

Exhibit 42 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for
Shootingstar Broadcasting of New England, LLC
WZMY-DT Derry, New Hampshire
Facility ID 14682
Ch. 35 7.3 kW 205 m

Shootingstar Broadcasting of New England, LLC (“*Shootingstar*”) is the permittee of WZMY-DT, Channel 35, Derry, New Hampshire (FCC file number BPCDT-19991101AKG) and licensee of the paired analog WZMY-TV¹ Channel 50 facility (BLCT-19831012KG). WZMY-DT is authorized to operate with an effective radiated power (“ERP”) of 96.1 kW and an antenna height above average terrain (“HAAT”) of 213.4 meters. Under the instant application, *Shootingstar* seeks to modify the WZMY-DT CP to specify a reduction in ERP and HAAT.

WZMY-DT is currently operating pursuant to Special Temporary Authorization (“STA”, BDSTA-20020919ABI) at the presently authorized DTV CP site.² No change in site location is proposed. No tower or antenna construction work will be necessary to carry out this proposal.

The WZMY-DT STA specifies an ERP of 7.3 kW at an antenna HAAT of 191 meters with a non-directional antenna system. Under the instant proposal, the WZMY-DT CP will be modified to specify the same antenna, antenna mounting location, and operating parameters as are presently being employed by the STA facility (as corrected herein – see footnote 3 below). Thus the modified CP would authorize an ERP of 7.3 kW, non-directional, at a HAAT of 205 m.³

¹formerly WNDS-TV

²It should be noted that the rounded NAD-27 coordinates for the WZNY-CP location match those derived from the station’s Antenna Structure Registration (“ASR”), Number 1033400. Specifically, under the NAD-83 datum, the structure coordinates are: 42° 44' 07" N Latitude, 71° 23' 35" W Longitude. Converting to NAD-27 datum and rounding to the nearest second, the coordinates become: 42° 44' 07" N Latitude, 71° 23' 37" W Longitude.

However, a review of the information contained in the present WZMY-DT STA shows that NAD-27 coordinates of 42° 44' 07" N Latitude, 71° 23' 31" W Longitude are erroneously specified, even though the same structure is being employed by for the WZMY-DT CP site and the STA transmitting location.

³A recalculation on the average terrain in the vicinity of the WZMY-DT site using U.S.G.S. 3 arc-second data yields an antenna HAAT of 204.8 meters (which rounds to 205 meters) after considering the present STA antenna radiation height *above mean sea level* of 271.1 meters. (The WZMY-DT radiation center will remain unchanged - at 271.1

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Exhibit 42 - Figure 1 depicts the predicted coverage contours for the proposed WZMY-DT facility. As shown thereon, the principal community coverage requirement of 48 dB μ will be met by the proposed facility.

Allocation Matters

The instant proposal cannot be considered a “checklist” application, as the proposal’s ERP/HAAT combination (7.3 kW/205 m) exceeds that which was allotted to WZMY-DT in some azimuths. Under the instant proposal, WZMY-DT will operate at its presently authorized site with a reduced ERP and antenna height. Reduction of the ERP and antenna height should serve to generally decrease any interference caused. Nonetheless, for completeness and pursuant to §73.622(f)(5) of the Commission’s Rules, a study in accordance with §73.623(c) was conducted to evaluate interference to analog facilities and DTV stations that may be attributed to the proposed WZMY-DT facility. As expected, the detailed OET Bulletin 69 study shows that the proposal complies with the Commission’s 2% / 10% de minimis interference limits to all DTV and NTSC television stations. (A copy of this analysis can be provided to Commission Staff upon request.) In addition, the instant proposal does not involve prohibited contour overlap to any authorized Class A station.

The nearest FCC monitoring station is 266.3 km distant at Belfast, Maine. 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 WZMY-DT transmitter site located 712.3 km from the National Radio Astronomy Observatory (“NRAO”) Quiet Zone, Green Bank, West Virginia, therefore coordination with the NRAO will not be required. 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.

meters AMSL, or 124.8 meters AGL).

