

Exhibit 41 - Statement A
ALLOCATION CONSIDERATIONS
INTERFERENCE ANALYSIS

prepared for
KZJL License Corporation
KZJL-DT Houston, TX
Facility ID 69531
Ch. 44 1000 kW 579 m

KZJL License Corporation (“*KLC*”) is the permittee of KZJL-DT, Channel 44, Houston, Texas (file number BPCDT-19991101AAF) and licensee of the paired analog KZJL(TV) Channel 61 facility (BLCT-19950614KE). The KZJL-DT Construction Permit (“CP”) authorizes an effective radiated power (“ERP”) of 1000 kW and an antenna height above average terrain (“HAAT”) of 421 meters. The instant application seeks to modify the CP to specify a different transmitter site for KZJL-DT and increase the antenna HAAT to 579 meters.

The proposed KZJL-DT antenna system will be mounted on an existing antenna supporting structure, having FCC Antenna Structure Registration number 1059622. The antenna system will be side-mounted on one of several candelabra antenna stacks at the structure’s top. This antenna supporting structure is currently authorized for various other stations.¹

Maximum Power / Height

The proposed 1000 kW ERP exceeds the maximum permitted for the proposed antenna HAAT of 579 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 market. In this case, the land area within the proposed KZJL-DT 41 dBμ contour is 35,030 square kilometers, which does not exceed the 35,400 square kilometers of land area within the reference KPRC-DT 41 dBμ contour (Ch. 35, Houston, TX, 1.2 km distant). See the attached **Exhibit 41 - Figure 1**, a map which depicts coverage contours for these facilities. Thus, the ERP specified herein is in compliance with §73.622(f)(5) of the Commission’s Rules.

¹Stations KTXH-DT (Ch. 19, Houston, TX), KTXH(TV) (Ch. 20), KETH-DT (Ch. 24, Houston, TX), KTBU-DT (Ch. 42, Conroe, TX), KXLN-TV (Ch. 45, Rosenberg, TX), KXLN-DT (Ch. 46), and KNWS-DT (Ch. 52, Katy, TX) are authorized under various Construction Permits to utilize this site. An application is pending for KTBU(TV) (Ch. 55) to employ this site. Additionally, a separate proposal will be filed to locate the paired KZJL analog Channel 61 facility at this site.

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NTSC and DTV Station Protection

The DTV reference effective radiated power (“ERP”) and height above average terrain (“HAAT”) of 122 kW and 429 meters, respectively, for KZJL-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 KZJL-DT facility will operate with 1000 kW ERP and 579 meters HAAT; the proposed ERP and HAAT thus exceed the reference ERP and HAAT. The proposed site is located 1.0 km from the reference KZJL-DT transmitter site. 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 facilities and DTV assignments that may be attributed to the proposed KZJL-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”).² 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 KZJL-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.

Class A Station Protection

With respect to television stations that have been granted a Class A License or hold a Class A Construction Permit, the instant proposal does not involve shortspacings or prohibited contour

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. Comparisons of various results of this computer program (run on a Sun processor) to the Commission’s implementation of OET-69 show excellent correlation.

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overlap to any Class A station, except for that of a pending application for KJIB-LP (Ch. 29, Clear Lake City, TX, 1.0 km distant). KJIB-LP, which is on the Commission's list³ of Low Power Television stations eligible for a Class A license, would receive contour overlap that would be prohibited under §73.623(c)(5)(i) from the proposed KZJL-DT facility. Protection requirements to all other pertinent Class A or Class A eligible stations are met.

A detailed review of the situation regarding KJIB-LP disclosed that overlap which would be prohibited presently exists from the authorized KZJL-DT facility. This overlap creates an area of "existing" predicted interference to KJIB-LP under the standard method of interference prediction specified in §73.623(c)(5)(i).

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 modification 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 KZJL-DT facility on KJIB-LP.⁴

The results of the interference study regarding Class A station KJIB-LP are summarized in **Exhibit 41 - Table 2**. As shown therein, the proposed KZJL-DT facility is not predicted to cause any new interference to KJIB-LP. If a waiver of §73.623(c)(5)(i) with respect to KJIB-LP is necessary, then one is respectfully requested on behalf of the applicant for the reasons stated above.

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 analog Class A facility is that area predicted to receive signal levels of at least 74 dB μ using the Longley-Rice methodology, and within the 74 dB μ F(50,50) service contour distance as corrected with the dipole factor.

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KJIB-LP is licensed on Channel 5. This facility appears to be displaced due to the assignment of DTV Channel 5 to nearby KPXB-DT, Conroe, TX. Although KJIB-LP is listed as a station eligible for Class A status, according to the Commission's database no *Application for Class A Television Broadcast Station Construction Permit or License* on FCC Form 302-CA is pending for KJIB-LP on Channel 5 or Channel 29. For eligible LPTV stations operating on a "core" channel, the deadline for filing such an application (which would trigger continued interference protection) was July 12, 2001.⁵ Accordingly, although provided in this case, interference protection to KJIB-LP is not believed to be necessary.

Other Allocation Considerations

The nearest FCC monitoring station is 330.5 km distant at Kingville, TX. 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.

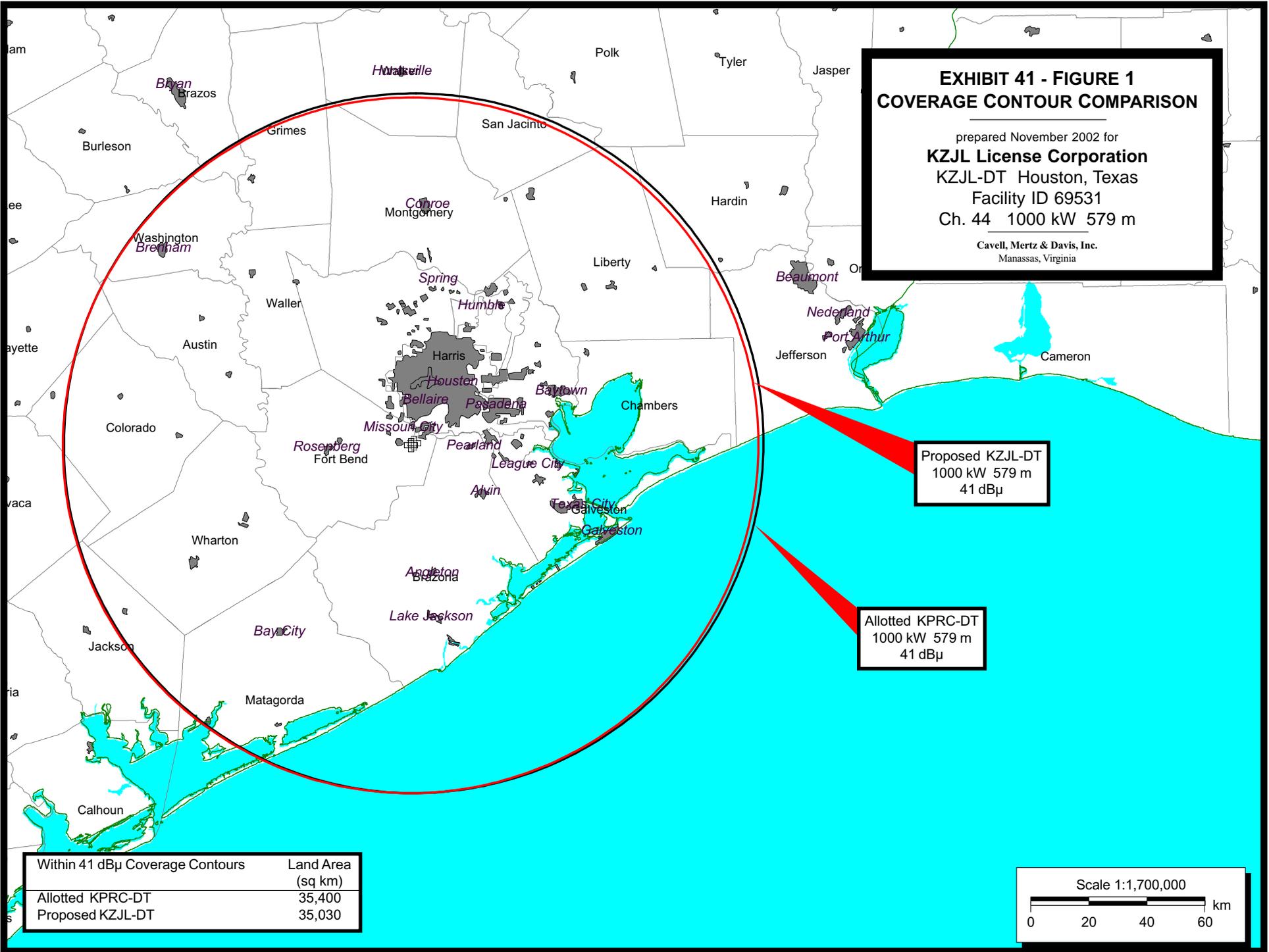
Thus, this proposal is believed to be in compliance with the current Commission Rules and policy with respect to allocation matters.

⁵See *Order*, MM Docket 00-10, DA 01-1730, released August 6, 2001.

**EXHIBIT 41 - FIGURE 1
COVERAGE CONTOUR COMPARISON**

prepared November 2002 for
KZJL License Corporation
 KZJL-DT Houston, Texas
 Facility ID 69531
 Ch. 44 1000 kW 579 m

Cavell, Mertz & Davis, Inc.
 Manassas, Virginia



Proposed KZJL-DT
 1000 kW 579 m
 41 dB μ

Allotted KPRC-DT
 1000 kW 579 m
 41 dB μ

Within 41 dB μ Coverage Contours	Land Area (sq km)
Allotted KPRC-DT	35,400
Proposed KZJL-DT	35,030

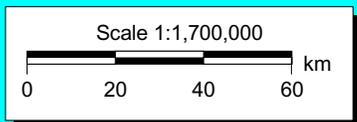


Exhibit 41 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for
KZJL License Corporation
 KZJL-DT Houston, TX
 Facility ID 69531
 Ch. 44 1000 kW 579 m

DTV Facilities

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population</u> (1)	<u>Calculated "Before" Service Population</u> (2)	<u>Calculated "After" Service Population</u> (3)	<u>--- Net "New" Interference ---</u> ("2 percent" test)		<u>Percentage Reduction of Baseline Population</u> ("10 percent" test)	
						<u>Population</u> (4)	<u>Percentage</u> (5)	<u>("10 percent" test)</u> (6)	
KTRE-DT (Ref)	Lufkin, TX 43	216.8	----- evaluation not required, KTRE-DT was ordered to DTV Channel 11 (MM Docket 01-245) -----						
KTRE-DT (CP)	Lufkin, TX 43	216.8	----- evaluation not required, KTRE-DT was ordered to DTV Channel 11 (MM Docket 01-245) -----						
KSHV-DT (Ref)	Shreveport, LA 44	375.6	----- no interference caused by proposal -----						
KSHV-DT (CP)	Shreveport, LA 44	375.5	----- no interference caused by proposal -----						

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NTSC Facilities

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population</u> (1)	<u>Calculated "Before" Service Population</u>	<u>Calculated "After" Service Population</u>	<u>--- Net "New" Interference ---</u> ("2 percent" test)		<u>---Total Interference---</u> <u>from DTV only</u> ("10 percent" test)	
				(2)	(3)	<u>Population</u> (4)	<u>Percentage</u> (5)	<u>Population</u> (7)	<u>Percentage</u> (8)
KWKT(TV) (Lic)	Waco, TX 44	261.2	643,200	607,701	604,251	3,450	0.54	3,537	0.55
KXLN-TV (CP)	Rosenberg, TX 45	0.0		----- no interference caused by proposal -----					
KXLN-TV (Lic)	Rosenberg, TX 45	1.0	3,656,056	3,653,252	3,651,933	1,319	0.04	2,289	0.06
KTMD(TV) (App)	Galveston, TX 47	1.0		----- no interference caused by proposal -----					
KTMD(TV) (Rulemaking)	Galveston, TX 47	96.8		----- no interference caused by proposal -----					
KTMD(TV) (Lic)	Galveston, TX 48	29.8		----- no interference caused by proposal -----					
KNWS-TV (Lic)	Katy, TX 51	0.8		----- no interference caused by proposal -----					

Exhibit 41 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY
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- 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 2

CLASS A STATION INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for

KZJL License Corporation

KZJL-DT Houston, TX

Facility ID 69531

Ch. 44 1000 kW 579 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 proposal</i>	
					<u>Population</u> (3)	<u>Percentage</u> (4)
KJIB-LP (App)	Clear Lake City, TX 29	1.0	2,291,342	2,283,813	0	0.00

OET-69 Class A station analysis notes:

- (1) Population within 74 dB μ service contour (with dipole factor correction)
- (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 decrease 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