

Exhibit 41 - Statement B
ALLOCATION CONSIDERATIONS
INTERFERENCE ANALYSIS

prepared for
USA Station Group Partnership of New Jersey
WHSI-DT Smithtown, New York
Facility ID 60553
Ch. 23 150 kW 204 m

USA Station Group Partnership of New Jersey, licensee of analog station WHSI-TV (Channel 67), has an application pending to construct the paired WHSI-DT facility on Channel 23 (file number BPCDT-19991028ADR). The purpose of the instant amendment is to reduce the antenna's height above average terrain (HAAT) and change the amount of electrical beamtilt. No other changes to the pending application are sought.

The DTV reference effective radiated power ("ERP") and height above average terrain ("HAAT") of 50 kW and 219 meters, respectively, for WHSI-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 WHSI-DT facility will operate with 150 kW ERP and 204 meters HAAT; the proposed ERP thus exceeds the reference ERP. Accordingly, as required by §73.622(f)(5), a study was conducted to evaluate interference to analog facilities and DTV assignments that may be attributed to the proposed WHSI-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

Exhibit 41 - Statement B
ALLOCATION CONSIDERATIONS
INTERFERENCE ANALYSIS
(page 2 of 3)

2, 1997 (“OET-69”).¹ 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 WHSI-DT).

The interference analysis is based on the use of a nominal 1 km cell size, which provides a finer resolution than the Commission’s standard 2 km cell size. **Commission processing using a 1 km cell size is requested.** All stations considered in this study are listed in **Table 1**. The results of the interference study, also summarized in **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.

The applicant was advised by the Commission by letter dated March 6, 2001 that the Commission’s analysis of the originally proposed WHSI-DT facility exceeded the 2% / 10% *de minimis* limit to NTSC station WEDH, Channel 24, Hartford, CT. The reduction in antenna HAAT specified herein, along with analysis of interference based on a 1 km cell size, results in no change to interference to WEDH when the proposal is compared to the allotted WHSI-DT facility. Accordingly, the provisions of §73.623(c)(2) are met with respect to the WEDH facility.

¹The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. **A cell size of 1 km was employed.** The Longley-Rice computer program input data, following the guidelines established under OET-69, includes a location variability of 50%, a time availability of 10%, a situation variability of 50%, horizontal polarization, 0.005 S/m conductivity, a climate constant of 15, an assumption of a continental temperate climate zone, and a receive antenna height of 10 meters. The service area for each DTV facility under study is that area predicted to receive signal levels of at least 41 dBμ using the Longley-Rice methodology, and within the DTV F(50,90) service contour distance as determined per §73.625(b). In instances where the DTV reference ERP is 50 kW or 1,000 kW, the Grade B contour of the associated analog station (authorized as of April 3, 1997) is used to determine the extent of the DTV station’s service area. The F(50,90) DTV service contour level is established by the formula $41 - 20\log[615/(\text{channel mid-frequency})]$ dBμ. The service area for each NTSC facility under study is that area predicted to receive signal levels of at least 64 dBμ using the Longley-Rice methodology, and within the NTSC F(50,50) service contour distance as determined per §73.684(c). The F(50,50) NTSC service contour level is established by the formula $64 - 20\log[615/(\text{channel mid-frequency})]$ dBμ. Comparisons of various results of this computer program to the Commission’s implementation of OET-69 show good correlation.

Exhibit 41 - Statement B
ALLOCATION CONSIDERATIONS
INTERFERENCE ANALYSIS
(page 3 of 3)

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 it is noted that the pending application for WHSI-DT was filed prior to December 31, 1999. Accordingly, the pending application was not required to provide protection to any station eligible for Class A status.³

The instant amendment reduces the proposed antenna's HAAT. The resulting sets of interfering contours that may impact Class A facilities from the proposal as amended contained within those of the pending application. Thus, any predicted interference to a Class A facility resulting from the proposal will be essentially the same as that which would result from the original application, as determined by §73.623(c)(5)(i). Based on the foregoing, the proposal complies with the Commission's requirements with respect to the protection of Class A stations.

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

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

³See December 7, 1999 Public Notice "*Community Broadcasters Protection Act of 1999*" *Sets Deadline of December 31, 1999 for Full Service TV Stations to File Letters of Intent to Maximize their DTV Facilities*, DA 99-2739.

Exhibit 41 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY
 prepared for
USA Station Group Partnership of New Jersey
 WHSI-DT Smithtown, New York
 Facility ID 60553
 Ch. 23 150 kW 204 m

DTV Facilities

<u>DTV Facilities</u>				Calculated “Before” Service <u>Population</u> (2)	Calculated “After” Service <u>Population</u> (3)	--- Net “New” Interference --- (“2 percent” test) <u>Population</u> <u>Percentage</u> (4) (5)		Percentage Reduction of Baseline Population (“10 percent” test) (6)
<u>Stations Considered</u>	<u>City, State Channel</u>	<u>Distance (km)</u>	<u>Baseline Population</u> (1)					
WLIW-DT (Ref 88.3 kW)	Garden City, NY 22	43.5	12,547,000	12,447,040	12,435,973	11,067	0.09	0.88
WLIW-DT (CP 88.3 kW)	Garden City, NY 22	43.5	12,547,000	12,680,579	12,669,767	10,812	0.09	0.00
WLWC-DT (Ref 155.1 kW)	New Bedford, MA 22	196.1			----- no interference predicted from proposal -----			
WLWC-DT (App 440 kW)	New Bedford, MA 22	196.2			----- no interference predicted from proposal -----			
WNJS-DT (Ref 71.7 kW)	Camden, NJ 22	206.1			----- no interference predicted from proposal -----			
WNJS-DT (CP 197 kW)	Camden, NJ 22	206.1			----- no interference predicted from proposal -----			
WHUB-DT (Ref 50 kW)	Marlborough, MA 23	205.8	5,977,000	5,988,805	5,987,731	1,074	0.02	0.00
WHUB-DT (CP 49.6 kW)	Marlborough, MA 23	205.7			----- no interference predicted from proposal -----			

Exhibit 41 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY
(page 2 of 4)

DTV Facilities

<u>DTV Facilities</u>							Percentage Reduction of Baseline Population (“10 percent” test)
Stations <u>Considered</u>	City, State <u>Channel</u>	Distance <u>(km)</u>	Baseline <u>Population</u> (1)	Calculated “Before” Service <u>Population</u> (2)	Calculated “After” Service <u>Population</u> (3)	--- Net “New” Interference --- (“2 percent” test)	
						<u>Population</u> (4)	<u>Percentage</u> (5)
WHUB-DT (App 100 kW)	Marlborough, MA 23	205.8	5,977,000	6,028,898	6,024,696	4,202	0.07
WLYH-DT (Ref 50 kW)	Lancaster, PA 23	305.3	2,079,000	2,087,986	2,087,981	5	0.00
WLYH-DT (App 325 kW)	Lancaster, PA 23	305.3	2,079,000	2,371,973	2,371,968	5	0.00
WNYE-DT (Ref 80.7 kW)	NewYork, NY 24	88.5	16,695,000	16,605,806	16,512,204	93,602	0.56
WNYE-DT (App 200 kW)	NewYork, NY 24	88.5	16,695,000	17,754,457	17,707,305	47,152	0.28

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)		
WTXX(TV) (Lic)	Waterbury, CT 20	70.0	5,303,893	3,670,784	3,670,784	0	---- no change in interference ----		

Exhibit 41 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY
(page 3 of 4)

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>
WLIW(TV) (Lic)	Garden City, NY 21	43.6	12,857,166	10,876,243	10,873,908	2,335	0.02	60,593	0.47
WWLP(TV) (CP)	Springfield, MA 22	134.4				----- no interference predicted from proposal -----			
WWLP(TV) (Lic)	Springfield, MA 22	134.4				----- no interference predicted from proposal -----			
WNJS(TV) (Lic)	Camden, NJ 23	206.1	6,107,741	5,837,463	5,807,311	30,152	0.49	275,933	4.52
WXXA-TV (Lic)	Albany, NY 23	211.1	1,338,998	1,140,350	1,140,350	0	---- no change in interference ----		
WEDH(TV) (Lic)	Hartord, CT 24	99.0	3,006,313	2,270,653	2,270,653	0	---- no change in interference ----		
WNYE-TV (Lic)	New York, NY 25	88.5	17,019,109	16,392,049	16,357,435	34,614	0.20	305,114	1.79
WHPX(TV) (Lic)	New London, CT 26	86.4				----- no interference predicted from proposal -----			
WVIT(TV) (Lic)	New Britain, CT 30	90.6	4,327,651	3,102,805	3,102,805	0	---- no change in interference ----		
WPXN-TV (Lic)	New York, NY 31	91.6				----- no interference predicted from proposal -----			

Exhibit 41 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY
(page 4 of 4)

- 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*"