

Exhibit 41 - Statement B
ALLOCATION CONSIDERATIONS
INTERFERENCE ANALYSIS
prepared for
KWTX/KBTX License Corp.
KWTX-DT Waco, Texas
Facility ID 35903
Ch. 53 1,000 kW (MAX-DA) 515 m

KWTX/KBTX License Corp., licensee of analog station KWTX-TV (Channel 10), has a construction permit for the paired KWTX-DT facility on Channel 53 (file number BPCDT-19991026ABV). The purpose of the instant minor change application is to specify a different main lobe orientation for the proposed directional antenna system. No other changes to the construction permit are sought.

The DTV reference ERP and HAAT of 732 kW and 552 meters, respectively, for KWTX-DT have been established under §73.622(f)(1) of the Commission's Rules. The proposed KWTX-DT facility will operate with 1,000 kW ERP and 515 meters HAAT; the proposed ERP thus exceeds the reference ERP. Accordingly, as required by §73.622(f)(5), a study was conducted to evaluate interference to analog facilities and DTV assignments that may be attributed to the proposed KWTX-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 The interference study examined the change in interference as experienced by other stations that would result from the proposed facility.

All stations considered in this study are listed in **Exhibit 41 - Table I**. The results of the interference study, also summarized in **Exhibit 41 - Table I**, indicate that any additional interference to

¹The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A standard terrain profile step size of 1 km and cell size of 2 km were used. Comparisons of various results of this computer program to the Commission's implementation of OET-69 show good correlation.

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INTERFERENCE ANALYSIS

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these stations meets the Commission's 2% / 10% interference limits to all pertinent NTSC and DTV stations and allotments.

The instant proposal does not cause prohibited contour overlap to any 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.² Thus, it is believed that the instant proposal complies with the Commission's allocation Rules and policies regarding NTSC, DTV, and Class A stations.

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

Exhibit 41 - Table I
INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for
KWTX/KBTX License Corp.
 KWTX-DT Waco, Texas
 Facility ID 35903
 Ch. 53 1,000 kW (MAX-DA) 515 m

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>		
KLDT-DT (Ref 70.7 kW)	Lake Dallas, TX 54	189.3				----- no interference caused by proposal -----			
KLDT-DT (CP 70.7 kW)	Lake Dallas, TX 54	189.3				----- no interference caused by proposal -----			

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 (4)</u>	<u>Percentage (5)</u>	<u>Population (7)</u>	<u>Percentage (8)</u>
KNCT(TV) (LIC)	Belton, TX 46	47.6	609,332	538,730	538,730	0	0.00	8,592	1.41
BNPCT-20000817AAF	Blanco, TX 52	119.7	1,032,642	961,019	960,609	410	0.04	63,124	6.11

Exhibit 41 - Table I
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</u> (1)	<u>Calculated "Before" Service Population</u> (2)	<u>Calculated "After" Service Population</u> (3)	<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)
KFWD(TV) (LIC)	Fort Worth, TX 52	158.4		----- no interference caused by proposal -----					
BPCT-19850320KG	Blanco, TX 52	160.4	2,219,440	2,114,610	2,114,589	21	0.00	23,079	1.04
BPCT-19850320LC	Blanco, TX 52	181.2	2,256,103	2,020,771	2,020,771	0	0.00	27,451	1.22
KNVA(TV) (LIC)	Austin, TX 54	119.7	1,028,217	944,889	944,757	132	0.01	68,459	6.66

- 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*"