

Exhibit 41 - Statement A
ALLOCATION CONSIDERATIONS
INTERFERENCE ANALYSIS
prepared for
WFMY Television Corporation
WFMY-DT Greensboro, North Carolina
Facility ID 72064
Ch. 51 1,000 kW 569 m

WFMY Television Corporation (“*WFMY*”) is the licensee of analog station WFMY-TV Channel 2, Greensboro, North Carolina. *WFMY* has been granted a Construction Permit (file number BPCDT-19991020ABC) for the paired WFMY-DT, Channel 51. *WFMY* herein proposes minor modification of that construction permit, to specify changes in antenna height above average terrain, antenna system and overall structure height.

The same site as that employed by the licensed WFMY-TV NTSC facility is proposed to be used for WFMY-DT. The tower structure has been registered with the Commission; the registration number is 1001558. It is noted that the registration shows the present overall structure height of 583.4 meters. A lower overall structure height of 575.9 meters is proposed. Upon grant of this proposal, appropriate FAA notice and commensurate FCC Form 854 will be filed to modify the registration accordingly.

The DTV reference ERP and HAAT of 1,000 kW and 561 meters, respectively, for WFMY-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 (“*SMO&O*”), per §73.622(f)(1) of the Commission’s Rules. The proposed WFMY-DT facility will operate with 1,000 kW ERP and 569 meters HAAT. The proposed ERP/HAAT combination thus exceeds the reference ERP/HAAT. 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 WFMY-DT facility.

The proposed ERP exceeds the maximum power for the proposed antenna HAAT of 569 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 largest station within the same

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market. In this case, the proposed service area does not exceed that of the paired WFMY-TV (NTSC Channel 2) facility, which provides the largest service area in the market. The total area within the proposed WFMY-DT 42.06 dB μ ¹ contour is 42,653 square kilometers, which does not exceed the 49,420 square kilometers within the licensed WFMY-TV Grade B contour. A depiction of the service areas for WFMY-TV and the proposed WFMY-DT is supplied as **Exhibit 41 - Figure 1**. Even with the maximum ERP of 1,000 kW (non-directional) as proposed, WFMY-DT will not achieve full replication of the paired WFMY-TV facility. Thus, the ERP specified herein is in compliance with §73.622(f)(5) of the Commission's Rules.

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").² 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

¹For this comparison, the dipole factor is used to adjust the standard UHF DTV 41 dB μ coverage contour value, consistent with the Commission's replication procedure used to establish DTV allotments and protected service areas.

²The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A standard cell size of 2 km was employed. 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 μ 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 μ . The service area for each NTSC facility under study is that area predicted to receive signal levels of at least 64 dB μ 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 μ . Comparisons of various results of this computer program to the Commission's implementation of OET-69 show good correlation.

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

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,³ the instant proposal causes contour overlap only to WAPG-LP, Ch. 51, Blackwater, Tennessee, 260.0 km distant, that would normally be prohibited under §73.623(c)(5)(i). However, §73.623(c)(5)(iii) allows for the use of OET Bulletin No. 69 to request a waiver of the interference protection rules to demonstrate that the proposed facility would not be likely to cause interference.

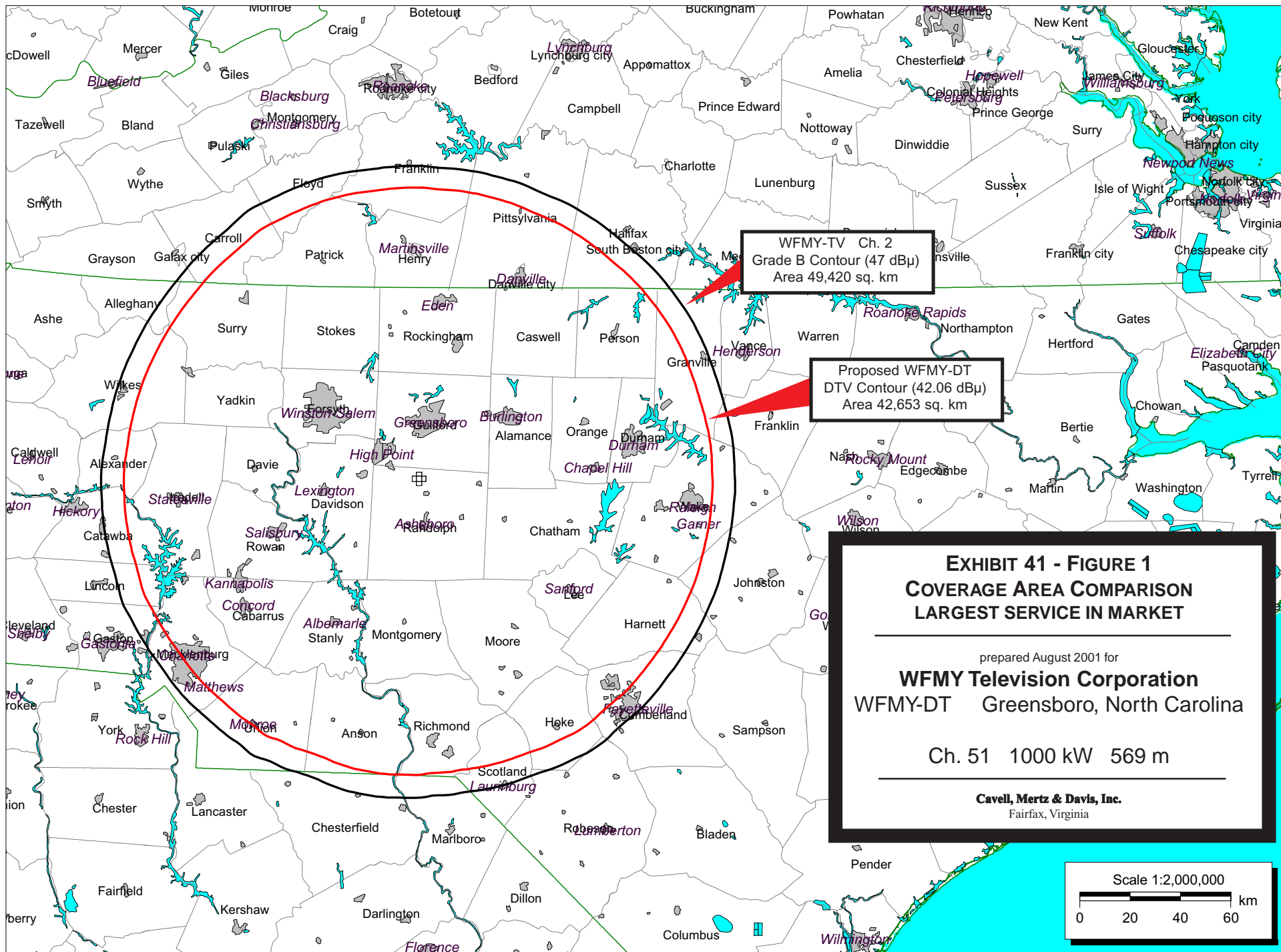
Accordingly, a study was conducted to evaluate the change in interference to WAPG-LP that may be attributed to the proposed Channel 51 facility. A detailed interference study was conducted in accordance with OET-69.⁴ The interference study examined the net change in interference as experienced by other stations that would result from the proposal.

The WAPG-LP facility is shown in **Exhibit 41 - Table II** with summary information regarding the findings of the study. No increase in interference is predicted to WAPG-LP. Based on the foregoing, and in accordance with §73.623(c)(5)(iii), a waiver of §73.623(c)(5)(i) is respectfully requested with respect to WAPG-LP. No interference is predicted to any other Class A station.

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

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

⁴For OET-69 evaluation of Class A station service, a nominal cell size of 1 km was employed (since the Class A station service area is much smaller than that for full-power stations). The service area for the involved Class A facility is that area predicted to receive signal levels of at least 74 dBμ using the Longley-Rice methodology, and within the NTSC F(50,50) 74 dBμ contour distance.



WFMY-TV Ch. 2
Grade B Contour (47 dBμ)
Area 49,420 sq. km

Proposed WFMY-DT
DTV Contour (42.06 dBμ)
Area 42,653 sq. km

EXHIBIT 41 - FIGURE 1
COVERAGE AREA COMPARISON
LARGEST SERVICE IN MARKET

prepared August 2001 for
WFMY Television Corporation
WFMY-DT Greensboro, North Carolina

Ch. 51 1000 kW 569 m

Cavell, Mertz & Davis, Inc.
Fairfax, Virginia

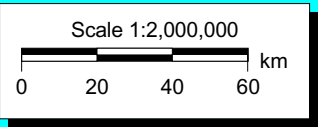


Exhibit 41 - Table I
INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for
WFMY Television Corporation
 WFMY-DT Greensboro, North Carolina
 Facility ID 72064
 Ch. 51 1,000 kW 569 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>	
WAXN-DT (Ref 50 kW)	Kannapolis, NC 50	105.0	1,497,000	1,479,834	1,479,680	154	0.01	1.16
WAXN-DT (CP 50 kW)	Kannapolis, NC 50	105.0	1,497,000	1,613,200	1,612,585	615	0.04	0.00
WFXG-DT (Ref 65.1 kW)	Augusta, GA 51	327.9	537,000	537,513	537,513	0	0.00	0.00
WFXG-DT (CP 1,000 kW)	Augusta, GA 51	327.9	537,000	815,341	815,341	0	0.00	0.00
WAGV-DT (Ref 50 kW)	Harlan, KY 51	333.8		----- no interference caused by proposal -----				
WAGV-DT (CP 550 kW)	Harlan, KY 51	333.8	547,000	1,085,292	1,085,292	0	0.00	0.00
WBDC-DT (Ref 65 kW)	Washington, DC 51	424.0		----- no interference caused by proposal -----				
WBDC-DT (CP 100 kW)	Washington, DC 51	424.0		----- no interference caused by proposal -----				

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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>	
WTVD-DT (Ref 1,000 kW)	Durham, NC 52	120.3	2,304,000	2,312,370	2,311,951	419	0.02	0.00
WTVD-DT (LIC 1,000 kW)	Durham, NC 52	120.3		----- checklist facility, analysis not required -----				
WTVD-DT (CP 1,000 kW)	Durham, NC 52	120.3		----- checklist facility, analysis 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 (4)</u>	<u>Percentage (5)</u>	<u>Population (7)</u>	<u>Percentage (8)</u>
WCNC-TV (LIC)	Charlotte, NC 36	133.8	2,440,900	2,211,489	2,211,489	0	0.00	70,324	2.88
WUPN-TV (LIC)	Greensboro, NC 48	0.0		----- no interference caused by proposal -----					
WUPN-TV (APP)	Greensboro, NC 48	0.0		----- no interference caused by proposal -----					

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<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>
WRAZ(TV) (LIC)	Raleigh, NC 50	119.9	1,999,496	1,876,249	1,876,240	9	0.00	103,923	5.20
WVPT(TV) (LIC)	Staunton, VA 51	258.9	348,549	227,186	227,186	0	0.00	1,631	0.47
WMSY(TV) (LIC)	Marion, VA 52	190.8	----- no interference caused by proposal -----						
WWWB(TV) (LIC)	Rock Hill, SC 55	131.8	2,330,407	2,109,109	2,109,109	0	0.00	93,997	4.03
WUNG-TV (LIC)	Concord, NC 58	90.0	2,141,174	2,037,048	2,037,048	0	0.00	39,767	1.86

- 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*”

Exhibit 41 - Table II

CLASS A TELEVISION INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for

WFMY Television Corporation

WFMY-DT Greensboro, North Carolina

Facility ID 72064

Ch. 51 1,000 kW 569 m

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population</u> (1)	<u>Service Population</u> (2)	<i>---- Unique Interference ---- from WFMY-DT</i>	
					<u>Population</u> (3)	<u>Percentage</u> (4)
WAPG-LP (LIC)	Blackwater, TN 51	260.0	65,813	20,581	0	0.00

Notes:

- (1) Total population within noise-limited contour
- (2) Interference-free service population per OET-69 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

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*"