

Exhibit 41 - Statement B  
**ALLOCATION CONSIDERATIONS**  
**INTERFERENCE ANALYSIS**  
prepared for  
**Crossover Licenses, Ltd.**  
WNKY-DT Bowling Green, Kentucky  
Facility ID 61217  
Ch. 16 600 kW 224 m

*Crossover Licenses, Ltd.* (“*Crossover*”) is the licensee of analog WNKY(TV), Channel 40, Bowling Green, Kentucky, (file number BLCT-19960813KE). The Commission’s DTV Table of Allotment assigns WNKY-DT paired DTV Channel 16 for which an application is pending (BPCDT-19991101ADV). The WNKY-DT application appeared on the March 1, 2002 Public Notice listing mutually exclusive DTV Applications in Group #6 with WELF-DT(DTV Channel 16, Dalton, GA, BPCDT-19991013ABQ) and WZTV-DT (DTV Channel 15, Nashville, TN, BPCDT-19991101ADI). With the instant amendment, *Crossover* is proposing a substitute directional antenna for WNKY-DT which, according to the results of a detailed interference study utilizing a 1 km grid, appears to resolve the mutually exclusive situation between WNKY-DT and WELF-DT and between WNKY-DT and WZTV-DT.

The DTV reference effective radiated power (“ERP”) and height above average terrain (“HAAT”) of 50 kW and 244 meters, respectively, for WNKY-DT have been established under **Appendix B** of the Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders in MM Docket 87-268, FCC 98-315, released December 18, 1998, per §73.622(f)(1) of the Commission’s rules. The proposed WNKY-DT facility specifies an ERP of 600 kW ERP and 224 meters HAAT. The authorized ERP thus exceeds the reference ERP. Accordingly, as required by §73.622(f)(5) of the Commission’s rules, a study per §73.623(c) was conducted to evaluate interference to analog facilities and DTV assignments that may be attributed to the proposed WNKY-DT facility.

A detailed interference study was conducted in accordance with the terrain dependent Longley-Rice point-to-point propagation model, per the Commission’s Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and*

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*Interference*, July 2, 1997 (“OET-69”).<sup>1</sup> The interference study examined the net change in interference as experienced by other stations that would result from the proposed facility (in lieu of the reference WNKY-DT).

The interference analysis is based on the use of a nominal 1 km cell size, which provides a finer resolution than the Commission’s standard 2 km cell size. **Commission processing using a 1 km cell size is requested.** All stations considered in this study are listed in **Table 1**. The results of the interference study, also summarized in **Table 1**, indicate that any additional interference to these stations meets the Commission’s 2% / 10% interference limits regarding DTV proposals. No interference is predicted to any other station or DTV allotment. Thus, this proposal is believed to be in compliance with the provisions of §73.623(c)(2) of the Commission’s rules.

In the event that the Commission deems that interference may occur notwithstanding the OET-69 studies provided herein, *Crossover* has entered into a mutual interference agreement for WNKY-DT with WZTV-DT. This agreement is incorporated elsewhere within the instant amendment.

There are no known Class A television stations or LPTV television stations known to be eligible for Class A status<sup>2</sup> that would receive prohibited overlap from the proposed facility.

The nearest FCC monitoring station is 375.9 km distant at Powder Springs, Georgia. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3). There are

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<sup>1</sup>The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. **A cell size of 1 km was employed.** Comparisons of various results of this computer program (run on a Sun computer) to the Commission’s implementation of OET-69 show excellent correlation.

<sup>2</sup>See June 2, 2000 Public Notice *Certificates of Eligibility for Class A Television Station Status*, DA 00-1224.

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no AM broadcast stations within 3.2 km (2 miles) of the proposed site, according to information extracted from the Commission's engineering database.

Thus, it is believed that the instant proposal complies with the Commission's allocation Rules and policies regarding NTSC, DTV, and Class A stations.

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prepared May 24, 2002 by  
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Exhibit 41 - Table 1  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**

prepared for  
**Crossover Licenses, Ltd.**  
WNKY-DT Bowling Green, Kentucky  
Facility ID 61217  
Ch. 16 600 kW 224 m

**DTV Facilities**

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population (1)</u>	<u>Calculated “Before” Service Population (2)</u>	<u>Calculated “After” Service Population (3)</u>	<u>--- Net “New” Interference --- ( “2 percent” test)</u>		<u>Percentage Reduction of Baseline Population (“10 percent” test) (6)</u>
						<u>Population (4)</u>	<u>Percentage (5)</u>	
WZTV-DT (App)	Nashville, TN 15	102.2	1,338,000	1,497,208	1,471,404	25,804	1.93	0.00
WZTV-DT (Ref)	Nashville, TN 15	117.1	1,338,000	1,329,368	1,326,399	2,969	0.22	0.87
WELF-DT (App)	Dalton, GA 15	242.0	704,000	1,023,421	1,022,350	1,071	0.15	0.00
WELF-DT (Ref)	Dalton, GA 15	242.0	704,000	700,136	699,951	185	0.03	0.58
WKHA-DT (CP)	Hazard, KY 16	265.8				----- checklist facility, evaluation not required -----		
WKHA-DT (Ref)	Hazard, KY 16	265.8	347,000	341,037	338,990	2,047	0.59	2.31
WHMB-DT (CP)	Indianapolis, IN 16	317.3				----- no interference predicted from proposal -----		
WHMB-DT (Ref)	Indianapolis, IN 16	317.3	1,689,000	1,688,226	1,688,226	0	0.00	0.05
WKPC-DT (Lic)	Louisville, KY 17	150.7				----- checklist facility, evaluation not required -----		
WKPC-DT (Ref)	Louisville, KY 17	150.7				----- no interference predicted from proposal -----		

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**NTSC Facilities**

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population (1)</u>	<u>Calculated “Before” Service Population (2)</u>	<u>Calculated “After” Service Population (3)</u>	<u>--- Net “New” Interference --- ( “2 percent” test)</u>		<u>---Total Interference--- from DTV only (“10 percent” test)</u>	
						<u>Population (4)</u>	<u>Percentage (5)</u>	<u>Population (7)</u>	<u>Percentage (8)</u>
WKPC-TV (Lic)	Louisville, KY 15	150.7		----- no interference predicted from proposal -----					
WUSI-TV (Lic)	Olney, IL 16	263.9	258,945	250,933	250,919	14	0.01	5,428	2.10
WPTD(TV) (Lic)	Dayton, OH 16	342.1		----- no interference predicted from proposal -----					
WJKT(V) (Lic)	Jackson, TN 16	297.1	454,254	447,372	444,623	2,749	0.61	4,166	0.92
WZTV(TV) (Lic)	Nashville, TN 17	117.1	1,351,012	1,317,662	1,315,044	2,618	0.19	20,630	1.53
WZTV(TV) (CP)	Nashville, TN 17	117.1	1,385,585	1,342,205	1,339,232	2,973	0.21	27,904	2.01
WZTV(TV) (App)	Nashville, TN 17	102.2	1,466,500	1,372,577	1,367,469	5,108	0.35	60,946	4.16
WAZE-TV (Lic)	Madisonville, KY 19	127.2		----- no interference predicted from proposal -----					
WKZT-TV (Lic)	Elizabethtown, KY 23	77.4	743,169	442,375	441,824	551	0.07	18,287	2.46
WKYU-TV (Lic)	Bowling Green, KY 24	23.6	244,515	226,084	224,605	1,479	0.60	9,767	3.99

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- Notes:
- (1) For DTV stations, greater of NTSC or DTV Service Population, from FCC Table  
For NTSC stations, total population within noise-limited contour
  - (2) Service population after reduction from terrain and interference losses, before consideration of proposal
  - (3) Service population after reduction from terrain and interference losses, considering proposal
  - (4) Net change in population receiving interference resulting from proposal, equals (2) minus (3). A number in parenthesis indicates a *reduction* in interference.
  - (5) Proposal's impact in terms of percentage, equals (4)/(1) times 100 percent: not to exceed *de minimis* limit of 2.0 percent
  - (6) Total interference to DTV stations: equals 100 percent minus [(3)/(1) X 100%]; proposal may not add interference above 10% total. Zero total interference is indicated if (3) is greater than (1).
  - (7) NTSC station total population subject to interference from DTV only sources (considering proposal)
  - (8) Proposal's impact to NTSC station in terms of percentage, equals (7)/(1) times 100 percent; proposal may not add interference above 10% total

The determination of stations for consideration and the determination of baseline population and interference percentages were made as described in the Commission's August 10, 1998 Public Notice "*Additional Application Processing Guidelines for Digital Television*"

Exhibit 41 Table I:  
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