Exhibit 41 - Statement A

NATURE OF THE PROPOSAL

prepared for

Wichita License Subsidiary Corporation

KSNG-DT Garden City, Kansas

Ch. 16 631 kW 218 m

Wichita License Subsidiary Corporation ("Wichita"), licensee of analog station KSNG(TV) Channel 11, Garden City, Kansas, proposes herein to amend pending application BPCDT-19990709LG to construct KSNG-DT, a new digital television ("DTV") facility. In the Commission's Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders on Advanced Television,[1] DTV Channel 16 was allotted as a "paired" DTV Channel for KSNG. The instant amendment proposes different values for effective radiated power, antenna height above average terrain, and overall structure height.

The same site as that authorized for the existing licensed KSNG(TV) analog Channel 11 facility is proposed for KSNG-DT. The licensed KSNG(TV) analog Channel 11 antenna is top-mounted on a steel tower structure. The proposed KSNG-DT antenna will be side-mounted below the existing KSNG(TV) analog antenna.

No change in overall tower structure height is proposed as a result of this proposal. The antenna structure has been registered with the Commission; the registration number is 1031276.

The instant proposal does not require an interference study under the present requirements of §73.622(f)(2) of the Commission's rules. Specifically, (1) the proposed DTV Channel 16 was established for this station under §73.622(b); (2) the proposed facility will operate from the reference site for KSNG established under §73.622(d)(1); and (3) the proposed facility will operate with an effective radiated power ("ERP") of 631 kW and antenna height above average terrain ("HAAT") of 218 meters, which will not

[1]See MM Docket 87-268, *Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service,* FCC 98-315, released December 18, 1998.

exceed the DTV reference ERP and HAAT established for this station (606.3 kW ERP and 244 meters HAAT) under §73.622(f)(1), as described in the following.

The reference ERP refers only to the *maximum* ERP that may be achieved by the DTV station; however, actual ERP values vary by azimuth. The Commission's replication process develops a directional antenna pattern for the reference KSNG-DT in order to match the distance to the analog Grade B contour with the DTV coverage contour. The KSNG reference directional antenna pattern (repKSGARDEN_CITY16) was obtained from the Commission's database. Examination of this reference directional antenna pattern determined that the minimum relative field along *any* azimuth in this pattern is 0.916. Thus, the *minimum* reference ERP becomes 508.7 kW (i.e.: 0.916^2 times 606.3 kW), at the reference HAAT of 244 meters.

The KSNG-DT DTV antenna will be mounted *below* the reference height (at 218 meters HAAT as opposed to 244 meters HAAT, a difference of 26 meters). In this case, the reference ERP may be adjusted upward 0.939 dB using the formula and method described in §73.622(f)(3) of the Commission's rules[2]. Thus, the adjusted minimum reference ERP becomes 631.5 kW (i.e.: 0.939 dB higher than the allotted minimum 508.7 kW), which exceeds the proposed 631 kW ERP. Therefore, the instant proposal is not subject to the interference analysis provisions of §73.623(c).

The proposed transmitting antenna, a *Dielectric* model TFU-30DSC-R O3, is non-directional in the horizontal plane. Electrical beam tilt of 0.75 degrees is proposed. The ERP will be 631 kilowatts, horizontally polarized. The antenna system will be installed in accordance with the manufacturer's instructions. Said installation will be supervised on-site by a competent technical representative of the applicant.

[2]Adjustment was based on an assumed HAAT of 219 m, per §73.622(f)(3).