

Exhibit 41 - Statement A
ALLOCATION CONSIDERATIONS
INTERFERENCE ANALYSIS
prepared for
CBS Stations Group of Texas L.P.
KTVT-DT Fort Worth, Texas
Facility ID 23422
Ch. 19 695 kW 500 m

CBS Stations Group of Texas L.P. (“*CBS*”) is the licensee of KTVT-DT, Channel 19, Fort Worth, Texas (file number BLCDT-20021031AAM) and licensee of the paired analog KTVT-TV Channel 11 facility (BMLCT-20021028AAN). KTVT-DT is licensed to operate with a nondirectional effective radiated power (“ERP”) of 565 kW and an antenna height above average terrain (“HAAT”) of 500 meters. The instant application seeks an increase in ERP to 695 kW.

CBS employs a “common” antenna system for KTVT-DT, which is also utilized by station KERA-DT (Ch. 14, Dallas, TX). Continued use of the existing, common antenna is proposed. No changes in site location, antenna height, or the existing antenna structure’s overall height are proposed. No tower or antenna construction work is necessary to carry out this proposal. The Antenna Structure Registration number is 1047708.

Exhibit 41 - Figure 1 depicts the predicted coverage contours for the proposed KTVT-DT facility. The DTV service contour (41 dBμ) will completely encompass Fort Worth, the principal community. **Exhibit 41 - Figure 1** also demonstrates that the enhanced principal community coverage requirement of 48 dBμ (required by December 31, 2004 for commercial stations) will also be met by the proposed KTVT-DT facility.

Maximum Power / Height

The proposed 695 kW ERP exceeds the maximum permitted for the proposed antenna HAAT of 500 meters currently permitted by §73.622(f)(8)(i). However, §73.622(f)(5) permits the maximum ERP to be exceeded in order to provide the same geographic coverage area as the station having the largest coverage area within the same market. In this case, the largest service area is that of KXAS-DT (Ch. 14, Fort Worth, TX, 1.6 km distant, 1000 kW ERP / 514 meters HAAT). The area within the proposed KTVT-DT 41 dBμ contour is 38,564 square kilometers, which does not

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exceed the 41,214 square kilometers of area within the reference KXAS-DT 41 dB μ contour. The attached **Exhibit 41 - Figure 2** is a map which depicts the 41 dB μ coverage contours for these facilities. Thus, the ERP specified herein is in compliance with §73.622(f)(5) of the Commission's Rules.

NTSC and DTV Station Protection

The DTV reference effective radiated power ("ERP") and height above average terrain ("HAAT") of 552.2 kW and 509 meters, respectively, for KTVT-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, released December 18, 1998, per §73.622(f)(1) of the Commission's Rules. The proposed KTVT-DT facility will operate with 695 kW ERP and 500 meters HAAT; the proposed ERP thus exceeds the reference ERP. Accordingly, as required by §73.622(f)(5) of the Commission's Rules, a study per §73.623(c) was conducted to evaluate interference to analog facilities and DTV assignments that may be attributed to the proposed KTVT-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").¹ **Commission processing utilizing a 1 km cell size resolution is requested.** 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 KTVT-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 with one permissible exception (discussed below) any additional interference to these stations meets the Commission's 2% / 10% interference limits to all pertinent NTSC and DTV stations and allotments.

¹The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. **A cell size of 1 km was employed.** Comparisons of various results of this computer program (run on a Sun processor) to the Commission's implementation of OET-69 show excellent correlation.

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The proposed KTVT-DT facility involves a 0.29 percent (population) increase in interference to the Construction Permit ("CP") facility for KLSB-TV (Ch. 19, Nacogdoches, TX). While the 2 percent *de minimis* interference limit is not exceeded, this 0.29 percent increase in interference raises the total DTV interference to KLSB-TV CP to 11.08 percent. Under the Commission's 2% / 10% *de minimis* interference criteria, normally no increase in interference to a facility already experiencing interference over 10 percent would be permitted. However, an exception to the 10 percent limit does exist, and is described in the Commission's August 10, 1998 DTV processing Public Notice.² This exception is believed to be applicable to this proposal. That Public Notice describes the 10 percent exception as follows:

The new PERCENTLOSS must not be more than 10%, based on the NTSC station's authorized facilities at the time the application is prepared, with the following exception. NTSC stations authorized to change their coverage after the date of the *Order* may have taken their construction permit subject to accepting significant amounts of interference. If the new PERCENTLOSS based on the NTSC station's facilities at the time the application is prepared exceeds 10% and the NTSC station's facilities were authorized after the date of the *Order*, an additional analysis should be done based on the NTSC facilities as they were authorized at the time of the *Order*. The application will be considered as meeting the 10% *de minimis* criteria if the PERCENTLOSS determined by that additional analysis is less than 10%.

For the case at hand, the KLSB-TV CP (BPCT-20020509AAK) was granted on July 31, 2002, well after the establishment of the DTV Table of Allotments (April, 1997). The presently licensed KLSB-TV facility (BLCT-19910910KH) was the authorized KLSB-TV facility as of April, 1997. Pursuant to the exception as described above, the KLSB-TV CP was taken subject to accepting significant interference, primarily from KTVT-DT. As indicated on **Exhibit 41 - Table 1**, the proposed KTVT-DT facility complies with the 2 percent and the 10 percent *de minimis* interference limits with respect to the licensed KLSB-TV facility. Therefore, the 10 percent total interference limit is not applicable to the KLSB-TV CP facility, and the instant proposal is in compliance with the Commission's requirements as outlined in the August 1998 Public Notice.

²"Additional Application Processing Guidelines for Digital Television (DTV)"

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Class A Station Protection

With respect to television stations that have been granted a Class A License or hold a Class A Construction Permit, the instant proposal does not involve prohibited contour overlap to any authorized Class A station.

Other Allocation Considerations

The nearest FCC monitoring station is 576.5 km distant at Kingsville, TX. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. Based on information extracted from the Commission's engineering database, there are no AM stations within 3.2 km of the proposed site.

Thus, it is believed that the instant proposal complies with the Commission's allocation Rules and policies.

EXHIBIT 41 - FIGURE 1 PROPOSED COVERAGE CONTOURS

prepared June 2004 for
CBS Stations Group of Texas, L.P.
KTVT-DT Fort Worth, Texas
Facility ID 23422
Ch. 19 695 kW 500 m

Cavell, Mertz & Davis, Inc.
Manassas, Virginia

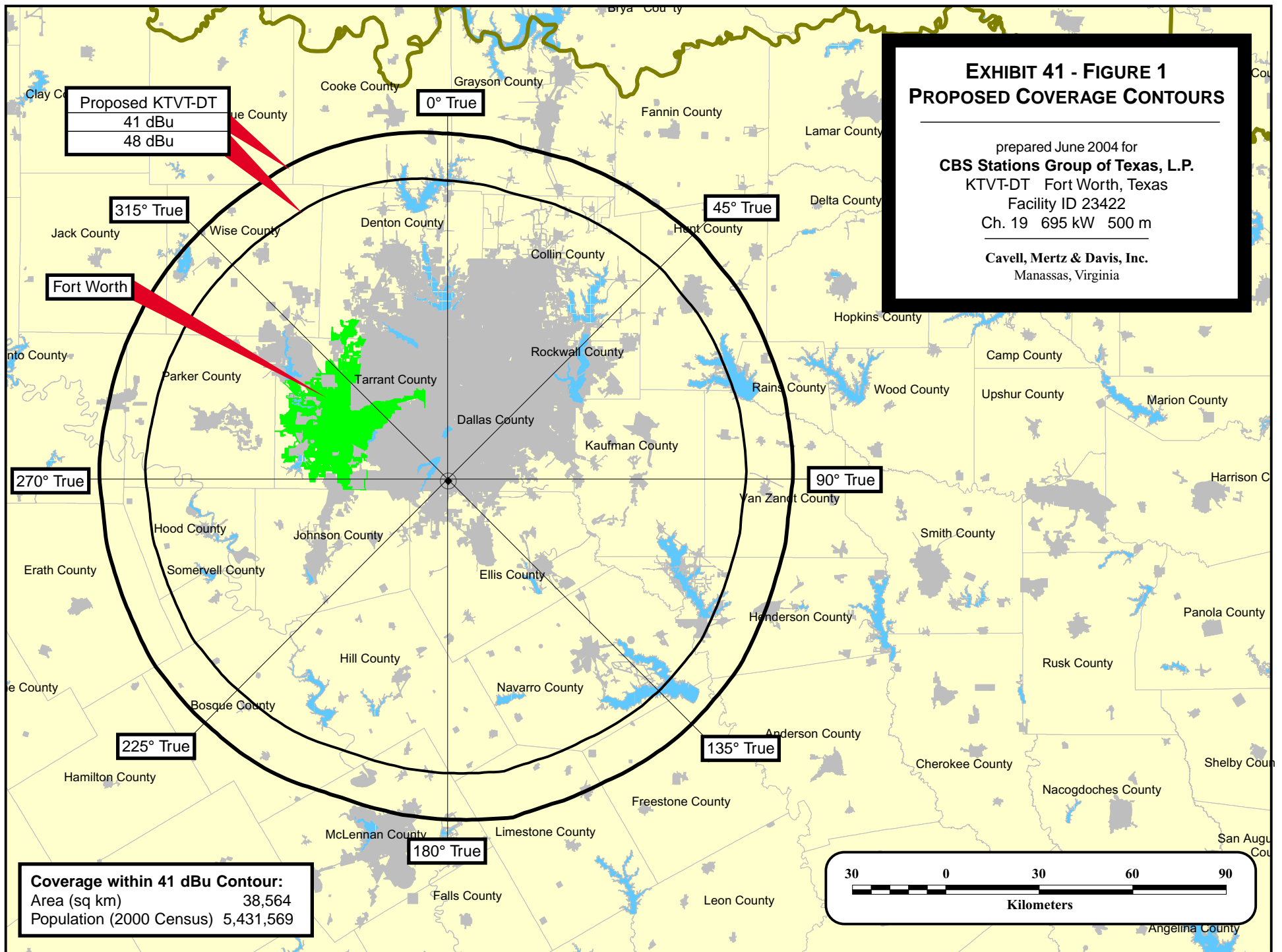


EXHIBIT 41 - FIGURE 2 COVERAGE CONTOUR COMPARISON

prepared June 2004 for
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Cavell, Mertz & Davis, Inc.
Manassas, Virginia

Allotted KXAS-DT
Ch. 41 Fort Worth, TX
1000 kW 514 m
41 dBu

Proposed KTVT-DT
695 kW 500 m
41 dBu

Within 41 dBu Coverage Contour:	Area (sq km)
Allotted KXAS-DT	41,214
Proposed KTVT-DT	38,564

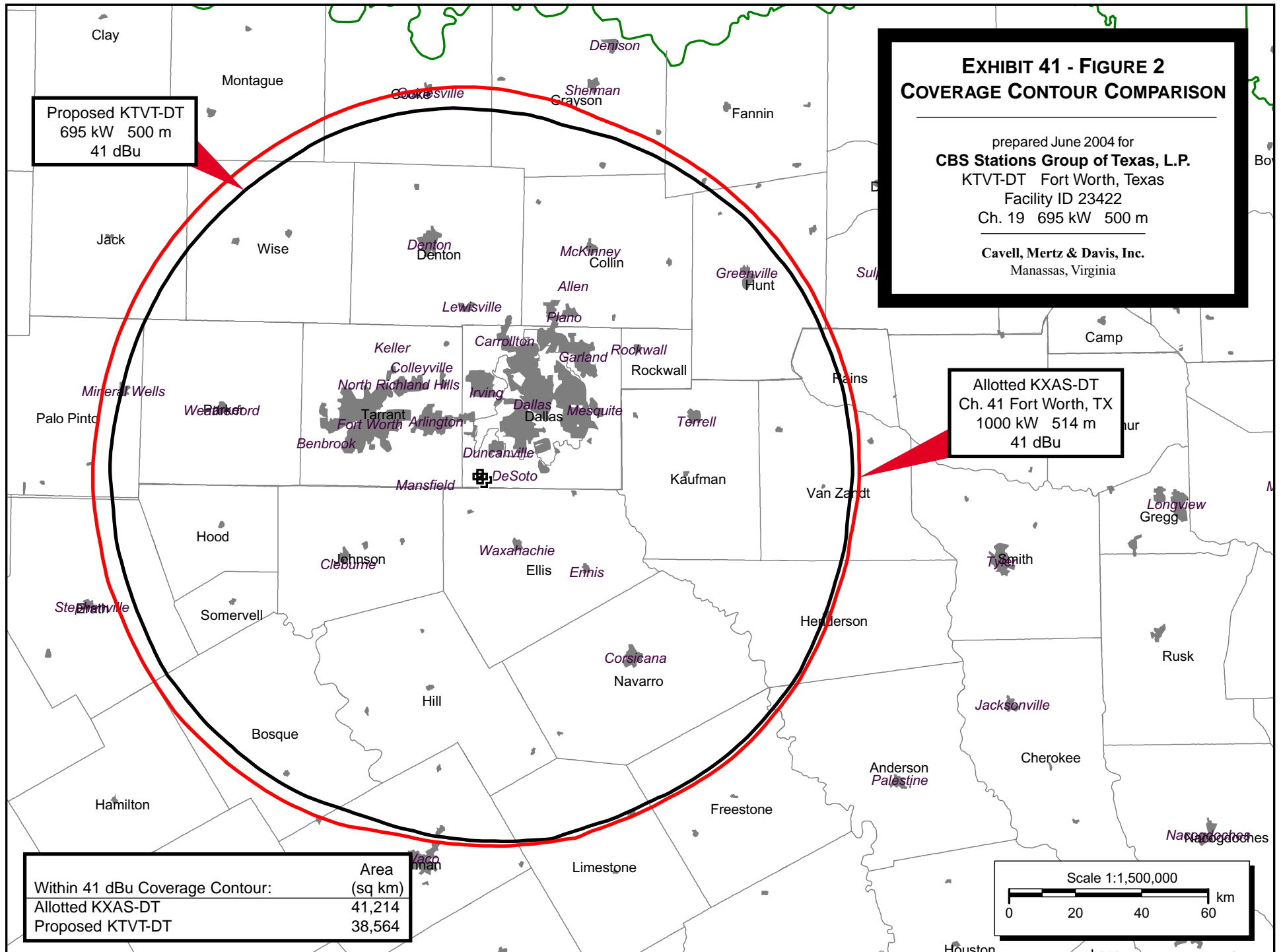
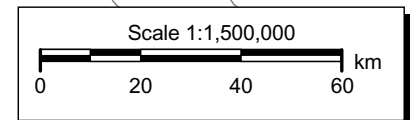


Exhibit 41 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY
 prepared for
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DTV Facilities

<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 (4)</u>	<u>Percentage (5)</u>	
KTXA-DT (Ref)	Fort Worth, TX 18	1.9	4,053,000	4,031,454	4,020,450	11,004	0.27	0.80
KTXA-DT (Lic)	Fort Worth, TX 18	4.0	4,053,000	4,057,092	4,055,980	1,112	0.03	0.00
KLSB-DT (CP)	Nacogdoches, TX 18	191.3	141,000	736,904	736,904	0	0.00	0.00
KIDY-DT (Ref)	San Angelo, TX 19	353.8	140,000	139,958	139,946	12	0.01	0.04
KIDY-DT (CP)	San Angelo, TX 19	353.9	----- checklist facility, evaluation not required -----					
KTXH-DT (Ref)	Houston, TX 19	360.2	3,788,000	3,788,845	3,788,845	0	0.00	0.00
KTXH-DT (Lic)	Houston, TX 19	361.7	3,788,000	3,872,784	3,872,505	279	0.01	0.00
KWBU-DT (Ref)	Waco, TX 20	120.4	----- no interference caused by proposal -----					
KWBU-DT (CP)	Waco, TX 20	144.2	201,000	585,890	585,629	261	0.13	0.00

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DTV Facilities (Cont'd)

<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)	
KXII-DT (Ref)	Sherman, TX 20	161.9	684,000	679,978	666,708	13,270	1.94	2.53
KXII-DT (Lic)	Sherman, TX 20	161.9		----- checklist facility, evaluation not required -----				

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)
KLSB-TV (Lic)	Nacogdoches, TX 19 (BLCT-19910910KH)	244.2	140,458	132,000	132,000	0	0.00	8,293	5.90
KLSB-TV (CP)	Nacogdoches, TX 19 (BPCT-20020509AAK)	191.3	626,221	555,158	553,350	1,808	0.29	69,357	11.08
<i>New interference is permissible to KLSB-TV CP despite total DTV interference over 10% --- KLSB-TV CP was granted after DTV allotment Order date and proposed KTVT-DT facility does not involve interference over 10% towards the KLSB-TV License facility, which was authorized at the time of the Order (see text in Exhibit 41 - Statement A)</i>									
KWBT(TV) (Lic)	Muskogee, OK 19	367.6	894,560	844,119	844,095	24	0.00	3,856	0.43
KTXA(TV) (Lic)	Fort Worth, TX 21	1.9		----- no interference caused by proposal -----					

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INTERFERENCE ANALYSIS RESULTS SUMMARY
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NTSC Facilities (Cont'd)

<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>	<u>Percentage</u> (5)	<u>Population</u> (7)	<u>Percentage</u> (8)
KUVN-TV (Lic)	Garland, TX 23	2.0		----- no interference caused by proposal -----					
KDFI(TV) (Lic)	Dallas, TX 27	4.0		----- no interference caused by proposal -----					
KDFI(TV) (CP)	Dallas, TX 27	4.0		----- no interference caused by proposal -----					

- 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 negative number 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*”