

Exhibit 41 - Statement A
PROPOSED ANTENNA SYSTEM
ALLOCATION CONSIDERATIONS
prepared for
Gray Television Licensee, Inc.
WIBW-DT Topeka, Kansas
Facility ID 63160
Ch. 44 193 kW (MAX-DA) 379 m

Gray Television Licensee, Inc. (“*Gray*”) is the permittee of WIBW-DT, Channel 44, Topeka, Kansas (file number BPCDT-19991029ADS) and licensee of the paired analog WIBW-TV Channel 13 facility (BLCT-2399). WIBW-DT is authorized to operate with an effective radiated power (“ERP”) of 892.3 kW and an antenna height above average terrain (“HAAT”) of 421 meters. Under the instant application, *Gray* seeks to modify the WIBW-DT CP to specify a reduction in ERP and HAAT and use of a directional antenna.

WIBW-DT presently holds a Special Temporary Authorization (“STA”, BMDSTA-20051004ABE) having an ERP of 193 kW and an antenna HAAT of 379 meters, using a directional antenna. *Gray* is contemporaneously filing a request to modify the STA to adjust the rotation angle of the directional antenna pattern. Under the instant proposal, the WIBW-DT CP will be modified to specify the same antenna and operating parameters as the modified STA facility, at an ERP of 193 kW and a HAAT of 379 m.

All WIBW-DT facilities described herein specify the same transmitting location. No change in site location is proposed. The existing WIBW-DT antenna supporting structure is associated with FCC Antenna Structure Registration (“ASR”) number 1032648. The site coordinates as reported on the ASR record differ from the FCC licensing records for this facility by 3 seconds in latitude and 1 second in longitude. Accordingly, the site coordinates are corrected herein to match the data in the ASR record. No actual change in transmitter site location is proposed.

The specified antenna system is an ERI model ALP32L4-HSP-44. Electrical beamtilt of 1.0 degrees will be employed. The antenna’s horizontal plane pattern, expressed in terms of relative field and power, is supplied in **Exhibit 41 - Figure 1**, properly oriented relative to True North. **Exhibit 41 - Figures 2 and 2A** graphically present the theoretical vertical plane (elevation) pattern.

Exhibit 41 - Statement A
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(Page 2 of 3)

A map is supplied as **Exhibit 41 - Figure 3**, which depicts the standard predicted coverage contours. This map includes the boundaries of Topeka, WIBW-DT's principal community. As demonstrated thereon, the proposed facility complies with §73.625(a)(1), as the entire principal community will be encompassed by the 48 dB μ contour.

The map attached as **Exhibit 41 - Figure 4** supplies a comparison of the presently authorized and proposed 41 dB μ noise-limited DTV service contour locations. No extension in contour location will result, in compliance with the Commission's August 3, 2004 "freeze" concerning expansion in service area.¹

WIBW-DT has successfully received a tentative post-transition channel assignment corresponding to the present WIBW-TV Channel 13, and will "carry-over" its replication facility back to Channel 13. As shown in the following table, the proposed facility would serve 85.4% of the target baseline service population, which satisfies the 80% baseline population match requirement of the DTV Channel Election process².

¹*Public Notice* "Freeze on the Filing of Certain TV and DTV Requests for Allotment or Service Area Changes," DA 04-2446, released August 3, 2004.

²See Report and Order, "*Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*," FCC 04-192, released September 7, 2004.

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(Page 3 of 3)

WIBW-DT Population Match Determination³

<u>WIBW-TV Facility</u>	<u>ERP/HAAT</u>	<u>Interference-Free Service Population (2000 Census)</u>	<u>Percent Match of Target</u>
NTSC Ch. 13 (1997 baseline facility)	316 kW / 421 m	595,619	--
DTV Ch. 44 DTV Allotment	912.4 kW / 421 m	682,549	--
DTV Ch. 44 Proposed	193 kW / 379 m	508,651	85.4%

Allocation Matters

Under the instant proposal, WIBW-DT will operate at its presently authorized site with reduced ERP and HAAT. The resulting coverage and interfering contour locations are wholly within those of the authorized facility. The proposal's ERP/HAAT combination (193 kW MAX-DA / 379 m) does not exceed that which was allotted to WIBW-DT (870.9 kW MIN-DA / 421 m), therefore a detailed interference study per OET Bulletin 69 is not required. As a "checklist" facility, no consideration of Class A television stations is required.

The nearest FCC monitoring station is 294.3 km distant at Grand Island, NE. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. 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, this proposal is believed to be in compliance with the current Commission Rules and policy with respect to allocation matters.

³ Interference-free service population is population within contour less population subject to terrain blockage and interference per FCC OET Bulletin 69. Target population for "Percent Match" is the smaller of the 1997 NTSC facility and DTV allotment.

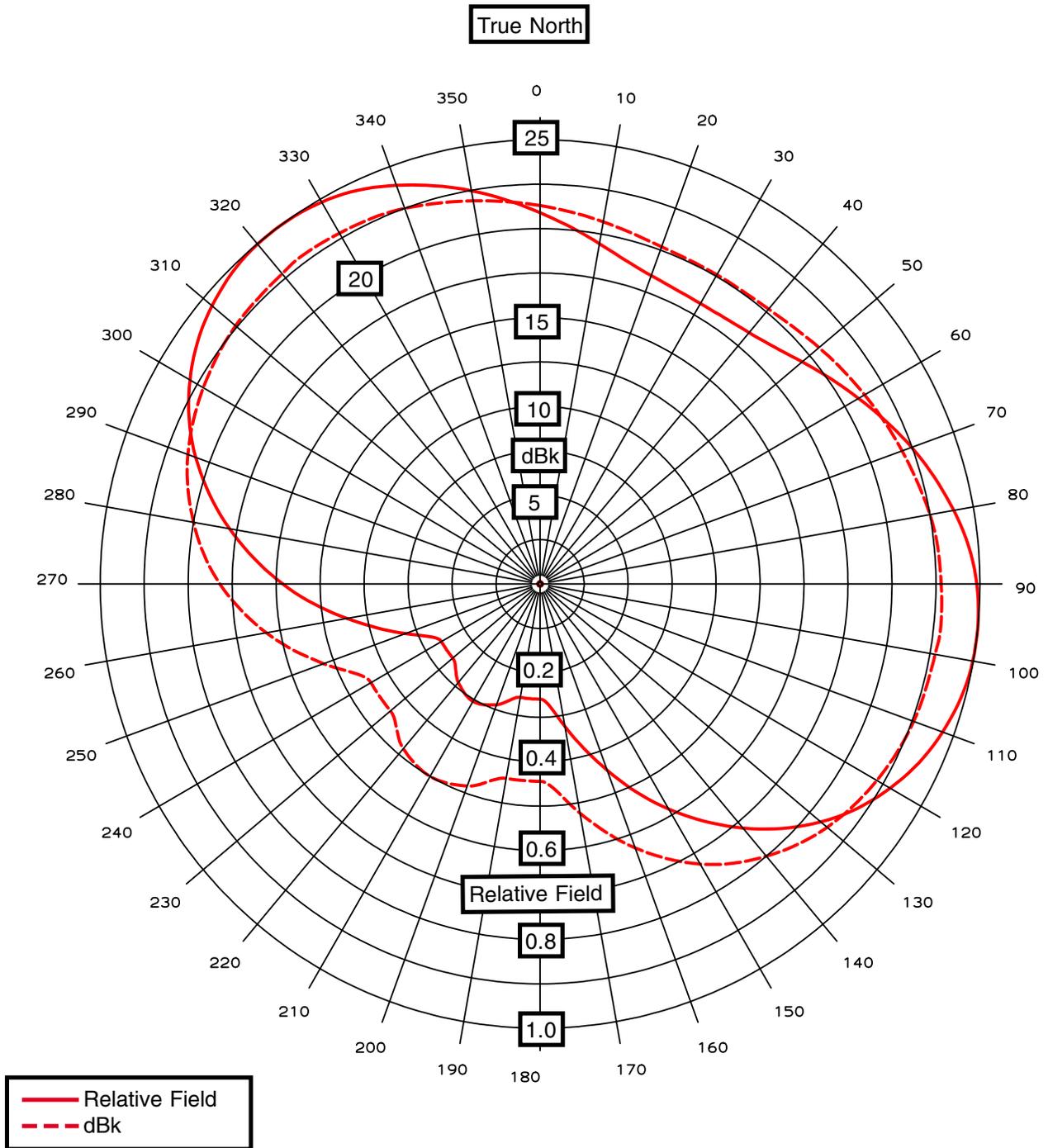


EXHIBIT 41 - FIGURE 1
ANTENNA HORIZONTAL PLANE RADIATION PATTERN

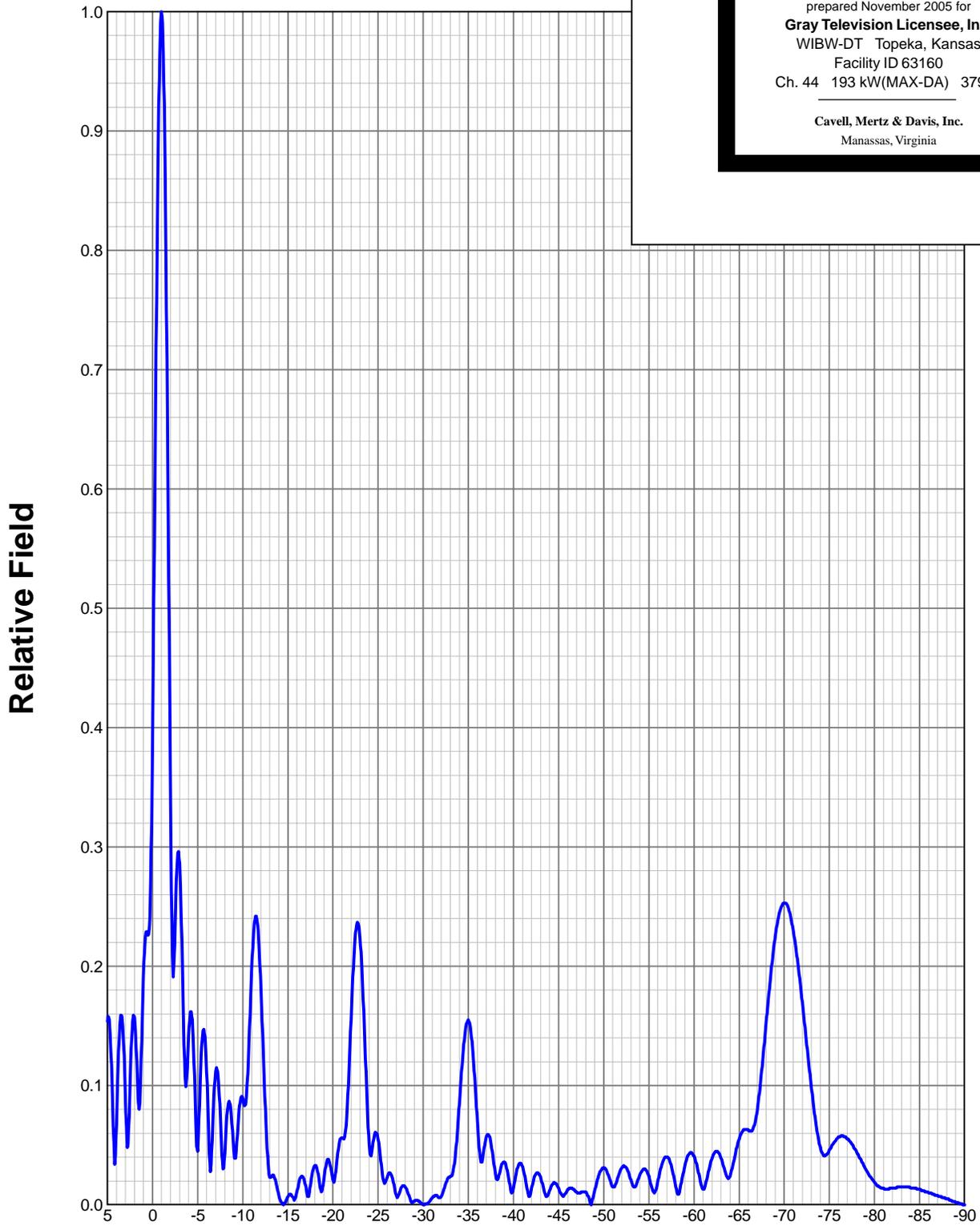
prepared November 2005 for
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Cavell, Mertz & Davis, Inc.
 Manassas, Virginia

**EXHIBIT 41 - FIGURE 2
ANTENNA VERTICAL ELEVATION
RADIATION PATTERN**

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**EXHIBIT 41 - FIGURE 2A
ANTENNA VERTICAL ELEVATION
RADIATION PATTERN (DETAIL)**

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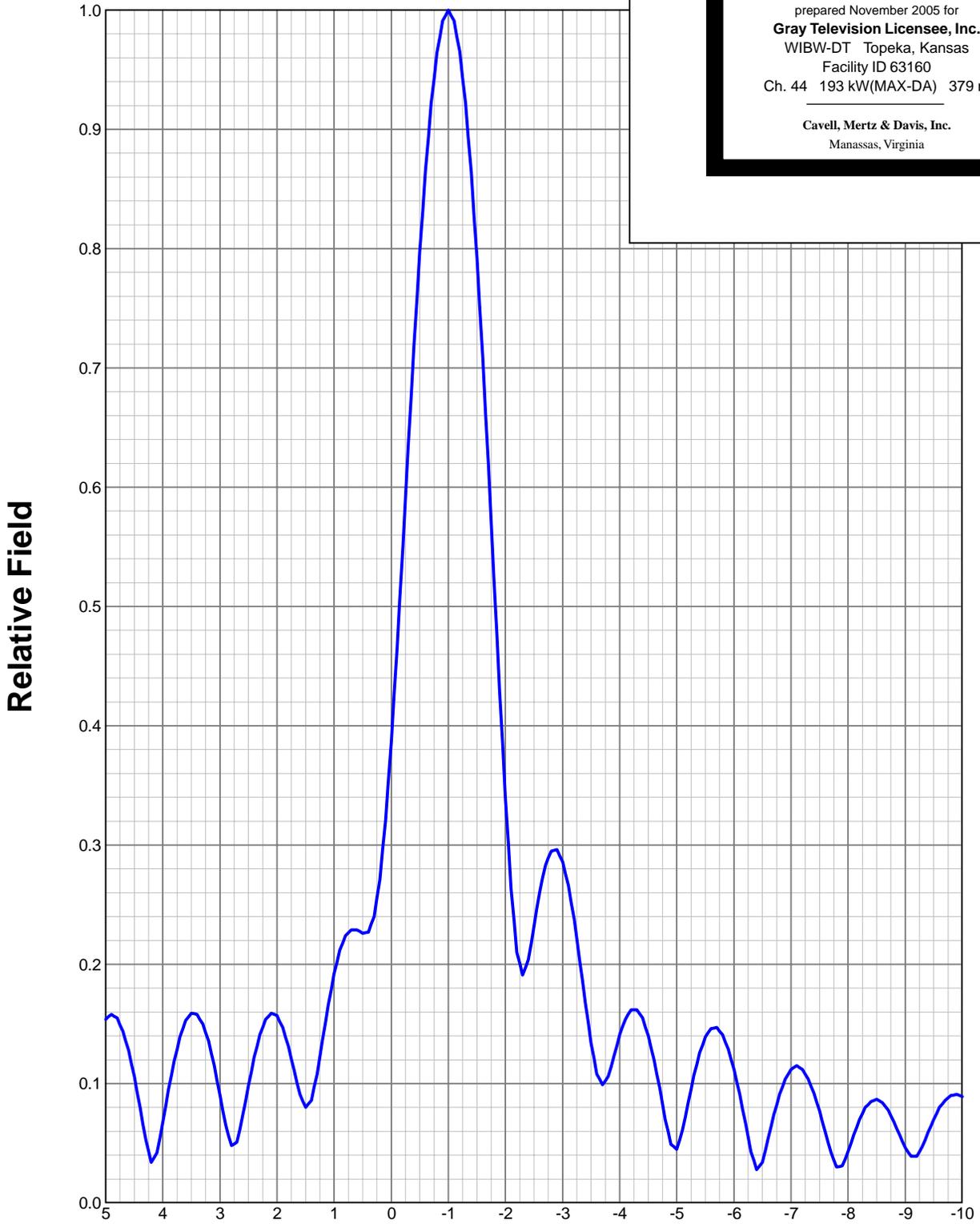
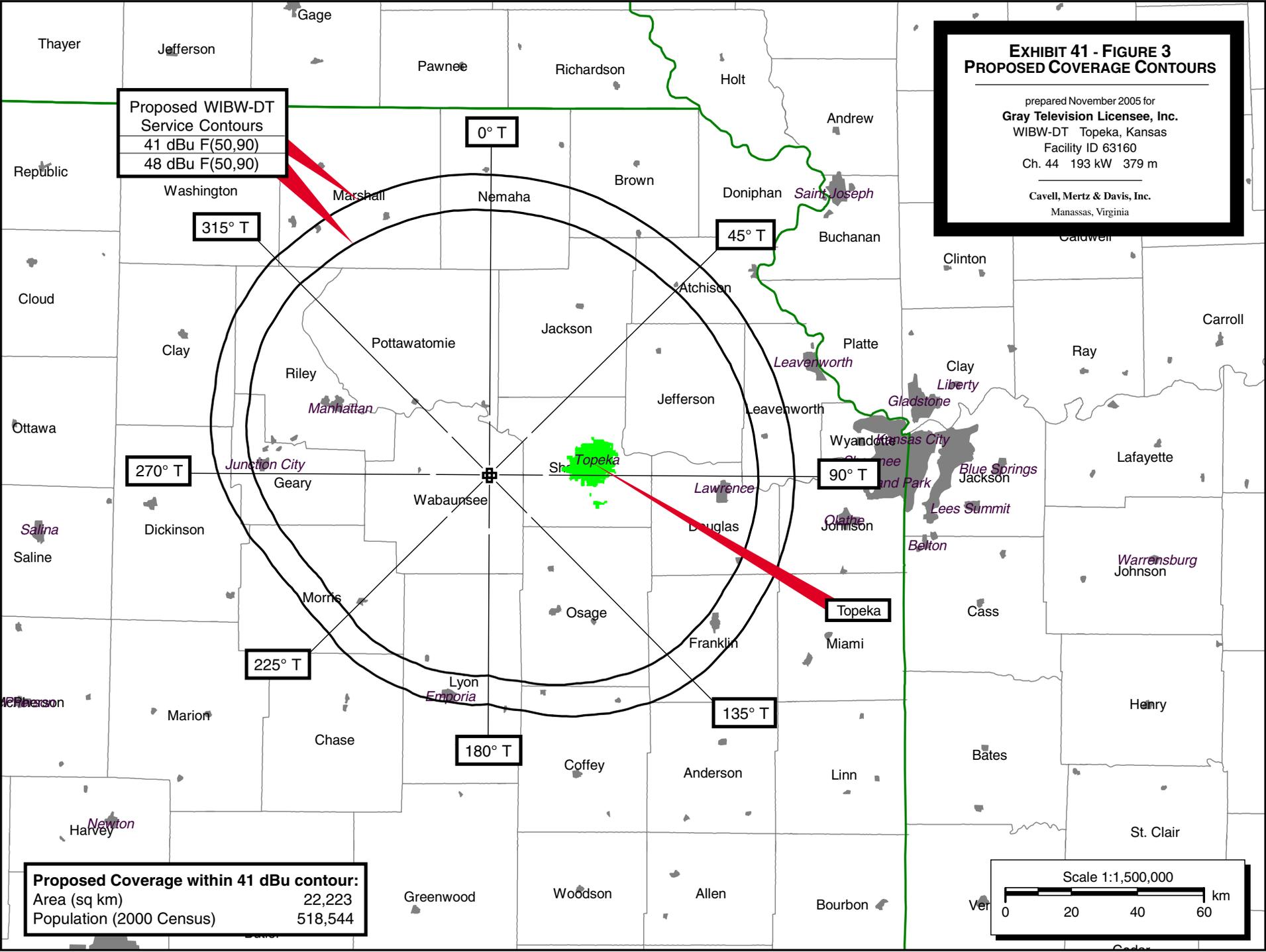


EXHIBIT 41 - FIGURE 3
PROPOSED COVERAGE CONTOURS

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**Proposed WIBW-DT
 Service Contours**
 41 dBu F(50,90)
 48 dBu F(50,90)

270° T

315° T

225° T

180° T

135° T

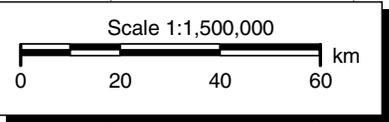
90° T

45° T

0° T

Topeka

Proposed Coverage within 41 dBu contour:
 Area (sq km) 22,223
 Population (2000 Census) 518,544



**EXHIBIT 41 - FIGURE 4
COVERAGE CONTOUR COMPARISON**

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DTV Ch. 44
Proposed Facility
41 dBu

Present CP
41 dBu
(DTV Service)

