

Exhibit 41 - Statement A  
**NATURE OF THE PROPOSAL**  
prepared for  
**Wichita License Subsidiary Corporation**  
KSNC-DT Great Bend, Kansas  
Ch. 22 1,000 kW 261 m

*Wichita License Subsidiary Corporation* (“Wichita”), licensee of analog station KSNC(TV) Channel 2, Great Bend, Kansas, proposes herein to amend pending application BPCDT-19990610KF to construct KSNC-DT, a new digital television (“DTV”) facility. In the Commission’s Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders on Advanced Television,<sup>1</sup> DTV Channel 22 was allotted as a “paired” DTV Channel for KSNC. The instant amendment proposes different values for effective radiated power, antenna height above average terrain, and overall structure height.

The same site as that authorized for the existing licensed KSNC(TV) analog Channel 2 facility is proposed for KSNC-DT. The licensed KSNC(TV) analog Channel 2 antenna is top-mounted on a steel tower structure. The proposed KSNC-DT antenna will be side-mounted below the existing KSNC(TV) analog antenna.

No change in overall tower structure height is proposed as a result of this proposal. The antenna structure has been registered with the Commission; the registration number is 1031274.

The instant proposal does not require an interference study under the present requirements of §73.622(f)(2) of the Commission’s rules. Specifically, (1) the proposed DTV Channel 22 was established for this station under §73.622(b); (2) the proposed facility will operate from the reference site for KSNC established under §73.622(d)(1); and (3) the proposed facility will operate with an effective radiated power (“ERP”) of 1,000 kW and antenna height above average terrain (“HAAT”) of 261 meters, which will not

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<sup>1</sup>See MM Docket 87-268, *Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service*, FCC 98-315, released December 18, 1998.

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exceed the DTV reference ERP and HAAT established for this station (1,000 kW ERP and 296 meters HAAT) under §73.622(f)(1), as described in the following.

The reference ERP refers only to the *maximum* ERP that may be achieved by the DTV station; however, actual ERP values vary by azimuth. The Commission's replication process develops a directional antenna pattern for the reference KSNC-DT in order to match the distance to the analog Grade B contour with the DTV coverage contour. The KSNC reference directional antenna pattern (repKSGREAT\_BEND22) was obtained from the Commission's database. Examination of this reference directional antenna pattern determined that the minimum relative field along *any* azimuth in this pattern is 0.939. Thus, the *minimum* reference ERP becomes 881.7 kW (i.e.:  $0.939^2$  times 1,000 kW), at the reference HAAT of 296 meters.

The KSNC-DT DTV antenna will be mounted *below* the reference height (at 261 meters HAAT as opposed to 296 meters HAAT, a difference of 35 meters). In this case, the reference ERP may be adjusted upward 0.766 dB using the formula and method described in §73.622(f)(3) of the Commission's rules<sup>2</sup>. Thus, the adjusted minimum reference ERP becomes 1,051.9 kW (i.e.: 0.766 dB higher than the allotted minimum 881.7 kW), which exceeds the proposed 1,000 kW ERP. Therefore, the instant proposal is not subject to the interference analysis provisions of §73.623(c).

The proposed transmitting antenna, a *Dielectric* model TFU-30DSC-R O3, is non-directional in the horizontal plane. Electrical beam tilt of 0.75 degrees is proposed. The ERP will be 1,000 kilowatts, horizontally polarized. The antenna system will be installed in accordance with the manufacturer's instructions. Said installation will be supervised on-site by a competent technical representative of the applicant.

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<sup>2</sup>Adjustment was based on an assumed HAAT of 271 m, per §73.622(f)(3).