

Exhibit 42 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**  
prepared for  
**Jefferson-Pilot Communications Company of Virginia**  
WWBT-DT Richmond, Virginia  
Facility ID 30833  
Ch. 54 1000 kW 211 m

*Jefferson-Pilot Communications Company of Virginia* ("Jefferson-Pilot"), is licensee of analog station WWBT(TV) Channel 12, Richmond, Virginia (file number BMLCT-19861014KI) along with the companion Channel 54 WWBT-DT facility (BLCDT-20020204ABB). Under the present license, WWBT-DT operates with a non-directional effective radiated power ("ERP") of 860 kW and an antenna height above average terrain ("HAAT") of 211 meters. The instant application herein proposes a minor change to specify operation of WWBT-DT with an ERP of 1,000 kW at the same antenna HAAT.

The WWBT-DT licensed side-mounted antenna (a Dielectric TFU-24DSC-R 04) will continue to be employed. Thus, no tower construction or antenna installation is required. Only an increase in the transmitter power output is necessary. No change in the overall height of the antenna support structure is proposed.

The attached **Exhibit 42 - Figure 1** is a map which depicts the coverage contours for the proposed WWBT-DT facility. Per the Commission's requirements, the DTV service contour (41 dBμ) of the facility will completely encompass the principal community. **Exhibit 42 - Figure 1** also demonstrates that the enhanced principal community coverage requirement of 48 dBμ (required by December 31, 2004 for commercial stations) will also be met by the proposed facility.

#### **Allocation Matters**

Under the instant proposal, WWBT-DT will operate from its presently authorized site with only an increase in ERP using the licensed non-directional antenna. The DTV service contour location for the proposed facility is wholly contained within the DTV service contour location for the WWBT-DT reference allotment facility as demonstrated in the attached **Exhibit 42 - Figure 1**.

## Exhibit 42 - Statement A

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Thus, the proposed facility is in compliance with the Commission's June 18, 2002 "freeze" concerning expansion in service area.<sup>1</sup>

The proposal's ERP/HAAT combination (1000 kW / 211 m) exceeds that which was allotted to WWBT-DT (1000 kW / 241 m) in certain directions when the allotted directional antenna pattern is considered. Therefore, pursuant to §73.622(f)(5) of the Commission's Rules a study per §73.623(c) was conducted to evaluate interference to analog facilities and DTV stations that may be attributed to the proposed WWBT-DT facility. The detailed interference study per OET Bulletin 69<sup>2</sup> shows that the proposal complies with the Commission's 2% / 10% *de minimis* interference limits. The instant proposal does not involve prohibited contour overlap to any authorized Class A station.

### **Other Allocation Considerations**

The proposed WWBT-DT site is located more than 400 km from the nearest points on the Canadian and Mexican borders and does not require international coordination.

The nearest FCC monitoring station is at Laurel, Maryland, at a distance of 193.6 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 authorized AM stations located within the distances specified in §73.1692 of the FCC Rules, based on information extracted from the Commission's database.

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

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<sup>1</sup> Public Notice "Freeze on the Filing of TV and DTV "Maximization" Applications in Channels 52-59", DA 02-1440, 17 FCC Rcd 11290 (2002), released June 18, 2002.

<sup>2</sup> FCC Office of Engineering and Technology Bulletin 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 ("OET-69"). The implementation of OET-69 for this study followed the guidelines for 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.

# EXHIBIT 42 - FIGURE 1 PROPOSED COVERAGE CONTOURS

prepared October 2004 for  
**Jefferson-Pilot Communications  
Company of Virginia**

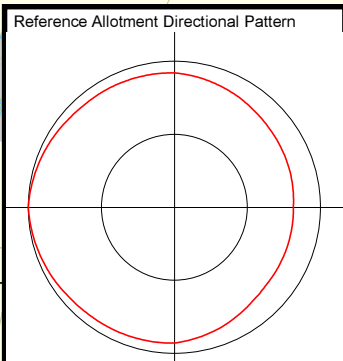
WWBT-DT Richmond, Virginia  
Facility ID 30833

Ch. 54 1000 kW 211 m

**Cavell, Mertz & Davis, Inc.**  
Manassas, Virginia

Proposed WWBT-DT  
1000 kW 211 m  
41 dBu F(50,90)  
48 dBu F(50,90)

Reference Allotment  
1000 kW 241 m  
41 dBu F(50,90)



**Proposed Coverage within 41 dBu contour:**  
Area (sq km) 17,360  
Population (2000 Census) 1,179,953

