

**EXHIBIT 41
ENGINEERING STATEMENT RE;
INTERFERENCE ANALYSIS
WGSA-DT 650 KW 461 M AMSL CH. 35
BAXLEY, GEORGIA**

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Prepared by
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May, 2001

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INTRODUCTION

This statement was prepared on behalf of Southern TV Corporation, licensee of commercial television broadcast station WGSA, Channel 34, at Baxley, Georgia. WGSA has a construction permit to activate the digital television (DTV) Channel 35 allotment that was paired with the analog television (TV) license of WGSA. This application requests a new antenna location and increased antenna height. It proposes to locate the DTV Channel 35 antenna on the proposed new multi user TV tower, to be built by Richland towers for the use of several broadcasters, rather than constructing a new tower as required in the original construction permit.

This statement along with Section III-D of FCC Form 301 provides technical information in support of this application by WGSA. All technical data contained in or attached to this statement has been determined in accordance with the current FCC Rules.

PROPOSED CHANGE IN FACILITIES

WGSA proposed in BPCDT-19991101AIG to construct a new antenna structure for the new DTV Channel 35 facility. It now proposes to locate the DTV antenna on the new tower, presently under construction by Richland Towers near Savannah, to be used to support several broadcast station antennas. A new custom antenna stack will use a of Dielectric Model TUC-05-16/80H-T UHF antenna for WGSA-DT Channel 35. The antenna radiation center height above average terrain (HAAT) will be 454 meters.

WGSA will operate on DTV Channel 35 in a nondirectional mode with an effective radiated power (ERP) of 650 kW. The intended nondirectional ERP exceeds the reference power in the DTV Allotment Plan in certain directions; however, this non-checklist proposal meets both the Commission's interference criteria in Section 73.623 and the maximum power requirement for UHF in Section 73.622(f)(8).

Attached as Figure 1 is a map showing both the 41 and 48 dBu predicted F(50,90) noise limited contours. The map indicates that using the standard FCC prediction method, service to the entire community of Baxley will exceed the former minimum signal requirement of 41 dBu coverage, as set forth in Section 73.625(a) of the FCC Rules. The proposal, however, falls short of the current 48 dBu predicted contour coverage rule. A supplemental coverage showing in support of 48 dBu coverage compliance is attached as Figure 1B in response to FCC Form 301, Section III-D, questions 3 and 12.

INTERFERENCE ANALYSIS

This application requires a technical response to Item 11 of Section III-D of FCC Form 301 to demonstrate compliance with the interference protection provisions of Section 73.623(a) of the FCC Rules. An interference analysis was conducted to evaluate the impact of the DTV Channel 35 proposal on other DTV and NTSC services. Interference was examined using an exact duplication of the Commission's DTV Interference Model software and computer hardware and operating system used in the FCC DTV allotment planning in the DTV Sixth Report and Order (1997).

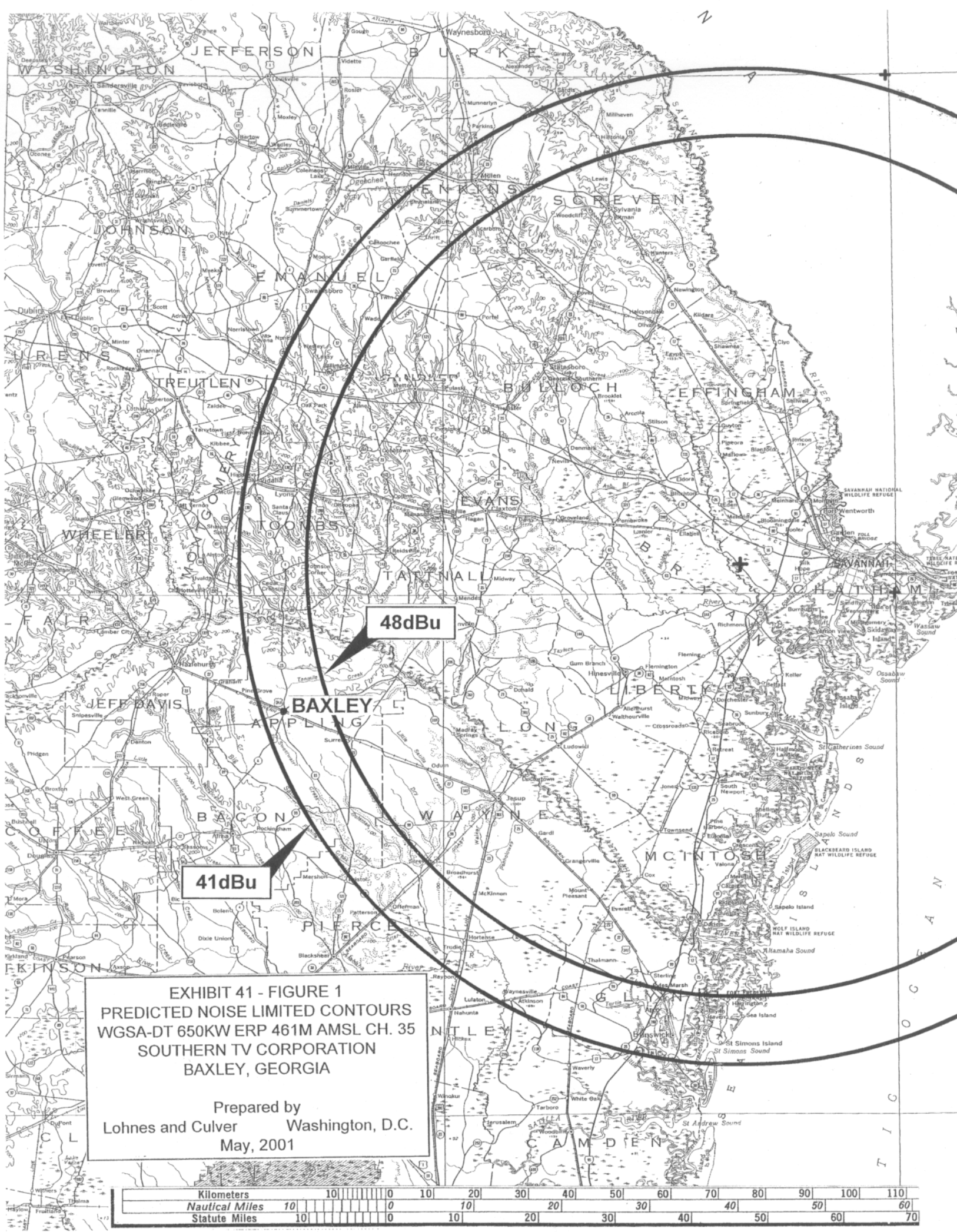
In accordance with Section 73.623(c) of the FCC Rules, the proposed DTV facility on Channel 35 meets the *de minimis* interference standard with respect to all NTSC stations and DTV allotments, including all non-checklist authorizations and non-checklist applications filed

prior to this proposal. Figures 2 and 3 summarize the proposal's impact on analog TV and DTV, respectively. Population lost to interference was determined using the procedures outlined in the Commission's *OET Bulletin No. 69*, based on the recommended cell size of 2 kilometers on a side. Current FCC database records were relied on to evaluate the affect on analog TV and non-checklist DTV stations while the reference facilities contained in the DTV Allotment Plan were used to determine the impact on DTV allotments.

Respectfully submitted,
Lohnes and Culver

By _____
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May, 2001



48dBu

41dBu

EXHIBIT 41 - FIGURE 1
PREDICTED NOISE LIMITED CONTOURS
WGSA-DT 650KW ERP 461M AMSL CH. 35
SOUTHERN TV CORPORATION
BAXLEY, GEORGIA

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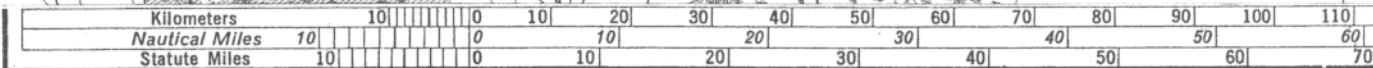


EXHIBIT 41 - FIGURE 2
DTV-TO-NTSC INTERFERENCE ANALYSIS
WGSA-DT 650Kw ERP 461 M AMSL CH.35
SOUTHERN TV. CORPORATION
BAXLEY, GEORGIA

NTSC STATIONS REQUIRING ANALYSIS:		CURRENT IMPACT ON NTSC SERVICE (1990 Census)	PROPOSED IMPACT ON NTSC SERVICE (1990 Census)
CH. 34	WGSA BAXLEY, GA. (self interference)		
	NTSC Grade B Service:	522,927	522,927
	• Grade B service not affected terrain losses:	522,789	522,789
	• Service Loss Due To NTSC Interference:	3,300	3,300
	Current NTSC Service:	519,489	519,489
	• Service Loss Due To Additional DTV Interference:	80	80
	• Service Loss Due To Proposal:	--	2,470
	Interference Contribution By Proposal, rounded to the nearest tenth of a percent (2.0% Limit):	--	0.5%
	Cumulative DTV Effect On NTSC, rounded to the nearest tenth of a percent (10.0% Limit):	0.02%	0.52%
ch. 35	WRLK COLUMBIA, SC.		
	NTSC Grade B Service:	727,449	727,449
	• Grade B service not affected terrain losses:	727,006	727,006
	• Service Loss Due To NTSC Interference:	5,881	5,881
	Current NTSC Service:	721,125	721,125
	• Service Loss Due To Additional DTV Interference:	55,194	55,194
	• Service Loss Due To Proposal:	--	6,518
	Interference Contribution By Proposal, rounded to the nearest tenth of a percent (2.0% Limit):	--	0.9%
	Cumulative DTV Effect On NTSC, rounded to the nearest tenth of a percent (10.0% Limit):	7.6%	8.5%

EXHIBIT 41 - FIGURE 3
DTV-TO-DTV INTERFERENCE ANALYSIS
WGSB-DT 650Kw ERP 461 M AMSL CH.35
SOUTHERN TV. CORPORATION
BAXLEY, GEORGIA

DTV STATIONS REQUIRING ANALYSIS:	CURRENT IMPACT ON DTV SERVICE (1990 Census)	PROPOSED IMPACT ON DTV SERVICE (1990 Census)
CH. 35 WGBI-DT COLUMBUS, GA.		
DTV Service From <i>Appendix B in MM Dkt. 87-268:</i>	589,000	589,000
Associated NTSC Service From <i>Appendix B in MM Dkt. 87-268:</i>	586,000	586,000
Baseline Population:	589,000	589,000
• Service Loss If The Associated NTSC Service Area Is Larger:	0	0
• Service Loss Due To Analog TV (NTSC) Interference:	3,446	3,446
• Service Loss Due To Additional Interference From DTV:	6,171	6,171
• Service Loss Due To Proposal:	--	816
Total Service Loss:	9,617	10,433
Interference Contribution By Proposal, rounded to the nearest tenth of a percent (2.0% Limit):	--	0.1 %
Cumulative Effect On DTV Service, rounded to the nearest tenth of a percent (10.0% Limit):	1.6%	1.8 %
CH. 36 WCES-DT WRENS, GA.		
DTV Service From <i>Appendix B in MM Dkt. 87-268:</i>	613,000	613,000
Associated NTSC Service From <i>Appendix B in MM Dkt. 87-268:</i>	614,000	614,000
Baseline Population:	614,000	614,000
• Service Loss If The Associated NTSC Service Area Is Larger:	1,000	1,000
• Service Loss Due To Analog TV (NTSC) Interference:	8,107	8,107
• Service Loss Due To Additional Interference From DTV:	0	0
• Service Loss Due To Proposal:	--	81
Total Service Loss:	9,107	9,269
Interference Contribution By Proposal, rounded to the nearest tenth of a percent (2.0% Limit):	--	0 %
Cumulative Effect On DTV Service, rounded to the nearest tenth of a percent (10.0% Limit):	1.5%	1.5 %
CH. 35 WMMP-DT CHARLESTON, SC.		
DTV Service From <i>Appendix B in MM Dkt. 87-268:</i>	502,000	502,000
Associated NTSC Service From <i>Appendix B in MM Dkt. 87-268:</i>	502,000	502,000
Baseline Population:	502,000	502,000
• Service Loss If The Associated NTSC Service Area Is Larger:	0	0
• Service Loss Due To Analog TV (NTSC) Interference:	53	53
• Service Loss Due To Additional Interference From DTV:	0	0
• Service Loss Due To Proposal:	--	10,278
Total Service Loss:	53	10,331
Interference Contribution By Proposal, rounded to the nearest tenth of a percent (2.0% Limit):	--	2 %
Cumulative Effect On DTV Service, rounded to the nearest tenth of a percent (10.0% Limit):	0%	2.1 %