

Exhibit 42 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**

prepared for  
**Gray Television Licensee, Inc.**  
WCTV-DT Thomasville, Georgia  
Facility ID 31590  
Ch. 46 1000 kW 566 m

*Gray Television Licensee, Inc.* (“Gray”), licensee of analog station WCTV(TV) Channel 6, Thomasville, Georgia (file number BLCT-19870630KF) has a Construction Permit (“CP,” BMPCDT-20030804AAZ ) which authorizes construction of the paired WCTV-DT facility on Channel 46. Under the present CP, WCTV-DT would operate with a nondirectional effective radiated power (“ERP”) of 1000 kW and an antenna height above average terrain (“HAAT”) of 265.2 meters. The instant application herein proposes to modify the CP to specify operation of WCTV-DT at a different location with a non-directional ERP of 1000 kW, and a higher antenna HAAT of 566 meters. The facilities specified herein are identical to those authorized to WCTV-DT under a prior CP (BPCDT-20001113ABJ). The current DTV application “freeze”<sup>1</sup> regarding contour extension proposals does not apply to the instant application since the proposed facility does not exceed the WCTV-DT allotment facility.

The proposed antenna system for WCTV-DT will be side-mounted on the existing WCTV(TV) antenna support structure. No change in the overall height of the antenna support structure is proposed (ASR 1019981). The proposed antenna is a Dielectric model TFU-30DSC-R O4.

The attached **Exhibit 42 - Figure 1** is a map which depicts the coverage contours for the proposed WCTV-DT facility. Per the Commission’s requirements, the DTV service contour (41 dBμ) of the facility will completely encompass the principal community. **Exhibit 42 - Figure 1**

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<sup>1</sup>*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.

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also demonstrates that the enhanced principal community coverage requirement of 48 dB $\mu$  (required by December 31, 2004 for commercial stations) will also be met by the proposed facility.

**“Checklist” Criteria**

The instant proposal does not require an interference study under the present requirements of 73.622(f)(2) of the Commission’s rules. Specifically, (1) the proposed DTV Channel 46 was established for this station under §73.622(b) as amended<sup>2</sup>; (2) the proposed facility will operate from a site within 5 km of the DTV reference site for WCTV-DT established under §73.622(d)(1); and (3) the proposed facility will operate with an ERP and antenna HAAT of 1,000 kW and 566 meters, which do not exceed the DTV reference ERP and HAAT combination established for this station (1,000 kW ERP and 619 meters HAAT) under §73.622(f)(1). Accordingly, the instant proposal is a “checklist” application and is not subject to the interference analysis provisions of 73.623(c), nor is any consideration required to any Class A Television station.

**Other Allocation Considerations**

The proposed WCTV-DT site is located 1226.5 km from the nearest Canadian border, and 1052.7 km from the nearest Mexican border location, both much greater than the distance which requires international coordination.

The nearest FCC monitoring station is at Powder Springs, Georgia, at a distance of 361.6 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 area specified in §73.1030(a)(1). Thus, notification of the instant proposal to the National Radio Astronomy Observatory at Green Bank, West Virginia, is not required. There

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<sup>2</sup>The DTV reference ERP and HAAT of 1000 kW and 619 meters, respectively, for WCTV-DT on Channel 46 have been established under a *Report and Order* (MM Docket 00-98, DA 00-2206, released October 2, 2000), wherein the Commission changed the DTV channel allotment for WCTV-DT to Channel 46.

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are no AM broadcast stations located within 3.2 km (2 miles) of the WCTV-DT site, according to information extracted from the Commission's 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 42 - FIGURE 1 PROPOSED COVERAGE CONTOURS

prepared October 2004 for  
**Gray Television Licensee, Inc.**  
WCTV-DT Thomasville, Georgia  
Facility ID 31590  
Ch. 46 1000 kW 566 m

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

Proposed WCTV-DT  
1000 kW 566 m  
41 dBu F(50,90)  
48 dBu F(50,90)

**Proposed Coverage within 41 dBu contour:**  
Land Area (sq km) 39,700  
Population (2000 Census) 965,278

