

Exhibit 41 - Statement A
ALLOCATION CONSIDERATIONS
INTERFERENCE ANALYSIS

prepared for
Emmis Television License Corporation of Wichita
KSNW-DT Wichita, Kansas
Facility ID 72358
Ch. 45 1000 kW 312 m

Emmis Television License Corporation of Wichita (“Emmis”) is the licensee of analog station KSNW(TV) Channel 3, Wichita, Kansas (file number BLCT-2525) and has authorization to construct the paired KSNW-DT facility on Channel 45 under a Construction Permit (“CP”) (BPCDT-19990709LH) with a nondirectional effective radiated power (“ERP”) of 1000 kW and an antenna height above average terrain (“HAAT”) of 276.2 meters. The instant application herein proposes to modify the CP to specify operation of KSNW-DT at a new location with an ERP of 1000 kW and a higher HAAT of 312 meters.

The antenna system for KSNW-DT will be top-mounted on a proposed new antenna support structure immediately adjacent to the existing KSNW analog Channel 3 tower. The FAA has been notified of the proposed tower construction, and when a *Determination of No Hazard* is received, the structure will be registered with the FCC. The proposed change in site location for KSNW-DT is one (1) second of latitude and no change of longitude from the CP.

The attached **Exhibit 41 - Figure 1** is a map which depicts the coverage contours for the proposed KSNW-DT facility. Per the Commission’s requirements, the DTV service contour (41 dBμ) of the facility will completely encompass the principal community. **Exhibit 41 - Figure 1** also demonstrates that the enhanced principal community coverage requirement of 48 dBμ (required by December 31, 2004 for commercial stations) will also be met by the proposed facility.

The DTV reference ERP and HAAT of 1000 kW and 305 meters, respectively, for KSNW-DT on Channel 45 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 (“SMO&O”), per §73.622(f)(1) of the

Exhibit 41 - Statement A
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(page 2 of 3)

Commission's Rules. The proposed KSNW-DT facility will operate with a non-directional ERP of 1,000 kW at 312 meters HAAT¹ at a location 0.38 km removed from the reference site. The proposed ERP/HAAT combination thus exceeds the reference ERP/HAAT. Accordingly, as required by §73.622(f)(5), a study was conducted to evaluate interference to analog and DTV facilities that may be attributed to the proposed KSNW-DT facility.

Discussion

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.

All stations considered in this study are listed in **Exhibit 41 - Table I**. The results of the interference study, also summarized in **Exhibit 41 - Table I**, indicate that any additional interference to these stations meets the Commission's 2% / 10% *de minimis* 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 hold a Class A Construction Permit, the instant proposal does not involve prohibited contour overlap to any Class A station except KTQW-LP (Ch. 49, Wichita, KS, 18.2 km distant). Pursuant to §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

¹The proposed ERP does not exceed the maximum permitted for the involved HAAT, per §73.622(f)(8)(i).

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

Exhibit 41 - Statement A
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INTERFERENCE ANALYSIS
(page 3 of 3)

demonstrated using OET-69 methods. Accordingly, detailed interference studies were conducted in accordance with OET-69 to determine the impact of the proposed KSNW-DT facility on KTQW-LP. The results of the interference study regarding Class A station KTQW-LP is also summarized in **Exhibit 41 - Table I**. As shown therein, the proposed KSNW-DT facility is not predicted to cause any new interference to KTQW-LP.

If a waiver of §73.623(c)(5)(i) with respect to KTQW-LP is necessary, then one is respectfully requested on behalf of the applicant for the reasons stated above.

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

Other Allocation Considerations

The nearest FCC monitoring station is at Grand Island, Nebraska, at a distance of 358.3 km from the proposed site. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. The proposed site is also located outside the area specified in §73.1030(a)(1). Thus, notification of the instant proposal to the National Radio Astronomy Observatory at Green Bank, West Virginia, is not required. There are no AM broadcast stations located within 3.2 km (2 miles) of the KSNW-DT site, according to information extracted from the Commission's engineering database.

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

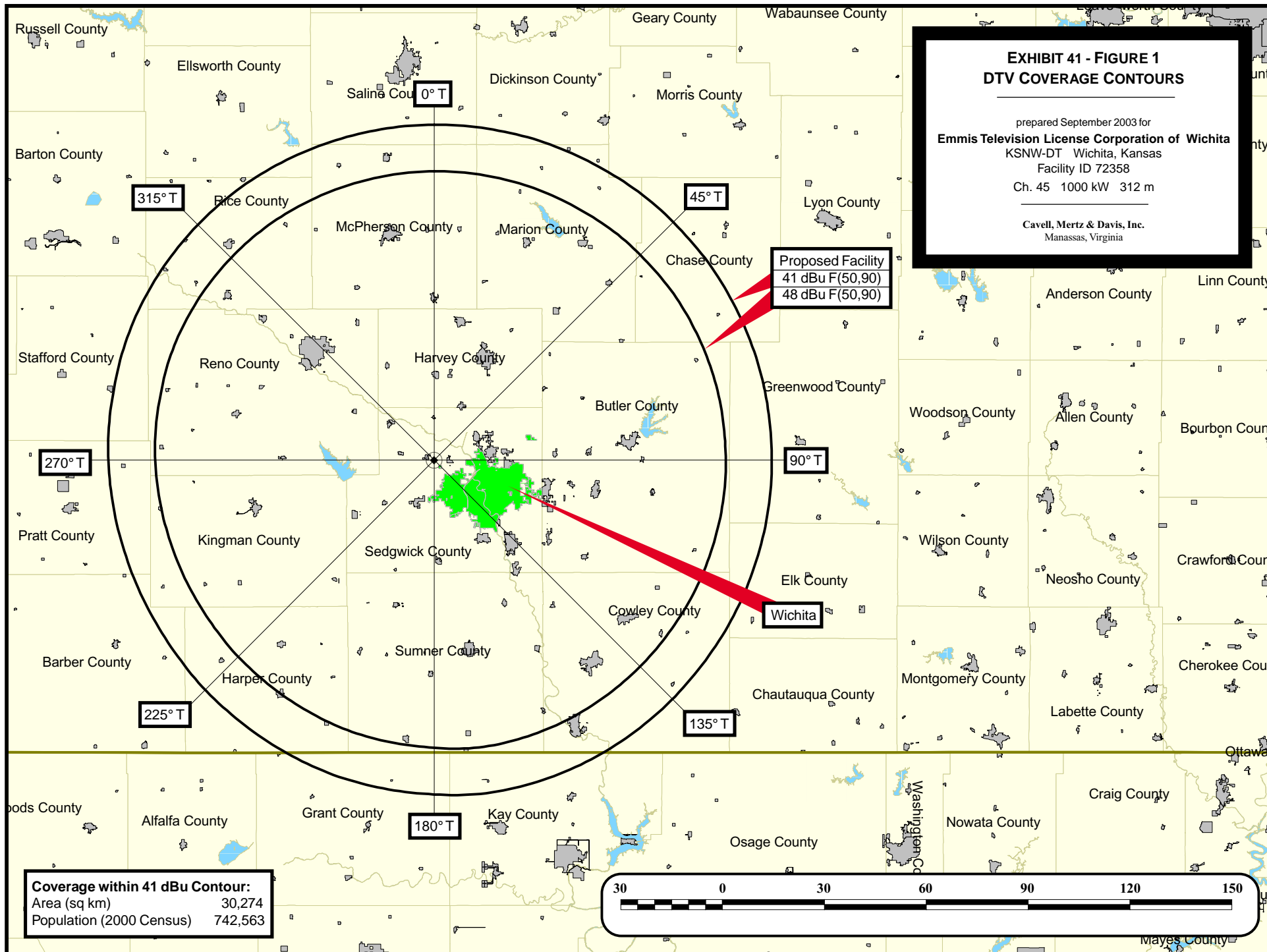


Exhibit 41 - Table I
INTERFERENCE ANALYSIS RESULTS SUMMARY
 prepared for
Emmis Television License Corporation of Wichita
 KSNW-DT Wichita, Kansas
 Facility ID 72358
 Ch. 45 1000 kW 312 m

DTV Facilities

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population (1)</u>	<u>Calculated “Before” Service Population (2)</u>	<u>Calculated “After” Service Population (3)</u>	<u>--- Net “New” Interference --- (“2 percent” test)</u>		<u>Percentage Reduction of Baseline Population (“10 percent” test) (6)</u>
						<u>Population</u> (4)	<u>Percentage</u> (5)	
WIBW-DT (CP)	Topeka, KS 44	187.3				----- no interference caused by proposal -----		
WIBW-DT (Ref)	Topeka, KS 44	187.3				----- no interference caused by proposal -----		
KAFT-DT (LIC)	Fayetteville, AR 45	379.6	706,000	707,759	707,831	(72)	-NA-	-NA-
KAFT-DT (Ref)	Fayetteville, AR 45	379.6	706,000	705,847	705,819	28	0.00	0.00
KMTV-DT (CP)	Omaha, NE 45	412.6				----- no interference caused by proposal -----		
KMTV-DT (Ref)	Omaha, NE 45	412.6				----- no interference caused by proposal -----		
New (DTV) (PRM)	Derby, KS 46	17.0	622,090	622,063	611,500	10,563	1.70	1.70

Exhibit 41 - Table I
INTERFERENCE ANALYSIS RESULTS SUMMARY
(page 2 of 3)

NTSC Facilities

Stations Considered	City, State Channel	Distance (km)	Baseline Population (1)	Calculated “Before” Service Population	Calculated “After” Service Population	--- Net “New” Interference --- (“2 percent” test)		---Total Interference--- from DTV only (“10 percent” test)	
				Population (2)	Population (3)	Population (4)	Percentage (5)	Population (7)	Percentage (8)
960726KJ (APP)	Wichita, KS 42	0.5		----- no interference caused by proposal -----					
960930KH (APP)	Wichita, KS 42	0.5		----- no interference caused by proposal -----					
960920KJ (APP)	Wichita, KS 42	0.6		----- no interference caused by proposal -----					
960528KP (APP)	Wichita, KS 42	39.2		----- no interference caused by proposal -----					
951106KP (APP)	Lincoln, NE 45	336.5	587,947	290,364	290,344	20	0.00	-NA-	-NA-
951107KG (APP)	Lincoln, NE 45	337.0		----- no interference caused by proposal -----					
950630KE (APP)	Lincoln, NE 45	337.5	357,391	113,604	113,600	4	0.00	-NA-	-NA-
951106KF (APP)	Lincoln, NE 45	343.8	419,105	159,237	159,237	0	0.00	-NA-	-NA-
KTQW-LP (LIC)	Wichita, KS 49	18.2		----- no interference caused by proposal -----					

Exhibit 41 - Table I
INTERFERENCE ANALYSIS RESULTS SUMMARY
(page 3 of 3)

- 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*"