

Exhibit 41 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**  
prepared for  
**Gannett River States Publishing Corporation**  
WJXX-DT Orange Park, Florida  
Facility ID 11893  
Ch. 10 11.1 kW 307 m

*Gannett River States Publishing Corporation* (“*Gannett*”) is the licensee of digital television (“DTV”) station WJXX-DT, Channel 10, Orange Park, FL (file number BLCDT-20020419AAJ) and licensee of the paired analog WJXX(TV) Channel 25 facility (BLCT-19971016KF). WJXX-DT is licensed to operate with a nondirectional effective radiated power (“ERP”) of 12 kW and an antenna height above average terrain (“HAAT”) of 298 meters. The instant application seeks an increase in antenna HAAT to 307 meters and a decrease in ERP to 11.1 kW.

As a matter of due diligence, representatives of *Gannett* have determined that the “as-built” antenna height is slightly higher (by 9.3 meters) than the authorized values. This was disclosed during a review of the facility data associated with preparation of the license renewal application material and in response to the Commission’s *Report and Order*<sup>1</sup> in MB Docket 03-15 regarding confirmation of FCC database engineering information.

Due to the increase in antenna height, the instant proposal also specifies a commensurate reduction in ERP to maintain the same 36 dBμ contour location as the presently licensed facility. In particular, the licensed operation (12 kW ERP / 297.5 m HAAT) and proposed operation (11.1 kW / 306.8 m) both result in a 36 dBμ service contour distance of 93.6 km. An extension in contour is avoided in order to comply with the Commission’s August 3, 2004 “freeze” concerning expansion in service area.<sup>2</sup> A request for *Special Temporary Authority* to operate WJXX-DT at 11.1 kW is being filed contemporaneously with the instant application.

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<sup>1</sup>*Report and Order* in Second Periodic Review of the Commission’s Rules and Policies Affecting the Conversion to Digital Television, MB Docket 03-15, FCC 04-192, released September 7, 2004, at para. 34.

<sup>2</sup>*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.

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Additionally, the overall structure height was found to be slightly shorter (by 3.3 meters) from that as authorized on the associated Antenna Structure Registration (“ASR”, number 1017604). Separately, the structure owner will take the necessary steps to revise the ASR with the corrected overall height.

*Gannett* employs a “common” antenna system for WJXX-DT, which is also utilized by commonly owned station WTLV-DT (Ch. 13, Jacksonville, FL).<sup>3</sup> Continued use of the existing, common antenna is proposed. No changes in site location is proposed. No tower or antenna construction work is necessary to carry out this proposal.

**Exhibit 41 - Figure 1** depicts the predicted coverage contours for the proposed WJXX-DT facility. The DTV service contour (36 dBμ) will completely encompass Orange Park, the principal community. **Exhibit 41 - Figure 1** also demonstrates that the enhanced principal community coverage requirement of 43 dBμ (required by December 31, 2004 for commercial stations) will also be met by the proposed WJXX-DT facility.

#### **NTSC and DTV Station Protection**

The DTV reference effective radiated power (“ERP”) and height above average terrain (“HAAT”) of 3.2 kW and 151 meters, respectively, for WJXX-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 WJXX-DT facility will operate with 11.1 kW ERP and 307 meters HAAT; the proposed ERP and HAAT thus exceed the reference ERP and HAAT. Further, the site is located 32.9 km from the allotment “reference” point. Although the proposed facility may be considered to be “equivalent” to the licensed WJXX-DT facility, pursuant to §73.622(d)(1) and §73.622(f)(5) of the Commission’s Rules a study per §73.623(c) was

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<sup>3</sup>The as-built height of this common antenna is within the +2 / -4 meter height allowance (see §73.1690(c)(1)) with respect to the WTLV-DT license, therefore no correction to that facility’s authorization is required.

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nonetheless conducted to evaluate interference to analog facilities and DTV assignments that may be attributed to the proposed WJXX-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*, February 6, 2004 ("OET-69").<sup>4</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 WJXX-DT). 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 to all pertinent NTSC and DTV stations and allotments.

#### **Class A Station Protection**

With respect to television stations that have been granted a Class A License or hold a Class A Construction Permit, the instant proposal does not involve prohibited contour overlap to any Class A station, except for WJKF-CA (Ch. 9, Jacksonville, FL, Lic 1.9 km distant, CP 1.8 km). The WJKF-CA licensed and CP facilities would receive contour overlap that would be prohibited under §73.623(c)(5)(i) from the proposed WJXX-DT facility. Standard protection requirements are met to all other pertinent Class A stations.

However, overlap to WJKF-CA which would be prohibited presently exists from the authorized WJXX-DT facility. This overlap creates an area of "existing" predicted interference to the WJKF-CA licensed and CP facilities under the standard method of interference prediction specified in §73.623(c)(5)(i).

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<sup>4</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 (run on a Sun processor) to the Commission's implementation of OET-69 show excellent correlation.

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Per §73.623(c)(5)(iii) of the Commission's Rules, a request for waiver of the standard contour protection requirements of §73.623(c)(5)(i) 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 modification may also be demonstrated using OET-69 methods. Accordingly, detailed interference studies were conducted in accordance with OET-69 to determine the impact of the proposed WJXX-DT facility on the WJKF-CA licensed and CP facilities.<sup>5</sup>

The results of the interference study regarding the affected Class A station are summarized in **Exhibit 41 - Table 2**. As shown therein, interference from the proposed WJXX-DT facility is predicted to be decreased to WJKF-CA licensed and CP facilities when compared to interference caused by the licensed WJXX-DT facility. Therefore, the instant proposal complies with established Commission policy regarding protection to Class A stations.

**Other Allocation Considerations**

The nearest FCC monitoring station is 308.9 km distant at Vero Beach, FL. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station.

Based on information extracted from the Commission's engineering database, the only AM station within 5 km of WJXX-DT is WIOJ (1010 kHz, Jacksonville, FL, 1.8 km distant). This is within the 3.2 km distance the Commission generally applies for directional AM station antenna pattern disturbance considerations. The WIOJ operation is directional, however grant of the instant proposal will not result in an impact to WIOJ. The instant proposal merely involves a correction to the WJXX-DT antenna height and a commensurate change in power. Since no tower or antenna construction work is necessary to carry out this proposal, there will be no change in actual conditions with respect to WIOJ or any such AM station. Therefore, it is respectfully requested that

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<sup>5</sup>For 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 facilities is that area predicted to receive signal levels of at least 68 dBμ using the Longley-Rice methodology, and within the 68 dBμ F(50,50) service contour distance.

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the Commission not attach a condition to the resulting CP for WJXX-DT regarding disturbance to WIOJ.

Thus, it is believed that the instant proposal complies with the Commission's allocation Rules and policies.

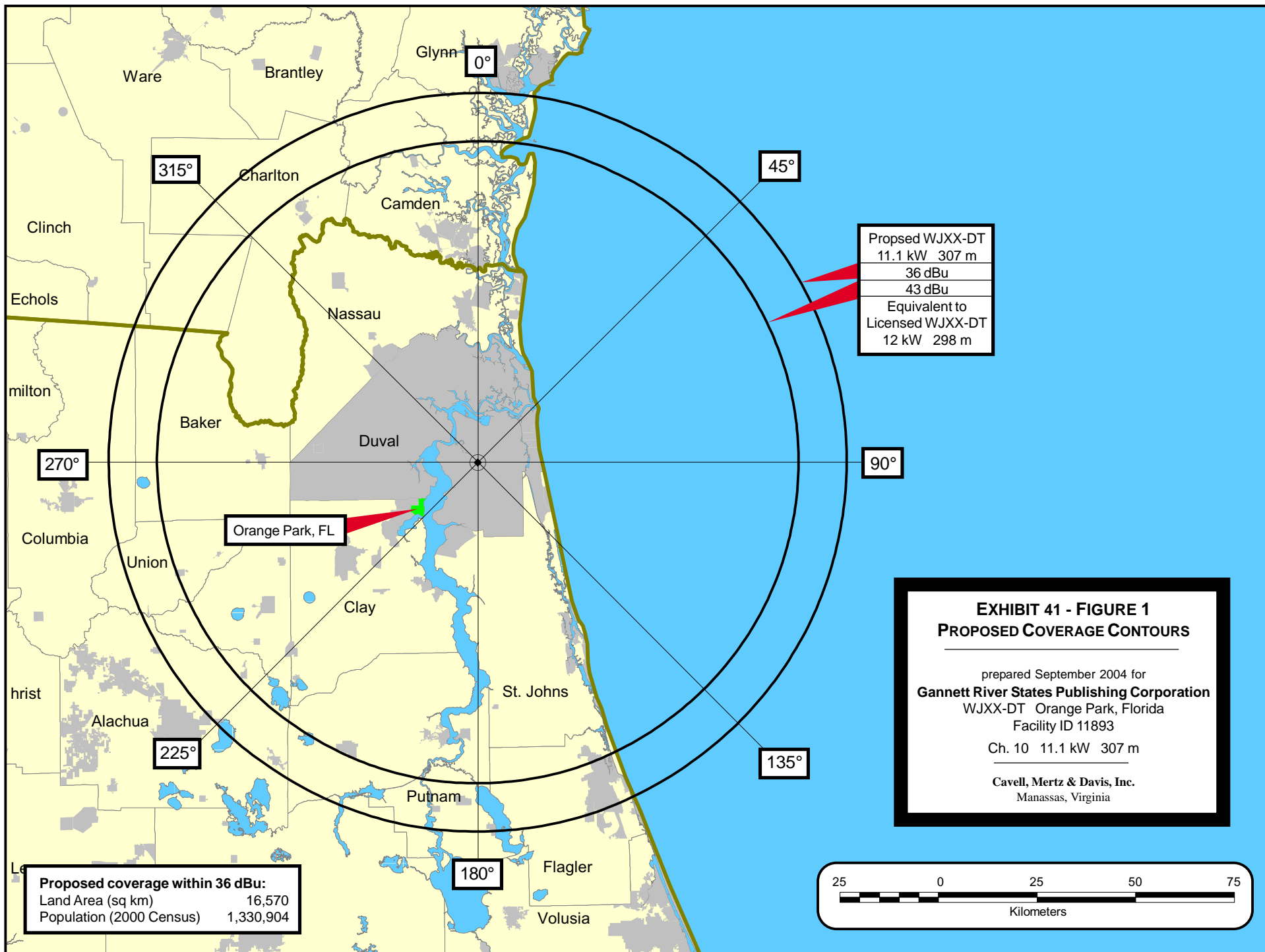


Exhibit 41 - Table 1  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**  
 prepared for  
**Gannett River States Publishing Corporation**  
 WJXX-DT Orange Park, Florida  
 Facility ID 11893  
 Ch. 10 11.1 kW 307 m

**DTV 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>Percentage Reduction of Baseline Population (“10 percent” test) (6)</u>
						<u>Population (4)</u>	<u>Percentage (5)</u>	
WXGA-DT (Ref)	Waycross, GA 9	143.5	342,000	189,060	189,060	0	0.00	44.72
WXGA-DT (CP-MOD)	Waycross, GA 9	143.5	342,000	303,910	303,910	0	0.00	11.14
WESH-DT (Ref)	Daytona Beach, FL 11	149.8	2,602,000	2,576,059	2,575,000	1,059	0.04	1.04
WESH-DT (Lic)	Daytona Beach, FL 11	190.5		----- no interference caused by proposal -----				

Exhibit 41 - 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 (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>
WFTV(TV) (Lic)	Orlando, FL 9	190.6		----- no interference caused by proposal -----					
WVAN-TV (Lic)	Savannah, GA 9	207.8		----- no interference caused by proposal -----					
WALB(TV) (Lic)	Albany, GA 10	250.1	594,365	533,619	527,463	6,156	1.04	14,886	2.50
WTSP(TV) (Lic)	St. Petersburg, FL 10	259.6	2,936,671	2,793,632	2,783,268	10,364	0.35	10,364	0.35
WTOC-TV (Lic)	Savannah, GA 11	198.4		----- 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*”



Exhibit 41 - Table 2  
**CLASS A STATION INTERFERENCE ANALYSIS RESULTS SUMMARY**  
 prepared for  
**Gannett River States Publishing Corporation**  
 WJXX-DT Orange Park, Florida  
 Facility ID 11893  
 Ch. 10 11.1 kW 307 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>
WJKF-CA (Lic)	Jacksonville, FL 9	1.9	160,017	72,647	(4,566)	<i>decreases</i>
WJKF-CA (CP)	Jacksonville, FL 9	1.8	526,053	464,267	(1,523)	<i>decreases</i>

OET-69 Class A station analysis notes:

- (1) Population within 68 dBμ service contour.
- (2) Service population after reduction from terrain and interference losses, before consideration of proposal, assuming the **Licensed** WJXX-DT operation
- (3) Net change in population receiving interference resulting from proposal in lieu of the WJXX-DT licensed facility  
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