

Exhibit 42 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for
Gray Television Licensee, Inc.
WOWT-DT Omaha, Nebraska
Facility ID 65528
Ch. 22 1000 kW 398 m

Gray Television Licensee, Inc. (“Gray”), licensee of analog station WOWT-TV Channel 6, Omaha, Nebraska (file number BLCT-19831024KI) has a Construction Permit (“CP,” BPCDT-19991018AAP) which authorizes construction of the paired WOWT-DT facility on Channel 22. Under the present CP, WOWT-DT would operate with a nondirectional effective radiated power (“ERP”) of 982.1 kW and an antenna height above average terrain (“HAAT”) of 418 meters. The instant application herein proposes to modify the CP to specify operation of WOWT-DT with an ERP of 1,000 kW at a lower antenna HAAT of 398 meters. The current DTV application “freeze”¹ regarding contour extension proposals does not apply since the proposed facility does not exceed the WOWT-DT allotment facility.

The proposed antenna system for WOWT-DT will be side-mounted on the existing WOWT-TV antenna support structure. No change in the overall height of the antenna support structure is proposed. The proposed antenna is an ERI model ATW30H3-HSO-22S.

The attached **Exhibit 42 - Figure 1** is a map which depicts the coverage contours for the proposed WOWT-DT facility. Per the Commission’s requirements, the DTV service contour (41 dB μ) of the facility will completely encompass the principal community. **Exhibit 42 - Figure 1** also demonstrates that the enhanced principal community coverage requirement of 48 dB μ (required by December 31, 2004 for commercial stations) will also be met by the proposed facility.

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.

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“Checklist” Criteria

The instant proposal does not require an interference study under the present requirement of 73.622(f)(2) of the Commission’s rules. Specifically, (1) the proposed DTV Channel 22 was established for this station under §73.622(b); (2) the proposed facility will operate from a site within 5 km of the DTV reference site for WOWT-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 398 meters, which do not exceed the DTV reference ERP and HAAT combination established for this station (1,000 kW ERP and 418 meters HAAT) under §73.622(f)(1)². Accordingly, the instant proposal is a “checklist” application and is not subject to the interference analysis provisions of §73.623(c).

Other Allocation Considerations

The proposed WOWT-DT site is located 819.9 km from the nearest Canadian border, and 1370.4 km from the nearest Mexican border, both much greater than the distance which requires international coordination.

The nearest FCC monitoring station is at Grand Island, Nebraska, at a distance of 206.25 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.

Thus, this proposal is believed to be in compliance with the current Commission’s Rules and policy with respect to allocation matters.

²The proposed ERP/HAAT combination does not exceed the underlying allotment when the reference directional antenna pattern is considered in conjunction with the ERP adjustment method under §73.622(f)(3).

**EXHIBIT 42 - FIGURE 1
DTV COVERAGE CONTOURS**

prepared October 2004 for
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