

Exhibit 41 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**  
**INTERFERENCE ANALYSIS**

prepared for  
**WVLT Licensee Corp.**  
WVLT-DT Knoxville, Tennessee  
Facility ID 35908  
Ch. 30 398 kW 551m

*WVLT Licensee Corp.* (“WLC”), licensee of analog station WVLT-TV Channel 8, Knoxville, Tennessee, is authorized in a construction permit (file number BPCDT-19990921AAL) to construct WVLT-DT. Construction of the new tower and building for use by WVLT-DT has commenced. However, unforeseen site related construction issues have caused changes in certain specifications. Thus, the instant application for modification of the current construction permit seeks to acknowledge these changes. It should be noted that these changes do not affect the antenna radiation pattern (non-directional), effective radiation power (“ERP”), height above average terrain (“HAAT”), antenna height above mean sea level (“AMSL”), or the overall tower height AMSL.

Specifically, construction of the 460.6 meter (1,511 foot) AGL tower as currently authorized on a mountain top required the excavation of a substantial amount of soil to facilitate the proper installation of the tower base foundation and the new transmitter building. Approximately 7 meters (23 feet) of soil was removed from the area surrounding the tower base, which effectively reduced the site’s ground elevation to 400.8 meters AMSL. In order to maintain (1) the authorized WVLT-DT antenna height AMSL and (2) the overall tower height AMSL, additional tower steel will be added to the tower design to compensate for the difference in ground elevation. While this increases the tower’s height above ground, the antenna radiation center height AMSL will not change. Further, the overall tower height AMSL will remain unchanged from that authorized by the FAA. Thus, those site parameters related to air safety and FCC allocation constraints remain unchanged from that authorized in the construction permit. Only the ground elevation at the tower base and the height of the tower AGL require modification.

**Cavell, Mertz & Davis, Inc.**

*Prepared by Richard H. Mertz, November 18, 2002*

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The instant proposal specifies the same ERP as that authorized in the WVLT-DT construction permit. An Andrew antenna, model ABBP16H3-HTO5-17/30H, which is non-directional in the horizontal plane, is proposed for use by WVLT-DT in place of the authorized, non-directional, Dielectric TUD-05-16/80H-2-T antenna specified in the construction permit. Since the antenna pattern, ERP, antenna height AMSL, and antenna HAAT remain unchanged as a result of the instant proposal, the predicted coverage from the proposed facility will be identical to that of the authorized WVLT-DT facility. Since the proposed facility is identical in antenna pattern, ERP, and HAAT to that of the authorized WVLT-DT facility, it is believed that no additional allocation or interference studies are required.

Since the overall tower height AGL has changed, the FAA has been notified by the tower owner, Richland Towers, of this change on FAA Form 7460-1 *Notice of Proposed Construction or Alteration*. The existing FCC Antenna Structure Registration (1222895) will be modified by the tower owner once the FAA has updated its records to reflect the changes in site ground elevation and tower height AGL.

**Cavell, Mertz & Davis, Inc.**

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