

Exhibit 11 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS
INTERFERENCE ANALYSIS

prepared for
Polnet Communications, Ltd.
W22DG-D Park Ridge, Illinois
Facility ID 168237
Ch. 20 10 kW

Polnet Communications, Ltd., (“*Polnet*”) is the proposed Assignee of W24AJ, analog Class A Channel 24, Aurora, Illinois (file number BLTTL-19990716JA) and a Construction Permit for associated Digital Companion Channel W22DG-D, digital Channel 22, Aurora, Illinois (file number BDCCDTL-20061025ABB) (the “CP”). The instant application herein seeks a minor modification of the CP as a displacement to specify a new transmitting location, a different community of license, a different operating frequency, a different antenna system, and a decrease in effective radiated power (“ERP”). Considering the imminent February 17, 2009 DTV transition date, *Polnet* requests processing of the instant application under Post-Transition conditions. As necessary, waivers of the contingency rules are hereby requested.

The instant application qualifies as a “displacement” application per §73.3572(a)(4)(i) of the Commission’s Rules, as W22DG-D’s authorization on Channel 22 is predicted to cause interference to the maximization application of WIFR(TV), digital Channel 23 (file number BMPCDT-20080613AAB). As well, W22DG-D may be considered displaced due to its co-channel proximity to WVCY-TV (Ch. 22, Milwaukee, WI, 171.6 km distant), WSBT-TV (Ch. 22, South Bend, IN, 186.4 km distant) and WBUI(TV) (Ch. 22, Decatur, IL, 186.9 km distant). These co-channel facilities are well within the qualifying 265 km spacing specified in §73.3572(a)(4)(iv)(A) of the Rules for a displaced Low Power UHF facility.

The instant proposal specifies operation on Channel 20 with a maximum ERP of 10 kW and a “stringent” out of channel emission mask. The proposed antenna system for W22DG-D is a non-directional antenna (Dielectric model TLP-8A) which will be mounted above the rooftop of an existing antenna structure (ASR 1064582). **Exhibit 11 – Figure 1** depicts the manufacturer’s vertical (elevation) antenna pattern on Channel 20. Changes to the supporting structure’s overall

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ALLOCATION CONSIDERATIONS
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height are required as a result of the instant proposal; therefore an FAA study is being requested. Upon receipt of a “Determination of No Hazard,” the ASR will be updated to reflect the proposed changes.

Exhibit 11 - Figure 2 depicts the service contours of the authorized and the proposed digital companion facility. As demonstrated, the contour overlap with the authorized facility clearly 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 Post-Transition digital television, low power television, television translator, and Class A television facilities. 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*, July 2, 1997 (“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 I**, indicate that the instant proposal causes no undesirable interference as defined in §§74.793(e) through (h) to full power facilities, Class A stations, or to secondary stations. Accordingly, the instant proposal complies with §74.793 regarding interference protection to Post-Transition digital television, low power television, television translator, and Class A television facilities.

¹ The 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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International Considerations

The proposed transmitter site is located 403.6 km from the U.S.-Canadian border, which is greater than the 400 km coordination distance specified in the 2000 Canadian Letter of Understanding.² Thus, it is believed that international coordination will not be necessary for this instant proposal.

Other Allocation Considerations

The nearest FCC monitoring station is at Allegan, Michigan, at a distance of 183.1 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 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 are no AM broadcast stations located within 3.2 km (2 miles) of the W22DG-D 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 policies with respect to allocation matters.

² The Letter of Understanding Between the Federal Communications Commission of the United States of America and Industry Canada Related to the Use of the 54-72 MHz, 76-88 MHz, 174-216 MHz and 470-806 MHz Bands for the Digital Television Broadcasting Service Along the Common Border, September 29, 2000.



Antenna Type TLP-8F

EXHIBIT 11 - FIGURE 1
ANTENNA VERTICAL PLANE (ELEVATION)
RADIATION PATTERN

prepared January 2009 for
Polnet Communications, Ltd.
W22DG-D Park Ridge, Illinois
Facility ID 168237
Ch. 20 10 kW

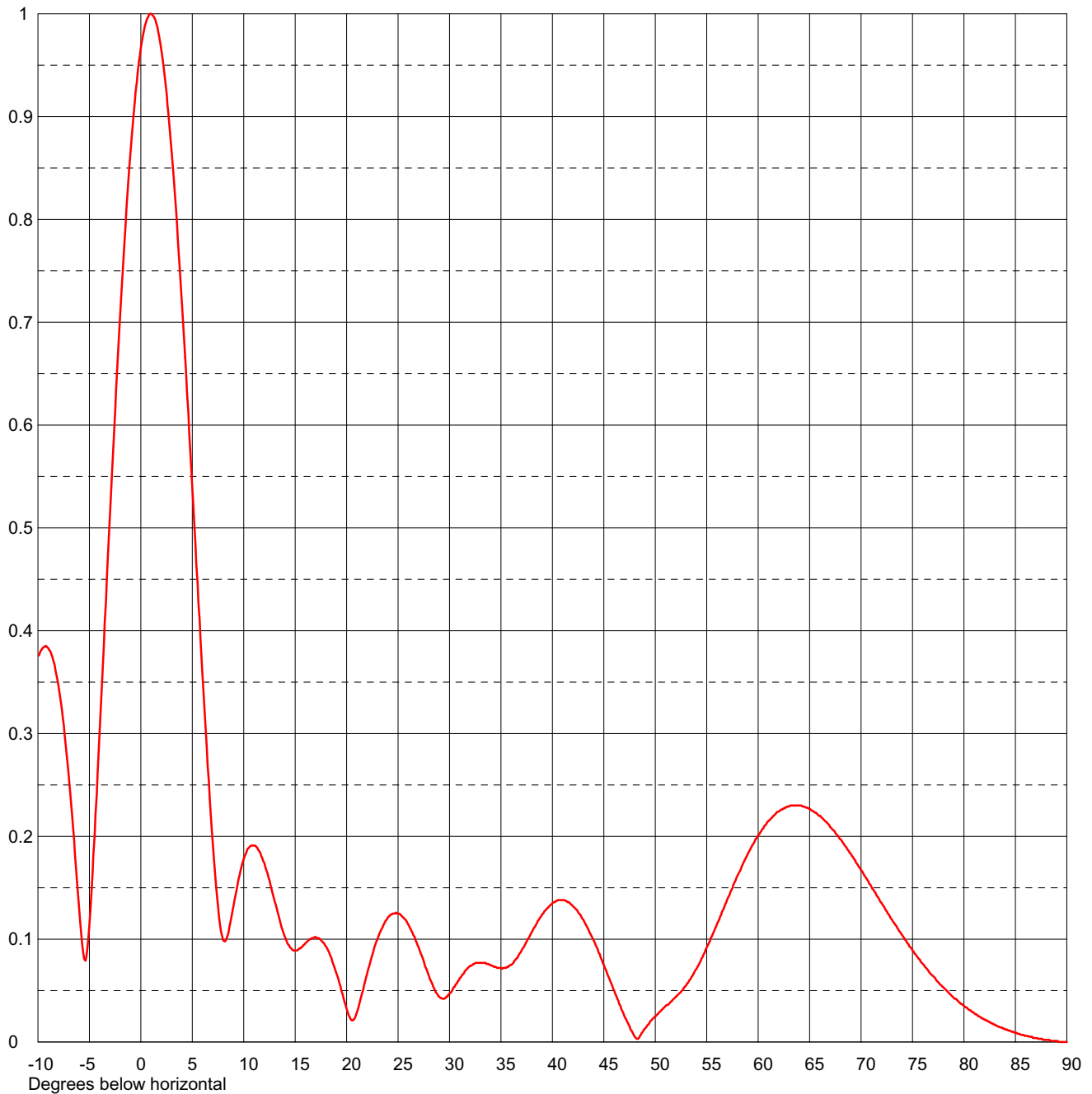
Cavell, Mertz & Associates, Inc.
Manassas, Virginia

ELEVATION PATTERN

RMS Gain at Main Lobe
RMS Gain at Horizontal
Calculated / Measured

8.0 (9.03 dB)
7.5 (8.75 dB)
Calculated

Beam Tilt 1.00 Degrees
Frequency 485.00 MHz
Drawing # 08L080100-90



Remarks:

EXHIBIT 11 - FIGURE 2
SERVICE CONTOUR COMPARISON

prepared January 2009 for
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Cavell, Mertz & Associates, Inc.
Manassas, Virginia

Proposed W22DG-D
51 dBμ F(50,90)
Service Contour

W22DG-D (CP)
BDCCDTL - 20061025ABB
51 dBμ F(50,90)
Service Contour

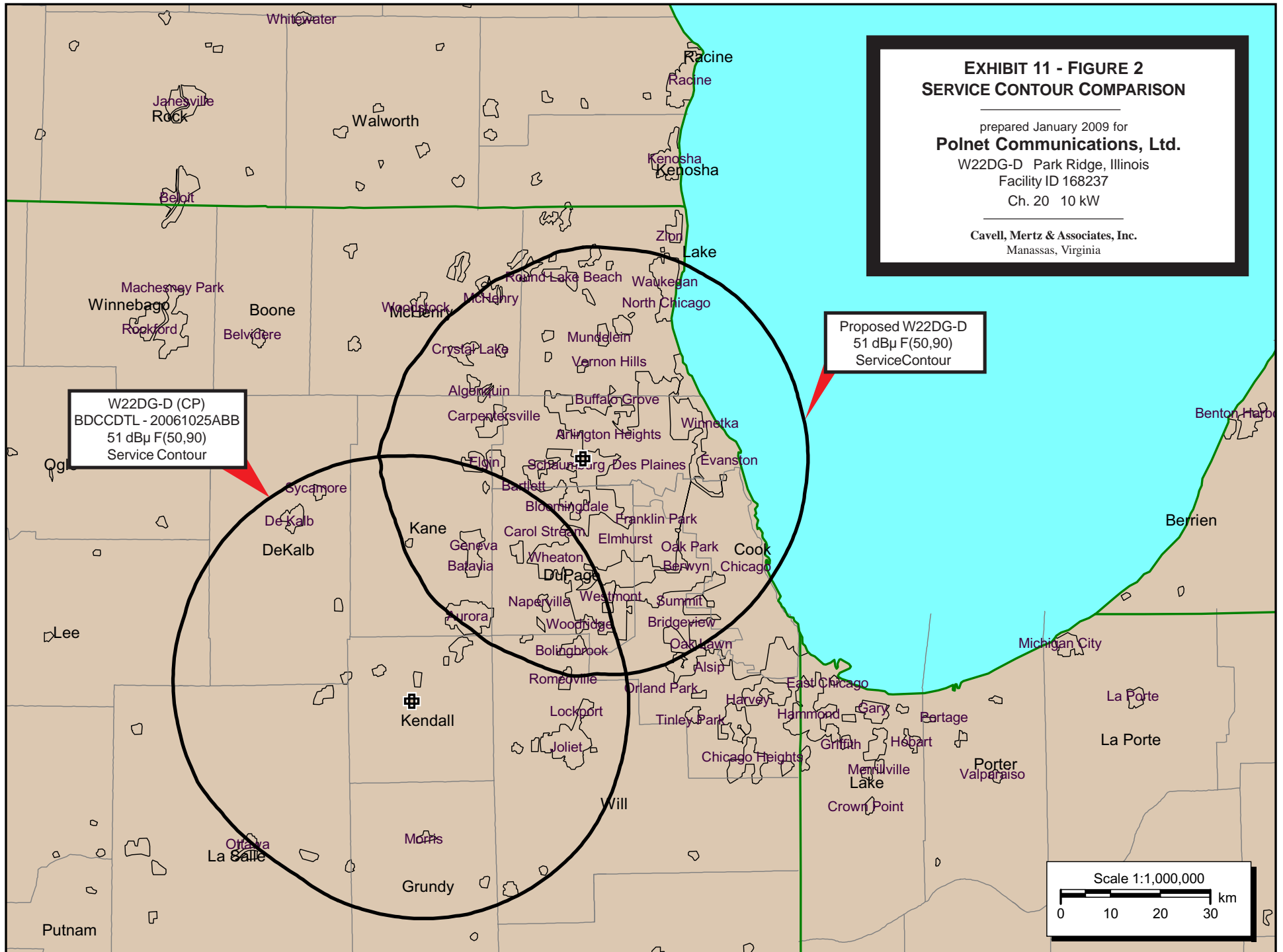


Exhibit 11 - Table I
INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for
Polnet Communications, Ltd.
W22DG-D Park Ridge, Illinois
Facility ID 168237
Ch. 20 10 kW

<u>Ch.</u>	<u>Call</u>	<u>City/State</u>	<u>Dist(km)</u>	<u>Status</u>	<u>File Number</u>	<u>---Population (2000 Census)---</u>	
						<u>Baseline</u>	<u>New Interference</u>
19	W19DE-D	Champaign/Urbana, IL	203.1	CP	BDCCDTL-20061026ACW	---	none
19	WGN-TV	Chicago, IL	38.3	LIC	BLCDT-20040316ACQ	9,501,671	403 / 0.00%
19	WGN-TV	Chicago, IL	38.3	APP	BPCDT-20080619AFN	9,501,671	2,690 / 0.03%
19	WHOI	Peoria, IL	201.2	CP-MOD	BMPCDT-20080619ACV	---	none
19	W19CX	Sterling-Dixon, IL	130.1	LIC	BLTT-20070806AFB	---	none
19	W19CX	Sterling-Dixon, IL	130.1	APP	BDFCDTT-20060330AMI	---	none
19	WMTV	Madison, WI	162.8	LIC	BLCDT-20040823ABP	---	none
19	WMTV	Madison, WI	162.8	CP	BPCDT-20080609ABR	---	none
20	W20CU	Quincy, IL	359.0	LIC	BLTTL-20080123AFO	---	none
20	WHMB-DR	Indianapolis, IN	284.4	APP	BPRM-20080619AEU	---	none
20	WOTV	Battle Creek, MI	219.6	LIC	BLCDT-20030721AHS	2,114,736	11 / 0.00%
20	KSMQ-TV	Austin, MN	406.2	CP-MOD	BMPEDT-20081114AAX	---	none
20	NEW	Findlay, OH	359.4	APP	BDCCDTL-20061026AGA	---	none
20	WHA-TV	Madison, WI	166.0	CP	BPEDT-20080620AEM	1,257,837	357 / 0.03%
20	WHA-TV	Madison, WI	166.0	LIC	BLEDT-20020503AAF	1,257,837	287 / 0.02%
20	WMKE-LD	Milwaukee, WI	111.0	CP	BDCCDTL-20061030AFR	---	none
21	WBKM-LP	Chana, IL	130.1	CP	BDCCDTL-20061030AMY	---	none
21	WYCC	Chicago, IL	38.3	LIC	BLEDT-20030501ABC	8,981,134	43,524 / 0.48%
22	W64CQ	Arlington Heights, IL	11.5	LIC	BLTT-19991020AAO	---	none
22	W17DD	Joliet, IL	56.0	APP	BPTTL-20020423ABE	---	none
23	WWME-CA	Chicago, IL	38.3	LIC	BLTTA-20040129AOW	---	none
23	WWME-CA	Chicago, IL	38.3	STA	BSTA-20041208ABO	---	none
23	WWME-CA	Chicago, IL	38.3	APP	BPTTA-20081023AAZ	---	none
23	W23BW	Madison, WI	162.4	LIC	BLTTA-20031125AAQ	---	none
23	W23BW	Madison, WI	162.4	APP	BPTTA-20030326AHF	---	none
24	WHVI-LP	Valparaiso, IN	102.4	LIC	BLTTL-19921102JE	---	none