

Exhibit 42 – Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS
prepared for
United Communications Corporation
WWNY-DT Carthage, New York
Facility ID 68851
Ch. 35 750 kW 203 m

United Communications Corporation (“United”) is the permittee of WWNY-DT, Channel 35, Carthage, New York (“CP”, BPCDT-19991028ADN) and licensee of the paired analog Channel 7 facility (BLCT-2160). Under its CP, WWNY-DT is authorized to operate with an effective radiated power (“ERP”) of 1000 kW at an antenna height above average terrain (“HAAT”) of 203 meters, WWNY-DT is currently operating under a Special Temporary Authorization (“STA”) with facilities as authorized in the CP but at reduced power level of 135 kW (BMDSTA-20021011ACH). The instant application proposes to modify the CP to specify operation of WWNY-DT with an ERP of 750 kW. The proposed facility will employ the same antenna currently employed for the STA facility and authorized in the CP (a directional, horizontally polarized, Andrew model ATW18H3-HSC2-35S). The directional antenna pattern data is provided in the application “tech-box” Section 10(e). Since the antenna proposed herein is the same as the antenna authorized in the CP and employed for the STA, for simplicity, and to avoid duplication, the customary polar plot and elevation pattern data have not been provided (see BPCDT-19991028ADN).

All WWNY-DT facilities described herein specify the same transmitting location. No change in site location is proposed. The existing WWNY-DT antenna supporting structure is associated with FCC Antenna Structure Registration number 1016048. No change to the overall structure height is proposed as a result of this proposal.

Exhibit 42 – Figure 1, attached, depicts the standard predicted coverage contours. This map includes the boundaries of Carthage, WWNY-DT’s principal community. As demonstrated thereon, the proposed facility complies with Section

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73.625(a)(1) of the Commission’s Rules, as the entire community will be encompassed by the 48 dBμ contour.

Attached as **Exhibit 42 – Figure 2** is a map depicting a comparison of the presently authorized and proposed 41 dBμ noise limited DTV service contour locations. No extension in contour location will result, in compliance with the Commission’s August 2, 2004 “freeze” concerning expansion in service area¹.

WWNY-DT has successfully received a tentative post-transition channel assignment corresponding to the authorized WWNY-DT CP facility and will “carry over” its authorized facility to Channel 7². As shown below, the facility proposed herein would serve 80.8% of the target baseline service population, which exceeds the 80% population match required for the DTV Channel election process³.

WWNY-DT Population Match Determination⁴

<u>WWNY-TV Facility</u>	<u>ERP/HAAT</u>	<u>Interference-Free Service Population (2000 Census)</u>	<u>Percent match of Target</u>
NTSC Ch. 7 (1997 baseline facility)	316 kW/219 m	253,036	--
DTV Ch. 35 Allotment	1000 kW / 219 m	279,587	--
DTV Ch. 35 Proposed	750 kW / 203 m	204,544	80.8%

Allocation Considerations

The instant proposal cannot be considered a “checklist” application, as the proposal’s ERP/HAAT combination (750 kW / 221 m) exceeds that which was allotted to WWNY-DT (1000 kW at 221 m) at certain azimuths. Under the instant proposal, WWNY-DT will operate at its presently authorized site at the authorized antenna height and directional pattern with a reduced ERP. The proposed coverage and interfering

¹ *Public Notice* “Freeze on the Filing of Certain TV and DTV Requests for Allotment or Service Area Changes”, DA 04-2446, released August 3, 2004.

² See BFRECT-20050124AIS

³ See *Report and Order*, “Second Periodic Review of the Commission’s Rules and Policies Affecting the Conversion to Digital Television,” FCC 04-192, released September 7, 2004.

⁴ Interference-free service population is the population within contour less population subject to terrain blockage and interference per FCC OET Bulletin 69. Target population for “Percent Match” is the smaller population of the 1997 NTSC facility and DTV allotment.

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contour locations are wholly within those of the authorized facility, consequently, the instant proposal should not require detailed discussion of its allocation situation with respect to other stations. Nonetheless, for completeness and pursuant to Section 73.622(f)(5) of the Commission's Rules, a study in accordance with Section 73.623(c) was conducted to evaluate interference to analog facilities and DTV stations that may be attributed to the proposed WWNY-DT facility. As expected the detailed OET Bulletin 69⁵ study shows that the proposal complies with the Commission's 2% / 10% *de minimis* interference limits to all DTV and NTSC television stations. Contour overlap is predicted to exist to Class A station WOBX-LP, Ch. 35, Syracuse, New York. The OET Bulletin 69 study indicates a reduction in interference to this facility resulting from the instant proposal.

The nearest Commission monitoring station is 169.9 km distant at Canandaigua, NY. This exceeds by a great margin the threshold minimum distance specified in Section 73.11030(c)(3) of the Commission's Rules that would suggest consideration of the monitoring station. 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 policies with respect to allocation matters.

⁵ FCC Office of Engineering and Technology Bulletin number 69, Longley-Rice Methodology for Evaluating TV Coverage and Interference, February 6, 2004 ("OET 69"). The implementation of OET 69 for this study followed the guidelines of OET-69 as specified therein. A standard cell size of 2 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 42 - FIGURE 1 **PROPOSED COVERAGE CONTOURS**

prepared June 2006 for
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Cavell, Mertz & Davis, Inc.
 Manassas, Virginia

Proposed Coverage within 41 dBu contour:
 Area (sq km) 17,818.1
 Population (2000 Census) 201,770

Proposed WWNY-DT Service Contours
 41 dBu F(50,90)
 48 dBu F(50,90)

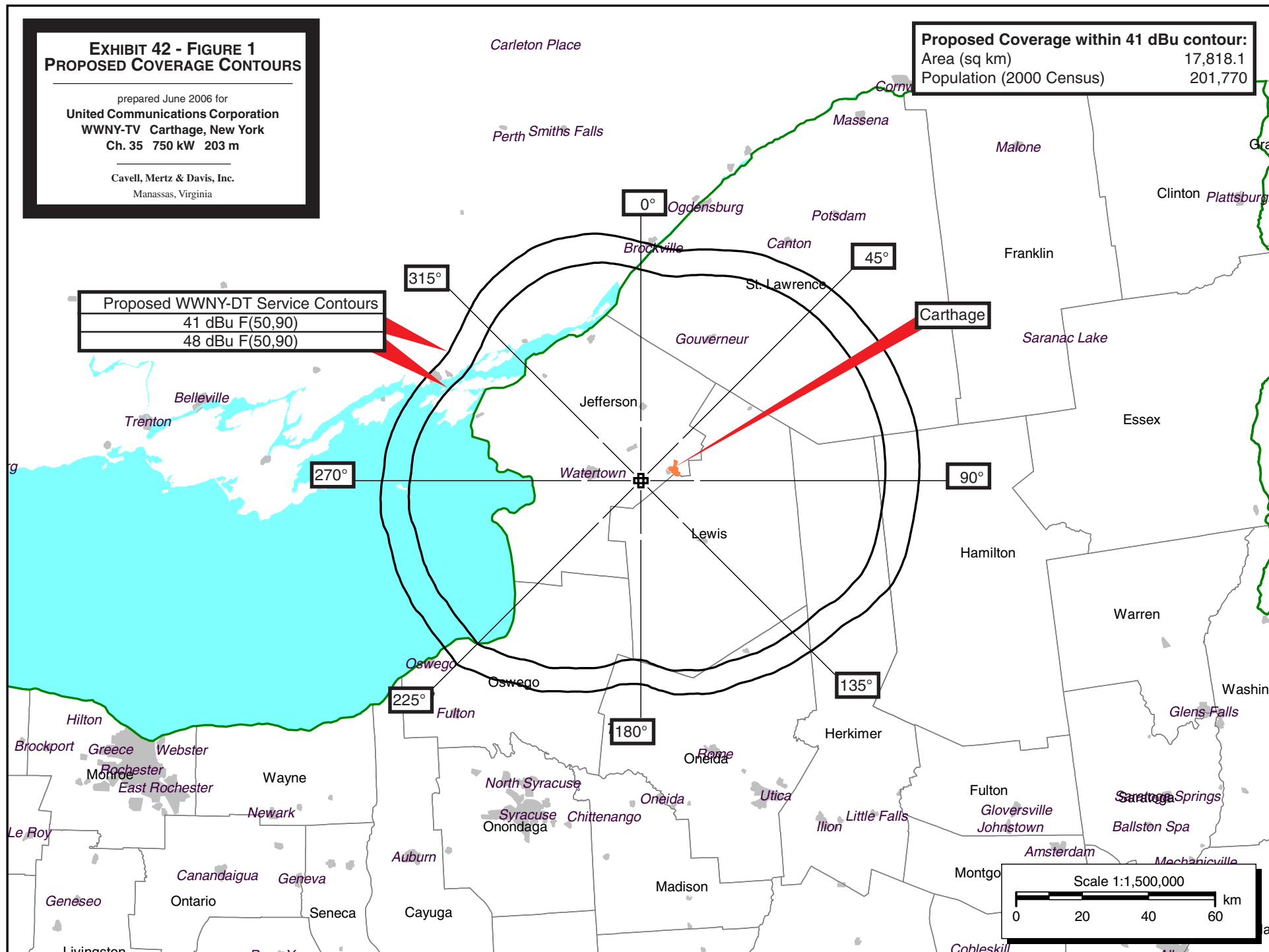


EXHIBIT 42 - FIGURE 2
COVERAGE CONTOUR COMPARISON

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