

Exhibit 41 - Statement A  
**NATURE OF THE PROPOSAL**  
prepared for  
**Emmis Television License Corporation of Wichita**  
KSNK-DT McCook, Nebraska  
Ch. 12 13.6 kW 177 m

*Emmis Television License Corporation of Wichita* (“Emmis”), licensee of analog station KSNK(TV) Channel 8, McCook, Nebraska, proposes herein to modify an existing Construction Permit (BPCDT-19990709LF) for the paired KSNK-DT. In the Commission’s Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders on Advanced Television,<sup>1</sup> DTV Channel 12 was allotted as a “paired” DTV Channel for KSNK. The instant application proposes different values for effective radiated power, antenna height above average terrain, and antenna system.

The same site as that authorized for the existing KSNK(TV) analog Channel 8 facility is proposed for KSNK-DT. The licensed KSNK(TV) analog Channel 8 antenna is top-mounted on a steel tower structure. The proposed KSNK-DT antenna will be side-mounted below the existing KSNK(TV) analog antenna.

No change in overall tower structure height is proposed as a result of this proposal. The antenna structure has been registered with the Commission; the registration number is 1031277.

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 12 was established for this station under §73.622(b); (2) the proposed facility will operate from a site within five kilometers of the DTV reference site for KSNK established under §73.622(d)(1); and (3) the proposed facility will operate with an effective radiated power (“ERP”) of 13.6 kW and antenna height above average terrain (“HAAT”) of 177 meters, which will not exceed the DTV reference ERP and HAAT established for this station (11.6 kW ERP and 216 meters HAAT) under §73.622(f)(1), as described in the following.

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<sup>1</sup>See MM Docket 87-268, *Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service*, FCC 98-315, released December 18, 1998.

Exhibit 41 - Statement A  
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(Page 2 of 2)

The reference ERP refers only to the *maximum* ERP that may be achieved by the DTV station; however, actual ERP values vary by azimuth. The Commission's replication process develops a directional antenna pattern for the reference KSNK-DT in order to match the distance to the analog Grade B contour with the DTV coverage contour. The KSNK reference directional antenna pattern (repNEMCCOOK\_\_\_12) was obtained from the Commission's database. Examination of this reference directional antenna pattern determined that the minimum relative field along *any* azimuth in this pattern is 0.958. Thus, the *minimum* reference ERP becomes 10.6 kW (i.e.:  $0.958^2$  times 11.6 kW), at the reference HAAT of 216 meters.

The KSNK-DT DTV antenna will be mounted *below* the reference height (at 177 meters HAAT as opposed to 216 meters HAAT, a difference of 39 meters). In this case, the reference ERP may be adjusted upward 1.068 dB using the formula and method described in §73.622(f)(3) of the Commission's rules<sup>2</sup>. Thus, the adjusted minimum reference ERP becomes 13.615 kW (i.e.: 1.068 dB higher than the allotted minimum 10.6 kW), which is greater than the proposed 13.6 kW ERP. Therefore, the instant proposal is not subject to the interference analysis provisions of §73.623(c).

The proposed transmitting antenna, a *Dielectric* model TW-6B12-R SM, is non-directional in the horizontal plane. Electrical beam tilt of 0.8 degrees is proposed. The ERP will be 13.6 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.

Exhibit 41 Statement A:  
prepared May 14, 2002 by  
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<sup>2</sup>Adjustment was based on an assumed HAAT of 191 m, per §73.622(f)(3).