

Exhibit 41 - Statement B  
**ALLOCATION CONSIDERATIONS**  
**INTERFERENCE ANALYSIS**  
prepared for  
**Pacific and Southern Company, Inc.**  
WLTX-DT Columbia, South Carolina  
Facility ID 37176  
Ch. 17 1000 kW 500 m

*Pacific and Southern Company, Inc. ("Pacific")* is the permittee of WLTX-DT, Channel 17, Columbia, South Carolina (file number BPCDT-19991020ABB) and licensee of the paired analog WLTX(TV) Channel 19 facility (BLCT-19850719KF). The purpose of the instant application is to modify the WLTX-DT Construction Permit to specify a decrease in antenna height on the same antenna support structure as currently authorized, with a similar directional antenna pattern.

The DTV reference effective radiated power ("ERP") and height above average terrain ("HAAT") of 232 kW and 533 meters, respectively, for WLTX-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 WLTX-DT facility is authorized with an ERP of 1000 kW ERP and 509 meters HAAT. The authorized ERP thus exceeds the reference ERP. The proposed WLTX-DT facility specifies an ERP of 1000 kW ERP and 500 meters HAAT, which also exceeds the DTV reference ERP and HAAT. 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 WLTX-DT facility.

The proposed 1000 kW ERP exceeds the maximum permitted for the proposed antenna HAAT of 500 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 area within the proposal's 41 dBμ coverage contour is smaller than that of nearby station WIS-DT(CP)(Ch. 41, Columbia, SC, 3.16 km distant). Specifically, the total area within the proposed WLTX-DT 41 dBμ contour is 32,655 square kilometers, which does not exceed the 37,991 square kilometers of area within the authorized WIS-DT 41 dBμ contour. Thus, the ERP specified herein is in compliance with §73.622(f)(5) of the Commission's Rules.

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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").<sup>1</sup> 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 WLTX-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.

There are no known Class A television stations or LPTV television stations known to be eligible for Class A status<sup>2</sup> that would receive prohibited overlap from the proposed facility.

The nearest FCC monitoring station is 366.8 km distant at Powder Springs, Georgia. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3). 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, it is believed that the instant proposal complies with the Commission's allocation Rules and policies regarding NTSC, DTV, and Class A stations.

Exhibit 41 Statement B:  
prepared May 14, 2002 by  
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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 computer) to the Commission's implementation of OET-69 show excellent correlation.

<sup>2</sup>See June 2, 2000 Public Notice *Certificates of Eligibility for Class A Television Station Status*, DA 00-1224.

Exhibit 41 - Table 1  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**  
 prepared for  
**Pacific and Southern Company, Inc.**  
 WLTX-DT Columbia, South Carolina  
 Facility ID 37176  
 Ch. 17 1000 kW 500 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 (4)</u>	<u>Percentage (5)</u>	
WPDE-DT (CP)	Florence, SC 16	135.4	1,066,000	1,385,690	1,378,721	6,969	0.65	0.00
WPDE-DT (Ref)	Florence, SC 16	135.4	1,066,000	1,065,028	1,063,954	1,074	0.10	0.19
WALB-DT (CP)	Albany, GA 17	442.4			----- no interference predicted from proposal -----			
WALB-DT (Ref)	Albany, GA 17	442.4			----- no interference predicted from proposal -----			
WKOP-DT (CP)	Knoxville, TN 17	359.0			----- no interference predicted from proposal -----			
WKOP-DT (App)	Knoxville, TN 17	359.4			----- no interference predicted from proposal -----			
WKOP-DT (Ref)	Knoxville, TN 17	358.8			----- no interference predicted from proposal -----			
WFXR-DT (CP)	Roanoke, VA 17	348.3	818,000	1,033,536	1,033,536	0	0.00	0.00

Exhibit 41 - Table 1  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**  
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**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 ("10 percent" test)</u> (6)
						<u>Population</u> (4)	<u>Percentage</u> (5)	
WFXR-DT (Ref)	Roanoke, VA 17	348.3	818,000	819,492	819,492	0	0.00	0.00
WNEH-DT (CP)	Greenwood, SC 18	132.9	772,000	849,680	849,082	598	0.08	0.00
WNEH-DT (Ref)	Greenwood, SC 18	132.9	772,000	772,065	772,008	57	0.01	0.00
WFXB-DT (CP)	Myrtle Beach, SC 18	146.2	760,000	1,131,444	1,130,366	1,078	0.14	0.00
WFXB-DT (Ref)	Myrtle Beach, SC 18	146.2		----- no interference predicted from proposal -----				

**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> (2)	<u>Calculated "After" Service Population</u> (3)	<u>--- Net "New" Interference ---</u> ( "2 percent" test)		<u>---Total Interference---</u> from DTV only ( "10 percent" test)	
						<u>Population</u> (4)	<u>Percentage</u> (5)	<u>Population</u> (7)	<u>Percentage</u> (8)
WEBA-TV (Lic)	Allendale, SC 14	116.8		----- no interference predicted from proposal -----					
WPDE-TV (Lic)	Florence, SC 15	135.4		----- no interference predicted from 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> (2)	<u>Calculated “After” Service Population</u> (3)	<u>--- Net “New” Interference --- ( “2 percent” test)</u>		<u>---Total Interference--- from DTV only (“10 percent” test)</u>	
						<u>Population</u> (4)	<u>Percentage</u> (5)	<u>Population</u> (7)	<u>Percentage</u> (8)
WJWJ-TV (Lic)	Beaufort, SC 16	153.8				----- no interference predicted from proposal -----			
WGS-TV (Lic)	Greenville, SC 16	177.9				----- no interference predicted from proposal -----			
WGS-TV (CP)	Greenville, SC 16	177.9				----- no interference predicted from proposal -----			
WNCN(TV) (Lic)	Goldsboro, NC 17	269.1	2,233,550	2,004,328	2,003,527	801	0.04	29,044	1.3
WUNE-TV (Lic)	Linville, NC 17	239.3	1,218,100	832,999	828,458	4,541	0.37	6,956	0.57
WTBS(TV) (Lic)	Atlanta, GA 17	336.9	3,161,191	3,025,972	3,022,914	3,058	0.10	20,266	0.64
WCCB(TV) (Lic)	Charlotte, NC 18	129.8	1,824,429	1,498,753	1,498,755	0	0.00	111,585	6.12
WMMB(TV) (Lic)	Florence, SC 21	135.4				----- no interference predicted from proposal -----			
WMMB(TV) (CP)	Florence, SC 21	135.4				----- no interference predicted from proposal -----			
WOLO-TV (Lic)	Columbia, SC 25	2.1				----- no interference predicted from 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 number in parenthesis 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 I:  
prepared May 14, 2002 by  
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