

Exhibit 11 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**

prepared for  
**Gray Television Licensee, Inc.**  
K57CZ North Platte, Etc., NE  
Facility ID 7891  
Ch. 25 (Digital) 2.28 kW

*Gray Television, Inc.* (“*Gray*”) is the licensee of television translator station K57CZ, Channel 57, North Platte, Etc, NE, Facility ID 7891 (BLTT-198303151A). K57CZ’s licensed operation on Channel 57 is displaced pursuant to §73.3572(a)(4)(ii). *Gray* proposes herein to change K57CZ to Channel 25 and “flash cut” to digital operation. No change in site location or antenna height is specified.

The proposed facility will operate on Channel 25 using a “simple” out of channel emission mask, with a directional antenna having an effective radiated power of 2.28 kW at the presently licensed transmitting antenna location. **Exhibit 11 - Figure 1** depicts the coverage contours of the licensed (74 dB $\mu$ ) and the proposed (51 dB $\mu$ ) facilities. The use of the same transmitter site and the service area overlap shown demonstrates compliance with §73.3572 for a minor change.

The proposed antenna system for K57CZ will be side-mounted on an existing municipal water tower. The tower structure is registered with the Commission (ASR #1256275), and no change in overall structure height will result. Since no change to the structure’s overall height is proposed, FAA notification is not necessary.

**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 Number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6,

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2004 (“OET-69”).<sup>1</sup> 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 1**, 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 Considerations**

The nearest FCC monitoring station is at Grand Island, NE, at a distance of 197.5 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 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. The site is not located within the border zones requiring international coordination. There is one (1) AM broadcast station located within 3.2 km (2 miles) of the proposed site. According to information extracted from the Commission’s engineering database, KODY(AM), 1240 kHz, 1.0 kW ND1, North Platte, NE is 1.8 km distant. Pursuant to §73.1692(c), protective issues are triggered only when the proposed facility is situated within 0.8 km of a non-directional AM station such as KODY(AM). Thus, this proposal is believed to be in compliance with the current Commission’s Rules and policy with respect to allocation matters.

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<sup>1</sup>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.

**EXHIBIT 11 - FIGURE 1  
COVERAGE CONTOUR COMPARISON  
K57CZ NORTH PLATTE, ETC., NEBRASKA  
Ch. 25 (DIGITAL) 2.28 kW**

prepared December 2006 for  
**Gray Television Licensee, Inc.**

Cavell, Mertz & Davis, Inc.  
Manassas, Virginia

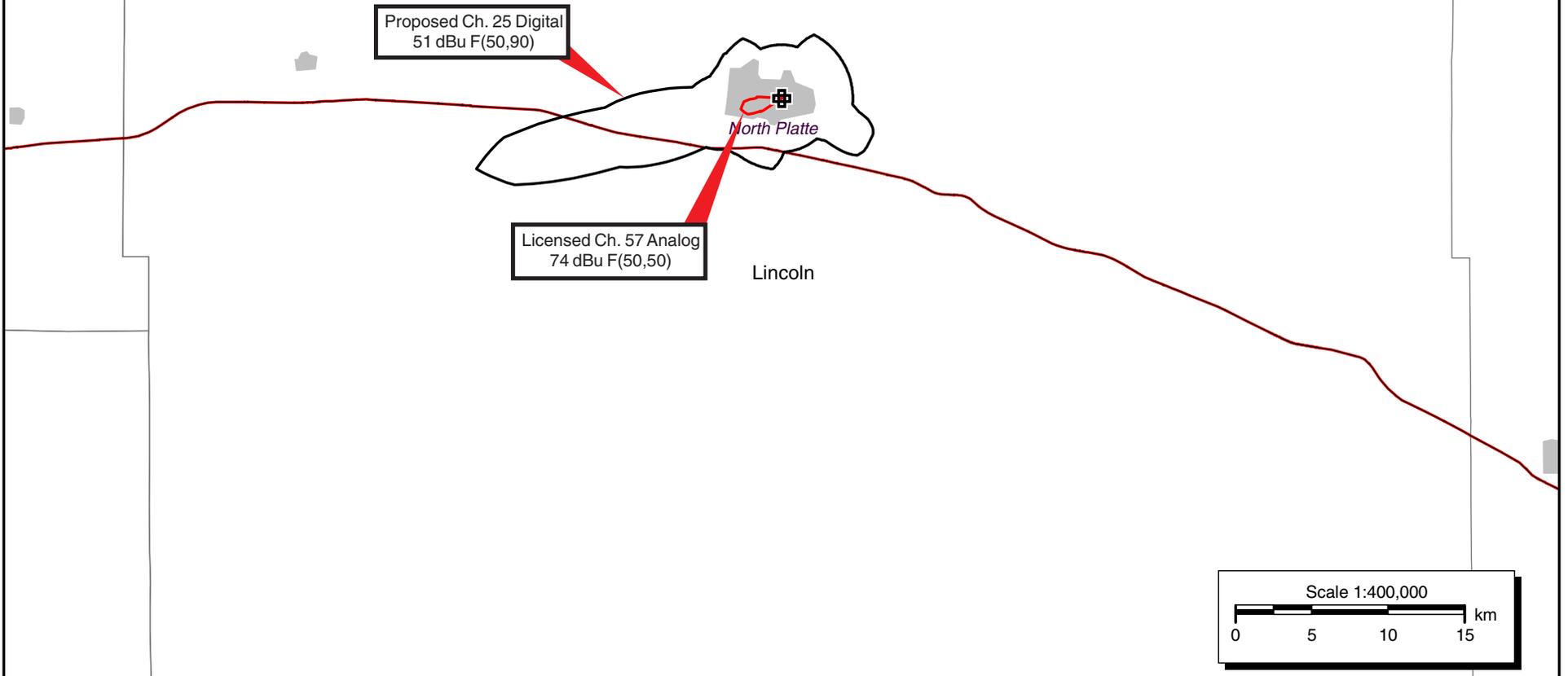


Exhibit 11 - Table 1  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**

prepared for  
**Gray Television Licensee, Inc.**  
 K57CZ North Platte, Etc., NE  
 Facility ID 7891  
 Ch. 25 (Digital) 2.28 kW

<u>Ch.</u>	<u>Call</u>	<u>City/State</u>	<u>Dist(km)</u>	<u>Status</u>	<u>Application Ref. No.</u>	<u>---Population (1990 Census)---</u>	
						<u>Baseline</u>	<u>New Interference</u>
18	K18GM	PLEASANT VALLEY CO	133.9	LIC	BLTT-20030620ABX	---	none
18	K18DH	BROKEN BOW NE	83.3	LIC	BLTT-19901210JL	---	none
21	K21CY	OGALLALA NE	80.6	LIC	BLTT-19900618IG	---	none
24	K24FU	PLEASANT VALLEY CO	133.9	LIC	BLTT-20050713ACA	---	none
24	KTNE-TV	ALLIANCE NE	206.4	LIC	BLEDT-20040310ABN	---	none
24	K55AF	COZAD NE	105.5	CP	BDISDTT-20060329ANJ	---	none
25	K25GZ	HOLYOKE CO	151.8	LIC	BLTT-20030304AAS	---	none
25	KDEN	LONGMONT CO	367.8	CP	BPCT-20040524AOH	---	none
25	KDEN	LONGMONT CO	368.3	LIC	BLCT-19970428KE	---	none
25	NEW	SIOUX CITY IA	398.2	APP	BSFDTL-20060630DCR	---	none
25	NEW	GARDEN CITY KS	354	APP	BDCCDTL-20061030ASE	---	none
25	K25CV	HAYS KS	275.8	LIC	BLTT-20030806AAG	---	none
25	K25CV	HAYS KS	275.8	CP	BDFCDTT-20060331ABZ	---	none
25	K25DS	JUNCTION CITY KS	406.4	LIC	BLTT-19970814JB	---	none
25	KOLN	LINCOLN NE	302.5	CP MOD	BMPCDT-20020412AAA	---	none
25	K25GM	NEWPORT NE	203.2	LIC	BLTT-20020103AAH	---	none
25	NEW	SOUTH SIOUX CITY NE	388.5	APP	BSFDTL-20060630BYT	---	none
25	K31DP	YANKTON SD	328.8	CP	BDISDTT-20060327ACG	---	none
25	K25IE	LARAMIE WY	395.8	CP	BNPTTL-20000829ALL	---	none
26	K26GX	PLEASANT VALLEY CO	133.9	LIC	BLTT-20050622AAQ	---	none

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**INTERFERENCE ANALYSIS RESULTS SUMMARY**  
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<u>Ch.</u>	<u>Call</u>	<u>City/State</u>	<u>Dist(km)</u>	<u>Status</u>	<u>Application Ref. No.</u>	<u>---Population (1990 Census)---</u>	
						<u>Baseline</u>	<u>New Interference</u>
26	KLNE-TV	LEXINGTON NE	138	APP	BPEDT-20060913AAD	---	none
26	KLNE-TV	LEXINGTON NE	138	LIC	BLEDT-20030409AAY	---	none
26	K26CV	OGALLALA NE	78.4	LIC	BLTT-19911217JC	---	none
28	K28IX	PLEASANT VALLEY CO	133.9	LIC	BLTT-20051005AAW	---	none
28	K28GC	GOTHENBURG NE	51.1	LIC	BLTT-20011115AAI	---	none
29	KUVR-LP	MCCOOK NE	103.4	CP	BNPTTL-20000829AEE	---	none
33	K33FO	BENKELMAN NE	130.1	LIC	BLTT-20001103AAF	---	none
33	K33FF	WALLACE, ECT. NE	37.3	LIC	BLTT-20010504ABQ	---	none