

Exhibit 41 - Statement A  
**ALLOCATION CONSIDERATIONS**  
**INTERFERENCE ANALYSIS**

prepared for  
**Combined Communications Corporation of Oklahoma, Inc.**  
WZZM-DT Grand Rapids, Michigan  
Facility ID 49713  
Ch. 39 1,000 kW 305 m

*Combined Communications Corporation of Oklahoma, Inc. (“CCCOI”)* is the licensee of analog station WZZM-TV Channel 13, Grand Rapids, Michigan (file number BMLCT-19951006KH). CCCOI has been granted a Construction Permit (BPCDT-19991020ABR) for the paired WZZM-DT, Channel 39. CCCOI herein proposes minor modification of that construction permit, to specify changes in antenna location (two seconds change in latitude), antenna height above average terrain (“HAAT”), effective radiated power (“ERP”), antenna system and overall structure height.

The proposed WZZM-DT facility will be mounted on a proposed new tower structure to be constructed immediately adjacent to the existing WZZM-TV tower. Notification of construction has been filed with the Federal Aviation Administration (on February 26, 2002). Upon receipt of a “Determination of No Hazard” from that agency, FCC Form 854 will be filed with the Commission to register the new structure.

The DTV reference ERP and HAAT of 1,000 kW (MAX-reference DA pattern) and 305 meters, respectively, for WZZM-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 WZZM-DT facility will operate with a non-directional ERP of 1,000 kW at 305 meters HAAT. The proposed ERP/HAAT combination exceeds the reference ERP/HAAT along some azimuths. 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 WZZM-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

Exhibit 41 - Statement A  
**ALLOCATION CONSIDERATIONS**  
**INTERFERENCE ANALYSIS**  
(page 2 of 3)

Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, July 2, 1997 (“OET-69”)<sup>1</sup>. 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 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,<sup>2</sup> the instant proposal causes contour overlap only to WMKG-LP (LIC Ch. 40, CP Ch. 38, Muskegon, MI, 20.5 km distant) and W39BO (Ch. 39, Crystal, MI, 81.1 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 WMKG-LP and W39BO that may be attributed to the proposed Channel 39 facility. A detailed interference study was conducted in accordance with OET-69.<sup>3</sup> The interference study examined the net change in interference as experienced by other stations that would result from the proposal.

---

<sup>1</sup>The 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. Comparisons of various results of this computer program (run on a Sun processor) to the Commission’s implementation of OET-69 show good correlation.

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

<sup>3</sup>For 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 (with dipole factor correction) using the Longley-Rice methodology, and within the NTSC F(50,50) 74 dBμ contour distance.

Exhibit 41 - Statement A  
**ALLOCATION CONSIDERATIONS**  
**INTERFERENCE ANALYSIS**  
(page 3 of 3)

The WMKG-LP and W39BO facilities are shown in **Exhibit 41 - Table II** with summary information regarding the findings of the study. No increase in interference is predicted to WMKG-LP and W39BO. 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.

The proposed transmitter site is located 78.3 kilometers from the FCC monitoring station at Allegan, Michigan. The predicted received field strength from the proposed WZZM-TV at that monitoring station is 2.4 mV/m. This is less than the 10 mV/m limit specified in §73.1030(c); therefore, it is believed that advance consultation with the Commission is not required. There are no AM stations within 3.2 kilometers of the proposed transmitter site, based on information contained within the Commission's database.

Exhibit 41 - Table I  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**  
 prepared for  
**Combined Communications Corporation of Oklahoma, Inc.**  
 WZZM-DT Grand Rapids, Michigan  
 Facility ID 49713  
 Ch. 39 1,000 kW 305 m

**DTV Facilities**

<u>DTV Facilities</u>								Percentage Reduction of Baseline Population (“10 percent” test) (6)
Stations <u>Considered</u>	City, State <u>Channel</u>	Distance <u>(km)</u>	Baseline <u>Population</u> (1)	Calculated “Before” Service <u>Population</u> (2)	Calculated “After” Service <u>Population</u> (3)	--- Net “New” Interference --- ( “2 percent” test)		
						<u>Population</u> (4)	<u>Percentage</u> (5)	
WSYM-DT (Ref 50 kW)	Lansing, MI 38	138.9				----- no interference caused by proposal -----		
WSYM-DT (CP 1000 kW)	Lansing, MI 38	138.9	1,012,000	1,231,788	1,231,788	0	0.00	0.00
WFRV-DT (PRM 1000 kW)	Green Bay, WI 39	201.2	1,014,271	1,006,223	1,003,764	2,459	0.24	1.04
WADL-DT (Ref 148 kW)	Mount Clemens, MI 39	260.1	4,167,000	4,147,441	4,148,278	(837)	interference decreases	
WADL-DT (CP 189 kW)	Mount Clemens, MI 39	260.1				----- checklist facility, analysis not required -----		
WADL-DT (APP 1000 kW)	Mount Clemens, MI 39	260.1	4,167,000	4,429,725	4,423,730	5,995	0.14	0.00
WAOE-DT (Ref 50 kW)	Peoria, IL 39	411.8				----- no interference caused by proposal -----		
WAOE-DT (CP 100 kW)	Peoria, IL 39	411.8				----- no interference caused by proposal -----		

Exhibit 41 - Table I  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**  
 (Page 2 of 3)

**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>		
WWTV-DT (Ref 857.6 kW)	Cadillac, MI 40	102.7	656,000	652,416	651,307	1,109	0.17	0.72	
WWTV-DT (STA 175 kW)	Cadillac, MI 40	102.7		----- STA facility, analysis not required -----					
WWTV-DT (CP 845.6 kW)	Cadillac, MI 40	102.7		----- checklist facility, analysis not required -----					
WPXE-DT (Ref 97.2 kW)	Kenosha, WI 40	177.6		----- no interference caused by proposal -----					
WPXE-DT (APP 910 kW)	Kenosha, WI 40	163.2		----- 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>
WGVU-TV (LIC)	Grand Rapids, MI 35	38.9	1,080,636	1,050,252	1,050,018	234	0.02	26,327	2.44
FWFA(TV) (LIC)	Fort Wayne, IN 39	252.3	688,654	678,125	675,709	2,416	0.35	12,945	1.88

Exhibit 41 - Table I  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**  
 (Page 3 of 3)

<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>
WQRF-TV (LIC)	Rockford, IL 39	288.3	691,379	676,567	675,292	1,275	0.18	7,791	1.13
WOTV(TV) (LIC)	Battle Creek, MI 41	89.7	1,800,294	1,688,590	1,688,238	352	0.02	106,023	5.89
WZPX(TV) (LIC)	Battle Creek, MI 43	98.2	1,871,276	1,704,538	1,704,538	0	0.00	81,417	4.35
BPRM 20000717AEG	Bay City, MI 46	120.1	1,235,205	1,208,285	1,208,285	0	0.00	3,515	0.28
WSYM-TV (LIC)	Lansing, MI 47	138.9	----- 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*”

Exhibit 41 - Table II  
**CLASS A TELEVISION INTERFERENCE ANALYSIS RESULTS SUMMARY**  
 prepared for  
**Combined Communications Corporation of Oklahoma, Inc.**  
 WZZM-DT Grand Rapids, Michigan  
 Facility ID 49713  
 Ch. 39 1,000 kW 305 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</i> ---- <i>from WZZM-DT</i>	
					<u>Population</u> (3)	<u>Percentage</u> (4)
WMKG-LP (CP 13.5 kW)	Muskegon, MI 38	20.5	103,751	103,930	0	0.00
WMKG-LP (CP 33.8 kW)	Muskegon, MI 38	20.5	121,210	119,633	0	0.00
W39BO (LIC)	Crystal, MI 39	81.1	1,690	0	0	0.00
WMKG-LP (LIC)	Muskegon, MI 40	20.5	102,855	42,759	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*"