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FILED/ACCEPTED

OCT 29 2007

Federal Communications Commission
Office of the Secretary

October 29, 2007

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
236 Massachusetts Avenue, N.E.
Suite 110
Washington, DC 20002

Attention: Media Bureau, Video Division

Re: Analog Television Station WWAZ-TV, Channel 68,
Fond du Lac, Wisconsin, Facility ID No. 60571
Voluntary Band-Clearing Request

Dear Ms. Dortch:

WWAZ License, LLC ("Licensee"), the licensee of television station WWAZ-TV, Channel 68, Fond du Lac, Wisconsin (the "Station"), by its attorneys, hereby submits a voluntary band-clearing request seeking authority to: (i) terminate analog broadcasting on Channel 68 and surrender its license for that channel; and (ii) thereafter operate WWAZ-TV in Fond du Lac as a digital-only television station on Channel 44, as currently authorized.

This request is filed pursuant to the Commission's voluntary band-clearing procedures¹ and is in keeping with the Commission's band-clearing decisions.² As with other requests, grant of this instant one would remove an impediment to, and would enable early provision of, new wireless services, including, potentially, public safety services. As shown below, the termination of analog service by the Station would have a negligible impact on the public.

Past Precedent and Commission Policy Support Grant of this Request

The public interest factors identified in the *Upper 700 MHz MO&O and FNPRM* support grant of Licensee's request. In the *Upper 700 MHz MO&O and FNPRM*, the

¹ Service Rules for the 746-764 and 776-794 MHz Bands, and Revisions to Part 27 of the Commission's Rules, WT Docket No. 99-168, *Memorandum Opinion and Order and Further Notice of Proposed Rulemaking*, 15 FCC Rcd 20845, 20870-71 (2000) ("*Upper 700 MHz MO&O and FNPRM*").

² See, e.g., *Letter to Living Faith Ministries, Inc.*, DA 07-2236, rel. May 30, 2007 (involving WLFG(TV), Channel 68, Grundy, Virginia) ("*WLFG(TV) Letter*").

Ms. Marlene H. Dortch

October 29, 2007

Page 2

Commission said it would "...weigh[] the loss of broadcast service and the advent of new wireless service on a case-by-case basis" and consider a variety of relevant public interest factors in deciding whether or not to approve the request.³ The Commission established a rebuttable presumption favoring grant of certain band-clearing requests, believing that substantial public-interest benefits would arise in such circumstances.⁴ The Commission said that it would recognize such a presumption in response to any request that: (1) "...would make new or expanded wireless service, such as '2.5' or '3G' services, available to consumers; (2) would clear commercial frequencies that enable provision of public safety services; or (3) would result in the provision of wireless service to rural or other underserved communities."⁵ The Commission further said that in order to obtain and retain the presumption, a grant of a band-clearing request could not result in any one of the following: "... (1) the loss of any of the four stations in the designated market area (DMA) with the largest audience share; (2) the loss of the sole service licensed to the local community; or (3) the loss of a community's sole service on a channel reserved for noncommercial educational broadcast service."⁶

As discussed below, the majority of these enumerated public-interest factors, coupled with other additional public-interest factors, overwhelmingly supports grant of this instant request.

A. Presumptive Benefit: Provision of Public Safety Services

Termination of the Station's analog Channel 68 operations would benefit the public by removing the impediment to, and enabling early provision of, new wireless public safety services. Indeed, four public safety agencies serving Wisconsin and Illinois⁷ have already contacted Licensee in writing (attached hereto as Exhibit 1) to express their interest in immediately occupying Channel 68, which is specifically designated for public safety use.⁸ Each of these agencies cites its urgent need to utilize the spectrum currently allocated to Licensee, and the FCC's authority to grant their requests pursuant to the Auction Reform Act of 2002, which gives the FCC discretion to waive certain restrictions relative to band-clearing and cessation of analog operations for stations seeking authority to vacate the frequencies that constitute television channels 63, 64, 68, and 69 in order to make such frequencies available for public safety pursuant to Section 337 of the Communications Act of 1934, as amended.⁹

³ *Upper 700 MHz MO&O and FNPRM* at 20869-71.

⁴ *Id.*

⁵ *Id.* at 20870.

⁶ *Id.*

⁷ The Chair of the Region 45 700 MHz Planning Committee; the Sheriff of Dodge County, Wisconsin; the President of the Southeast Wisconsin Communications Resources/Support Group; and the Chair of the Region 54 700 MHz Planning Committee.

⁸ See Exhibit 1.

⁹ *Id.*

Ms. Marlene H. Dortch

October 29, 2007

Page 3

By cancelling the analog license for the Station, the Commission easily could allow for the early provision of these new wireless public safety services in a manner consistent with Congress's directive that the Commission expeditiously auction this spectrum.¹⁰ Although Licensee is not submitting this request pursuant to a band-clearing agreement, the Commission has not found this aspect dispositive under past precedent, nor of sufficient weight to counterbalance the strong public-interest benefits supporting grant of this request.¹¹

B. Countervailing Presumption Loss Factors

1. Loss of Top Four Station

The Station is not among the top four rated stations in the DMA, so this factor does not weigh against the presumption in favor of a grant of this request.

2. Loss of the Sole Station Licensed to the Community

Licensee acknowledges that the Station is the sole television station licensed to Fond du Lac, Wisconsin, but this fact is not dispositive. On numerous occasions, the Commission has granted early band-clearing requests involving stations that were the sole television service licensed to their community.¹² Indeed, as discussed in more detail below, there are twenty-eight (28) other analog and digital television stations serving portions of the Station's coverage area within the Station's predicted Grade B field-intensity signal contour¹³ so that the loss of the Station would not leave any persons living within that contour served by fewer than five (5) alternative full-power analog or digital stations.

3. Loss of a Community's Sole Service on a Channel Reserved for Noncommercial Educational Broadcast Service

The Station is a commercial station, so grant of this request will not deprive Fond du Lac of its sole station operating on a channel reserved for noncommercial, educational broadcast service. This third factor, accordingly, is not implicated.

¹⁰ Deficit Reduction Act of 2005, Title III, Pub. L. No. 109-171, 120 Stat. 4 (2006).

¹¹ See, e.g., *Letter to WRNN-TV Associates L.P.*, DA 04-2039, 19 FCC Rcd. 12343 (2004) (involving WRNN-TV, Kingston, New York).

¹² See, e.g., *WFLG(TV) Letter*.

¹³ See Exhibit 2.

Ms. Marlene H. Dortch

October 29, 2007

Page 4

C. Other Public Interest Factors Favor Grant

Not only will grant of the instant request provide public-safety agencies with much-needed spectrum for emergency services, but the termination of analog service by the Station would have a negligible impact on the television viewing public. While Licensee acknowledges that the early return of the Station's license would result in loss of the sole analog television channel allotted to Fond du Lac, the impact on the public likely will be imperceptible, as the Station does not meet the minimum reportable viewing levels measured in the Green Bay-Appleton DMA by Nielsen Media Research's audience surveys. Furthermore, as noted in greater detail in Exhibit 2, the entirety of the population residing within the predicted Grade B field-intensity signal contour of the Station's analog operations on Channel 68 receives over-the-air analog or digital service from no fewer than five (5) other stations. Finally, Licensee's digital television ("DTV") station WWAZ-DT is presently operating on DTV Channel 44 in Fond du Lac pursuant to a construction permit and an outstanding special temporary authorization, and viewers in Fond du Lac will continue to be able to view that station's DTV signal with the necessary DTV reception equipment.

While the early termination of analog service by the Station will have an imperceptible impact on the consumer, it will have a vital impact on the financial condition of Licensee. A review of Licensee's historical performance, and that of its sole member, Pappas Telecasting of Wisconsin, L.P., establishes that the Station is currently hemorrhaging money and is simply not economically sustainable at this point. Operating at full power for the past 12 ½ years, the Station, along with WWAZ-DT, operating with reduced facilities in order to conserve resources and minimize costs,¹⁴ have posted cumulative net operating losses of \$8,971,354.¹⁵ This is from the inception of service on March 24, 1995 through July 31, 2007. If the Commission were to grant Licensee's instant request for the early surrender of its analog license for the Station, Licensee would be able to use its limited resources for other purposes, including the development of its digital station.

CONCLUSION

For all of the foregoing reasons, Licensee seeks the Commission's grant of the instant band-clearing request. Attached hereto as Exhibit 4 is a Declaration of Harry J. Pappas, Chairman and CEO of Pappas Telecasting Companies, which is the corporate general partner of Pappas Telecasting of Wisconsin, L.P., which in turn is the sole member of Licensee. In the Declaration, Mr. Pappas verifies that the statements made herein with respect to Licensee are true and correct. Should any further information be

¹⁴ See File No. BDSTA-20020307ACU, granted on March 19, 2002, as modified and extended.

¹⁵ This is based upon excerpts from financial statements (attached hereto as Exhibit 3) for the year-ended 2006 and unaudited financial statements for 2007 through July 31 of this year.

PaulHastings

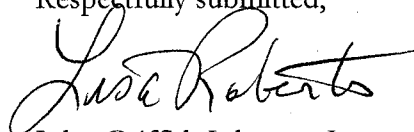
Ms. Marlene H. Dortch

October 29, 2007

Page 5

desired in connection with this matter, please contact the undersigned counsel to Licensee.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lisa E. Roberts". The signature is written in a cursive style with a large initial "L".

John Griffith Johnson, Jr.

Lisa E. Roberts

Attorneys for WWAZ License, LLC

Exhibits 1-4 (attached)

EXHIBIT 1



October 24, 2007

Ms. Monica Desai
Chief, Media Bureau
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Dear Ms. Desai:

We are writing to you regarding the Region 45 700MHZ Planning Committee's urgent need for early clearance of the analog channels that have been specially designated for public safety purposes. Region 45 covers $\frac{3}{4}$ of the State of Wisconsin. We urge the Commission to grant the request of Pappas Telecasting of Wisconsin, licensee of Station WWAZ, Channel 68, Fond du Lac, Wisconsin, for an early cessation of analog operations on Channel 68.

Elimination of this channel from active broadcast transmission will serve the public interest by enabling reassignment of frequencies in the 794MHZ to 800MHZ range for use by Wisconsin and Illinois public safety agencies. Programming services carried by WWAZ, Channel 68, will continue to be broadcast on digital Channel 44.

As you are aware, the Auction Reform Act of 2002, Section 6, granted the FCC discretion to waive certain restrictions relative to band clearing and cessation of analog operations for stations seeking authority to vacate the frequencies that constitute television channels 63, 64, 68 and 69 in order to make such frequencies available for public safety pursuant to Section 337 of the Communications Act of 1934 (FCC Second Order on Reconsideration of the Third Report & Order, November 3, 2003, at page 4). In view of that authority, and in light of Region 45's urgent need to utilize the Channel 68 frequencies for public safety purposes, we respectfully request that the Commission grant the request of Pappas Telecasting of Wisconsin, and grant said licensee the relief requested by special order in order to enable the early return of this spectrum to the affected states for public safety purposes.

Sincerely,

RUSSELL R. SCHREINER
CHAIRMAN
REGION 45 700MHZ
PLANNING COMMITTEE

DEPARTMENT
OF POLICE

CITY HALL
SUITE 101
828 CENTER AVE.
SHEBOYGAN, WI
53081-4499

920/459-3333
FAX 920/459-0205
www.sheboyganpolice.com

RRS:pmh
Enclosure

OFFICE OF DODGE COUNTY SHERIFF

TODD M. NEHLS
Sheriff



BLAINE LAUERSDORF
Chief Deputy

October 24, 2007

Ms. Monica Desai, Chief
Media Bureau
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

Dear Ms. Desai:

This letter is to inform you that the Dodge County Sheriff's Department, Juneau, Wisconsin, supports the efforts of Pappas Telecasting of Wisconsin, licensee of Station WWAZ, Channel 68, Fond du Lac, Wisconsin, for an early cessation of analog operations on Channel 68.

Elimination of this channel from active broadcast transmission will serve the public interest by enabling reassignment of frequencies in the 794 MHz to 799 MHz range for use by Wisconsin public safety agencies such as ours. It is our understanding that programming services carried by WWAZ, Channel 68 will continue to be broadcast on digital Channel 44.

As you are aware, the Auction Reform Act of 2002, Section 6, granted the FCC discretion to waive certain restrictions relative to band clearing and cessation of analog operations for stations seeking authority to vacate the frequencies that constitute television channels 63, 64, 68 and 69 in order to make such frequencies available for public safety pursuant to Section 337 of the Communications Act of 1934 (FCC Second Order on Reconsideration of the Third Report & Order, November 3, 2003 at page 4). In view of that authority, and in light of our urgent need to utilize the Channel 68 frequencies for public safety purposes, we respectfully request that the Commission grant the request of Pappas Telecasting of Wisconsin and grant said licensee the relief requested by special order in order to enable the early return of this spectrum to the affected states for public safety purposes.

Sincerely,



Todd M. Nehls
Sheriff

TN:dd



Southeast Wisconsin Communications Resource/Support Group

October 24, 2007

Ms. Monica Desai
Chief, Media Bureau
Federal Communications Commission
445 12th Street SW
Washington DC 20554

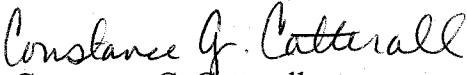
Dear Ms. Desai:

We are writing to you regarding the Southeast Wisconsin Communications Resource/Support Group's urgent need for early clearance of the analog channels that have been specially designated for public safety purposes. The SEWCRSG is a coalition of counties that cover much of southern Wisconsin, including the Milwaukee metropolitan area. We urge the Commission to grant the request of Pappas Telecasting of Wisconsin, licensee of Station WWAZ, Channel 68, Fond du Lac, Wisconsin, for an early cessation of analog operations on the aforementioned Channel 68.

Removal of this channel from active broadcast transmission will enable reassignment of frequencies in the 794 MHz to 800 MHz range for use by Wisconsin and Illinois public safety agencies. Programming services carried by WWAZ, Channel 68 will continue to be broadcast on digital Channel 44.

As you are aware the Auction Reform Act of 2002, Section 6, granted the FCC discretion to waive certain restrictions relative to band clearing and cessation of analog operations for stations seeking authority to vacate the frequencies that constitute television channels 63, 64, 68 and 69 in order to make such frequencies available for public safety pursuant to Section 337 of the Communications Act of 1934 (FCC Second Order on Reconsideration of the Third Report & Order, November 3, 2003 at page 4). In view of that authority, and in light of the SEWCRSG's urgent need to utilize the Channel 68 frequencies for public safety purposes, we respectfully request that the Commission grant the request of Pappas Telecasting of Wisconsin, and grant said licensee the relief requested by special order to enable the early return of this spectrum to the affected states for public safety purposes.

Sincerely yours,


Constance G. Catterall
President SEWCRSG
www.sewcrsg.org

October 25, 2007

Monica Desai

Chief Media Bureau

Federal Communications Commission

445 12th Street SW

Washington DC 20554

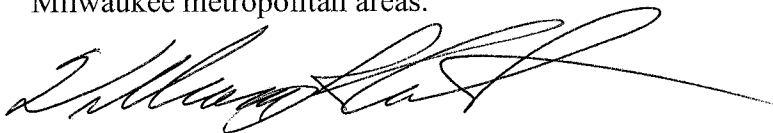
Dear Ms. Gregg:

This letter is to inform you that the Region 54 700 MHz Planning Committee's at its regular meeting held in Morris, Illinois on January 10, 2007, adopted a resolution supporting the efforts of Pappas Telecasting of Wisconsin, licensee of Station WWAZ, Channel 68, Fond du Lac, Wisconsin, for an early cessation of analog operations on Channel 68.

Elimination of this channel from active broadcast transmission will serve the public interest by enabling reassignment of frequencies in the 794 MHz to 799 MHz range for use by Wisconsin and Illinois public safety agencies. Programming services carried by WWAZ, Channel 68 will continue to be broadcast on digital Channel 44.

As you are aware the Auction Reform Act of 2002, Section 6, granted the FCC discretion to waive certain restrictions relative to band clearing and cessation of analog operations for stations seeking authority to vacate the frequencies that constitute television channels 63, 64, 68 and 69 in order to make such frequencies available for public safety pursuant to Section 337 of the Communications Act of 1934 (FCC Second Order on Reconsideration of the Third Report & Order, November 3, 2003 at page 4). In view of that authority, and in light of Region 54's urgent need to utilize the Channel 68 frequencies for public safety purposes, we respectfully request that the Commission grant the request of Pappas Telecasting of Wisconsin, and grant said licensee the relief requested by special order in order to enable the early return of this spectrum to the affected states for public safety purposes.

Region 54 covers much of Northern Illinois and Southern Wisconsin, including the Chicago and Milwaukee metropolitan areas.



Sincerely yours,

William J. Carter

Region 54 Chairman

EXHIBIT 2

EXHIBIT A

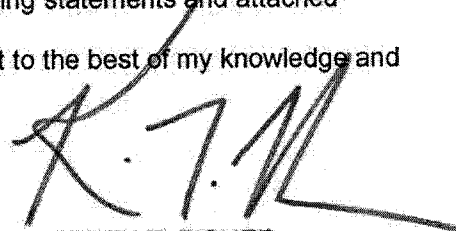
ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of WWAZ LICENSE, LLC, licensee of Television Station WWAZ-TV, Channel 68 in Fond du Lac, Wisconsin, in support of its early termination of analog service on Channel 68, and continued operation of WWAZ-DT on Channel 44. Channel 68, an out-of-core channel, has been designated by the FCC for use by public safety services throughout the United States. The purpose of this exhibit is to describe the number of other off-air primary analog and digital television services available to viewers residing in the WWAZ-TV coverage area.

Exhibit B is a tabulation of licensed full-power analog and digital television stations that place a predicted service contour within a portion of the Grade B service contour of analog WWAZ-TV. Exhibit C is a map upon which those contours are plotted.

From this exhibit, we have determined that all viewers living within the WWAZ-TV Grade B contour will continue to receive at least 5 analog and/or digital television signals if WWAZ-TV is allowed to discontinue analog operation.

I declare, under penalty of perjury, that the foregoing statements and attached exhibits, which were prepared by me, are true and correct to the best of my knowledge and belief.


KEVIN T. FISHER

October 25, 2007

SMITH AND FISHER

EXHIBIT B

OTHER TELEVISION SERVICES

<u>Call Sign</u>	<u>City/State</u>	<u>CH.</u>	<u>ERP(kw)</u>	<u>HAAT(m)</u>
WWAZ-TV	Fond du Lac, WI	68	4,986	195
WBAY-TV	Green Bay, WI	2	100	389
WBAY-DT	Green Bay, WI	23	1,000	372
WISC-DT	Madison, WI	50	603	466
WISC-TV	Madison, WI	3	24	469
WTMJ-TV	Milwaukee, WI	4	100	305
WFRV-TV	Green Bay, WI	5	100	341
WITI	Milwaukee, WI	6	100	305
WMVS*	Milwaukee, WI	10	223	338
WLUK-TV	Green Bay, WI	11	316	384
WISN-TV	Milwaukee, WI	12	316	303
WREX-TV	Rockford, IL	13	316	216
WMTV	Madison, WI	15	891	415
WVTV	Milwaukee, WI	18	5,000	307
WHA-TV*	Madison, WI	21	870	453
WCGV-TV	Milwaukee, WI	24	3,020	313
WGBA	Green Bay, WI	26	5,000	369
WKOW-TV	Madison, WI	27	2,400	455
WVCY-TV	Milwaukee, WI	30	1,070	293
WMVT*	Milwaukee, WI	36	4,790	340
WPNE*	Green Bay, WI	38	1,070	375
WMSN-TV	Madison, WI	47	1,150	450

SMITH AND FISHER

EXHIBIT B

<u>Call Sign</u>	<u>City/State</u>	<u>CH.</u>	<u>ERP(kw)</u>	<u>HAAT(m)</u>
WJJA	Racine, WI	49	2,570	149
WWRS-TV	Mayville, WI	52	5,000	202
WWRS-DT	Mayville, WI	43	300	186
WPXE	Kenosha, WI	55	5,000	144
WBUW	Janesville, WI	57	5,000	415
WDJT-TV	Milwaukee, WI	58	5,000	339

*Noncommercial/Educational

SMITH and FISHER

- ANALOG CONTOURS
- DIGITAL CONTOURS
- WWAZ-TV GRADE B

- WFRVTV
- WBAYTV
- WGBA
- WLUKTV
- WPNE
- WBAY-D

Appleton

Manitowoc

Oshkosh

Fond du Lac

Chesham

- WWRSTV WWRSD
- WWAZTV
- West Bend

Meromonee Falls

- WTMJTV
- WMVS
- WITI
- WISNTV
- WTVT
- WCGVTV
- WVCYTV
- WDJT TV

- Madison
- WISC-D/C
- WKOWTV
- WMTV
- WHATV
- WMSNTV
- WBUW

Waukesha

Milwaukee

Greenfield

WJJA

WPXE

Racine

Janesville

Bellevue

**OTHER EXISTING SERVICES
IN AREA WITHIN WWAZ-TV
GRADE B CONTOUR**

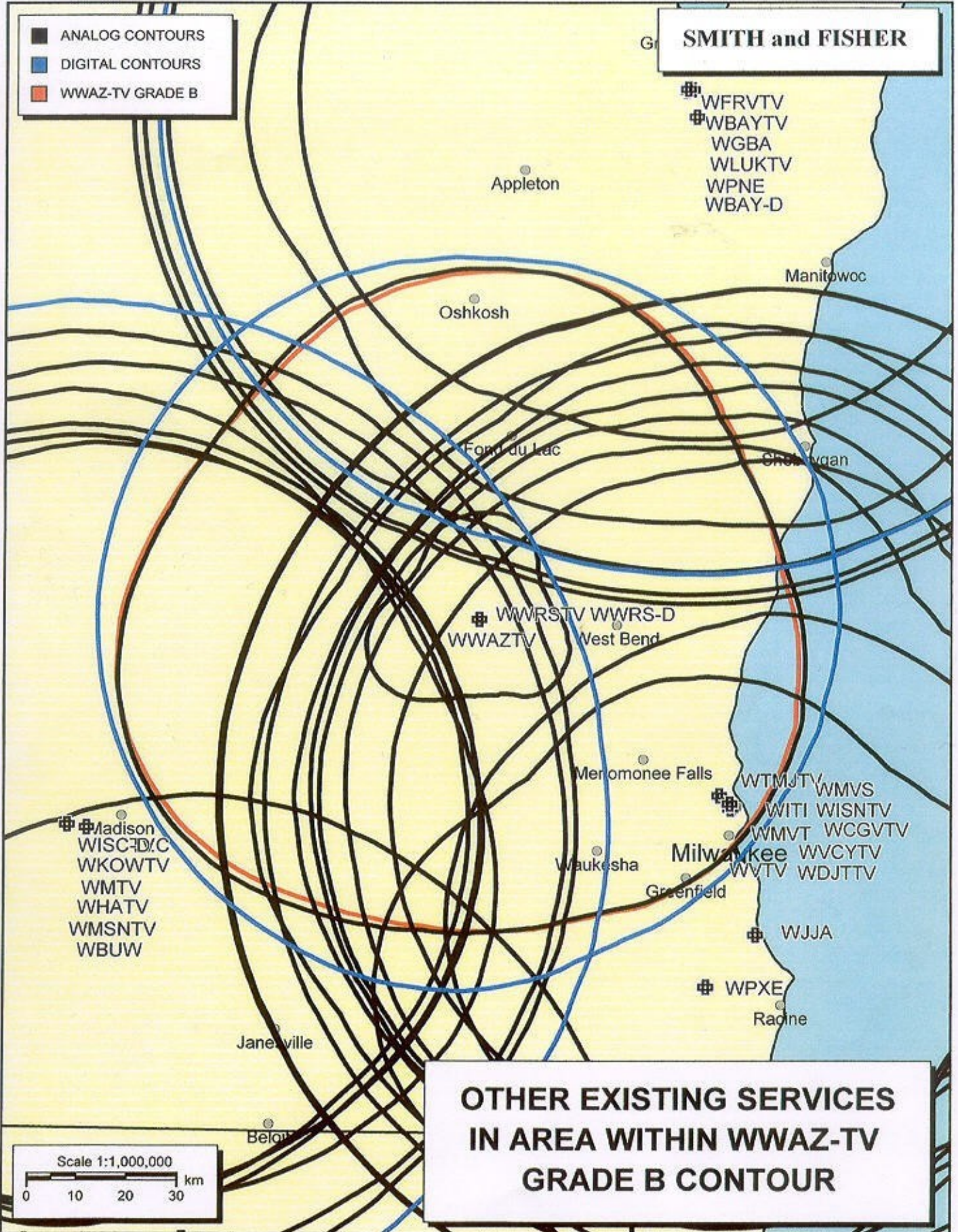
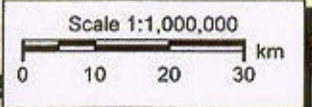


EXHIBIT 3

**PAPPAS TELECASTING
OF WISCONSIN, L. P.**

CONSOLIDATED FINANCIAL STATEMENTS

**Year Ended December 31, 2006 and the
Period from Inception (March 24, 1995)
Through December 31, 2006**



M. Green and Company LLP

CERTIFIED PUBLIC ACCOUNTANTS

LARRY W. AYERS, C.P.A.
MARLA D. BORGES, C.P.A.
KEVIN M. GREEN, C.P.A.
WM. KENT JENSEN, C.P.A.
KATHLEEN M. LAMPE, C.P.A.
LYNN M. LAMPE, C.P.A.
ALAN S. MOORE, C.P.A.
JUSTIN MORALES, JR., C.P.A.
KENNETH B. NUNES, C.P.A.
GIUSEPPE SCALIA, C.P.A.
KENNETH W. WHITE, JR., C.P.A.
REBECCA AGREBAND, C.P.A.
LYNDA S. ANDERSON, C.P.A.
ELAINED. REULE, C.P.A.
NATALIE H. SIEGEL, C.P.A.
NANCY R. TUTSCHULTE, C.P.A.
ROBERT L. BANDY, C.P.A.
Consultant
JAMES G. DWYER, C.P.A.
Consultant
DONALD G. GORDON
Consultant
FOREST A. MCQUEEN, C.P.A.
Consultant
CHARLES L. SOUTHARD, C.P.A.
Consultant
KENT A. WOOLLEY, C.P.A.
Consultant
JOSEPH L. GRAY, C.P.A.
Independent Consultant

REPORT OF INDEPENDENT AUDITORS

To the Partners
Pappas Telecasting of Wisconsin, L. P.

We have audited the accompanying consolidated balance sheet of Pappas Telecasting of Wisconsin, L. P. (a Delaware limited partnership) (a development stage company) and its subsidiary as of December 31, 2006, and the related consolidated statements of operations, changes in partners' equity, and cash flows for the year then ended and for the period from inception (March 24, 1995) through December 31, 2006. These consolidated financial statements are the responsibility of the Company and its subsidiary's management. Our responsibility is to express an opinion on these consolidated financial statements based on our audits.

We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audits to obtain reasonable assurance about whether the consolidated financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the consolidated financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audits provide a reasonable basis for our opinion.

In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the financial position of Pappas Telecasting of Wisconsin, L. P. and its subsidiary as of December 31, 2006, and the results of their operations and their cash flows for the year then ended and the period from inception (March 24, 1995) through December 31, 2006, in conformity with accounting principles generally accepted in the United States of America.

M. Green and Company LLP

April 26, 2007
Tulare, California

*Dinuba
Hanford
Tulare
Visalia*

PAPPAS TELECASTING OF WISCONSIN, L. P.

**CONSOLIDATED STATEMENTS OF OPERATIONS
YEAR ENDED DECEMBER 31, 2006 AND THE PERIOD FROM
INCEPTION (MARCH 24, 1995) THROUGH DECEMBER 31, 2006**

<u>EXPENSES:</u>	<u>2006</u>	<u>From Inception (March 24, 1995) Through December 31, 2006</u>
Operating expenses	\$ 412,522	\$ 2,601,414
Depreciation	437,876	1,904,818
Corporate allocation fee	-	50,000
	<hr/>	<hr/>
Total expenses	850,398	4,556,232
	<hr/>	<hr/>
<u>OTHER INCOME (EXPENSES):</u>		
Rental income	3,500	9,990
Interest income	-	49,185
Other revenue	2,284	4,428
Disposal of assets	-	(11,374)
Intangible amortization	-	(310,807)
Interest expense	(808,435)	(3,142,120)
	<hr/>	<hr/>
Total other income (expenses)	(802,651)	(3,400,698)
	<hr/>	<hr/>
Net loss	<u>\$ (1,653,049)</u>	<u>\$ (7,956,930)</u>

See accompanying notes.

WWAZ - Pappas Telecasting of Wisconsin, LP

INCOME & EXPENSE STATEMENT FOR THE MONTH ENDING 7/31/2007

Unaudited

THIS MONTH ACTUAL	THIS MONTH LAST YEAR	THIS MONTH BUDGET	VARIANCE TO BUDGET	VAR% 1/2 BUDGET	REVENUE:	THIS YEAR TO DATE	LAST YEAR TO DATE	Y-T-D BUDGET	VARIANCE TO BUDGET	VAR% 1/2 BUDGET
1,000.00	0.01	-	(1,000.00)	0%	CASH AIRTIME REVENUE	15,901.65	5,783.74	-	(15,901.65)	0%
1,000.00	0.01	-	1,000.00	0%	CASH AIRTIME REVENUE-DIGITAL	15,901.65	5,783.74	-	15,901.65	0%
107.67	119.00	-	107.67	0%	TRADE REVENUE	1,035.00	674.91	-	1,035.00	0%
16,117.52	19,523.16	-	16,117.52	0%	TRADE REVENUE-DIGITAL	78.75	-	-	78.75	0%
-	157.50	-	-	0%	OTHER CASH REVENUE	141,392.37	209,574.79	-	141,392.37	0%
133,328.02	147,848.90	-	133,328.02	0%	TOTAL REVENUE	887,819.25	907,330.55	-	887,819.25	0%
149,553.21	167,648.56	-	149,553.21	0%	EXPENSES:	1,030,325.37	1,117,895.25	-	1,030,325.37	0%
(148,553.21)	(167,648.55)	-	(148,553.21)	0%	PROGRAMMING	(1,014,423.72)	(1,112,111.51)	-	(1,014,423.72)	0%
36,500.00	59,996.38	-	36,500.00	0%	NEWS & PUBLIC AFFAIRS	255,500.00	419,974.66	-	255,500.00	0%
85,183.06	77,231.84	-	85,183.06	0%	ENGINEERING	559,005.94	427,129.87	-	559,005.94	0%
(26,870.15)	(30,420.34)	-	(26,870.15)	0%	PRODUCTION	-	(0.11)	-	-	0%
		-		0%	GENERAL & ADMINISTRATION	(199,917.78)	(265,006.99)	-	(199,917.78)	0%
		-		0%	TOTAL EXPENSES	(199,917.78)	(265,006.99)	-	(199,917.78)	0%
		-		0%	PROFIT <LOSS>	(199,917.78)	(265,006.99)	-	(199,917.78)	0%
		-		0%	MEMO:					
		-		0%	DEPRECIATION	255,500.00	419,974.66	-	255,500.00	0%
		-		0%	INTEREST EXPENSE	559,005.94	427,129.87	-	559,005.94	0%
		-		0%	OTHER REVENUE	-	(0.11)	-	-	0%
		-		0%	BROADCAST CASH FLOW	(199,917.78)	(265,006.99)	-	(199,917.78)	0%

EXHIBIT 4



PAPPAS
TELECASTING
COMPANIES

Harry J. Pappas
CHAIRMAN /
CHIEF EXECUTIVE OFFICER

DECLARATION OF HARRY J. PAPPAS

I, Harry J. Pappas, do hereby declare under penalty of perjury that the assertions of fact set forth in the attached letter to the Federal Communications Commission (the "Commission") from counsel for WWAZ License, LLC (which holds, *inter alia*, a license from the Commission that authorizes WWAZ License, LLC to operate primary analog UHF commercial television broadcasting station WWAZ-TV on so-called "out-of-core" NTSC Channel 68 in Fond du Lac, Wisconsin), which is a wholly-owned subsidiary of Pappas Telecasting of Wisconsin, L.P., a Delaware limited partnership, whose corporate general partner is Pappas Telecasting Companies, a Nevada corporation, of which I am the Chairman and CEO, other than such factual matters as to which the Commission may take official notice, are true and correct to the best of my knowledge, information, and belief.

Executed on October 25, 2007.

Harry J. Pappas
Chairman and CEO
Pappas Telecasting Companies