

Exhibit 41 - Statement A  
**ALLOCATION CONSIDERATIONS**  
**INTERFERENCE ANALYSIS**

prepared for  
**WKYC-TV, Inc.**  
WKYC-DT Cleveland, Ohio  
Facility ID 35645  
Ch. 2 8 kW 296 m

WKYC-TV, Inc., licensee of analog station WKYC-TV Channel 3 and the paired WKYC-DT Channel 2, Cleveland, Ohio, has an application pending to modify WKYC-DT (file number BPCDT-20000501ABZ). The pending application proposes an increase in effective radiated power (ERP) from the licensed 7 kW to 20 kW. The purpose of the instant amendment is to specify an ERP of 8 kW.

The amendment also provides corrected site coordinates for the proposed WKYC-DT facility. The coordinates provided herein match the licensed WKYC-DT facility coordinates and those of the corresponding Antenna Structure Registration (number 1013919).<sup>1</sup> No other changes to the pending application are sought.

The determination of antenna height above average terrain (HAAT) for the instant proposal employed the use of terrain data on file for WKYC-TV (file number BPCT-943). The antenna HAAT for the licensed NTSC WKYC-TV facility was established using the 157 degree radial's average elevation (corresponding to the principal community) being substituted for the 135 degree radial's average elevation. For consistency with the paired WKYC-TV facility and the DTV allotment table, the same basis for antenna HAAT is used herein. The attached **Exhibit 41 - Table 1** provides a summary of the terrain data.

The DTV reference ERP and antenna HAAT of 9.3 kW and 305 meters, respectively, for WKYC-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,

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<sup>1</sup>The coordinates as supplied in the pending application (BPCDT-20000501ABZ) are 41° 23' 10" N-Lat, 81° 41' 21" W-Lon (NAD-27). The corrected coordinates as specified herein are 41° 23' 00" N-Lat, 81° 41' 21" W-Lon, a difference of 10 seconds.

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released December 18, 1998, per §73.622(f)(1) of the Commission's rules. The proposed WKYC-DT facility will operate with 8 kW ERP at 296 meters HAAT. Due to the assigned directional antenna pattern for the "replication" WKYC-DT reference facility (which contains a minimum relative field value of 0.859), the proposed 8 kW ERP exceeds the reference ERP in certain azimuths (even when the ERP adjustment provided in §73.622(f)(4) for reduced antenna HAAT is considered). Accordingly, as required by §73.622(f)(5), a study was conducted to evaluate interference to analog and DTV facilities that may be attributed to the proposed WKYC-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 Interference*, July 2, 1997 ("OET-69").<sup>2</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 WKYC-DT).

All stations considered in this study are listed in **Exhibit 41 - Table 1**. The results of the interference study, also summarized in **Exhibit 41 - Table 1**, indicate that any additional interference to these stations meets the Commission's 2% / 10% interference limits regarding DTV proposals. No

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<sup>2</sup>The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A standard cell size of 2 km was used. The Longley-Rice computer program input data, following the guidelines established under OET-69, includes a location variability of 50%, a time availability of 10%, a situation variability of 50%, horizontal polarization, 0.005 S/m conductivity, a climate constant of 15, an assumption of a continental temperate climate zone, and a receive antenna height of 10 meters. The service area for each DTV facility under study is that area predicted to receive signal levels of at least 28 dBμ using the Longley-Rice methodology, and within the 28 dBμ F(50,90) service contour distance as determined per §73.625(b). In instances where the DTV reference ERP is 1 kW, the Grade B contour of the associated analog station (authorized as of April 3, 1997) is used to determine the extent of the DTV station's service area. The service area for each NTSC facility under study is that area predicted to receive signal levels of at least 47 dBμ using the Longley-Rice methodology, and within the 47 dBμ NTSC F(50,50) service contour distance as determined per §73.684(c). Comparisons of various results of this computer program to the Commission's implementation of OET-69 show good correlation.

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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.

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,<sup>3</sup> it is noted that the pending application for WKYC-DT was filed on May 1, 2000. The pending application was not required to provide protection to any station eligible for Class A status.<sup>4</sup>

The pending application proposes a non-directional facility of 20 kW at an antenna HAAT of 296 meters. The instant amendment specifies a reduction in ERP to 8 kW, and a correction in coordinates of 10 seconds latitude. No change in antenna HAAT is proposed. The resulting sets of interfering contours that may impact Class A facilities from the proposal will be contained within those of the pending application (i.e.: the distance to the WKYC-DT interfering contours will be reduced as a result of the instant amendment). Thus, any predicted interference to a Class A facility resulting from the proposal (8 kW / 296 meters) will be reduced from that which would result from the original application (20 kW / 300 meters), as determined by §73.623(c)(5)(i). Based on the foregoing, the proposal complies with the Commission's requirements with respect to the protection of Class A stations.

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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<sup>3</sup>See June 2, 2000 Public Notice *Certificates of Eligibility for Class A Television Station Status*, DA 00-1224.

<sup>4</sup>See December 7, 1999 Public Notice "*Community Broadcasters Protection Act of 1999*" Sets Deadline of December 31, 1999 for Full Service TV Stations to File Letters of Intent to Maximize their DTV Facilities, DA 99-2739.

Exhibit 41 - Table 1  
**TERRAIN AVERAGE ELEVATION DETERMINATION**  
prepared for  
**WKYC-TV, Inc.**  
WKYC-DT Cleveland, Ohio  
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Azimuth ( <u>ET</u> )	Average Elevation ( <u>meters</u> )	Effective Height ( <u>meters</u> )
0	198.1	370.2
45	256.0	312.3
90	248.7	319.6
157	330.7	237.6
180	357.5	210.8
225	302.4	265.9
270	252.4	315.9
315	231.6	336.7

Terrain data from WKYC-TV license file . See file number BPCT-943 (June, 1952) and letter dated September 2, 1952.

Exhibit 41 - Table 2  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**

prepared for  
**WKYC-TV, Inc.**  
 WKYC-DT Cleveland, Ohio  
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**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</u> (4)	<u>Percentage</u> (5)	
WWMT-DT (Ref 7.2 kW)	Kalamazoo, MI 2	347.7	2,051,000	2,007,158	2,007,158	----- no change in interference -----		
WWMT-DT (App 10 kW)	Kalamazoo, MI 2	347.7	2,051,000	2,002,807	2,002,807	----- no change in interference -----		
WETM-DT (Ref 1 kW)	Elmira, NY 2	408.7				----- no interference predicted from proposal -----		
WETM-DT (App 7.5 kW)	Elmira, NY 2	408.7				----- no interference predicted from proposal -----		

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**INTERFERENCE ANALYSIS RESULTS SUMMARY**  
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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</u> (4)	<u>Percentage</u> (5)	<u>Population</u> (7)	<u>Percentage</u> (8)
KDKA-TV (Lic)	Pittsburgh, PA 2		171.9	3,879,940	3,129,261	3,126,327	2,934	0.1	203,564 5.2
WJBK(TV) (Lic)	Detroit, MI 2	174.1	5,923,808	4,702,484	4,720,282	(17,798)	----- interference decreases -----		
WDTN(TV) (Lic)	Dayton, OH 2	285.4	3,533,202	3,021,115	3,019,771	1,344	0.0	9,188	0.3
WGRZ-TV (Lic)	Buffalo, NY 2	298.3	2,455,598	1,831,607	1,831,607	----- no change in interference -----			

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”*