

Exhibit 41 - Statement A
ALLOCATION CONSIDERATIONS
INTERFERENCE ANALYSIS
prepared for
WCTV Licensee Corp.
WCTV-DT Thomasville, Georgia
Facility ID 31590
Ch. 46 1000 kW 265 m

WCTV Licensee Corp (“WCTV”) is the licensee of analog station WCTV-TV Channel 6, Thomasville, Georgia (file number BLCT-19870630KF) and has authorization to construct the paired WCTV-DT facility on Channel 46 under a Construction Permit (“CP”) (file number BPCDT-20001113ABJ) with an effective radiated power (“ERP”) of 1000 kW and an antenna height above average terrain (“HAAT”) of 566 meters. The instant application herein proposes to modify the CP to specify operation of WCTV-DT at a new location with an ERP of 1000 kW at a reduced HAAT of 265 meters.

The instant application also proposes to co-locate first adjacent channel WVUP-CA, (NTSC Channel 45, file number BLTTA-20030227ABY) using the same antenna system for both facilities to minimize the predicted interference to WVUP. The application for WVUP-CA is being filed separately and concurrently with the instant application.

The proposed antenna system for WCTV-DT will be a “common” multi-user antenna top-mounted on an existing antenna structure (ASR number 1031203). According to information provided by the applicant, no change in overall tower structure height is proposed as a result of this proposal.

The attached **Exhibit 41 - Figure 1** is a map which depicts the coverage contours for the proposed WCTV-DT facility. The DTV reference ERP and HAAT of 1000 kW and 619 meters, respectively, for WCTV-DT on Channel 46 have been established under a Rulemaking (file number BPRM-20000328AAL). The proposed WCTV-DT facility will operate with a non-directional ERP of 1000 kW at 265 meters HAAT at a location 27.3 km removed from the reference site. The FCC

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41 dBu F(50, 90) predicted contour of the proposed ERP/HAAT combination is wholly contained within the 41 dBu contour of the reference 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").¹ 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 minimus 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 WBXT-CA (Ch. 43, Tallahassee, FL, 12 km distant) and WVUP-CA (Ch. 45, Tallahassee, FL, 12.2 km distant). Protection requirements to all other pertinent Class A or Class A eligible stations are met.

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 demonstrated using OET-69 methods. Accordingly,

¹The 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.

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detailed interference studies were conducted in accordance with OET-69 to determine the impact of the proposed WCTV-DT facility on WBXT-CA and WVUP-CA. The results of the interference study regarding Class A station WBXT is summarized in **Exhibit 41 - Table I**. As shown therein, the proposed WCTV-DT facility is not predicted to cause any new interference to WBXT-CA.

Interference studies were also conducted to determine the impact of the proposed WCTV-DT facility on WVUP-CA. Because of the predicted interference to the current WVUP authorization, the instant proposal considered co-location of first adjacent channel WVUP-CA with the proposed WCTV facility. As the summary in **Exhibit 41 - Table I** demonstrates, no interference is predicted to occur from the proposed WCTV-DT facility to a co-located WVUP-CA facility. Christian Television Corporation, Inc., licensee of WVUP-CA will be filing under separate cover, an application proposing relocation of the WVUP transmitter facility.

If a waiver of §73.623(c)(5)(i) with respect to WBXT-CA or WVUP-CA 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 Powder Springs, Georgia, at a distance of 367.9 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 WCTV-DT site, according to information extracted from the Commission's engineering database. No new tower

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erection or modification which affects the overall height to the tower is envisioned by the instant proposal.

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

Proposed Site Coordinates
30° 34' 27" N Lat
84° 12' 09" W Lon
Antenna: Omnidirectional
Antenna C/R 305 m AMSL

Thomasville

Reference Facility
BPRM-20000328AAL
1000 kW 618 m
41 dBμ

Proposed Facility
1000 kW 265 m
41 dBμ
48 dBμ

Authorized
WCTV-DT
Site

Proposed
WCTV-DT
Site

EXHIBIT 41 - FIGURE 1
DTV COVERAGE CONTOURS
WCTV-DT THOMASVILLE, GEORGIA
Facility ID: 31590
Ch. 46 1000 kW 265 m

prepared July 2003 for
WCTV Licensee Corp.

Cavell, Mertz & Davis, Inc.
Manassas, Virginia

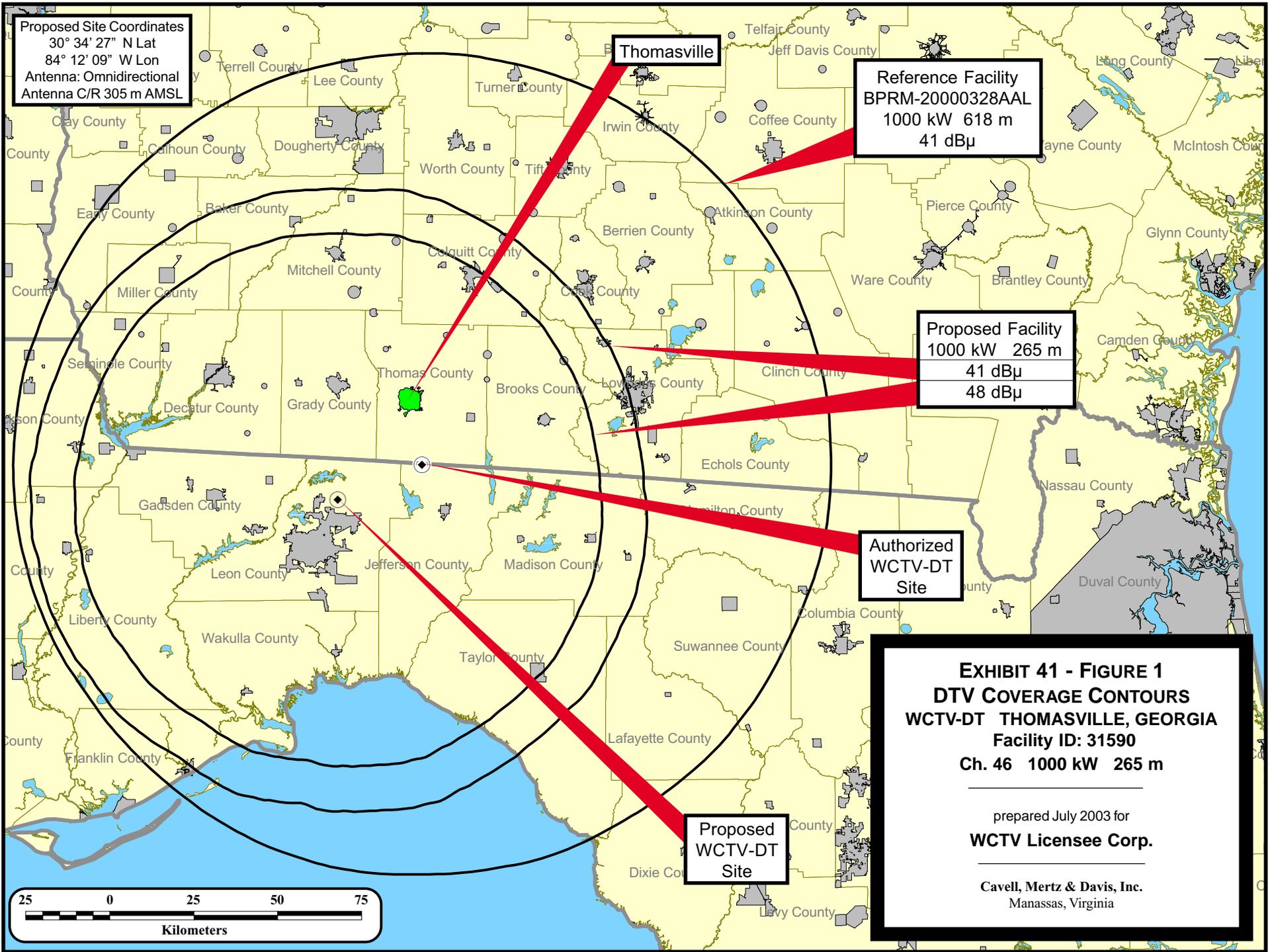
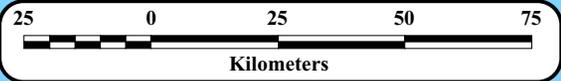


Exhibit 41 - Table I
INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for
WCTV Licensee Corp.
WCTV-DT Thomasville, Georgia
Ch. 46 1000 kW 265 m

DTV Facilities

| <u>Stations Considered</u> | <u>City, State Channel</u> | <u>Distance (km)</u> | <u>Baseline Population</u> (1) | <u>Calculated</u> <u>"Before"</u> <u>Service</u> <u>Population</u> | <u>Calculated</u> <u>"After"</u> <u>Service</u> <u>Population</u> | <u>--- Net "New" Interference ---</u> <u>("2 percent" test)</u> | | <u>Percentage Reduction of Baseline Population ("10 percent" test)</u> (6) | |
|----------------------------|----------------------------|----------------------|-----------------------------------|---|--|---|--------------------------|---|--|
| | | | | (2) | (3) | <u>Population</u> (4) | <u>Percentage</u> (5) | | |
| WMCF-DT (CP) | Montgomery, AL 46 | 277.6 | 366,000 | 570,543 | 570,133 | 410 | 0.11 | 3.32 | |
| WMCF-DT (Ref) | Montgomery, AL 46 | 277.6 | | ----- no interference caused by proposal ----- | | | | | |
| WCLB-DT (APP) | Leesburg, FL 46 | 374.0 | | ----- no interference caused by proposal ----- | | | | | |
| WCLB-DT (CP) | Leesburg, FL 46 | 374.0 | | ----- no interference caused by proposal ----- | | | | | |
| WCLB-DT (Ref) | Leesburg, FL 46 | 302.2 | | ----- no interference caused by proposal ----- | | | | | |
| WPCT-DT (CP-Mod) | Panama City Beach, FL 47 | 157.6 | | ----- no interference caused by proposal ----- | | | | | |
| WPCT-DT (REF) | Panama City Beach, FL 47 | 157.6 | | ----- no interference caused by proposal ----- | | | | | |
| WTVM-DT (LIC) | Columbus, GA 47 | 201.6 | | ----- no interference caused by proposal ----- | | | | | |
| WTVM-DT (Ref) | Columbus, GA 47 | 201.6 | | ----- no interference caused by proposal ----- | | | | | |

Exhibit 41 - Table I
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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 --- ("2 percent" test)</u> | | <u>---Total Interference--- from DTV only ("10 percent" test)</u> | |
|-------------------------------|-----------------------------|----------------------|-----------------------------------|--|--|--|--------------------------|---|--------------------------|
| | | | | (2) | (3) | <u>Population</u> (4) | <u>Percentage</u> (5) | <u>Population</u> (7) | <u>Percentage</u> (8) |
| WFXL(TV) (LIC) | Albany, GA 31 | 90.0 | 405,837 | 403,655 | 403,344 | 311 | 0.08 | 2,493 | 0.61 |
| 970331LQ (App) | Dothan, AL 39 | 128.0 | | ----- no interference caused by proposal ----- | | | | | |
| 960920KM (App) | Dothan, AL 39 | 133.3 | | ----- no interference caused by proposal ----- | | | | | |
| WBXT-CA (CP) | Tallahassee, FL 43 | 12.0 | 185,180 | 159,984 | 159,984 | 0 | 0.00 | 0 | 0.00 |
| WVAG(TV) (LIC) | Valdosta, GA 44 | 103.9 | | ----- no interference caused by proposal ----- | | | | | |
| WVUP-CA (App) ¹ | Tallahassee, FL 45 | 0.0 | | ----- no interference caused by proposal ----- | | | | | |
| WPCT(TV) (LIC) | Panama City Beach, FL 46 | 157.6 | | ----- no interference caused by proposal ----- | | | | | |
| WGCL-TV (LIC) | Atlanta, GA 46 | 358.8 | | ----- no interference caused by proposal ----- | | | | | |
| WTLH (TV) (LIC) | Bainbridge, GA 49 | 25.0 | | ----- no interference caused by proposal ----- | | | | | |

¹Please see Exhibit 41 - Statement A regarding relocation of WVUP-CA.

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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*"