Exhibit 41 - Statement B

ALLOCATION CONSIDERATIONS
INTERFERENCE ANALYSIS

prepared for

Bend Licenses, Limited Partnership

KTVZ-DT Bend, Oregon
Facility ID 55907
Ch. 18 50 kW 188 m

Bend Licenses, Limited Partnership is the permittee of KTVZ-DT, Channel 18, Bend, Oregon (file number BPCDT-19991027AAU) and licensee of the paired analog KTVZ(TV) Channel 21 facility (BLCT-19920820KT). The purpose of the instant application is to modify the KTVZ-DT Construction Permit ("CP") to specify a different different directional antenna pattern, increase the antenna radiation center above ground level by one meter, and provide corrected ground elevation data for the transmitter site.

The DTV reference effective radiated power ("ERP") and height above average terrain ("HAAT") of 50 kW and 197 meters, respectively, for KTVZ-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, per §73.622(f)(1) of the Commission's rules. The proposed KTVZ-DT facility will operate with 50 kW ERP and 188 meters HAAT. Considering the proposed directional antenna pattern (with respect to the "reference" KTVZ-DT replication directional pattern), the proposed ERP exceeds the reference ERP in certain azimuths. Accordingly, as required by §73.622(f)(5) of the Commission's rules, a study per §73.623(c) was conducted to evaluate interference to analog and DTV facilities that may be attributed to the proposed KTVZ-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 net change in interference as experienced by other stations that would result from the proposed facility (in lieu of the reference KTVZ-DT). All stations considered in this study are listed in **Exhibit 41 - Table 1**. The results of the interference study, also summarized in **Exhibit 41 - Table 1**, 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 CP, or are eligible for Class A status, only station KABH-CA (Channel 15, Bend, OR) is near enough the proposed facility to warrant discussion. KABH-CA is licensed (BLTTL-19950803JA) to operate with 11.9 kW ERP at a site 0.3 km from the proposed KTVZ-DT site. A CP (BPTTA-20010806ACM) authorizes KABH-CA to increase ERP to 84 kW.

Given the close proximity of KABH-CA to the proposed KTVZ-DT operation (0.3 km), these facilities can be considered to be essentially co-located. Using the D/U criteria of §73.623(c)(5)(i), it can be demonstrated that the threshold for interference is not exceeded, due to the power levels involved. For the licensed 11.9 kW KABH-CA facility, the proposed 50 kW KTVZ-DT facility would result in a D/U ratio of -6.2 dB, which does not approach the Commission's interference threshold of -34 dB D/U[2] by a substantial margin. Additionally, an examination of the respective transmitted power levels on an azimuth-by-azimuth basis (which considered each facility's respective directional antenna pattern) also showed that the proposed KTVZ-DT operation would not violate the Commission's -34 dB D/U requirement along any azimuth.

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[1]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 (as run on a Sun processor) to the Commission's implementation of OET-69 show excellent correlation.

[2]Based on the Commission's criteria, interference would occur if the predicted D/U is *less* than the -34 dB D/U threshold.

The KABH-CA CP facility is authorized to operate with 84 kW ERP, using a non-directional antenna system. In this case, the maximum ERP from KTVZ-DT (50 kW) would result in a worst-case D/U of 2.3 dB, which also does not approach the Commission's interference threshold of -34 dB D/U by a considerable margin. Thus, interference protection to KABH-CA is provided using the standard protection requirements of §73.623(c)(5)(i).

For completeness, a detailed interference study was also conducted to further demonstrate protection to KABH-CA. 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 KTVZ-DT facility on KABH-CA.[3]

The results of the interference study regarding KABH-CA is summarized in **Exhibit 41 - Table 2**. As shown therein, no new interference is predicted to the Licensed or CP KABH-CA facilities. 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.

The nearest FCC monitoring station is 550.3 km distant at Ferndale, Washington. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. There are no AM broadcast stations within 3.2 km (2 miles) of the proposed site, according to information extracted from the Commission's engineering database.

[3]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 facility is that area predicted to receive signal levels of at least 74 dBµ using the Longley-Rice methodology, and within the dipole factor corrected 74 dBµ F(50,50) service contour distance.

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

Exhibit 41 - Table 1

INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for

Bend Licenses, Limited Partnership

KTVZ-DT Bend, Oregon

Facility ID 55907

Ch. 18 50 kW 188 m

DTV Facilities

Stations Considered	City, State Channel	Distance (km)	Baseline Population (1)	Calculated "Before" Service Population (2)	Calculated "After" Service Population (3)	--- Net "New" Interference --- ("2 percent" test) Population (4)	Percentage (5)	Percentage Reduction of Baseline Population ("10 percent" test) (6)
KMTR-DT (Ref 72.7 kW)	Eugene, OR 17	133.7			------ no interference predicted from proposal -----			
KMTR-DT (CP 72.7 kW)	Eugene, OR 17	133.7			------ no interference predicted from proposal -----			
KTVC-DT (CP 50 kW)	Roseburg, OR 18	185.9			------ no interference predicted from proposal -----			
KTVC-DT (Ref 50 kW)	Roseburg, OR 18	185.9			------ no interference predicted from proposal -----			
KEPR-DT (CP 36.4 kW)	Pascoe, WA 18	280.6			------ checklist facility, evaluation not required -----			
KEPR-DT (Ref 50 kW)	Pascoe, WA 18	280.6			------ no interference predicted from proposal -----			
KIXE-DT (CP 93 kW)	Redding, CA 18	401.1	322,000	310,392	310,370	22	0.01	3.61
KIXE-DT (Ref 183.8 kW)	Redding, CA 18	401.1			------ no interference predicted from proposal -----			

Exhibit 41 - Table 1

INTERFERENCE ANALYSIS RESULTS SUMMARY

DTV Facilities

Stations Considered	City, State Channel	Distance (km)	Baseline Population (1)	Calculated "Before" Service Population (2)	Calculated "After" Service Population (3)	--- Net "New" Interference --- ("2 percent" test) Population (4)	Percentage (5)	Percentage Reduction of Baseline Population ("10 percent" test) (6)
KCPQ-DT (Ref 602.8 kW)	Tacoma, WA 18	402.4			------ no interference predicted from proposal -----			
KCPQ-DT (Lic 600 kW)	Tacoma, WA 18	402.4			------ no interference predicted from proposal -----			
KPIC-DT (Ref 50 kW)	Roseburg, OR 19	185.0			------ no interference predicted from proposal -----			
KPIC-DT (CP 50 kW)	Roseburg, OR 19	185.9			------ no interference predicted from proposal -----			

Exhibit 41 - Table 1

INTERFERENCE ANALYSIS RESULTS SUMMARY

NTSC Facilities

Stations Considered	City, State Channel	Distance (km)	Baseline Population (1)	Calculated "Before" Service Population (2)	Calculated "After" Service Population (3)	--- Net "New" Interference --- ("2 percent" test) Population (4)	Percentage (5)	---Total Interference--- from DTV only ("10 percent" test) Population (7)	Percentage (8)
KMTR(TV) (Lic)	Eugene, OR 16	133.7	------ no interference predicted from 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 number in parenthesis 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 2

CLASS A STATION INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for

Bend Licenses, Limited Partnership

KTVZ-DT Bend, Oregon

Facility ID 55907

Ch. 18 50 kW 188 m

Stations Considered	City, State Channel	Distance (km)	Baseline Population (1)	Service Population (2)	---- *Unique Interference* ---- *from proposal* Population (3)	Percentage (4)
KABH-CA (Lic)	Bend, OR	0.3	58,207	58,004	0	0.00
KABH-CA (CP)	Bend, OR	0.3	70,160	69,714	0	0.00

OET-69 Class A station analysis notes:

(1) Population within dipole-corrected 74 dBu 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. A number in parenthesis indicates a *reduction* in interference.

(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