

**EXHIBIT 41**  
**DIGITAL, ANALOG AND CLASS A TELEVISION**  
**INTERFERENCE PROTECTION REQUIREMENTS**

The applicant, Emmis Television License Corporation, is proposing to change the antenna supporting structure for commercial digital television station WLUK-DT, Channel 51, Green Bay, WI. This minor modification involves a change in site of 8.4 kilometers to a new multi-user antenna location. The station will share a directional antenna system with several other local stations.

The proposal's affect on other DTV , analog TV and Class A services was examined in accordance with the interference criteria in Section 73.623(a) of the FCC Rules. Potentially affected DTV and analog TV stations were identified by employing the "culling" distances in the Commission's *Additional Application Processing Guidelines for Digital Television*. There were five DTV allotments, three nonchecklist DTV authorizations, two nonchecklist DTV applications, and two analog TV authorizations found within the prescribed culling distances. These facilities were evaluated for interference using the Commission's *Digital Television Application Processing Software* and the results are summarized in Exhibits 41.1 and 41.2.

The proposal meets the Commission's *de minimis* interference standard with respect to all the potentially affected DTV and analog TV facilities identified in Exhibits 41.1 and 41.2. Compliance with the *de minimis* interference criteria was determined using the Commission's *OET Bulletin No. 69* methodology and the procedures described in the *Additional Application Processing Guidelines For Digital Television*. Service losses were

computed based on the Commission's recommended cell size of 2 kilometers on a side.

Finally, the proposal will not cause increased interference to any potentially affected Class A television stations. Accordingly, Class A facilities were examined for interference based on the protection requirements adopted in the Report and Order entitled *Establishment of a Class A Television Service* in MM Docket 00-01 using the D/U ratios in Section 73.623(c)(2) of the FCC Rules.

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April 2002

**EXHIBIT 41.1  
DTV INTERFERENCE ANALYSIS**

<b>Analysis of Interference to Affected Station(s):</b>	<b>Initial Baseline Calculation (1990 Census)</b>	<b>Analysis of Current Record Before Proposal (1990 Census)</b>	<b>Analysis of Current Record After Proposal (1990 Census)</b>
<b>51A KGAN-DT CEDAR RAPIDS, IA - Appendix B Facilities</b>			
Population within Noise Limited Contour:	912,925	837,885	837,885
Population not affeted by terrain losses:	867,319	803,265	803,265
• Lost to all DTV and analog TV (NTSC) interference:	58,521	61,191	61,191
DTV SERVICE:	808,798	742,074	742,074
DTV/NTSC baseline population in <i>Appendix B</i> :	809,000	809,000	809,000
<b>Percent of baseline population covered by DTV SERVICE:</b>	<b>100%</b>	<b>91.7%</b>	<b>91.7%</b>
<b>Percent of DTV SERVICE impacted by proposal:</b>	<b>n/a</b>	<b>n/a</b>	<b>0%</b>
<b>51A KGAN-DT CEDAR RAPIDS, IA - Nonchecklist Authorization</b>			
Population within Noise Limited Contour:	912,925	833,693	833,693
Population not affeted by terrain losses:	867,319	806,693	806,693
• Lost to all DTV and analog TV (NTSC) interference:	58,521	46,969	46,969
DTV SERVICE:	808,798	759,724	759,724
DTV/NTSC baseline population in <i>Appendix B</i> :	809,000	809,000	809,000
<b>Percent of baseline population covered by DTV SERVICE:</b>	<b>100%</b>	<b>93.9%</b>	<b>93.9%</b>
<b>Percent of DTV SERVICE impacted by proposal:</b>	<b>n/a</b>	<b>n/a</b>	<b>0%</b>
<b>51A WPWR-DT GARY, IN - Appendix B Facilities</b>			
Population within Noise Limited Contour:	8,334,764	8,335,429	8,335,429
Population not affeted by terrain losses:	8,334,764	8,335,429	8,335,429
• Lost to all DTV and analog TV (NTSC) interference:	8,912	8,912	7,409
DTV SERVICE:	8,325,852	8,326,517	8,328,020
DTV/NTSC baseline population in <i>Appendix B</i> :	8,325,000	8,325,000	8,325,000
<b>Percent of baseline population covered by DTV SERVICE:</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>
<b>Percent of DTV SERVICE impacted by proposal:</b>	<b>n/a</b>	<b>n/a</b>	<b>0%</b>
<b>51A WPWR-DT GARY, IN - Nonchecklist Authorization</b>			
Population within Noise Limited Contour:	8,334,764	8,696,559	8,696,559
Population not affeted by terrain losses:	8,334,764	8,691,833	8,691,833
• Lost to all DTV and analog TV (NTSC) interference:	8,912	9,567	9,400
DTV SERVICE:	8,325,852	8,682,266	8,682,433
DTV/NTSC baseline population in <i>Appendix B</i> :	8,325,000	8,325,000	8,325,000
<b>Percent of baseline population covered by DTV SERVICE:</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>
<b>Percent of DTV SERVICE impacted by proposal:</b>	<b>n/a</b>	<b>n/a</b>	<b>0%</b>
<b>51A WLAJ-DT LANSING, MI - Appendix B Facilities</b>			
Population within Noise Limited Contour:	776,743	813,113	813,113
Population not affeted by terrain losses:	776,743	813,039	813,039
• Lost to all DTV and analog TV (NTSC) interference:	89	6,038	6,038
DTV SERVICE:	776,654	807,001	807,001
DTV/NTSC baseline population in <i>Appendix B</i> :	777,000	777,000	777,000
<b>Percent of baseline population covered by DTV SERVICE:</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>
<b>Percent of DTV SERVICE impacted by proposal:</b>	<b>n/a</b>	<b>n/a</b>	<b>0%</b>

<b>Analysis of Interference to Affected Station(s):</b>	<b>Initial Baseline Calculation (1990 Census)</b>	<b>Analysis of Current Record Before Proposal (1990 Census)</b>	<b>Analysis of Current Record After Proposal (1990 Census)</b>
<b>51A WLAJ-DT LANSING, MI - Nonchecklist Application</b>			
Population within Noise Limited Contour:	776,743	1,698,366	1,698,366
Population not affected by terrain losses:	776,743	1,691,012	1,691,012
• Lost to all DTV and analog TV (NTSC) interference:	89	42,356	42,354
DTV SERVICE:	776,654	1,648,656	1,648,658
DTV/NTSC baseline population in <i>Appendix B</i> :	777,000	777,000	777,000
<b>Percent of baseline population covered by DTV SERVICE:</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>
<b>Percent of DTV SERVICE impacted by proposal:</b>	<b>n/a</b>	<b>n/a</b>	<b>0%</b>
<b>50A WPBN-DT TRAVERSE CITY, MI - Appendix B Facilities</b>			
Population within Noise Limited Contour:	410,829	409,470	409,470
Population not affected by terrain losses:	407,038	406,071	406,071
• Lost to all DTV and analog TV (NTSC) interference:	3,317	5,244	5,244
DTV SERVICE:	403,721	400,827	400,827
DTV/NTSC baseline population in <i>Appendix B</i> :	404,000	404,000	404,000
<b>Percent of baseline population covered by DTV SERVICE:</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>
<b>Percent of DTV SERVICE impacted by proposal:</b>	<b>n/a</b>	<b>n/a</b>	<b>0%</b>
<b>50A WPBN-DT TRAVERSE CITY, MI - Nonchecklist Application</b>			
Population within Noise Limited Contour:	410,829	175,476	175,476
Population not affected by terrain losses:	407,038	171,147	171,147
• Lost to all DTV and analog TV (NTSC) interference:	3,317	486	486
DTV SERVICE:	403,721	170,661	170,661
DTV/NTSC baseline population in <i>Appendix B</i> :	404,000	404,000	404,000
<b>Percent of baseline population covered by DTV SERVICE:</b>	<b>100%</b>	<b>42.2%</b>	<b>42.2%</b>
<b>Percent of DTV SERVICE impacted by proposal:</b>	<b>n/a</b>	<b>n/a</b>	<b>0%</b>
<b>50A WISC-DT MADISON, WI - Appendix B Facilities</b>			
Population within Noise Limited Contour:	1,361,880	1,361,981	1,361,981
Population not affected by terrain losses:	1,352,543	1,353,090	1,353,090
• Lost to all DTV and analog TV (NTSC) interference:	37,589	38,720	38,720
DTV SERVICE:	1,314,951	1,314,370	1,314,370
DTV/NTSC baseline population in <i>Appendix B</i> :	1,315,000	1,315,000	1,315,000
<b>Percent of baseline population covered by DTV SERVICE:</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>
<b>Percent of DTV SERVICE impacted by proposal:</b>	<b>n/a</b>	<b>n/a</b>	<b>0%</b>
<b>50A WISC-DT MADISON, WI - Nonchecklist Authorization</b>			
Population within Noise Limited Contour:	1,361,880	1,493,919	1,493,919
Population not affected by terrain losses:	1,352,543	1,477,586	1,477,586
• Lost to all DTV and analog TV (NTSC) interference:	37,543	57,097	57,097
DTV SERVICE:	1,314,951	1,420,489	1,420,489
DTV/NTSC baseline population in <i>Appendix B</i> :	1,315,000	1,315,000	1,315,000
<b>Percent of baseline population covered by DTV SERVICE:</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>
<b>Percent of DTV SERVICE impacted by proposal:</b>	<b>n/a</b>	<b>n/a</b>	<b>0%</b>

**EXHIBIT 41.2  
ANALOG TV INTERFERENCE ANALYSIS**

<b>Affected Analog TV (NTSC) Station(s):</b>	<b>Initial FCC Determination in Appendix B (1990 Census)</b>	<b>Analysis of current Record Before Proposal (1990 Census)</b>	<b>Analysis of Current Record After Proposal (1990 Census)</b>
<b>52N WWRS-TV MAYVILLE, WI</b>			
Population within NTSC Grade B contour:	87,045	1,554,988	1,554,988
Population not affected by terrain losses:	85,269	1,489,241	1,489,241
• Lost to NTSC interference:	0	391,240	391,240
• Lost to additional interference by DTV:	730	292,270	293,213
<b>Percent loss due to cumulated service reductions:</b>	<b>0.8%</b>	<b>18.8%</b>	<b>18.9%</b>
<b>Percent loss change as a result of proposal:</b>	<b>n/a</b>	<b>n/a</b>	<b>0.1%</b>
<b>55N WFXS WITTENBERG, WI</b>			
Population within NTSC Grade B contour:	n/a	353,994	353,994
Population not affected by terrain losses:	n/a	352,280	352,280
• Lost to NTSC interference:	n/a	122	122
• Lost to additional interference by DTV:	n/a	193	193
<b>Percent loss due to cumulated service reductions:</b>	<b>n/a</b>	<b>0.1%</b>	<b>0.1%</b>
<b>Percent loss change as a result of proposal:</b>	<b>n/a</b>	<b>n/a</b>	<b>0%</b>