

Exhibit 41 - Statement B
ALLOCATION CONSIDERATIONS & INTERFERENCE ANALYSIS
prepared for
Liberman Television of Dallas License Corp.
KMPX-DT Decatur, Texas
Facility ID 73701
Ch. 30 1000 kW 544 m

Liberman Television of Dallas License Corp. (“*Liberman*”) is the licensee of KMPX(TV), Channel 29, Decatur, Texas and the permittee of KMPX-DT, the paired DTV facility on Channel 30. With the instant application, *Liberman* is proposing to modify the KMPX-DT construction permit (BMPCDT-20030616ABD).

The DTV reference ERP and HAAT of 99.3 kW and 160 meters, respectively, for KMPX-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 (“*SMO&O*”), per §73.622(f)(1) of the Commission’s Rules. The proposed KMPX-DT facility will operate with a directional ERP of 1000 kW at 544 meters HAAT. The proposed KMPX-DT facility will also be situated 31.6 km from the site of the KMPX-DT reference facility. The proposed site is thus in excess of 5 km and the proposed ERP/HAAT combination thus exceeds the reference ERP/HAAT. Accordingly, as required by §73.622(f)(5) and §73.622(d)(1), a study was conducted to evaluate interference to analog and DTV facilities that may be attributed to the proposed KMPX-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 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.

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.

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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% interference limits to all pertinent NTSC and DTV stations and allotments. As noted in **Exhibit 41 - Table I**, a pending application for a new TV station on Channel 31 at Fort Worth, Texas was dismissed as of June 16, 2003, pursuant to the Commission's Broadcast Actions Report released June 30, 2003, (BPET-19960920WF, Facility ID 83954).²

With respect to television stations that have been granted a Class A License or hold a Class A Construction Permit, the instant proposal causes contour overlap only to K30DJ (Lic), Ch. 30, Wichita Falls, Texas (Facility ID 11029, BLTTL-19931112IW), 206.4 km distant.

With regard to the licensed K30DJ, per §73.623(c)(5)(iii) of the Commission's Rules, a request for waiver of the standard contour protection requirements of §73.623 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 minor modification may be demonstrated using OET-69 methods. Accordingly, detailed interference studies were conducted in accordance with OET-69 to determine the impact of the proposed KMPX-DT facility on K30DJ.³

The results of the interference studies regarding Class A station K30DJ are summarized in **Table II**. The analysis compares the impact to K30DJ from the proposed KMPX-DT facility with

²As reported on **Exhibit 41 - Table I**, the instant proposal is predicted to cause interference to 4.65% of the population within the Grade B service area for BPET-19960920WF. Prior to its dismissal, the application had not even been placed on "cut-off." Pursuant to Commission Rules and stated policy, §73.623(h) and Report and Order and Further proposed Rule Making, in MM Docket 00-39, FCC-01-24, released January 19, 2001 (para 52) the adopted system of priorities would not have required protection of the pending application, BPET-19960920WF until it had been placed on "cut-off." Thus, the application, as dismissed, does not warrant consideration.

³For OET-69 evaluation of Class A station service, a nominal cell size of 1 km was employed (since the Class A station service area is much smaller than that for full-power stations). The service area for the involved analog Class A facility is that area predicted to receive signal levels of at least 74 dBμ using the Longley-Rice methodology, and within the 74 dBμ F(50,50) service contour distance as corrected with the dipole factor.

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that of the allotment facility for KMPX-DT. As shown therein, the proposed KMPX-DT facility will cause no new interference to K30DJ.

Thus, it is believed that the instant proposal complies with the Commission's allocation Rules and policies regarding NTSC, DTV, and Class A stations. In the event that the Commission deems a waiver of §73.623 is required with regard to K30DJ, one is respectfully requested.

There are no AM stations within 3.2 kilometers of the proposed transmitter site, based on information contained within the Commission's database. The nearest FCC Monitoring station is 577.4 km distant at Kingsville, Texas. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station.

Exhibit 41 - Table I
INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for

Liberman Television of Dallas License Corp.

KMPX-DT Decatur, Texas

Facility ID 73701

Ch. 30 1000 kW 544 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 ---</u> ("2 percent" test)		<u>Percentage Reduction of Baseline Population ("10 percent" test)</u> (6)
						<u>Population</u> (4)	<u>Percentage</u> (5)	
KYLE-DT (Ref)	Bryan, TX 29	216.9				----- no interference caused by proposal -----		
KYLE-DT (CP)	Bryan, TX 29	216.9				----- no interference caused by proposal -----		
KABB-DT (Ref)	San Antonio, TX 30	386.2				----- no interference caused by proposal -----		
KABB-DT (CP)	San Antonio, TX 30	386.2	1,505,000	1,601,944	1,601,119	825	0.05	0.00
KVHP-DT (Ref)	Lake Charles, LA 30	411.0				----- no interference caused by proposal -----		
KVHP-DT (CP)	Lake Charles, LA 30	411.0				----- no interference caused by proposal -----		
KFXK-DT (Ref)	Longview, TX 31	193.2				----- no interference caused by proposal -----		
KFXK-DT (CP)	Longview, TX 31	193.2	533,000	714,854	714,786	68	0.01	0.00

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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 ---</u> ("2 percent" test)		<u>---Total Interference---</u> <u>from DTV only</u> ("10 percent" test)	
						<u>Population</u> (4)	<u>Percentage</u> (5)	<u>Population</u> (7)	<u>Percentage</u> (8)
KDFI(TV) (Lic)	Dallas, TX 27	5.1		----- no interference caused by proposal -----					
KDFI(TV) (CP Mod)	Dallas, TX 27	5.1		----- no interference caused by proposal -----					
KQOK(TV) (Lic)	Shawnee, OK 30	300.8	1,079,650	1,069,591	1,067,725	1,866	0.17	5,762	0.53
KQOK(TV) (CP Mod)	Shawnee, OK 30	300.8	1,079,650	1,069,591	1,067,725	1,825	0.17	5,762	0.53
KDAF(TV) (Lic)	Dallas, TX 33	5.1		----- no interference caused by proposal -----					
KMPX(TV) (Lic)	Decatur, TX, 29	31.6	3,742,958	3,706,191	3,682,119	24,072	0.64	30,230	0.81
KMPX(TV) (CP)	Decatur, TX, 29 (BMPCT-20031121AOP)	0.0		----- no interference caused by proposal -----					
KUVN(TV) (Lic)	Garland, TX, 23	0.2		----- no interference caused by proposal -----					
New (App)	Ft. Worth, TX 31 (BPET-19960920WF - Dismissed 06/16/2003 per Broadcast Actions Report 06/30/2003 - Protection Not Required - See Exhibit 41 - Statement B)	33.4	3,522,029	3,034,869	2,871,232	163,637	4.65	498,000	14.14

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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 II
CLASS A STATION INTERFERENCE ANALYSIS RESULTS SUMMARY
 prepared for
Liberman Television of Dallas License Corp.
 KMPX-DT Decatur, Texas
 Facility ID 73701
 Ch. 30 1000 kW 544 m

<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population (1)</u>	<u>Service Population (2)</u>	<i>---- Unique Interference ---- from proposal</i>	
					<u>Population (3)</u>	<u>Percentage (4)</u>
K30DJ (Lic)	Wichita Falls, TX 30	206.4	113,001	112,825	0	0.00

OET-69 Class A station analysis notes:

- (1) Population within 74 dBμ service contour (with dipole factor correction)
- (2) Service population after reduction from terrain and interference losses, before consideration of proposal
- (3) Net change in population receiving interference resulting from proposal
A number in parenthesis indicates a decrease in interference
- (4) Proposal's impact in terms of percentage, equals (3)/(1) times 100 percent: not to exceed zero when rounded to the nearest whole percent