

Exhibit 41 - Statement B  
**ALLOCATION CONSIDERATIONS**  
**INTERFERENCE ANALYSIS**  
prepared for  
**White Knight Broadcasting of Natchez License Corp.**  
WNTZ-DT Natchez, Mississippi  
Facility ID 16539  
Ch. 49 790 kW 549 m

*White Knight Broadcasting of Natchez License Corp.* is the permittee of WNTZ-DT, Channel 49, Natchez, Mississippi (BPCDT-19991027ABM) and licensee of the paired analog Channel 48 facility (file number BLCT-19951010KS). The purpose of the instant application is to modify the WNTZ-DT Construction Permit to specify a different transmitter site for WNTZ-DT, increase the antenna height above average terrain (“HAAT”) to 549 meters, reduce the effective radiated power (“ERP”) to 790 kW, and to employ a different directional antenna system.

The DTV reference ERP and antenna HAAT of 82.2 kW and 316 meters, respectively, for WNTZ-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 proposed WNTZ-DT facility will operate with 790 kW ERP and 549 meters HAAT; the proposed ERP thus exceeds the reference ERP. The proposed site is located 77.5 km from the reference WNTZ-DT transmitter site. Accordingly, as required by §73.622(f)(5) and §73.622(d)(1) 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 WNTZ-DT facility.

The proposed 790 kW ERP exceeds the maximum permitted for the proposed antenna HAAT of 549 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 proposed ERP and HAAT combination of 790 kW at 549 meters does not exceed that of station WLBT-DT (Ch. 51, Jackson, MS, located in the same market as the proposed WNTZ-DT facility), which has been allotted 1000 kW at 610 meters. The total area within the proposed WNTZ-DT 41 dB $\mu$  contour is 32,639 square kilometers, which does not exceed the 42,539 square

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kilometers within the reference WLBT-DT 41 dB $\mu$  contour. Further, the area within the 41 dB $\mu$  contour of the allotted WJTV-DT (Ch. 52, Jackson, MS, also in the same market) is 40,805 square kilometers, which also exceeds the 32,639 service area proposed herein for WNTZ-DT. Thus, the ERP specified herein is in compliance with §73.622(f)(5) of the Commission's Rules.

### **Interference Analysis**

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 WNTZ-DT). All stations considered in this study are listed in **Exhibit 41 - Table 2**. The results of the interference study, also summarized in **Exhibit 41 - Table 2**, 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.

Predicted interference with respect to the paired analog WNTZ Channel 48 facility is not summarized herein. Interference studies per OET Bulletin 69 show that interference from the instant proposal to the presently licensed WNTZ facility will exceed the Commission's *de minimis* limits. However, an application to modify the analog WNTZ facility has been filed (BPCT-2001115AAF). Under that proposal, the analog WNTZ facility will employ the same site and antenna system proposed herein for the WNTZ-DT operation, which will mitigate the potential for interference to this first-adjacent facility. Further, *White Knight Broadcasting of Natchez License Corp.*, as licensee of WNTZ, agrees to the extent required to accept such interference that may result from the operation of the WNTZ-DT facility proposed herein.

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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 to the Commission's implementation of OET-69 show good correlation.

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**NTSC Channel 50 Pending Rulemaking Proposal**

A pending proposal to assign NTSC Channel 50 to Jackson, MS (file number BPRM-20000717AEN) would cause interference to the proposed WNTZ-DT facility. Specifically, the NTSC Channel 50 proposal would reduce the proposed WNTZ-DT service population from 678,867 to 654,701, according to an OET-69 analysis. This reduction in population of 24,166 is 13.5 percent of the WNTZ-DT “Appendix B” baseline population of 179,000, which exceeds the Commission’s *de minimis* interference limit. (Note that interference from the proposed WNTZ-DT facility to the NTSC Channel 50 channel change proposal *does not exceed the de minimis limit*, as demonstrated in **Exhibit 41 - Table 2**).

Based on informal conversations with Commission Staff, it is believed that priority is provided to the DTV proposal over an NTSC channel change proposal, particularly since a Notice of Proposed Rulemaking has apparently not been issued regarding BPRM-20000717AEN. Further, Section 73.623(h)(2) of the Commission’s Rules also provide for priority of a DTV proposal over NTSC applications.

According to material on file at the Commission, it appears that the NTSC Channel 50 proposal (BPRM-20000717AEN) was advanced by two of the applicants for a vacant NTSC Channel 51 at Jackson, MS, as that NTSC allotment was displaced by the DTV Channel 51 assignment for WLBT-DT (NTSC Ch. 3, Jackson, MS). Several other applicants for the NTSC Channel 51 allotment have jointly filed a separate petition to proposing to use Channel 59 in lieu of Channel 51 (file number BPRM-20000717AEP). Thus, the Channel 50 petition is not a single solution proposed jointly by the competing multiple applicants for Channel 51.

Separately, an ongoing Notice of Proposed Rulemaking initiated by WLBT-TV is pending at the Commission to change its DTV assignment from Channel 51 to Channel 9 (Mass Media Docket Number 01-43, released February 20, 2001). Should the WLBT-TV DTV channel change become

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successful, then it may not be necessary for a substitute channel for the Jackson NTSC Channel 51 allotment and the Channel 50 proposal (BPRM-20000717AEP) becomes moot.

Considering the priority typically offered to DTV proposals within the Commission's application processing procedures, the lack of a single alternate channel change proposal in lieu of the allotted NTSC Channel 51, and the possibility that the need for an alternate channel may be made moot (by MM Docket 01-43), the pending NTSC channel change petition (BPRM-20000717AEP) is not expected to create a conflict in the grant of the instant proposal.

### **Class A Television**

Consideration was also given to Class A television stations and to Low Power Television (LPTV) and translator stations that may be eligible for Class A status.<sup>2</sup> The instant proposal meets the standard protection requirements of §73.613 with respect to all known authorized Class A and Class A eligible LPTV stations.

### **International Considerations**

The proposed WNTZ-DT site is beyond the respective international "coordination" zones, with respect to the common borders between the U.S. and Canada and between the U. S. and Mexico. No international coordination should be necessary.

### **Other Allocation Considerations**

The nearest FCC monitoring station is 619.4 km distant at Powder Springs, GA. 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.

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

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

Exhibit 41 - Table 2  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**  
 prepared for  
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 WNTZ-DT Natchez, Mississippi  
 Facility ID 16539  
 Ch. 49 790 kW 549 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)	
WXXV-DT (Ref 128.4 kW)	Gulfport, MS 48	216.2				----- no interference predicted from proposal -----		
WXXV-DT (CP 300 kW)	Gulfport, MS 48	216.2				----- no interference predicted from proposal -----		
WTOK-DT (Ref 1000 kW)	Meridian, MS 49	215.3	290,000	290,346	284,566	5,780	1.99	1.87
WTOK-DT (CP 175 kW)	Meridian, MS 49	215.3				----- checklist facility, evaluation not required -----		
KVTJ-DT (CP 1000 kW)	Jonesboro, AR 49	415.1				----- 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 (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>---Total Interference--- from DTV only ("10 percent" test)</u>	
						<u>Population (4)</u>	<u>Percentage (5)</u>	<u>Population (7)</u>	<u>Percentage (8)</u>
BPCT-19960920LS (New - App)	Magee, MS 34	99.5				----- no interference predicted from proposal -----			
BPCT-19961001LB (New - CP)	Vicksburg, MS 35	57.1	483,587	463,838	463,838	0	0.00	19,307	3.99
BPCT-19961001XI (New - App)	Vicksburg, MS 35	60.8				----- no interference predicted from proposal -----			
BPCT-19961001LY (New - App)	Vicksburg, MS 35	67.8	142,398	118,753	118,753	0	0.00	22,670	15.92
BPCT-19960710KV (New - App)	Vicksburg, MS 35	67.8	327,202	249,058	249,058	0	0.00	17,884	5.47
BPET-19960919KY (New - App)	Natchez, MS 42	62.1				----- no interference predicted from proposal -----			
BPET-19960724KR (New - App)	Columbia, MS 45	122.6				----- no interference predicted from proposal -----			
KYPX(TV) (Lic)	Camden, AR 49	228.8	149,477	148,945	148,937	8	0.01	106	0.07
WPXL(TV) (CP)	New Orleans, LA 49	232.8				----- no interference predicted from proposal -----			
WPXL(TV) (Lic)	New Orleans, LA 49	232.8				----- 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 (1)</u>	<u>Calculated</u> "Before" <u>Service Population (2)</u>	<u>Calculated</u> "After" <u>Service Population (3)</u>	<u>--- Net "New" Interference ---</u> ( "2 percent" test)		<u>---Total Interference---</u> from DTV only ( "10 percent" test)	
						<u>Population (4)</u>	<u>Percentage (5)</u>	<u>Population (7)</u>	<u>Percentage (8)</u>
BPRM-20000717AER (New - Add)	Tupelo, MS 49	316.3	299,728	259,237	259,237	0	0.00	37,695	12.58
BPRM-20000717AEN (New - Add)	Jackson, MS 50	59.1	725,698	694,338	689,883	4,455	0.61	29,278	4.03
BPCT-19961001UW (New - App)	Jackson, MS 51	62.6	620,026	609,943	607,828	2,115	0.34	4,803	0.77
BPCT-19961001UV (New - App)	Jackson, MS 51	73.4	533,339	516,390	516,390	0	0.00	11,577	2.17
BPCT-19961001UU (New - App)	Jackson, MS 51	73.4	533,384	516,435	516,435	0	0.00	11,577	2.17
BPCT-19960920LT (New - App)	Jackson, MS 51	73.4	530,161	506,444	506,444	0	0.00	18,364	3.46
BPCT-19960930LW (New - App)	Jackson, MS 51	73.4	599,990	576,515	576,512	3	0.00	21,245	3.54
BPCT-19960722KJ (New - App)	Jackson, MS 51	78.1	532,557	490,842	490,839	3	0.00	32,644	6.13
BPCT-19960711LI (New - App)	Jackson, MS 51	109.3		----- no interference predicted from proposal -----					
BPCT-19960710KU (New - App)	Jackson, MS 51	117.4		----- 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</u> "Before" <u>Service Population</u> (2)	<u>Calculated</u> "After" <u>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)
BPCT-19960710KY (New - App)	Jackson, MS 51	133.3	731,977	667,552	667,552	0	0.00	58,573	8.00

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*"