

Exhibit 4 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**  
prepared for  
**Comcorp of Baton Rouge License Corp.**  
WBRL-CA Baton Rouge, Louisiana  
Facility ID 24976  
Ch. 21 150 kW

*Comcorp of Baton Rouge License Corp.* (“*Comcorp*”) is licensee of Class A television station WBRL-CA, Ch.21, Baton Rouge, Louisiana, Facility ID 24976 (file number BLTTL-19950329IB). *Comcorp* currently holds an authorization to construct a Class A television facility as proposed in BPTTL-20010227ABL. Pursuant to §73.3572(a)(3), *Comcorp* seeks permission for a minor modification of its Construction Permit to change the transmitter location, antenna system, and a slight power increase. The proposed site is an existing tower (Antenna Structure Registration number 1022810) located 16.3 km from the authorized WBRL-CA transmitter location.

### **NTSC Considerations**

The instant proposal complies with contour overlap protection and minimum distance separation requirements of §73.6011 toward all pertinent NTSC stations.

### **DTV Considerations**

In accordance with §73.6013 of the Rules a detailed interference study was conducted toward WAPT-DT (Ch. 21, Jackson, MS), KFDM-DT (Ch 21, Beaumont, TX), and WHNO-DT (Ch. 21, New Orleans, LA). The study was conducted using 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”)<sup>1</sup>. The interference study examined the change in interference as experienced by the subject DTV stations that would result from the proposed facility. All stations considered in this

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<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 excellent correlation.

study are listed in **Exhibit 4 - Table 1**. The results show that there will be no prohibited increase in interference to any DTV facility.

### **Class A, LPTV and Translator Considerations**

The proposed facility complies with contour overlap protection criteria of §§73.6012 and 73.6014 toward all Class A, LPTV, and translator facilities. The closest pertinent Class A television station is KLFT-LP (file number BLTTL-19910826JH). The proposed facilities of WBRL-CA do not cause any prohibited contour overlap of the KLFT-LP service area as shown in **Exhibit 4 - Figure 1**.

### **Conclusion**

The proposed use of Channel 21 fully complies with the standard requirements of §§73.6011 through 73.6014 of the FCC Rules. Requisite interference protection will be provided to analog TV, Low Power TV, TV translator stations, Class A television stations and digital television stations. Accordingly, it is believed that there will be no impact to NTSC facilities, DTV facilities, LPTV facilities, TV translator, or Class A television facilities as a result of the instant proposal.

Exhibit 4 - Table 1  
**OET-69 INTERFERENCE ANALYSIS RESULTS SUMMARY**

prepared for

**Comcorp of Baton Rouge License Corp.**

WBRL-CA Baton Rouge, Louisiana

Facility ID 24976

Ch. 21 150 kW

Stations Considered	City, State Channel	Distance (km)	Baseline Population (1)	Calculate “Before” Service Population (2)	Calculated “After” Service Population (3)	--- Net “New” Interference --- Population (4)	Percentage (5)
<b><u>DTV Facilities</u></b>							
WHNO-DT (Ref)	New Orleans, LA 21	128.6	1,532,000	1,531,688	1,528,585	3,103	0.20
WHNO-DT (CPMOD)	New Orleans, LA 21	128.6	1,532,000	1,531,688	1,528,585	3,103	0.20
WAPT-DT (Ref)	Jackson, MS 21	236.1	592,000	592,782	592,715	67	0.01
WAPT-DT (CP)	Jackson, MS 21	236.1	592,000	681,066	681,066	0	0.00
KFDM-DT (Ref)	Beaumont, TX 21	260.3					
KFDM-DT (CPMOD)	Beaumont, TX 21	260.3					

- Notes: (1) For DTV stations, greater of NTSC or DTV Service Population, from FCC Table  
 (2) For NTSC stations, total population within noise-limited contour  
 (3) Service population after reduction from terrain and interference losses, before consideration of proposal  
 (4) Service population after reduction from terrain and interference losses, considering proposal  
 (5) Net change in population receiving interference resulting from proposal, equals (2) minus (3). A negative number indicates a *reduction* in interference.  
 For DTV stations, the limit is 0.5 percent.  
 Proposal’s impact in terms of percentage, equals (4)/(1) times 100 percent. A negative number indicates a *reduction* in interference.

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*”

**Cavell, Mertz & Davis, Inc.**

