

Exhibit 11 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for

Arnold N. Applebaum

KSBT-LD Santa Barbara, California

Facility ID 168464

Ch. 10 (Digital Companion) 0.02 kW (MAX-DA)

Arnold N. Applebaum (“*Applebaum*”) is the licensee of Low Power Television station KSBT-LP, Channel 32, Santa Barbara, CA, Facility ID 2854 (BLTTL-19990922AAQ). *Applebaum* filed a proposal for a digital companion channel for KSBT-LP in the June 2006 filing window (file number BSFDTL-20060630CNJ).¹ *Applebaum*’s proposal for KSBT-LP was the winning bidder listed in a Public Notice². The instant application is filed as required by the Public Notice to request a Construction Permit for the proposed digital companion operation.

The transmitting antenna for the proposed KSBT-LP digital companion facility will be side-mounted on the existing tower structure. The tower’s FCC Antenna Structure Registration number is 1051063, and no change in overall structure height will result. Since no change to the structure’s overall height is proposed, FAA notification is not required.

The proposed facility will operate on Channel 10 using a “stringent” out of channel emission mask, with a directional antenna having a maximum effective radiated power of 0.02 kW. The proposed antenna is a SCA model CL7-150, an “off the shelf” directional antenna which will be rotated 343 degrees. **Exhibit 11-Figure 1** depicts the coverage contours of the licensed analog facility and the proposed digital companion facility. The service area overlap with each facility demonstrates compliance with the minor change criteria of §73.3572.

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

¹“*LPTV and TV Translator Digital Companion Channel Applications Filing Window for Auction No. 85*,” Public Notice, DA 06-874, released April 20, 2006.

²“*Auction of LPTV and TV Translator Digital Companion Channels Closes, Winning Bidders Announced for Auction 85*,” Public Notice, DA 08-2482, released November 14, 2008.

Exhibit 11 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS
(page 2 of 2)

Number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 (“OET-69”)³. The interference study examined the change in interference as experienced by nearby pertinent stations that would result from the proposed facility.

The results of the interference studies, summarized in **Exhibit 11-Table 1** (pre-transition operation) and **Exhibit 11-Table 2** (post-transition operation), 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 Matters

The nearest FCC monitoring station is 433.4 km distant at Livermore, CA. This exceeds 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. Based on information extracted from the Commission’s engineering database, there are no AM stations within 3.2 km of the proposed site. The site is located within the border zones requiring international coordination.

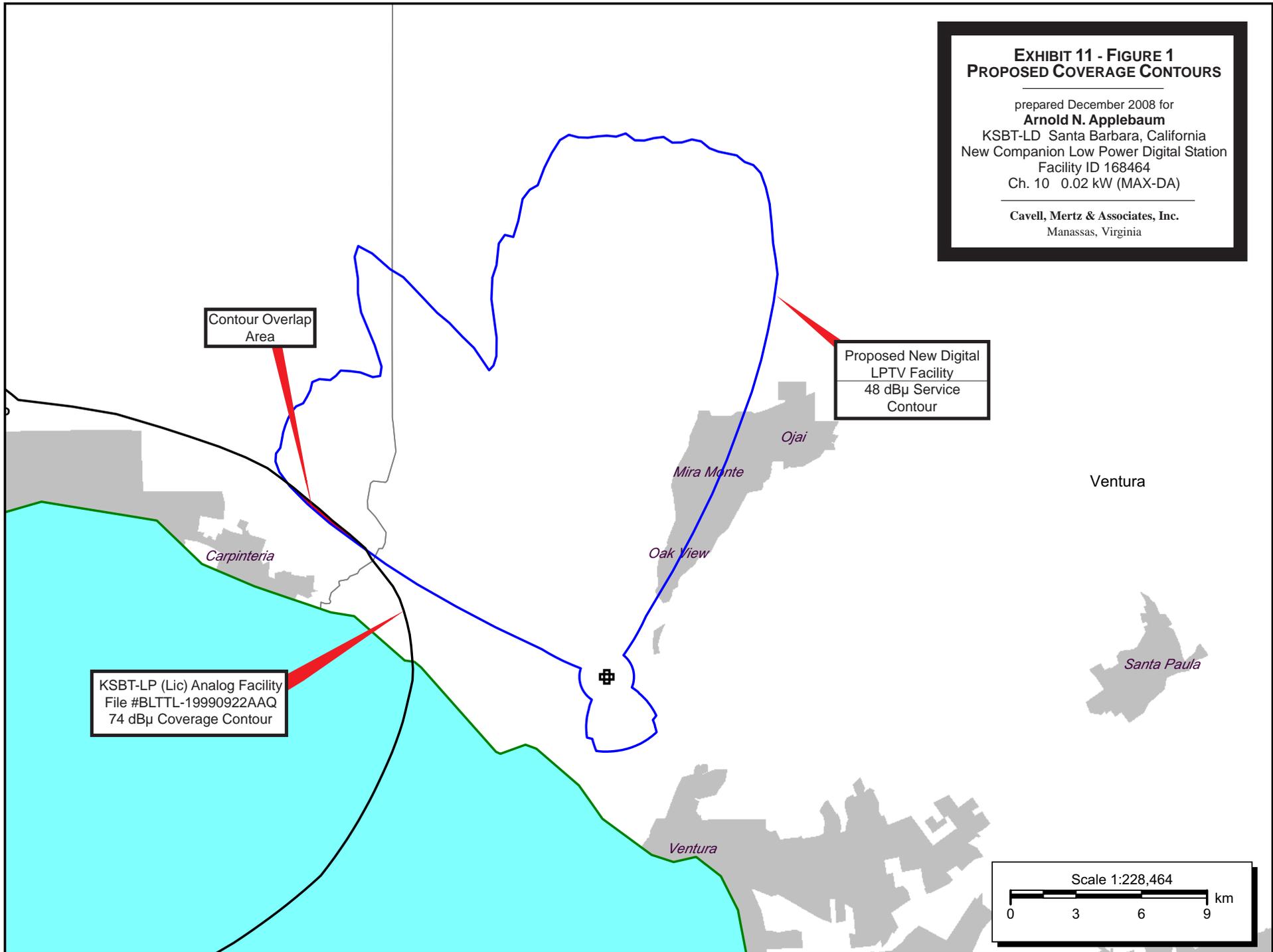
As described fully above, it is believed that the instant proposal complies with the Commission’s allocation Rules and policies.

³The 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 - FIGURE 1
PROPOSED COVERAGE CONTOURS**

prepared December 2008 for
Arnold N. Applebaum
KSBT-LD Santa Barbara, California
New Companion Low Power Digital Station
Facility ID 168464
Ch. 10 0.02 kW (MAX-DA)

Cavell, Mertz & Associates, Inc.
Manassas, Virginia



Contour Overlap
Area

Proposed New Digital
LPTV Facility
48 dBμ Service
Contour

KSBT-LP (Lic) Analog Facility
File #BLTTL-19990922AAQ
74 dBμ Coverage Contour



Exhibit 11 – Table 1
INTERFERENCE STUDY RESULTS SUMMARY
PRE-TRANSITION RESULTS

prepared for

Arnold N. Applebaum

New Companion Low Power Digital Station

KSBT-LD Santa Barbara, California

Facility ID 168464

Ch. 10 0.02 kW (MAX-DA)

<u>Channel</u>	<u>Affected Station</u>	<u>City, State</u>	<u>File Number</u>	<u>Calculated</u>	<u>Interference</u>	<u>Interference</u>	<u>New Interference</u>	
				<u>Baseline</u>	<u>Population</u>	<u>Population</u>	<u>Population</u>	<u>Percentage</u>
				<u>(2000 Census)</u>	<u>without Proposal</u>	<u>with Proposal</u>		
					<u>(2000 Census)</u>	<u>(2000 Census)</u>		
9	KCAL-TV	Los Angeles, CA	BLCT-19911107KP	15,051,041	117,064	117,090	26	0.0002%
9	KCAL-TV	Los Angeles, CA	BPCDT-20080418AAE	15,668,146	177,681	177,703	22	0.0001%
9	K09UF(TV)	Morro Bay, CA	BDFCDVA-20061030ADV		-- No Interference --			
9	K09UF(TV)	Morro Bay, CA	BLTVA-20070802ADY		-- No Interference --			
9	K09UF(TV)	Morro Bay, CA	BDFCDVA-20060707AEQ		-- No Interference --			
9	K09MG(TV)	Ridgecrest, Etc., CA	BLTTV-4570		-- No Interference --			
10	NEW(TV)	Altadena, CA	BDCCDVL-20070517AAK		-- No Interference --			
10	KERO-TV	Bakersfield, CA	BPCDT-20080619AIN		-- No Interference --			
10	KERO-TV	Bakersfield, CA	BMLCDT-20030429AAS		-- No Interference --			
10	NEW(TV)	Banning, CA	BDCCDVL-20080826ACZ		-- No Interference --			
10	K10OG(TV)	Lompoc, CA	BLTVL-19981007JB		-- No Interference --			
10	K10IX(TV)	Newberry Springs, CA	BLTTV-5095		-- No Interference --			
10	K10OU(TV)	Palm Springs, CA	BLTVL-20060830ADL		-- No Interference --			
10	KZSW-LD	Riverside, CA	BDCCDVL-20070517ADV		-- No Interference --			
10	KSBW-DR	Salinas, CA	BPRM-20000328AAU		-- No Interference --			
10	KSBW(TV)	Salinas, CA	BLCDT-20030221ABJ		-- No Interference --			
10	KGTV(TV)	San Diego, CA	BPCDT-20080310AAX		-- No Interference --			
10	KGTV(TV)	San Diego, CA	BLCT-20011004AAZ		-- No Interference --			
10	K59CD(TV)	Santa Barbara, CA	BDISDTV-20061215AAN	224,767	1,322	5,576	4,254	1.8926%
10	NEW(TV)	Santa Barbara, CA	BPRM-20000717AFE		-- No Interference --			
10	NEW(TV)	Van Nuys, CA	BSFDTL-20060630CZS		-- No Interference --			
10	DDK10IK(TV)	Yosemite Village, CA	BLTTV-19911107JJ		-- No Interference --			
11	KKEY-LP	Bakersfield, CA	BSTA-20060831ABP		-- No Interference --			
11	KKEY-LP	Bakersfield, CA	BLTVL-20031016ABY		-- No Interference --			

Exhibit 11 – Table 1
INTERFERENCE STUDY RESULTS SUMMARY
PRE-TRANSITION RESULTS

(Page 2 of 2)

<u>Channel</u>	<u>Affected Station</u>	<u>City, State</u>	<u>File Number</u>	<u>Calculated Baseline (2000 Census)</u>	<u>Interference Population without Proposal (2000 Census)</u>	<u>Interference Population with Proposal (2000 Census)</u>	<u>New Interference</u>	
							<u>Population</u>	<u>Percentage</u>
11	KTTV(TV)	Los Angeles, CA	BMPCDT-20080616AAK	16,057,496	126,742	126,831	89	0.0006%
11	KTTV(TV)	Los Angeles, CA	BLCT-2252	15,095,413	138,271	138,297	26	0.0002%
11	KTTV(TV)	Los Angeles, CA	BPCDT-20080319ACL	15,579,215	108,559	108,577	18	0.0001%
11	K11ML(TV)	Ridgecrest, Etc., CA	BLTTV-4571		-- No Interference --			
11	K11WB-D(TV)	San Luis Obispo, CA	BDCCDVL-20061019ABJ		-- No Interference --			

Exhibit 11 – Table 2
INTERFERENCE STUDY RESULTS SUMMARY
POST-TRANSITION RESULTS

prepared for
Arnold N. Applebaum
 New Companion Low Power Digital Station
 KSBT-LD Santa Barbara, California
 Facility ID 168464
 Ch. 10 0.02 kW (MAX-DA)

<u>Channel</u>	<u>Affected Station</u>	<u>City, State</u>	<u>File Number</u>	<u>Calculated Baseline (2000 Census)</u>	<u>Interference Population without Proposal (2000 Census)</u>	<u>Interference Population with Proposal (2000 Census)</u>	<u>New Interference</u>	
							<u>Population</u>	<u>Percentage</u>
9	KCAL-TV	Los Angeles, CA	BPCDT-20080418AAE	15,752,599	93,228	93,250	22	0.0001%
9	K09UF(TV)	Morro Bay, CA	BDFCDVA-20061030ADV		-- No Interference --			
9	K09UF(TV)	Morro Bay, CA	BLTVA-20070802ADY		-- No Interference --			
9	K09UF(TV)	Morro Bay, CA	BDFCDVA-20060707AEQ		-- No Interference --			
9	K09MG(TV)	Ridgecrest, Etc., CA	BLTTV-4570		-- No Interference --			
10	NEW(TV)	Altadena, CA	BDCCDVL-20070517AAK		-- No Interference --			
10	KERO-TV	Bakersfield, CA	BPCDT-20080619AIN		-- No Interference --			
10	KERO-TV	Bakersfield, CA	BMLCDT-20030429AAS		-- No Interference --			
10	NEW(TV)	Banning, CA	BDCCDVL-20080826ACZ		-- No Interference --			
10	K10OG(TV)	Lompoc, CA	BLTVL-19981007JB		-- No Interference --			
10	K10IX(TV)	Newberry Springs, CA	BLTTV-5095		-- No Interference --			
10	K10OU(TV)	Palm Springs, CA	BLTVL-20060830ADL		-- No Interference --			
10	KZSW-LD	Riverside, CA	BDCCDVL-20070517ADV		-- No Interference --			
10	KGTV(TV)	San Diego, CA	BPCDT-20080310AAX		-- No Interference --			
10	K59CD(TV)	Santa Barbara, CA	BDISDTV-20061215AAN	224,909	1,180	5,576	4,396	1.9546%
10	NEW(TV)	Van Nuys, CA	BSFDTL-20060630CZS		-- No Interference --			
10	DDK10IK(TV)	Yosemite Village, CA	BLTTV-19911107JJ		-- No Interference --			
11	KKEY-LP	Bakersfield, CA	BLTVL-20031016ABY		-- No Interference --			
11	KKEY-LP	Bakersfield, CA	BSTA-20060831ABP		-- No Interference --			
11	KTTV(TV)	Los Angeles, CA	BMPCDT-20080616AAK	16,150,478	33,760	33,849	89	0.0006%
11	KTTV(TV)	Los Angeles, CA	BPCDT-20080319ACL	15,660,835	26,939	26,957	18	0.0001%
11	K11ML(TV)	Ridgecrest, Etc., CA	BLTTV-4571		-- No Interference --			
11	K11WB-D(TV)	San Luis Obispo, CA	BDCCDVL-20061019ABJ		-- No Interference --			