

Exhibit 11 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for
Gray Television Licensee, Inc.
K53GC Neligh, NE
Facility ID 7897
Ch. 32 (digital) 4.9 kW

Gray Television, Inc. (“*Gray*”) is the licensee of television translator station K53GC, Channel 53, Neligh, NE, Facility ID 7897 (BLTT-20020409AAB). K53GC’s licensed operation on Channel 53 is displaced pursuant to §73.3572(a)(4)(ii). *Gray* proposes herein to change K53GC to Channel 32 and “flash cut” to digital operation. No change in site location or antenna height is specified.

The proposed facility will operate on Channel 32 using a “simple” out of channel emission mask, with a nondirectional antenna having an effective radiated power of 4.9 kW at the presently licensed transmitting antenna location. **Exhibit 11 - Figure 1** depicts the coverage contours of the licensed (74 dB μ) and the proposed (51 dB μ) facilities. The use of the same transmitter site and the service area overlap shown demonstrates compliance with §73.3572 for a minor change.

The proposed antenna system for K53GC will be side-mounted on an existing antenna support structure. The tower structure is registered with the Commission (ASR #1038177), and no change in overall structure height will result. Since no change to the structure’s overall height is proposed, FAA notification is not necessary.

Allocation Considerations

The instant proposal complies with the Commission’s interference protection requirements toward all NTSC, DTV, television translator, LPTV, and Class A 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

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("OET-69")¹. 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 1**, show that any new interference does not exceed the Commission's interference limits (0.5 percent to full power and Class A 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 nearest FCC monitoring station is at Grand Island, NE, at a distance of 129.1 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 located within 3.2 km (2 miles) of the proposed site, according to information extracted from the Commission's engineering database. The site is not located within the border zones requiring international coordination.

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

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.** 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 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY

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Ch.	Call	City/State	Dist(km)	Status	Application Ref. No.	----- Population (1990 Census) -----	
						Baseline	New Interference
17	K55HX	COLUMBUS-FREMONT NE	117.7	LIC	BLTTL-19950807JK	---	none
17	KTVG	GRAND ISLAND NE	138.3	APP	BMPCT-19960724KF	---	none
24	K49FP	COLUMBUS-FREMONT NE	117.7	LIC	BLTTL-19950807JE	---	none
25	K25GM	NEWPORT NE	124.6	LIC	BLTT-20020103AAH	---	none
28	K28EN	COLUMBUS-FREMONT NE	117.7	LIC	BLTTL-19950807JF	---	none
29	KHNE-TV	HASTINGS NE	141.7	LIC	BMLET-20020206ABQ	---	none
30	K35FM	NORFOLK NE	55.5	LIC	BLTT-19871015IC	---	none
31	K31EN	COLUMBUS, ETC NE	117.7	LIC	BLTTL-19950807JC	---	none
31	KLKN	LINCOLN NE	142.5	CP MOD	BMPCDT-20000428ABB	---	none
31	K31DP	YANKTON SD	91.8	LIC	BLTT-19930728JD	---	none
32	KBIN-TV	COUNCIL BLUFFS IA	202.2	LIC	BLET-19860923KL	---	none
32	NEW	MANHATTAN KS	346.7	APP	BNPTTL-20000807ABR	---	none
32	K32BY	OBERLIN KS	333.1	LIC	BLTT-19901226IV	---	none
32	K32GY	TOPEKA KS	403.5	CP	BNPTTL-20000831BOG	---	none
32	NEW	TOPEKA KS	365	APP	BNPTTL-20000831AQK	---	none
32	K32DR	GRANITE FALLS MN	364.8	LIC	BLTTL-19940517JE	---	none
32	K32GX-D	ST. JAMES MN	360.7	LIC	BLDTL-20051201ATW	---	none
32	KGIN	GRAND ISLAND NE	174.5	CP MOD	BMPCDT-20020109AAA	206,493	3 (0.00%)
32	K32FW	PIERRE SD	324.5	LIC	BLTTL-20050425ACA	---	none
32	K32GA	PORCUPINE SD	373.3	CP	BNPTTL-20000809AAA	---	none
32	KELO-TV	SIOUX FALLS SD	204.1	LIC	BLCDDT-20030417AAE	524,859	20 (0.00%)
32	K32DK	WATERTOWN SD	322.5	LIC	BLTT-19970922JH	---	none
33	KBIN-TV	COUNCIL BLUFFS IA	202.2	LIC	BLEDT-20050711ABX	---	none
33	K33EM	COLUMBUS, ETC. NE	117.7	LIC	BLTTL-19950807JD	---	none
33	K33GX	SPRINGFIELD SD	84.8	LIC	BLTTL-20020515AAF	---	none
35	K35FM	NORFOLK NE	55.5	CP	BPTT-20050414ABJ	---	none

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<u>Ch.</u>	<u>Call</u>	<u>City/State</u>	<u>Dist(km)</u>	<u>Status</u>	<u>Application Ref. No.</u>	<u>----- Population (1990 Census) -----</u>	
						<u>Baseline</u>	<u>New Interference</u>
36	KCAZ-LP	COLUMBUS NE	99.7	CP	BPTTL-20040910AAC	---	none
36	NEW	SOUTH SIOUX CITY NE	140.4	APP	BNPTTL-20000831ASH	---	none
39	K47FK	COLUMBUS-FREMONT NE	117.7	LIC	BLTTL-19950807JL	---	none
39	K39AL	NELIGH NE	0.5	LIC	BLTT-19851031IB	---	none
40	K39AL	NELIGH, ETC. NE	0.5	CP MOD	BMPTT-20060105ABH	---	none