

Exhibit 11 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**  
prepared for  
**Three Notch Communications, LLC**  
WAAO-LD Andalusia, AL  
Facility ID 15777  
Ch. 40 (Digital Flash-Cut) 15 kW

*Three Notch Communications, LLC* (“*Three Notch*”) is the licensee of low-power television station WAAO-LP, Channel 40, Andalusia, Alabama, Facility ID 15777 (BLTTTL-19980304JZ). The license for WAAO-LP was assigned<sup>1</sup> to *Three Notch* several months after the prior licensee suspended operations<sup>2</sup>. *Three Notch* now seeks authorization to restore operations following a “flash-cut” to digital modulation.

**Nature of the Proposal**

The proposed antenna system is a non-directional, PSI model PSILP18OMM-40, which will be side-mounted on an existing tower<sup>3</sup> without increasing the overall structure height. In the process of preparing this application, discrepancies in ground elevation and geographical coordinates were found in both the WAAO-LP license and the corresponding Antenna Structure Registration. A registered, professional land surveyor provided the corrected location data shown herein. Applications are being filed to correct the FAA records and the FCC Antenna Structure Registration.

The proposed digital facility will operate on Channel 40 using a “simple” out-of-channel emission mask with an effective radiated power of 15 kW. **Exhibit 11 - Figure 1** depicts the coverage contours of the licensed (analog 74 dBμ) and the proposed (digital 51 dBμ) facilities. As demonstrated by the provided map, the service area overlap complies with §73.3572 for a minor change.

---

<sup>1</sup> See file number BALTTTL-20090330AEY, granted May 11, 2009.

<sup>2</sup> See file number BLSTA-20090325ALR.

<sup>3</sup> See Antenna Structure Registration number 1037280.

Exhibit 11 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**  
(Page 2 of 3)

**Allocation Considerations**

The instant proposal complies with the Commission's interference protection requirements toward all DTV, television translator, LPTV, and Class A LPTV stations. 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 change in interference as experienced by nearby pertinent stations that would result from the proposed facility.

The results, summarized in **Exhibit 11 - Table I**, show that any new interference does not exceed the Commission's interference limits (0.5 percent to full service and Class A LPTV stations, and 2.0 percent to secondary stations). Accordingly, the instant proposal complies with §74.793 regarding interference protection to analog and digital television, low power television, television translator, and Class A television facilities.

**Other Allocation Considerations**

The proposed transmitter site is located more than one thousand kilometers from both Mexico and Canada. Therefore, international coordination is unnecessary. The nearest FCC monitoring station is at Powder Springs, GA, at a distance of 324 km from the proposed site. 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 proposed site is also located outside the areas specified in §73.1030(a)(1) and §73.1030(b). Thus, notification of the instant proposal to the National Radio Astronomy Observatory at Green Bank, West Virginia, or the Table Mountain Radio Receiving Zone in Boulder County, Colorado is not required. There are no AM broadcast stations

---

<sup>4</sup> The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. Comparisons of various results of this computer program (run on a Sun processor) to the Commission's implementation of OET-69 show excellent correlation.

Exhibit 11 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**  
(Page 3 of 3)

located within 3.2 km (2 miles) of the proposed site, according to information extracted from the Commission's CDBS engineering database.

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

**EXHIBIT 11 - FIGURE 1**  
**COVERAGE CONTOUR COMPARISON**

prepared June 2009 for  
**Three Notch Communications, LLC**  
WAAO-LD Andalusia, Alabama  
Facility ID 15777  
Ch. 40 (Digital Flash-Cut) 15 kW

**Cavell, Mertz & Associates, Inc.**  
Manassas, Virginia

Licensed WAAO-LP  
BLTTL-19980304JZ  
74 dBμ F(50, 50)  
Service Contour  
Proposed WAAO-LD  
51 dBμ F(50,90)  
Service Contour

Andalusia

Covington

Opp

Coffee

Enterprise

Geneva

Brewton

087-00-00 W

31-00-00 N

086-00-00 W

Scale 1:500,000

0 7.0 14.0 21 km

Exhibit 11 - Table I  
**INTERFERENCE STUDY RESULTS**  
prepared for  
**Three Notch Communications, LLC**  
WAAO-LD Andalusia, AL  
Facility Id: 15777  
Ch. 40 15 kW (MAX-DA)

<u>Channel</u>	<u>Affected Station</u>	<u>City, State</u>	<u>File Number</u>	<u>Calculated Baseline (1990 Census)</u>	<u>Interference Population without Proposal (1990 Census)</u>	<u>Interference Population with Proposal (1990 Census)</u>	<u>New Interference</u>	
							<u>Population</u>	<u>Percentage</u>
39	WETU-LP	Wetumpka, AL	BLTTL-19970206JC			--- No Interference ---		
39	WPAF-LP	Panama City, FL	BDISTTL-20060403ARH			--- No Interference ---		
39	W39BP	Pensacola, FL	BLTTL-19960405IA			--- No Interference ---		
40	WPAN	Fort Walton Beach, FL	BPCDT-19991029AGW	481,658	116	2,189	2,073	0.430 %
40	W40BU	Panama City, FL	BLTTL-20060410AAW			--- No Interference ---		
40	WTWC-TV	Tallahassee, FL	BPCDT-20080317AGG			--- No Interference ---		
40	WIRE-CA	Atlanta, GA	BLTTA-20070611AAI			--- No Interference ---		
40	WMGT-TV	Macon, GA	BLCDT-20070112AHJ			--- No Interference ---		
40	WDBD	Jackson, MS	BPCDT-20080401ATJ			--- No Interference ---		
40	WMRQ-LP	Meridian, MS	BLTTL-20070625AAZ			--- No Interference ---		
40	WMRQ-LP	Meridian, MS	BPTTL-20080627AAQ			--- No Interference ---		
40	W40BZ	Tupelo, MS	BLTTL-20070730ALP			--- No Interference ---		
40	W40CC	Tupelo, MS	BNPTTL-20000830BBO			--- No Interference ---		
41	W41BN	Dothan, AL	BLTT-19930122JE			--- No Interference ---		
41	W41BN	Dothan, AL	BDFCDTT-20060331ABX			--- No Interference ---		
41	NEW	Enterprise, AL	BNPTTL-20000828AEJ			--- No Interference ---		
41	WEIQ	Mobile, AL	BPEDT-20080619AGR			--- No Interference ---		
41	WEIQ	Mobile, AL	BLEDT-20030430AAX			--- No Interference ---		
41	WGOX-LP	Santa Rosa Beach, FL	BLTTL-20080530ABQ			--- No Interference ---		
41	NEW	Columbus, GA	BNPTTL-20000818ADX			--- No Interference ---		
41	W41DM	Columbus, GA	BNPTTL-20000802ABZ			--- No Interference ---		
42	W45BL	Montgomery, AL	BPTTL-20020723ABK			--- No Interference ---		
42	NEW	Columbus, GA	BNPTTL-20000831BEQ			--- No Interference ---		
44	WWBH-LP	Mobile, AL	BDISTTL-20060330AGA			--- No Interference ---		
44	W50BP	Panama City, FL	BDISTTL-20060306BCD			--- No Interference ---		
47	W47DK	Enterprise, AL	BNPTTL-20000828ANW			--- No Interference ---		
47	W47BX	Colquitt, GA	BLTTL-20001219AAD			--- No Interference ---		
48	WDES-CA	Destin, FL	BLTTL-19970509JB			--- No Interference ---		