

Exhibit 41 - Statement A
NATURE OF THE PROPOSAL
PROPOSED ANTENNA SYSTEM
prepared for
Harrisburg Television, Inc.
WHTM-DT Harrisburg, Pennsylvania
Facility ID 72326
Ch. 10 16.2 kW 311.1 m

Harrisburg Television, Inc. ("Harrisburg") licensee of analog station WHTM-TV, NTSC Channel 27, Harrisburg, Pennsylvania, has requested authority to construct the paired WHTM-DT facility on Channel 57 in the application, FCC File No. BPCDT-19991028ACF, which is currently pending before the Commission. The Commission, in their Report and Order in MB Docket 01-208, DA 02-3090, released November 15, 2002 ("*R&O*"), granted a Petition for Rulemaking to substitute Channel 10 for Channel 57 as WHTM-TV's DTV allotment, with a reference facility effective radiated power ("*ERP*") of 14 kilowatts and an antenna height above average terrain ("*HAAT*") of 346 meters. The purpose of the instant amendment is to specify operation of WHTM-DT on Channel 10 (as required by the *R&O*), with an ERP of 16.2 kilowatts and an HAAT of 311.1 meters.

The same transmitter site employed by the licensed WHTM-TV analog Channel 27 facility is proposed for WHTM-DT. The licensed WHTM-TV analog Channel 27 antenna is top-mounted on an existing steel tower structure. The proposed WHTM-DT antenna will be side-mounted below the existing WHTM-TV analog antenna.

No change in the overall tower structure height is proposed as a result of the proposal. The antenna structure has been registered with the Commission; the registration number is 1033740.

The proposed antenna system, a Dielectric model number THV-6A10-R S190, is directional in the horizontal plane (see **Exhibit 41-Figure 1**), and will operate with an effective radiated power for WHTM-DT of 16.2 kilowatts at 311.1 meters height above average terrain. The antenna system's elevation pattern is provided in **Exhibit 41-Figures 2 and 2A**. The

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instant proposal does not require an interference study under the present requirements of Section 73.622(f)(2) of the Commission's Rules. Specifically, (1) the proposed DTV Channel 10 was established for this station under Section 73.622(b) as amended by the *R&O*; (2) the proposed facility will operate from a site within five kilometers of the DTV reference site for WHTM-DT established under Section 73.622(d)(1); and (3) the proposed facility will operate with an effective radiated power of 16.2 kilowatts¹ and an antenna HAAT of 311.1 meters, which will not exceed the DTV reference ERP and HAAT established for this station (14 kW ERP and 346 m HAAT).

The nearest FCC monitoring station is at Laurel, Maryland, at a distance of 128.3 km from the proposed site. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. The proposed site is also located outside the area specified in §73.1030(a)(1). Thus, notification of the instant proposal to the National Radio Astronomy Observatory at Green Bank, West Virginia, is not required.

There are two AM broadcast stations located within 3.2 km (2 miles) of the WHTM-DT site, according to information extracted from the Commission's engineering database. WHP(AM), and WTKT(AM), both Harrisburg, Pennsylvania, are located 1.46 kilometers from the WHTM-DT site. Both AM stations employ directional antenna systems for some modes of operation. The proposed WHTM-DT construction involves mounting the WHTM-DT antenna on the side of an existing tower structure, with numerous antennas and transmission lines already in place. A new transmission line from the antenna input to the transmitter output will be installed. Said transmission line will be grounded to the existing tower at regular intervals. No new tower erection or extension is proposed, nor are any modification to the tower envisioned by the instant proposal.

¹Since the HAAT for the proposed facility is lower than that established in the *R&O*, the ERP was adjusted upward in accordance with Section 73.622(f)(3)(ii) of the Commission's Rules.

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Section 73.1692 requires notification of any AM stations within the required distance prior to commencing construction of tower modifications, or erection of a new tower structure so that determination of AM station power could be calculated by the indirect method if necessary. Mounting of the WHTM-DT Channel 10 antenna on the existing WHTM-TV tower is believed not to require any tower construction or modifications. Further, since it is believed that mounting of the WHTM-DT antenna on the existing tower may not require any tower modifications or construction, AM proof-of-performance measurements before and after the WHTM-DT antenna installation are also believed to be unnecessary. Therefore, based on the foregoing, *Harrisburg* herein respectfully requests a waiver of Section 73.1692 of the FCC's Rules, if a waiver is necessary, for the reasons stated above.

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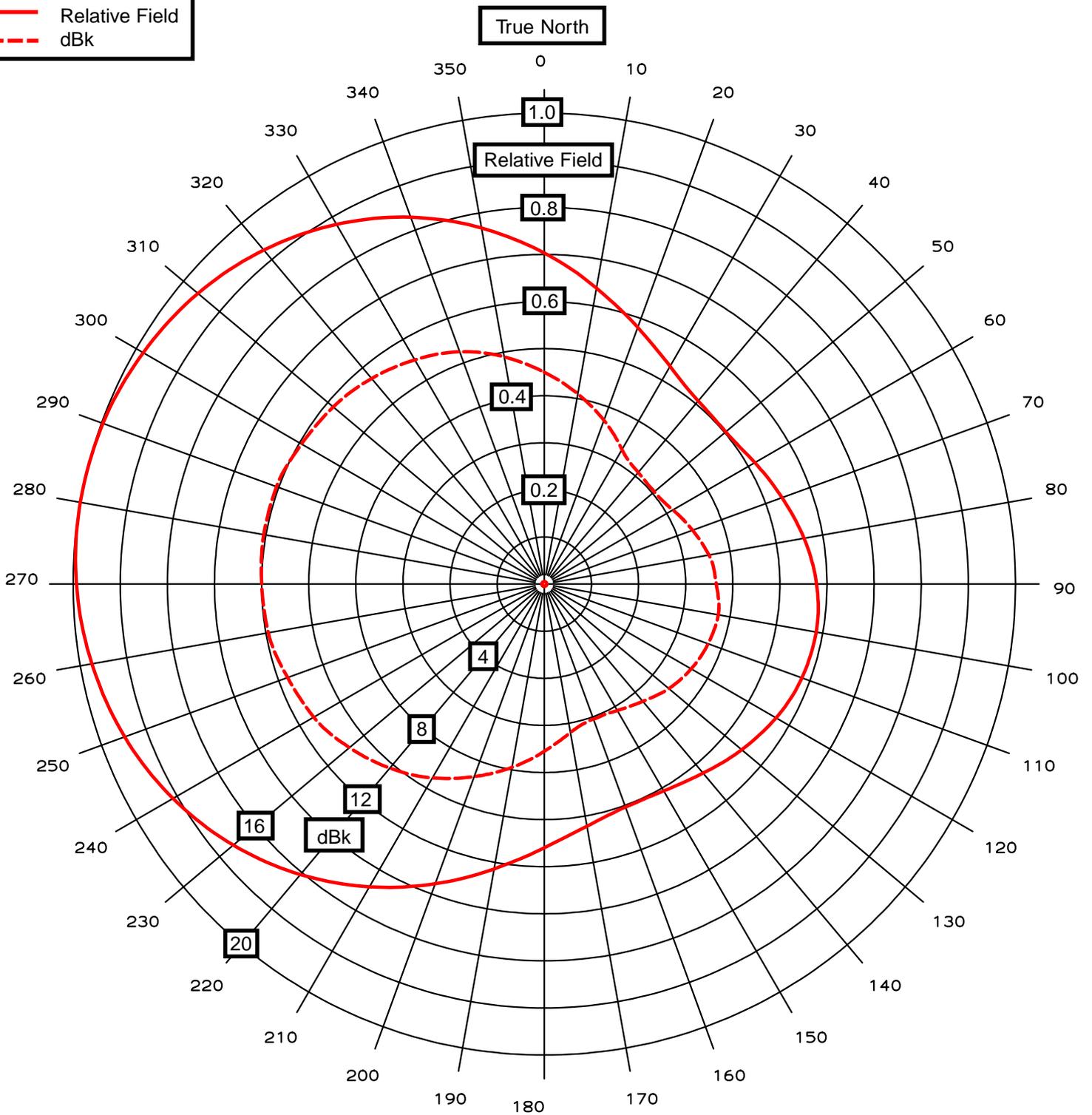


EXHIBIT 41 - FIGURE 1
ANTENNA HORIZONTAL PLANE RADIATION PATTERN

prepared December 2002 for
Harrisburg Television, Inc.
 WHTM-DT Harrisburg, Pennsylvania
 Facility ID 72326
 Ch. 10 16.2 kW 311.1 m

Cavell, Mertz & Davis, Inc.
 Manassas, Virginia



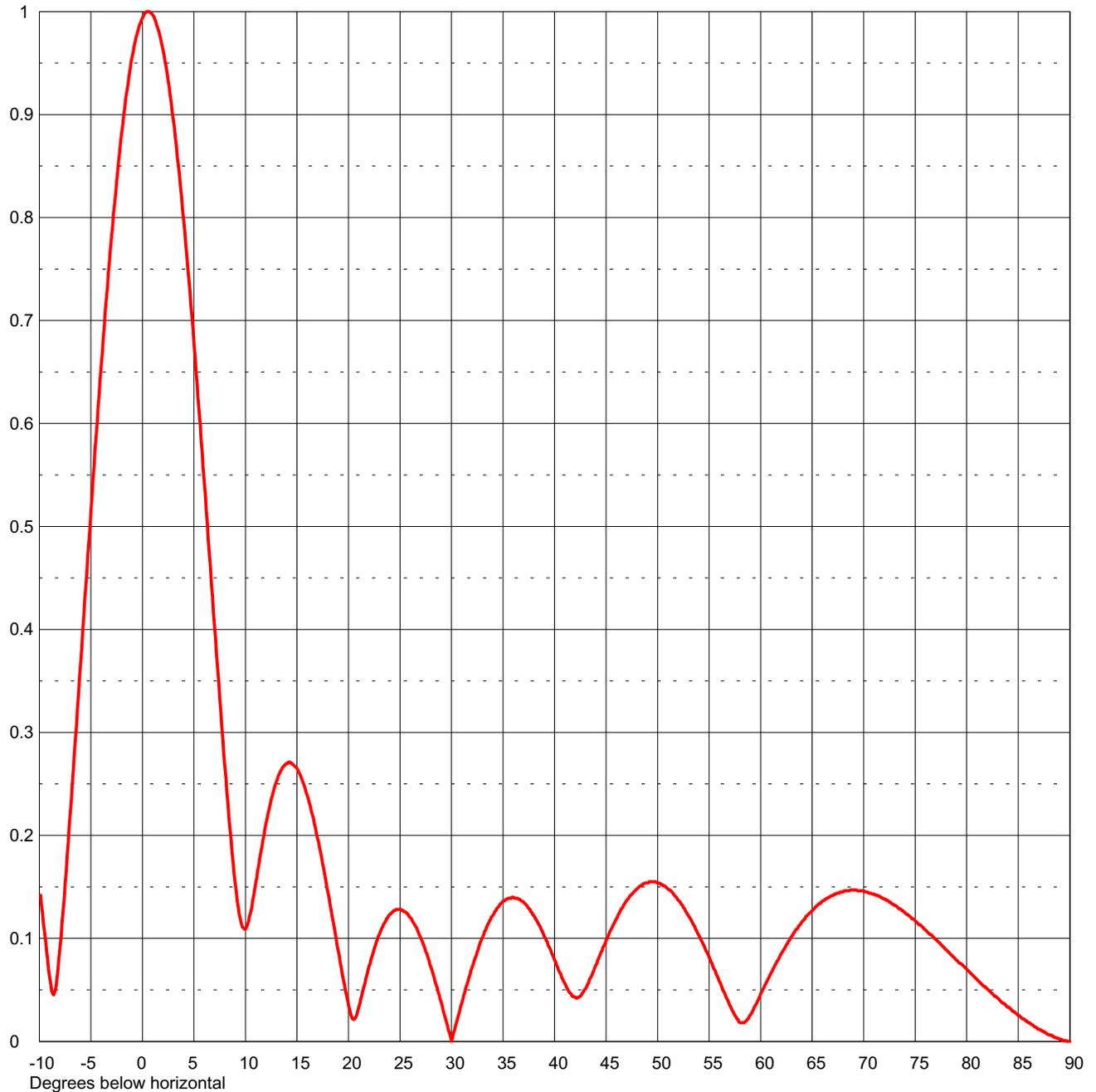
**EXHIBIT 41 - FIGURE 2
ANTENNA VERTICAL (ELEVATION)
PLANE RADIATION PATTERN**

prepared December 2002 for
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Manassas, Virginia

ELEVATION PATTERN

RMS Gain at Main Lobe	6.0 (7.78 dB)	Beam Tilt	0.50 Degrees
RMS Gain at Horizontal	5.9 (7.71 dB)	Frequency	195.00 MHz
Calculated / Measured	Calculated	Drawing #	06V060050-90



Remarks:



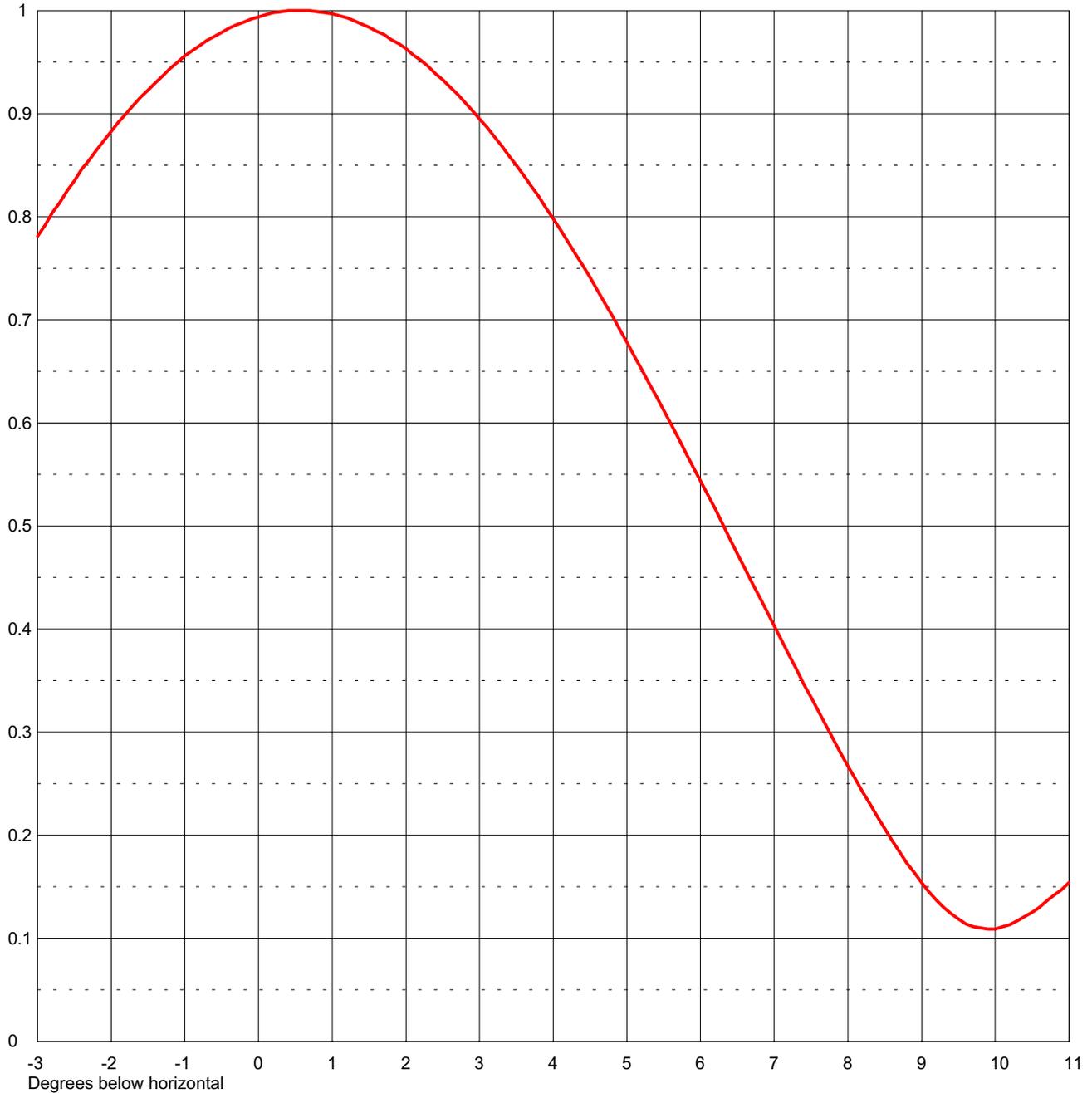
**EXHIBIT 41 - FIGURE 2A
ANTENNA VERTICAL (ELEVATION)
PLANE RADIATION PATTERN DETAIL**

prepared December 2002 for
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ELEVATION PATTERN

RMS Gain at Main Lobe	6.0 (7.78 dB)	Beam Tilt	0.50 Degrees
RMS Gain at Horizontal	5.9 (7.71 dB)	Frequency	195.00 MHz
Calculated / Measured	Calculated	Drawing #	06V060050



Remarks: