Exhibit 41 - Statement A

ANTENNA DESCRIPTION
ALLOCATION CONSIDERATIONS

prepared for

KZJL License Corporation

KZJL-DT Houston, TX
Facility ID 69531
Ch. 44 1000 kW 461 m

KZJL License Corporation ("KLC") is the permittee of KZJL-DT, Channel 44, Houston, Texas (file number BMPCDT-20021107AAB) and licensee of the paired analog KZJL(TV) Channel 61 facility (BLCT-19950614KE). The KZJL-DT Construction Permit ("CP") authorizes a non-directional effective radiated power ("ERP") of 1000 kW and an antenna height above average terrain ("HAAT") of 579 meters. Under a separate CP, the analog KZJL facility is authorized to be co-located with the KZJL-DT facility. *KLC* herein seeks to modify the KZJL-DT CP to specify a reduced antenna height and use of a directional antenna pattern at the presently authorized site.

KZJL-DT is presently operating pursuant to Special Temporary Authorization ("STA", BDSTA-20030324ADZ) at the same location authorized under the KZJL-DT CP. The STA facility employs a directional antenna, side-mounted on the tower structure, with a maximum ERP of 25.5 kW. Under the instant proposal, the KZJL-DT CP will be modified to specify the same antenna as the STA facility, at an ERP of 1000 kW.

The KZJL-DT antenna system is side-mounted on an existing antenna supporting structure, having FCC Antenna Structure Registration number 1059622. This antenna supporting structure is currently authorized for various other stations.[1]

The antenna's horizontal plane pattern, expressed in terms of relative field and power, is supplied as **Exhibit 41 - Figure 1**, properly oriented relative to True North. **Exhibit 41 - Figures 2** and **2A** graphically present the theoretical vertical plane (elevation) pattern for the proposed antenna. An electrical beamtilt of 0.75 degree is proposed.

[1]Stations KTXH-DT (Ch. 19, Houston, TX), KTXH(TV) (Ch. 20), KTBU-DT (Ch. 42, Conroe, TX), KXLN-TV (Ch. 45, Rosenberg, TX), KXLN-DT (Ch. 46), KNWS-DT (Ch. 52, Katy, TX), and KZJL(TV) (Ch. 61) are authorized under various Licenses and Construction Permits to utilize this site.

Exhibit 41 - Figure 3 depicts the predicted coverage contours for the proposed KZJL-DT facility. The DTV service contour (41 dBµ) will completely encompass Houston, the principal community. **Exhibit 41 - Figure 3** 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 KZJL-DT facility.

Allocation Matters

Under the instant proposal, KZJL-DT will operate at its presently authorized site with the same maximum ERP, however the antenna height will be reduced and a directional antenna employed. Consideration of the reduction in antenna height and use of a directional antenna pattern (in lieu of non-directional) will not result in an increase in interference to any other station (and actually serves to decrease interference). Although the instant proposal should not require detailed discussion of its allocation situation with respect to other stations, pursuant to §73.622(f)(5) of the Commission's Rules a study per §73.623(c) was nonetheless conducted to evaluate interference to analog facilities and DTV stations that may be attributed to the proposed KJZL-DT facility.

The proposal's ERP/HAAT combination (1000 kW / 461 m) exceeds that which was allotted to KZJL-DT (122 kW / 429 m). A detailed interference study per OET Bulletin 69 [2] shows that the proposal complies with the Commission's 2% / 10% *de minimis* interference limits. The OET Bulletin 69 analysis indicates that any interference caused to other stations will be decreased, when compared to the presently authorized facility (1000 kW / 579 m). The instant proposal does not involve prohibited contour overlap to any authorized Class A station.

The map attached as **Exhibit 41 - Figure 4** supplies a comparison of the presently authorized and proposed 41 dBµ noise-limited DTV service contour locations. No extension in contour location

[2]FCC Office of Engineering and Technology Bulletin number 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 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.

will result, in compliance with the Commission's August 3, 2004 "freeze" concerning expansion in service area.[3]

The proposed 1000 kW ERP exceeds the maximum permitted for the proposed antenna HAAT of 461 meters currently permitted by §73.622(f)(8)(i). However, since the proposed service contour is totally contained within the present CP facility contour (1000 kW / 579 m), and since the application underlying the present CP satisfied §73.622(f)(5) which permits the ERP / HAAT limit to be exceeded to provide a service area up to that of the largest station in the market, the facilities proposed herein also satisfy §73.622(f)(5).

The nearest FCC monitoring station is 330.5 km distant at Kingville, TX. 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.

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

[3] *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.

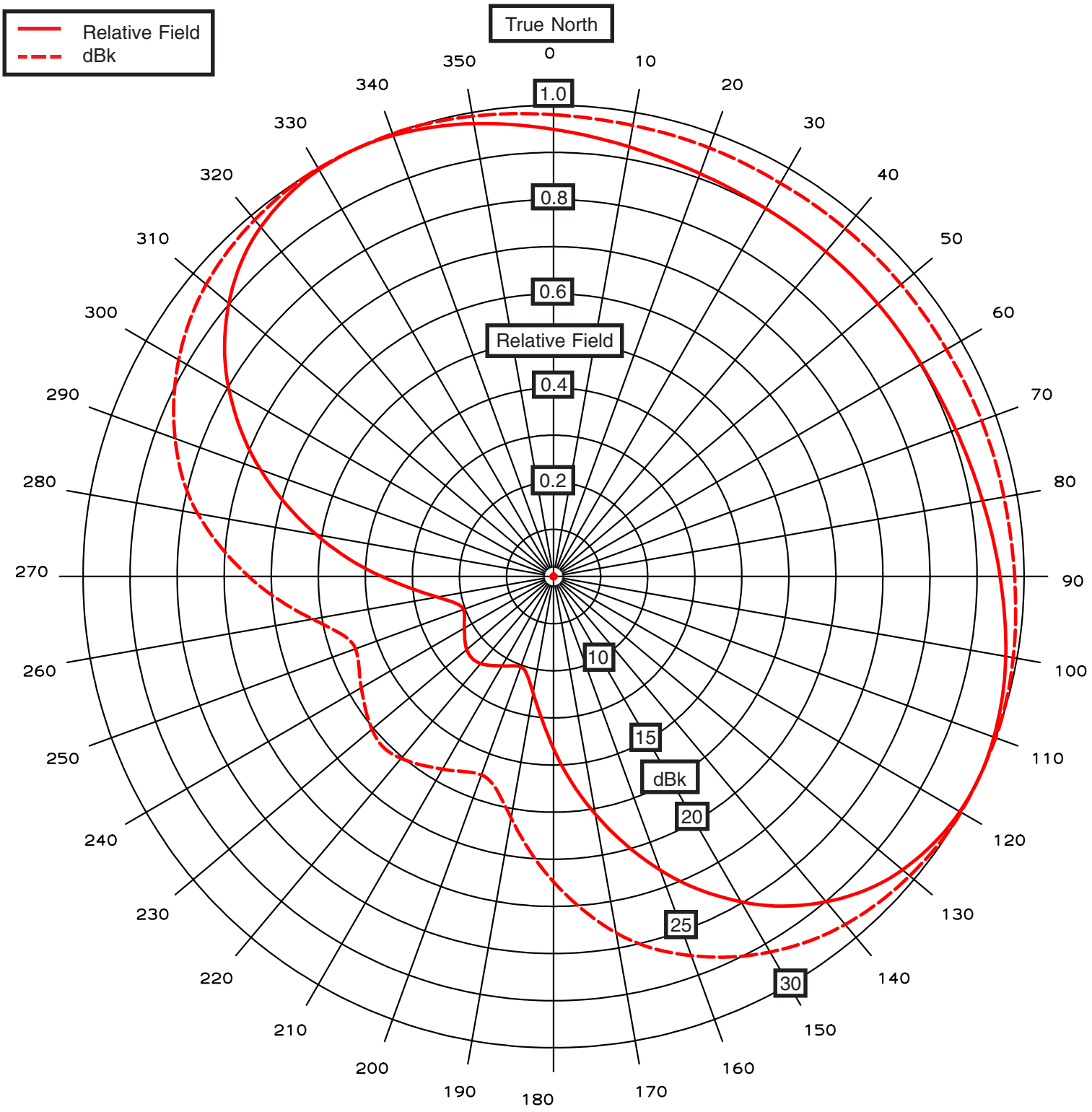


EXHIBIT 41 - FIGURE 1
ANTENNA HORIZONTAL PLANE RADIATION PATTERN

prepared November 2004 for

KZJL License Corporation

KZJL-DT Houston, Texas

Facility ID 69531

Ch. 44 1000 kW 461 m

Cavell, Mertz & Davis, Inc.

Manassas, Virginia

Dielectric

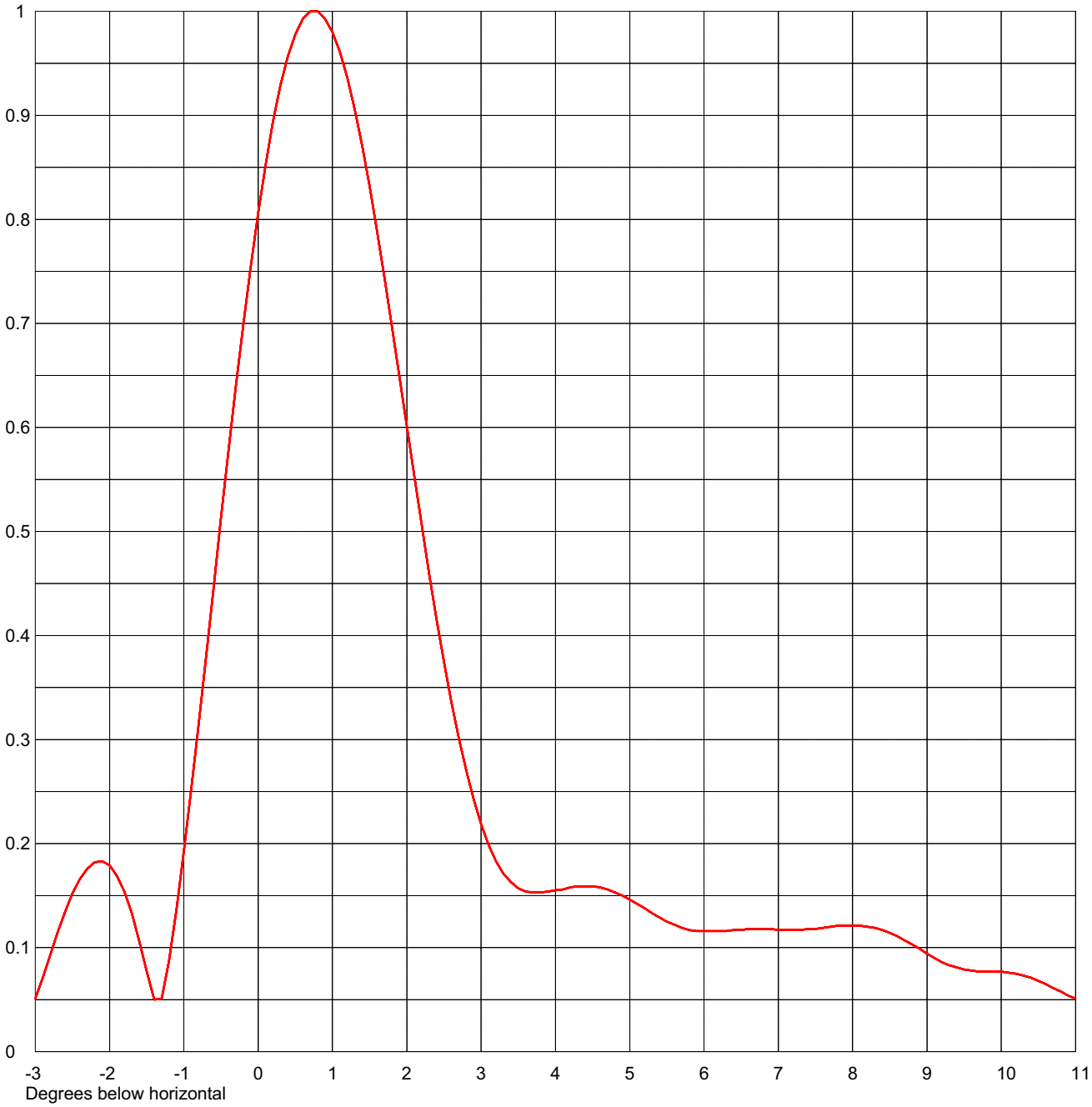
EXHIBIT 41 - FIGURE 2
ANTENNA VERTICAL (ELEVATION) PLANE RADIATION PATTERN

prepared November 2004 for
KZJL License Corporation
KZJL-DT Houston, Texas
Facility ID 69531
Ch. 44 1000 kW 461 m

Cavell, Mertz & Davis, Inc.
Manassas, Virginia

ELEVATION PATTERN

RMS Gain at Main Lobe	**25.5 (14.07 dB)**	Beam Tilt	**0.75 Degrees**
RMS Gain at Horizontal	**16.6 (12.20 dB)**	Frequency	**653.00 MHz**
Calculated / Measured	**Calculated**	Drawing #	**30Q255075**



Remarks:

Dielectric

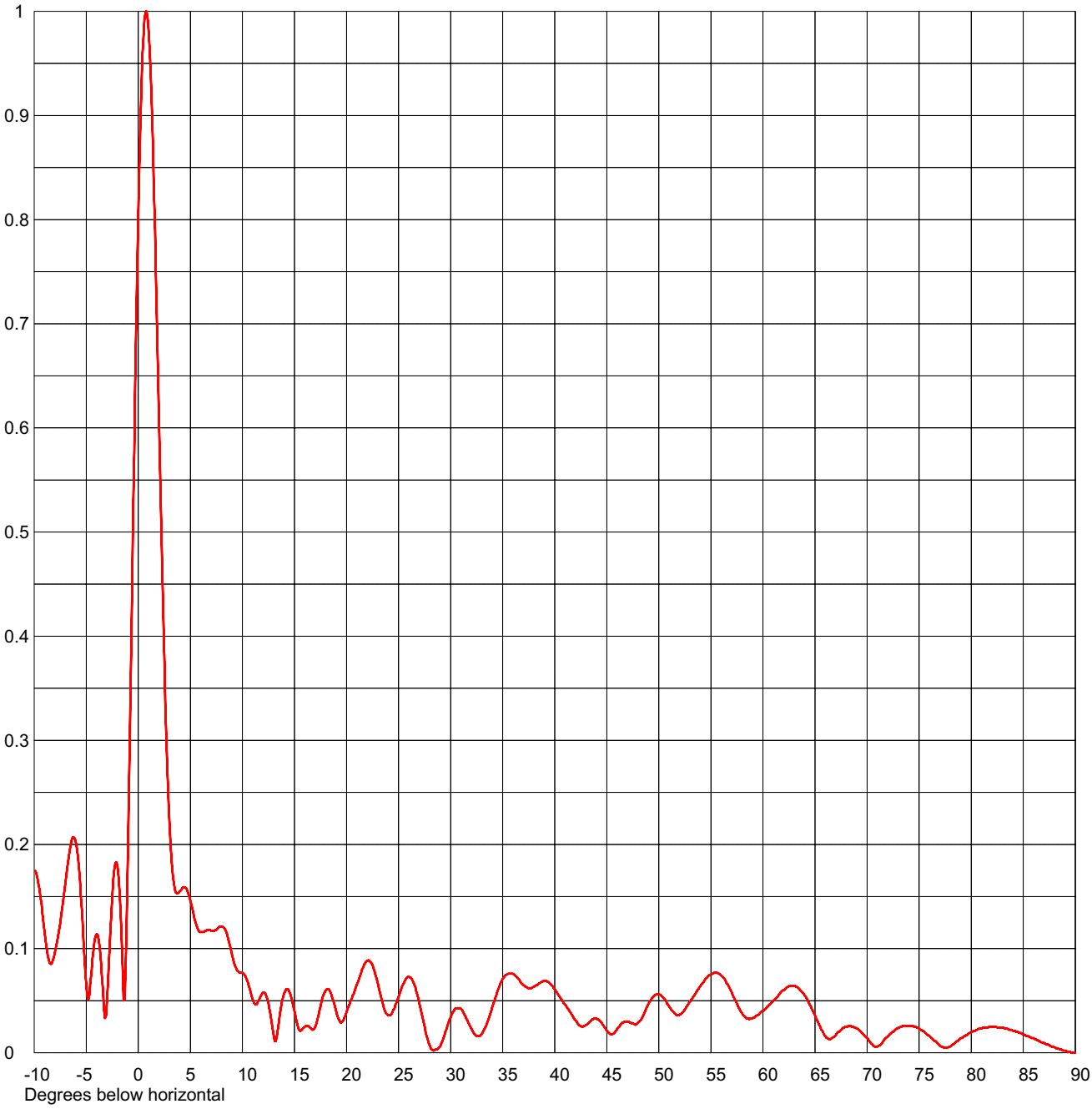
EXHIBIT 41 - FIGURE 2A
ANTENNA VERTICAL (ELEVATION) PLANE RADIATION PATTERN DETAIL

prepared November 2004 for
KZJL License Corporation
KZJL-DT Houston, Texas
Facility ID 69531
Ch. 44 1000 kW 461 m

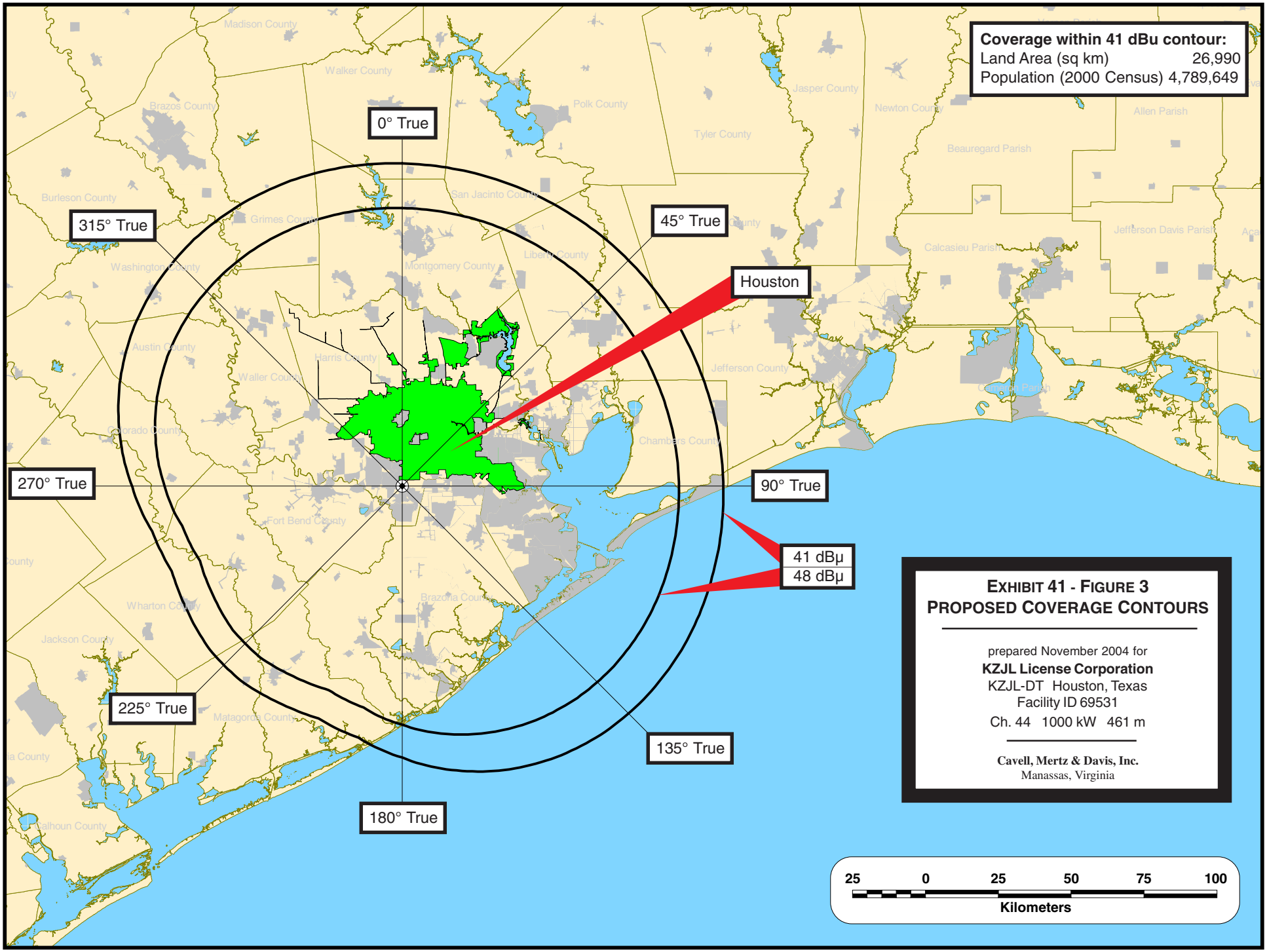
Cavell, Mertz & Davis, Inc.
Manassas, Virginia

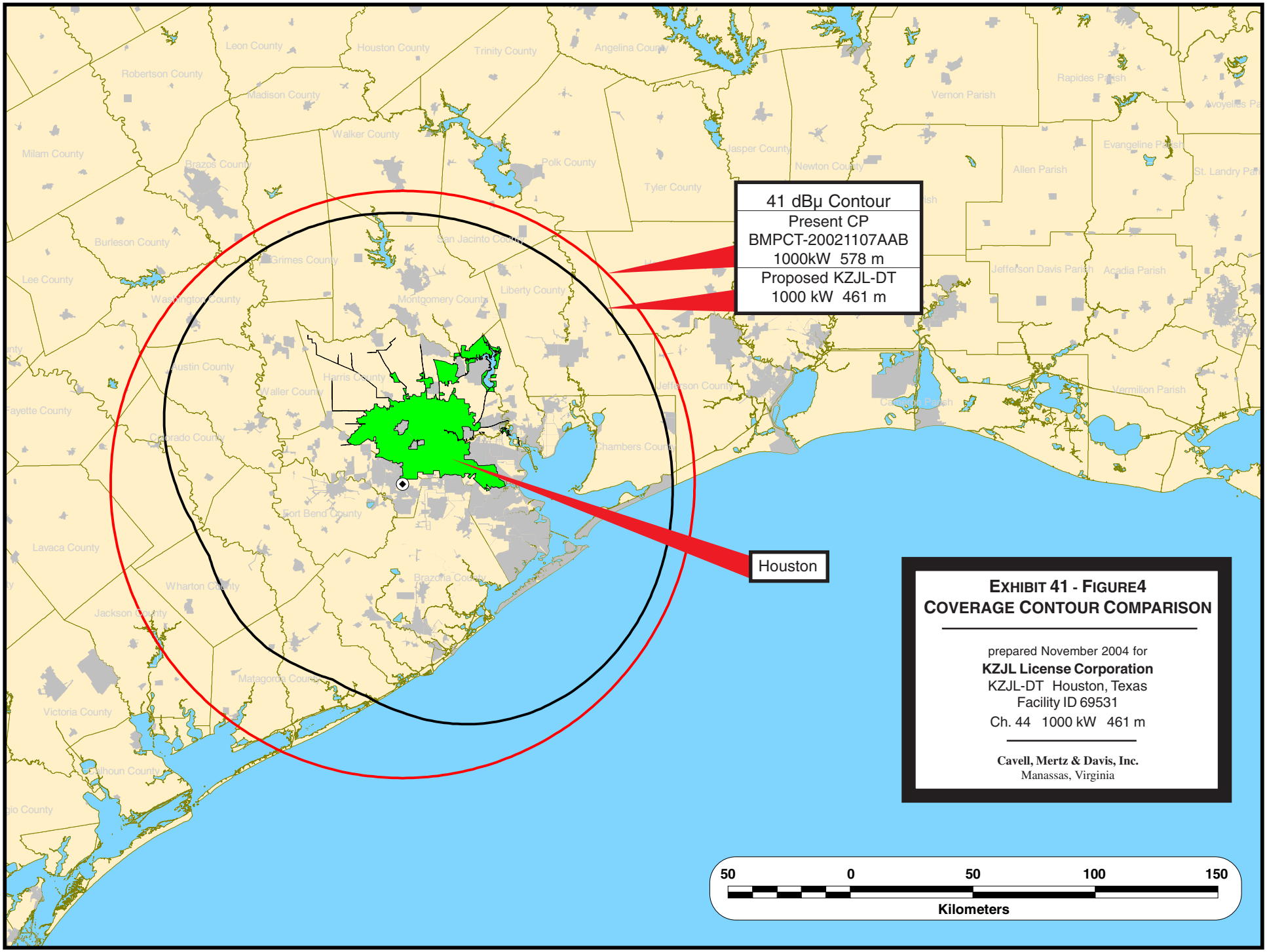
ELEVATION PATTERN

RMS Gain at Main Lobe	**25.5 (14.07 dB)**	Beam Tilt	**0.75 Degrees**
RMS Gain at Horizontal	**16.6 (12.20 dB)**	Frequency	**653.00 MHz**
Calculated / Measured	**Calculated**	Drawing #	**30Q255075-90**



Remarks:


Coverage within 41 dBu contour:
Land Area (sq km) 26,990
Population (2000 Census) 4,789,649
0° True
45° True
90° True
135° True
180° True
225° True
270° True
315° True
Houston
41 dBµ
48 dBµ
EXHIBIT 41 - FIGURE 3
PROPOSED COVERAGE CONTOURS
prepared November 2004 for
KZJL License Corporation
KZJL-DT Houston, Texas
Facility ID 69531
Ch. 44 1000 kW 461 m
Cavell, Mertz & Davis, Inc.
Manassas, Virginia
25 0 25 50 75 100
Kilometers


41 dBµ Contour
Present CP
BMPCT-20021107AAB
1000kW 578 m
Proposed KZJL-DT
1000 kW 461 m
Houston
EXHIBIT 41 - FIGURE4
COVERAGE CONTOUR COMPARISON
prepared November 2004 for
KZJL License Corporation
KZJL-DT Houston, Texas
Facility ID 69531
Ch. 44 1000 kW 461 m
Cavell, Mertz & Davis, Inc.
Manassas, Virginia
50 0 50 100 150
Kilometers