

Exhibit 41 - Statement B
ALLOCATION CONSIDERATIONS
INTERFERENCE ANALYSIS
prepared for
Emmis Television License Corporation
KREZ-DT Durango, Colorado
Facility ID 48589
Ch. 15 46 kW 90.4 m

Emmis Television License Corporation herein proposes to modify its Construction Permit for KREZ-DT (file number BPCDT-19991029AGL). The purpose of the instant proposal is to specify changes in the proposed antenna system (and commensurate directional antenna pattern), and slight decreases in ERP and antenna HAAT to 46 kW and 90 meters, respectively. Additionally, a change in geographic coordinates of two seconds latitude is specified herein to correct the KREZ-DT site data.

The same site as that employed by the licensed KREZ-TV analog Channel 6 facility is proposed to be used for KREZ-DT. Considering the two second coordinate correction, the proposed site is located 0.1 km from the “reference” facility coordinated established for KREZ-DT.

The proposed effective radiated power (ERP) - antenna height above average terrain (“HAAT”) combination (46 kW at 90 meters) exceeds the DTV reference ERP -HAAT combination (50 kW - 110 meters) for this station as established under §73.622(f)(1), in that the proposed facility’s directional antenna pattern results in the ERP along some azimuths exceeding the allotted values. Accordingly, pursuant to §73.622(f)(5) of the Commission’s rules, a study was conducted to evaluate interference to other facilities and assignments that may be attributed to the proposed KREZ-DT facility.

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*

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Interference, July 2, 1997 (“OET-69”)¹. The interference study examined the 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 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. Thus, this proposal is believed to be in compliance with the provisions of §73.623(c)(2) of the Commission’s rules.

With respect to television stations that have been granted a Class A License or hold a Class A Construction Permit, or are existing Low Power Television (LPTV) stations that are eligible for Class A status,² the instant proposal does not cause contour overlap to any facility that would normally be prohibited under §73.623(c)(5).

Thus, it is believed that the instant proposal complies with the Commission’s allocation Rules and policies regarding its impact to NTSC, DTV, and Class A stations.

The nearest FCC monitoring station is 659 km distant at Douglas, AZ. This exceeds by a large margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. Similarly, the Table Mountain Radio Receiving Zone at Boulder, CO is far removed from the proposed site, at 394 km distant. There are no AM stations within 3.2 kilometers of the proposed transmitter site, based on information contained within the Commission’s database.

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

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

Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY
 prepared for
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 KREZ-DT Durango, Colorado
 Facility ID 48589
 Ch. 15 46 kW 90.4 m

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 --- (“2 percent” test)</u> | | <u>Percentage Reduction of Baseline Population (“10 percent” test)</u> (6) |
|--------------------------------|--------------------------------|--------------------------|---------------------------------------|--|---|---|--|---|
| KFQX-DT (Ref 71.5 kW) | Grand Junction, CO 15 | 213.5 | | | | ----- no interference caused by proposal ----- | | |
| KFQX-DT (CP 71.5 kW) | Grand Junction, CO 15 | 213.5 | | | | ----- no interference caused by proposal ----- | | |
| KTVJ-DT (Ref 99.6 kW) | Boulder, CO 15 | 355.2 | | | | ----- no interference caused by proposal ----- | | |
| KTVJ-DT (CP 200 kW) | Boulder, CO 15 | 355.2 | | | | ----- no interference caused by proposal ----- | | |

Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY
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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) |
| 960703KK (New - App) | Price, UT 15 | 364.0 | | ----- no interference caused by proposal ----- | | | | | |

- 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*”