

Exhibit 41  
**ALLOCATION CONSIDERATIONS**  
**INTERFERENCE ANALYSIS**

prepared for  
**Entravision Holdings, LLC**  
KNVO-DT McAllen, Texas  
Ch. 49 1000 kW 285.6 m

**Nature of This Proposal**

*Entravision Holdings, LLC* (“*Entravision*”) is the licensee of analog station KNVO (TV) Channel 48, McAllen, Texas. *Entravision* presently has an application pending to construct the a companion digital television facility (FCC file number BPCDT-19991025ACS) on Channel 46.<sup>1</sup>

Separately, in **MM Docket 99-315** (RM-9731), *Entravision* had proposed the substitution of DTV Channel 49 in lieu of Channel 46. In a subsequent Report and Order for this proposed rule making (which was adopted January 31, 2001, released February 1, 2001), the Federal Communications Commission amended Section 73.622(b) of its Rules to specify the use of DTV Channel 49 at McAllen, Texas.<sup>2</sup> Accordingly, this application proposes to amend the pending DTV Channel 46 application (BPCDT-19991025ACS) to now specify the use of Channel 49 for its companion DTV facility. Further, it is proposed herein to maximize the potential coverage of the facility on Channel 49.

**Allocation and Interference Considerations**

*Entravision* herein proposes an effective radiated power (ERP) for KNVO-DT of 1000 kW at an effective antenna height of 285.6 meters above average terrain<sup>3</sup> (HAAT), which is above the reference power established for this facility on Channel 49 under the Commission’s Report and

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<sup>1</sup>“Maximized” facilities of 1000 kW effective radiated power at an effective antenna height of 285 meters above average terrain were requested under that proposal.

<sup>2</sup>This Order is effective as of March 19, 2001. The Channel 49 specifications adopted in the Order were for a DTV effective radiated power of 200 kW at an antenna height of 288 meters above average terrain.

<sup>3</sup>Terrain data for the eight “cardinal” radials was obtained from the U.S.G.S. 3-Arc second database. The determination of antenna HAAT included the truncation of the 135°, 180°, and 225° radials per §73.625(b)(4) of the Commission’s Rules. A portion of the 3.2 to 16.1 km section of these radials extends into Mexico; the DTV coverage contour does not encompass United States land area beyond the 16.1 km portion of these radials. Therefore, only the portions of the radials extending from the 3.2 km sector to the U.S. - Mexico border were employed in determining the average elevation along these radials. After averaging these eight radials as modified, and considering the proposed antenna height above mean sea level, the resulting antenna height above average terrain will be 285.6 meters.

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Order in **MM Docket 99-315** (i.e.: 200 kW ERP at an effective antenna height of 288 meters above average terrain). Accordingly, pursuant to §73.622(f)(5) of the Commission's rules, an interference study is supplied herein per §73.623(c). As shown in the following, it is believed that the instant proposal satisfies the Commission's published interference criteria.

Specifically, 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>4</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 Channel 49 KNVO-DT facility).

All stations considered in this study are listed in **Table I**, which is included with this exhibit attachment. The results of the interference study, also summarized in **Table I**, indicate that any additional interference to these stations meets the Commission's 2% / 10% interference limits regarding DTV proposals. In sum, no interference is predicted to any other station or DTV allotment. Only one DTV facility was located close enough (i.e.: was within the "culling distance") to warrant close examination. Thus, this proposal is believed to be in compliance with the provisions of §73.623(c)(2) of the Commission's Rules.

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<sup>4</sup>The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein, except that the terrain profile step size is 0.1 km (which provides a finer resolution than the Commission's standard 1 km step size). 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 41 dB $\mu$  using the Longley-Rice methodology, and within the DTV F(50,90) service contour distance as determined per §73.625(b). In instances where the DTV reference ERP is 50 kW or 1,000 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 F(50,90) DTV service contour level is established by the formula  $41 - 20\log[615/(\text{channel mid-frequency})]$  dB $\mu$ . The service area for each NTSC facility under study is that area predicted to receive signal levels of at least 64 dB $\mu$  using the Longley-Rice methodology, and within the NTSC F(50,50) service contour distance as determined per §73.684(c). The F(50,50) NTSC service contour level is established by the formula  $64 - 20\log[615/(\text{channel mid-frequency})]$  dB $\mu$ . Comparisons of various results of this computer program to the Commission's implementation of OET-69 show good correlation.

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**Interference to Co-located KNVO(TV)**

Predicted interference with respect to the paired NTSC KNVO-TV Channel 48 facility is not summarized herein. Interference studies per OET Bulletin 69 show that any resulting interference will be minimal in nature due to the proposed co-location. *Entravision*, as licensee of KNVO(TV), agrees to the extent required to accept such interference that may result from the operation of KNVO-DT on Channel 49.

**Mexican Border Zone Considerations**

The site is 2 km from the common border between the U.S. and Mexico, within the 275 kilometer coordination zone. Accordingly, pertinent Mexican DTV or NTSC allotments are listed below. The Mexican assignments and required distances are from the July 22, 1998 memorandum between the Commission and Mexican counterparts.<sup>5</sup> As shown, the required distances are satisfied. Nevertheless, coordination with Mexican authorities is respectfully requested, as required.

<u>Assignment</u>	<u>NAD-27 Coordinates</u>	<u>-----Distance (km)-----</u>	
		<u>Actual</u>	<u>Required</u>
Ciudad Allende, COA (NTSC Ch. 46)	28° 20' 48" 100° 50' 55"	372.6	244 or more
Piedras Negras, COA (NTSC Ch. 46)	28° 41' 14" 100° 32' 58"	378.8	244 or more
Nuevo Laredo, TAM (NTSC Ch. 45)	27° 29' 13" 99° 30' 06"	211.0	10 or less or 88 or more
Matamoros, TAM (NTSC Ch. 54)	25° 52' 32" 97° 29' 56"	61.1	24 or less or 32 or more

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<sup>5</sup>Memorandum of Understanding Between the Federal Communications Commission of the United States of America and the Secretaria de Comunicaciones Y Transportes of the United Mexican States Related to the Use of the 54-72 MHz, 76-88 MHz and 470-806 MHz bands for the Digital Television Broadcasting Service Along the Common Border.

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**Class A Low Power Television Considerations**

With respect to Low Power Television (LPTV) stations that have been granted a “Class A” license or Construction Permit, or are eligible for Class A status, several such stations<sup>6</sup> are near enough the proposed facility to warrant discussion.

A study was conducted to determine which Class A and “Class A eligible” LPTV stations’ protected contours are overlapped by the corresponding interfering contour from the proposed KNVO-DT facility, using the criteria of §73.623(c)(5). No prohibited overlap was found with respect to *licensed* Class A stations or LPTV facilities that are Class A eligible. However, overlap that would be prohibited under §73.623(c)(5) would occur from the proposed KNVO-DT facility to the facilities proposed in the following two pending applications:

KZMC-CA<sup>7</sup> Ch. 35  
McAllen, Texas  
(BPTTA-20010119AEP)

KMAO-LP Ch. 50  
Raymondville, Texas  
(BPTTL20010116AGZ)

However, per §73.623(c)(5)(iii) of the Commission’s Rules, a request for waiver of the standard contour protection requirements of §73.623(c)(5)(i) may be based on a more detailed analysis to show that interference is not likely. Specifically, interference protection to a Class A station from a DTV proposal may also be demonstrated using OET-69 methods. Accordingly, detailed interference studies were conducted in accordance with OET-69 to determine the impact of the proposed KNVO-DT facility on the application proposals listed above.<sup>8</sup>

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<sup>6</sup>See June 2, 2000 Public Notice *Certificates of Eligibility for Class A Television Station Status*, DA 00-1224.

<sup>7</sup>A detailed review of the situation disclosed that the “protected service contour” of the KZMC-LP application proposal is also overlapped by the “interfering contour” of the “reference” KNVO-DT facility.

<sup>8</sup>For OET-69 evaluation of LPTV station service, a nominal cell size of 1 km was employed (since the LPTV station service area is much smaller than that for full-power stations). The service area for the involved analog Low Power Television and Class A facilities is that area which is predicted to receive signal levels of at least 74 dB $\mu$  using the Longley-Rice methodology, and within the 74 dB $\mu$  F(50,50) service contour distance.

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The results of the interference study regarding Class A and Class A eligible stations is summarized in **Table II**, which is included with this exhibit attachment. As shown therein, any additional interference to these stations meets the Commission's 0.5 percent rounding tolerance for Class A stations.<sup>9</sup> If a waiver of §73.623(c)(5)(i) is necessary, then one is respectfully requested on behalf of the applicant for the reasons stated above.

It is noted that LPTV stations KTIZ-LP (Ch. 52, Harlingen, Texas, 38.1 km distant) and K57FE (Ch. 57, McAllen, Texas, 25.1 km distant) are also potentially eligible for Class A status (according to the Commission's June 2, 2000 Public Notice). However, while contour overlap would exist, both of these stations are operating on channels that are "out of the core". Hence protection of these stations on their present channels is not required under the Commission's Rules.

Thus, it is believed that the instant proposal complies with the Commission's allocation Rules and policies regarding Class A and Class A eligible LPTV stations.

Finally, it should also be noted that this maximization proposal is consistent with the intentions that *Entravision* expressed in BPCDT-19991025ACS, its presently pending DTV Channel 46 application. Specifically, *Entravision* noted in that earlier filing, that it had filed a "Notice of Intent to Maximize" its DTV facility prior to December 31, 1999, in response to the enactment of the *Community Broadcasters Preservation Act of 1999*.<sup>10</sup> The subsequent DTV application (BPCDT-19991025ACS) thus sought to maximize the KNVO-DT DTV facility on its then allotted channel, in keeping with the discussion in the Commission's Report and Order on the

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<sup>9</sup>See *Establishment of a Class A Television Service*, MM Docket 00-10, FCC 00-115, released April 4, 2000, at para 74 .

<sup>10</sup>See December 7, 1999 Public Notice "*Community Broadcasters Preservation 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-2739.

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Establishment of a Class A Television Service.<sup>11</sup> Thus, that application was not required to provide protection to any LPTV station eligible for “Class A” status.

Further, in the Channel 46 DTV maximization application, (BPCDT-19991025ACS), it was clearly stated that, upon grant of *Entravision*’s Channel 49 Rulemaking Petition (**MM Docket 99-315**), efforts to utilize the DTV Channel 46 facility as proposed therein would be moot, and that *Entravision* planned to exercise its right, as set forth in the *Order*, to carry over the maximized Channel 46 service area to its operation on Channel 49, (through an amendment of the Channel 46 DTV application, which this instant application constitutes). Therefore, it is believed that this proposal should be considered as having standing over any potentially conflicting Class A LPTV station or proposal.

**Conclusion**

Based upon the foregoing, it is believed that the instant proposal complies with the Commission’s allocation and interference Rules and Policies regarding NTSC, DTV , and Class A stations.

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<sup>11</sup>See *Establishment of a Class A Television Service*, MM Docket 00-10, FCC 00-115, released April 4, 2000, at para. 55-60.

Exhibit 41  
Table I  
**INTERFERENCE ANALYSIS**  
**RESULTS SUMMARY**

prepared for  
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 KNVO-DT McAllen, Texas  
 Ch. 49 1000 kW 285.6 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>	
KRIS-DT (Ref 1000 kW)	Corpus Christi, TX 50 DTV	188.7	n/a		----- no interference caused by proposal -----			

- Notes: - There were no NTSC facilities located within the "culling distance" from this proposal
- (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*"

Exhibit 41

**Table II**

**CLASS A STATION INTERFERENCE ANALYSIS  
RESULTS SUMMARY**

prepared for

**Entravision Holdings, LLC**

KNVO-DT McAllen, Texas

Ch. 49 1000 kW 285.6 m

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population (1)</u>	<u>Service Population (2)</u>	<i>---- Unique Interference ---- from proposal</i>	
					<u>Population (3)</u>	<u>Percentage (4)</u>
KZMC-CA (App)	McAllen, TX 35	25.1	347,903	347,903	20	0.01
KMAO-LP (App)	Raymondville, TX 50	49.8	20,193	20,193	0	0.00

OET-69 Class A station analysis notes:

- (1) Population within 74 dB $\mu$  service contour
- (2) Service population after reduction from terrain and interference losses, before consideration of proposal
- (3) Net change in population receiving interference resulting from proposal
- (4) Proposal's impact in terms of percentage, equals (3)/(1) times 100 percent: not to exceed zero when rounded to the nearest whole percent