

Exhibit 41 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS
prepared for
KOLN/KGIN License, Inc.
KGIN-DT Grand Island, Nebraska
Facility ID 7894
Ch. 32 831 kW 274 m

KOLN/KGIN License, Inc., licensee of analog television station KGIN-TV (Channel 11, Grand Island, Nebraska), has an authorization to construct the paired KGIN-DT facility on Channel 32 (file number BPCDT-19990812KF). The Construction Permit for KGIN-DT specifies an effective radiated power (ERP) of 831 kW and an antenna height above average terrain (HAAT) of 274 meters. The purpose of the instant application is to change the authorized non-directional antenna system to a directional antenna system.

The directional antenna proposed herein is a Dielectric model TFU-30DSC-RT130. As shown in **Exhibit 40 - Figures 1 and 2**, it is a “tri-lobe” antenna pattern with the pattern maxima oriented at 30, 150, and 270 degrees True. The proposed facility’s HAAT and maximum ERP will remain unchanged. Consequently, the proposed antenna radiation pattern is entirely encompassed by the presently authorized non-directional antenna.

“Checklist” Criteria

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 32 was established for this station under §73.622(b); (2) the proposed facility will operate from a site within 5 km from the DTV reference site¹ for KGIN-DT established under §73.622(d)(1); and (3) the proposed facility will operate with an ERP and antenna HAAT of 831 kW and 274 meters, which *does not* exceed the DTV reference power/height combination established for this station (770.5 kW ERP and 308 meters HAAT) under §73.622(f)(1), as described in the following.

¹The proposed site for KGIN-DT is the existing KGIN-TV transmitter site. The coordinates differ by six seconds latitude from the reference DTV coordinates, due to corrected site data resulting from the Commission’s Antenna Structure Registration program.

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The Commission's replication process developed a directional antenna pattern for the reference KGIN-DT in order to match the distance to the analog Grade B contour with the DTV coverage contour. The KGIN-DT reference directional antenna pattern (repNEGRAND_ISLA32) was obtained from the Commission's database and used to develop maximum ERP levels. Using this antenna pattern, the reference KGIN-DT facility was found to achieve a minimum relative field of 0.954, which occurs along bearings of 50, 120 and 130 degrees True. Considering the reference ERP of 770.5 kW for KGIN-DT, the minimum reference ERP for KGIN-DT is 701.244 kW along any radial.

The KGIN-DT DTV antenna will be mounted *below* the reference height (at 274 meters HAAT as opposed to 308 meters HAAT; a difference of 34 meters). In this case, the reference ERP may be adjusted upward 0.735 dB using the formula and method described in §73.622(f)(3) of the Commission's rules. Thus, at the proposed HAAT the adjusted reference ERP becomes 831 kW (i.e.: 0.735 dB higher than the allotted 701.244 kW).

The proposed maximum directional ERP of 831 kW does not exceed the reference facility's minimum ERP, and thus does not exceed the reference pattern envelope. Accordingly the instant proposal is a "checklist" application and is not subject to the interference analysis provisions of §73.623(c).

Other Considerations

With respect to television stations that have been granted a Class A License or hold a Class A Construction Permit, or are existing Low Power Television (LPTV) stations that are eligible for Class A status, it is noted that the instant proposal complies fully with the Commission's "checklist" criteria. Class A stations are required to provide interference protection to DTV allotments, and "checklist" applications, such as the case at hand, are not required to comply with interference criteria. Thus, the instant application is not required to provide protection to any station eligible for Class A status.

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The proposed KGIN-DT antenna system will be mounted on an existing antenna supporting structure, having FCC Antenna Structure Registration number 1041794. No change in overall tower structure height is proposed as a result of this proposal.

Conclusion

For the reasons described above, it is believed that the instant proposal complies with the Commission's allocation Rules and policies regarding NTSC, DTV, and Class A.