

Exhibit 41 - Statement A
**NATURE OF THE PROPOSAL, PROPOSED ANTENNA SYSTEM &
ALLOCATION CONSIDERATIONS**
prepared for
KITV Hearst-Argyle TV, Inc.
KHVO-DT Hilo, Hawaii
Facility ID 64544
Ch. 18 50 kW -187 m

KITV Hearst-Argyle TV, Inc. ("KITV") is the licensee of KHVO-DT, Channel 18, Hilo, Hawaii (file number BLC DT-19980318KF) and licensee of the paired analog KHVO(TV) Channel 13 facility (BLCT-19950620KF). The KHVO-DT facility is authorized to operate with a directional antenna having an ERP of 5.4 kW and an antenna height above average terrain ("HAAT") of -187 meters. The instant checklist application for construction permit proposes a non-directional antenna system at the same antenna height and an increased ERP of 50 kW on the same antenna support structure.

The proposed KHVO-DT antenna system will replace the existing licensed antenna system, side mounted on an existing antenna supporting structure. There is no proposed increase in overall height of the existing rooftop antenna support structure. The Commission's TOWAIR utility shows that the "obstruction, slope test" for this building and rooftop antenna support structure fails. The structure does not appear to be registered in the Commission's Antenna Structure Registration program. However, the FAA has reported in Aeronautical Study 94-AWP-0340-OE that the structure (building with rooftop antenna support structure) is not identified as an obstruction and that obstruction marking and lighting are not required.

The proposed transmitting antenna, a *Dielectric* model TFU8DSB-A(C), is non-directional in the horizontal plane. This antenna will employ no electrical beam tilt. The ERP will be 50 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.

Average Terrain Elevation and HAAT Determination

Terrain data for the eight "cardinal" radials were obtained from KHVO's engineering data on file at the Commission (file number BPCT-940824KG). The determination of height above

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average terrain ("HAAT") excluded the consideration of the 0° and 45° radials per §73.625(b)(4). The 3.2 to 16.1 km section of these radials extends entirely over the Pacific Ocean, and the DTV coverage contour does not encompass United States land area beyond the 16.1 km portion of these radials. Accordingly, the determination of HAAT was based on the average antenna elevation of the remaining six radials (90°, 135°, 180°, 225°, 270°, and 315°).¹ Averaging these six radials, the proposed antenna's resulting height above average terrain is minus 187 meters

Allocation Considerations

For KHVO-DT, the DTV reference effective radiated power ("ERP") and height above average terrain ("HAAT") of 50 kW and 33 meters, respectively, on Channel 18 have been established with a non-directional antenna pattern 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 KHVO-DT facility is licensed with a directional antenna, an ERP of 5.4 kW ERP and a -187 meter HAAT. The instant application for construction permit proposes a non-directional antenna system with the same antenna height and an increased ERP of 50 kW on the same antenna support structure. As there was no Hawaiian terrain data employed in the Commission's DTV replication process; and as there are no specified replication directional patterns for the Hawaiian stations; as recommended informally by Commission staff, an omnidirectional reference pattern is assumed for KHVO-DT. Thus, it is believed that this is a checklist application which complies with the Commission's allocation Rules and policies regarding NTSC, DTV, and Class A stations.

Exhibit 41
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¹The HAAT determination for the license KHVO analog and digital facilities was also determined in this fashion, per §73.684(d).