA LANCASTER	BLCDT	20040922AAC	LIC
24A VA FAIRFAX	BLEDT	20090612ACS	LIC
22A DC WASHINGTON	BDISDTL	20110329ACN	APP

Percent new IX = 0.0289%

Result key: 6
Scenario 6 Affected station 39
Before Analysis

Results for: 23A VA DALE CITY BDFCDTL 20110310ABW CP
HAAT 190.0 m, ATV ERP 15.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2815849	6440.3
not affected by terrain losses	2815454	6393.3
lost to NTSC IX	5903	6.0
lost to additional IX by ATV	710644	607.6
lost to ATV IX only	716547	612.6
lost to all IX	716547	613.6

Potential Interfering Stations Included in above Scenario 6

23N DC WASHINGTON	BSTA	20110420AAX	APP
23N VA CHESAPEAKE	BLTTA	20060614AAE	LIC
22A DC WASHINGTON	BDISDTL	20110224ACB	APP
23A PA LANCASTER	BLCDT	20040922AAC	LIC
24A VA FAIRFAX	BLEDT	20090612ACS	LIC

After Analysis

Results for: 23A VA DALE CITY BDFCDTL 20110310ABW CP
HAAT 190.0 m, ATV ERP 15.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2815849	6440.3
not affected by terrain losses	2815454	6393.3

lost to NTSC IX	5903	6.0
lost to additional IX by ATV	711250	608.6
lost to ATV IX only	717153	613.6
lost to all IX	717153	614.6

Potential Interfering Stations Included in above Scenario 6

23N DC WASHINGTON	BSTA	20110420AAX	APP
23N VA CHESAPEAKE	BLTTA	20060614AAE	LIC
22A DC WASHINGTON	BDISDTL	20110224ACB	APP
23A PA LANCASTER	BLCDT	20040922AAC	LIC
24A VA FAIRFAX	BLEDT	20090612ACS	LIC
22A DC WASHINGTON	BDISDTL	20110329ACN	APP

Percent new IX = 0.0289%

Result key: 7
Scenario 7 Affected station 39
Before Analysis

Results for: 23A VA DALE CITY BDFCDTL 20110310ABW CP
HAAT 190.0 m, ATV ERP 15.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2815849	6440.3
not affected by terrain losses	2815454	6393.3
lost to NTSC IX	5903	6.0
lost to additional IX by ATV	710644	607.6
lost to ATV IX only	715720	611.6
lost to all IX	716547	613.6

Potential Interfering Stations Included in above Scenario 7

23N DC WASHINGTON	BSTA	20110420AAX	APP
23N VA CHESAPEAKE	BLTTA	20060614AAE	LIC
23A PA LANCASTER	BLCDT	20040922AAC	LIC
24A VA FAIRFAX	BLEDT	20090612ACS	LIC

After Analysis

Results for: 23A VA DALE CITY BDFCDTL 20110310ABW CP
HAAT 190.0 m, ATV ERP 15.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	2815849	6440.3
not affected by terrain losses	2815454	6393.3
lost to NTSC IX	5903	6.0
lost to additional IX by ATV	711250	608.6
lost to ATV IX only	717153	613.6
lost to all IX	717153	614.6

Potential Interfering Stations Included in above Scenario 7

23N DC WASHINGTON	BSTA	20110420AAX	APP

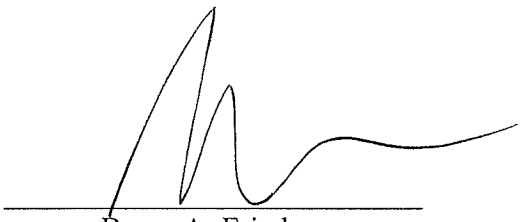
```
23N VA CHESAPEAKE           BLTTA     20060614AAE  LIC
23A PA LANCASTER            BLCDT     20040922AAC  LIC
24A VA FAIRFAX              BLEDT     20090612ACS  LIC
22A DC WASHINGTON           BDISDTL   20110329ACN  APP

Percent new IX =     0.0289%

Worst case new IX    0.0349% Scenario      1

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

FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED
```

CERTIFICATE OF SERVICE

I, Barry A. Friedman, hereby certify that I have served on this 10th day of May, 2011, a copy of the foregoing **OPPOSITION** on the following parties by first-class mail, postage pre-paid:

Robert L. Olender, Esq.
Koerner & Olender, PC
11913 Grey Hollow Court
Bethesda, Maryland 20852

Mr. Hossein Hashemzadeh*
Video Division
Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554



Barry A. Friedman

*By Hand