

Exhibit 11 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for
Gray Television Licensee, Inc.
K30GD Great Bend, KS
Facility ID 65534
Ch. 30 (Digital) 15 kW

Gray Television Licensee, Inc. (“Gray”) is the licensee of television translator station K30GD, Channel 30, Great Bend, KS, Facility ID 65534 (BLTT-20030805AIJ). Gray proposes herein to “flash cut” to digital operation. No change in site location or antenna height is specified.

The proposed facility will operate on Channel 30 using a “simple” out of channel emission mask, with a nondirectional antenna having an effective radiated power of 15 kW at the presently licensed transmitting antenna location. **Exhibit 11 - Figure 1** depicts the coverage contours of the licensed (74 dBμ) and the proposed (51 dBμ) facilities. The use of the same transmitter site and the service area overlap shown demonstrates compliance with §73.3572 for a minor change.

The existing K30GD antenna system will continue to be employed on its existing antenna support structure. The tower structure is registered with the Commission (ASR #1039957), 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 (“OET-69”)¹. The interference study examined the change in interference as experienced by nearby pertinent stations that would result from the proposed facility.

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.

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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 280.5 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.

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

prepared March 2006 for
Gray Television Licensee, Inc.
K30GD Great Bend, Kansas
Facility ID 65534
Ch. 30 (Digital) 15 kW

Cavell, Mertz & Davis, Inc.
Manassas, Virginia

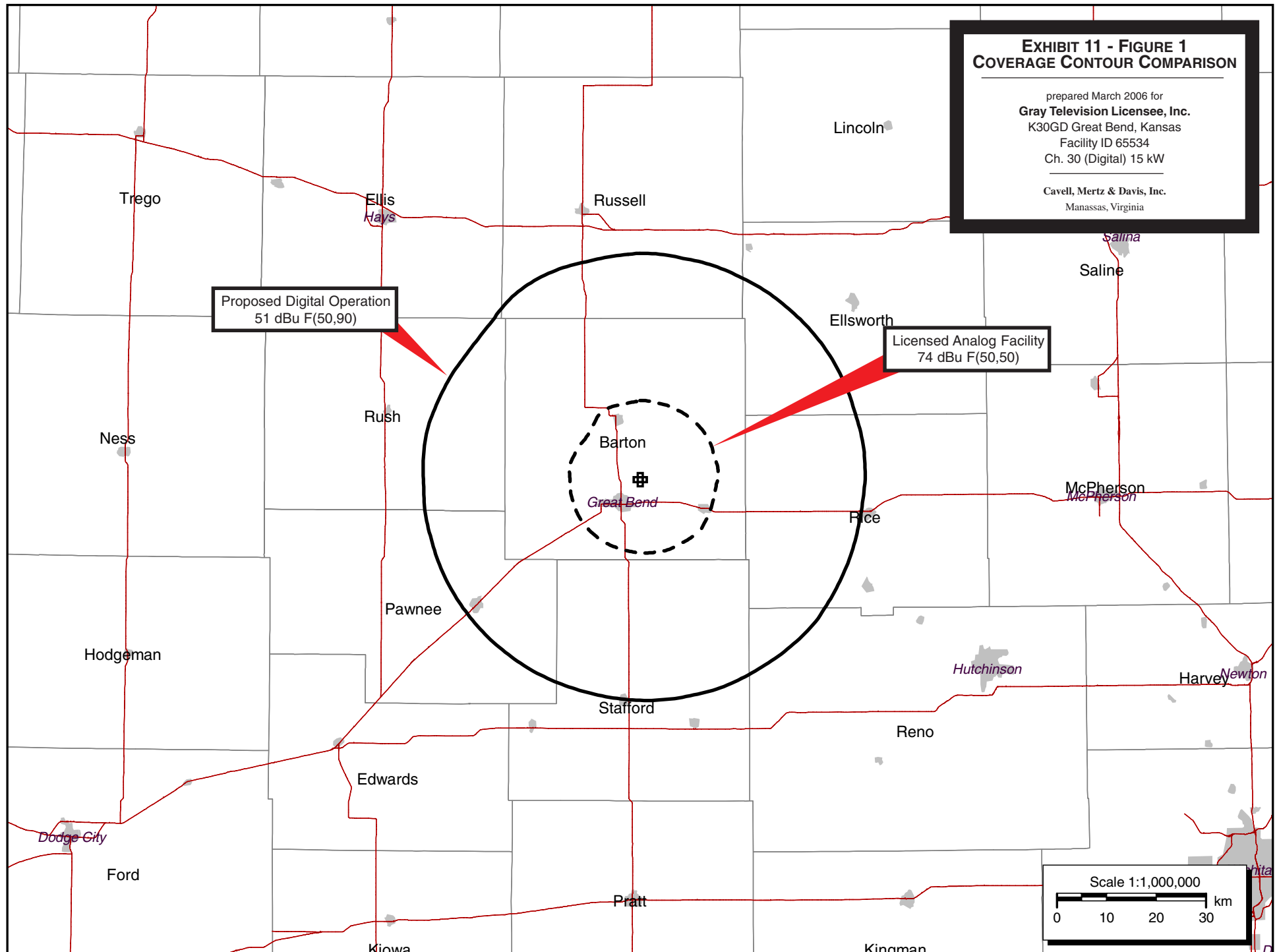


Exhibit 11 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for
Gray Television Licensee, Inc.
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 Facility ID 65534
 Ch. 30 (Digital) 15 kW

<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>
15	K15CN	SALINA KS	107.9	LIC	BLTTL-19880714IH	---	none
15	960930KI	WICHITA KS	126.8	APP	BPET-19960930KI	---	none
15	960724KP	WICHITA KS	126.8	APP	BPET-19960724KP	---	none
27	K27IK	DODGE CITY KS	140.2	CP	BNPTT-20000830ATN	---	none
27	K27HT	HAYS KS	79.3	CP	BNPTT-20000831BSK	---	none
29	KSAS-LP	DODGE CITY KS	136.3	LIC	BLTTL-19941209JF	---	none
29	KPTS	HUTCHINSON KS	91.3	LIC	BLEDT-20030724AER	668,840	358 (0.05%)
30	K30GO	PLEASANT VALLEY CO	373.3	LIC	BLTT-20030620ABY	---	none
30	K30HA	YUMA CO	401.5	LIC	BLTT-20031229ABT	---	none
30	K45EE	COUNCIL BLUFFS IA	401.1	APP	BPTTL-20020828AAW	---	none
30	K30AL	IOLA KS	319.3	LIC	BLTT-19840828ID	---	none
30	K30AL	IOLA KS	319.3	CP	BDFCDTT-20060208AAW	---	none
30	K30HN	JUNCTION CITY KS	173.6	CP	BNPTTL-20000807AAY	---	none
30	K30FV	CAMBRIDGE NE	256.7	LIC	BLTT-20020327AAG	---	none
30	KMBB-LP	NORTH PLATTE NE	352.1	CP	BNPTT-20000831BVX	---	none
30	K30AE	ALVA OK	180.6	LIC	BLTT-19820405IQ	---	none
30	KTUZ-TV	SHAWNEE OK	368.3	LIC	BLCT-20001108ABD	---	none
30	KTUZ-TV	SHAWNEE OK	368.3	CP	BPCT-20040729AOV	---	none
30	K30EF	STRONG CITY OK	301.5	CP	BPTT-20030206ACX	---	none
30	K30EF	STRONG CITY OK	301.5	LIC	BLTT-19940902IK	---	none
30	NEW	PAMPA TX	376.8	APP	BNPTT-20000830AWM	---	none
31	KAAS-LP	GARDEN CITY KS	194.8	LIC	BLTTL-19941209JG	---	none

Cavell, Mertz Davis, Inc.

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						<u>Baseline</u>	<u>New Interference</u>
31	K31BW	MANHATTAN KS	203.8	LIC	BLTTL-19890119II	---	none
31	KWCV	WICHITA KS	124.5	LIC	BLCDT-20020501AAQ	611,863	201 (0.03%)
33	NEW	HAYS KS	79.3	APP	BNPTT-20000831BSP	---	none
33	KWCV	WICHITA KS	124.5	LIC	BLCT-20010717AAW	---	none
38	NEW	DODGE CITY KS	135.0	APP	BNPTTL-20000830AQM	---	none
38	K38GH	RUSSELL KS	57.8	LIC	BLTT-20030805AJN	---	none