

Exhibit 41 - Statement A  
**NATURE OF THE PROPOSAL &  
PROPOSED ANTENNA SYSTEM &  
ALLOCATION CONSIDERATIONS**

prepared for  
**KITV Hearst-Argyle Television, Inc.**  
KITV-DT Honolulu, Hawaii  
Facility ID 64548  
Ch. 40 1000 kW -2 m

*KITV Hearst-Argyle Television, Inc. ("KITV")* is the licensee of KITV-DT, Channel 40, Honolulu, Hawaii (file number BLCDT-19980318KG) and licensee of the paired analog KITV(TV) Channel 4 facility (BLCT-2552). The KITV-DT facility is authorized to operate with a directional antenna having an ERP of 8.5 kW and an antenna height above average terrain ("HAAT") of 1 meter. The instant checklist application for construction permit proposes a non-directional antenna system with a slightly reduced antenna height and an increased ERP of 1000 kW on the same antenna support structure.

The proposed KITV-DT antenna system will be mounted on an existing antenna supporting structure, having FCC Antenna Structure Registration number 1019034. This antenna supporting structure is currently authorized for the paired analog TV station, KITV(TV).

The proposed transmitting antenna, a *Dielectric* model TFU-18GTH-R-O4, is non-directional in the horizontal plane. This antenna will employ 0.5 degrees of electrical beam tilt. The ERP will be 1000 kilowatts, horizontally polarized. The antenna system will be installed in accordance with the manufacturer's instructions. Said installation will be supervised on-site by a competent technical representative of the applicant.

**FCC Monitoring Station Protection - Waipahu, HI**

The FCC Enforcement Bureau's Waipahu, Hawaii Monitoring Station is situated approximately 18.7 km distant on a bearing of N 300.6° E (N21° 22' 45" W 157° 59' 54"). Using standard FCC F(50,10) "average elevation" methodology, the proposed facility would provide a

*Prepared June 25, 2002 by Mark B. Peabody*

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

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92.5 dB $\mu$  (42.2 mV/m) signal level at the Monitoring Station. Considering the standard FCC prescribed method, the resultant signal strength at the Waipahu Monitoring Station exceeds the 10 mV/m guideline established in §73.1030(c)(1).

Based on informal consultation with the Commission's Enforcement Bureau staff, the 10 mV/m signal level referenced in §73.1030(c)(1) was developed primarily for AM broadcast frequencies (540 - 1700 kHz). Higher signal levels for VHF and UHF television stations are acceptable. Commission Staff has advised that their threshold for objection (in the Channel 40 frequency band) is a signal level of approximately 134 mV/m (102.5 dB $\mu$ ). Thus, the 35.9 mV/m signal level attributed to the proposed KITV-DT facility is not expected to be objectionable to the Commission's Enforcement Bureau staff. Nevertheless, a copy of the application will be forwarded to the Enforcement Bureau.

#### **Terrain Data & HAAT Determination**

The determination of the effective antenna height above average terrain ("HAAT") herein is based upon manually derived terrain data for the eight "cardinal" radials, obtained from KITV's engineering data on file at the Commission (file number BPCT-4921). The determination of height above average terrain ("HAAT") excluded the consideration of the 180°, 225°, and 270° radials per §73.625(b)(4). The 3.2 to 16.1 km section of these radials extends entirely over the Pacific Ocean, and the DTV coverage contour does not encompass United States land area beyond the 16.1 km portion of these radials. Accordingly, the determination of HAAT was based on the average antenna elevation of the remaining five radials (0°, 45°, 90°, 135°, and 315°). Only the portion of the 135° radial extending from the 3.2 km sector to the outermost portion of United States land area was employed in determining the average elevation along this radial, as the DTV coverage contour does not encompass United States land area beyond the 16.1 km portion of the 135° radial.<sup>1</sup> Averaging

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<sup>1</sup>The HAAT determination for the licensed KITV was also determined in this fashion, per §73.684(d) (file number BPCT-4921).

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these five radials, the proposed antenna's resulting height above average terrain is minus two (-2) meters.

**Allocation Considerations**

For KITV-DT, the DTV reference effective radiated power ("ERP") and height above average terrain ("HAAT") of 1000 kW and 33 meters, respectively, on Channel 40 have been established with a non-directional antenna pattern 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 KITV-DT facility is licensed with a directional antenna and an ERP of 8.5 kW ERP and 1 meter HAAT. The instant application proposes operation with a non-directional antenna system, a slight decrease in antenna height, and an increased ERP of 1000 kW on the same antenna support structure. As there was no Hawaiian terrain data employed in the Commission's DTV replication process; and as there are no specified replication directional patterns for the Hawaiian stations; as recommended informally by Commission staff, an omnidirectional reference pattern is assumed for KITV-DT. Thus, it is believed that this is a checklist application which complies with the Commission's allocation Rules and policies regarding NTSC, DTV, and Class A stations.