Exhibit 11 - Statement A

NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for

Polnet Communications, Ltd.

W29DJ Sheboygan, WI
Facility ID 67976
Ch. 30 (Digital) 15 kW

Polnet Communications, Ltd. ("Polnet") is the proposed Assignee of analog television translator station W29DJ, Channel 29, Sheboygan, Wisconsin, Facility ID 67976 (BLTTL-20080221AAP) and of digital flash-cut Construction Permit (BDFCDTL-20080408ABL, "CP") for the same facility. The instant application herein seeks a minor modification of the CP as a displacement to specify a different operating frequency and a different antenna system. The same transmitting site location is specified for the proposed operation.

Nature of the Proposal

The instant application qualifies as a "displacement" application per §73.3572(a)(4)(i) of the Commission's Rules, as W29DJ's authorization on Channel 29 due to its co-channel proximity to WMAQ-TV (Ch. 29, Chicago, IL, 137 km distant). This co-channel facility is well within the qualifying 265 km spacing specified in §73.3572(a)(4)(iv)(A) of the Rules for a displaced Low Power UHF television facility.

The proposed antenna system for the digital W29DJ is a directional antenna (Dielectric model TLP-24M), which will be side-mounted on an existing antenna support structure (ASR number 1057482). No change in structure overall height is necessary to carry out this proposal. Since no change to the structure's overall height is proposed, no change to structure marking/lighting requirements will result.

The existing proposed directional horizontal plane relative field pattern, based on data provided by the antenna manufacturer, is tabulated in **FCC Form 346, Section III, Item 11c**. The attached **Exhibit 11 - Figure 1** supplies a plot of the W29DJ directional pattern, properly oriented to True North. **Exhibit 11 - Figure 2** supplies a plot of the vertical (elevation) plane pattern.

The proposed digital facility will operate on Channel 30 using a "stringent" out of channel emission mask with a directional antenna having a maximum effective radiated power of 15 kW at its currently authorized transmitting site location. **Exhibit 11 - Figure 3** depicts the coverage contours of the licensed (analog 74 dBµ), the authorized (digital 51 dBµ) and the proposed (digital 51 dBµ) facilities. As demonstrated on the provided map, the service area overlap shown demonstrates compliance with §73.3572 for a minor change.

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 No. 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 ("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**, show that any new interference does not exceed the Commission's interference limits (0.5 percent to full service 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.

International Coordination

The proposed transmitter site is located 403.1 km from the U.S.-Canadian border, which is greater than the 100 km required coordination distance specified for digital low power television

[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.

stations in the 2000 Canadian Letter of Understanding[2] and greater than the 400 km coordination distance for full service facilities. As demonstrated in **Exhibit 11 – Figure 4**, the worst-case interfering contour of 12.4 dBµ F(50,10)[3] does not reach the Canadian border. Thus, it is believed that international coordination will not be necessary for the instant proposal.

Other Allocation Considerations

The nearest FCC monitoring station is at Allegan, MI, at a distance of 168.3 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. There are no AM broadcast stations located within 3.2 km (2 miles) of the proposed 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.

[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, paragraph 12.

[3] Ibid., Appendix 2. The worst-case interfering contour for UHF digital facilities is the co-channel DTV into DTV interference, defined as 19.5 dB below the 39 dBµ protected contour using the F(10,10) contour. 7.1 dBµ is then subtracted from 19.5 dBµ F(10,10) to obtain the equivalent 12.4 dBµ F(50,10) worst-case interfering contour.

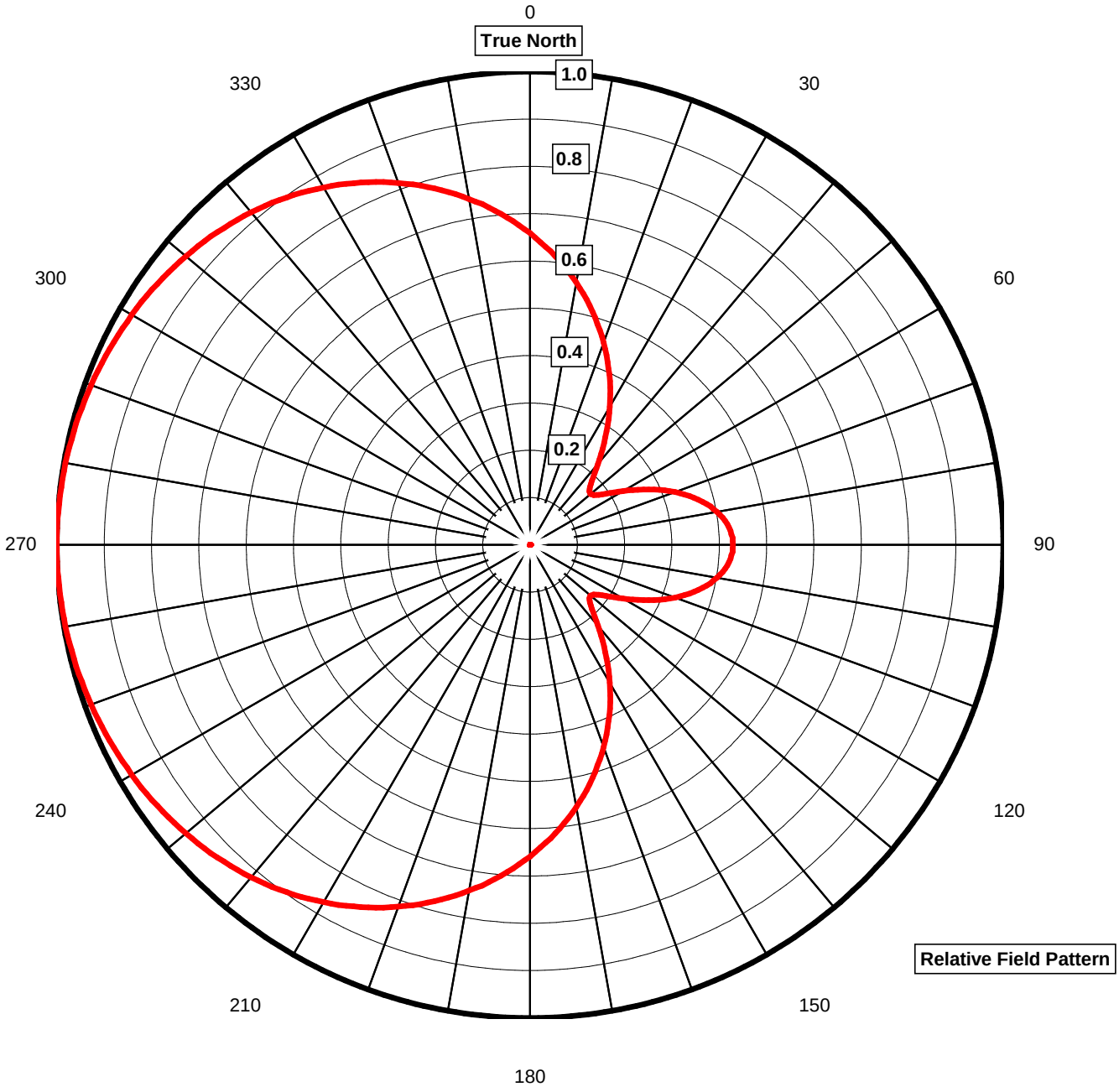

EXHIBIT 11 - FIGURE 1

ANTENNA HORIZONTAL PLANE RADIATION PATTERN

prepared August 2009 for

Polnet Communications, Ltd.

W29DJ Sheboygan, Wisconsin

Facility Id 67976

Ch. 30 (Digital) 15 kW

Cavell, Mertz & Associates, Inc.

Manassas, Virginia

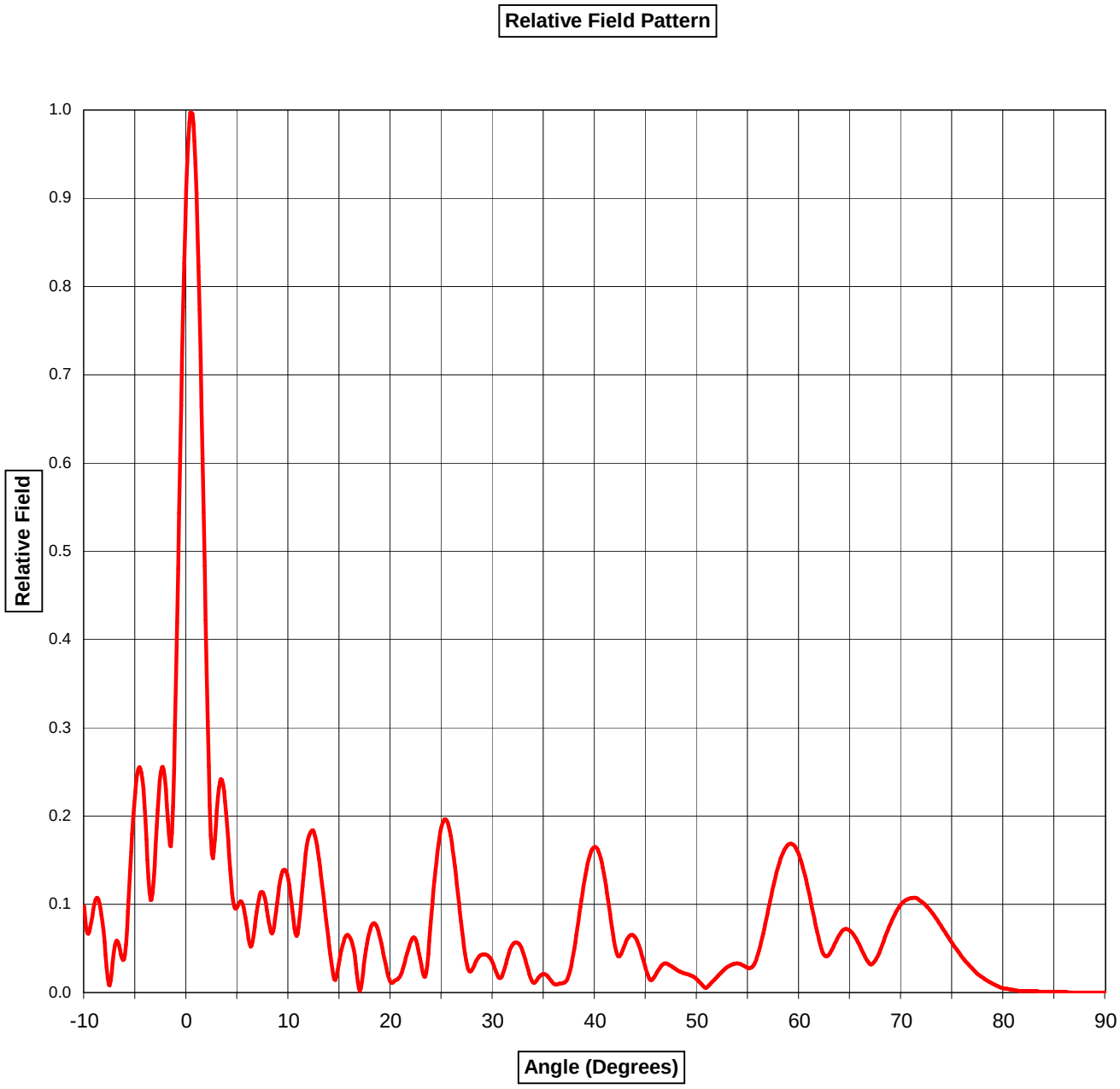

EXHIBIT 11 - FIGURE 2

ANTENNA VERTICAL PLANE (ELEVATION) RADIATION PATTERN

prepared August 2009 for

Polnet Communications, Ltd.
W29DJ Sheboygan, Wisconsin
Facility Id 67976
Ch. 30 (Digital) 15 kW

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

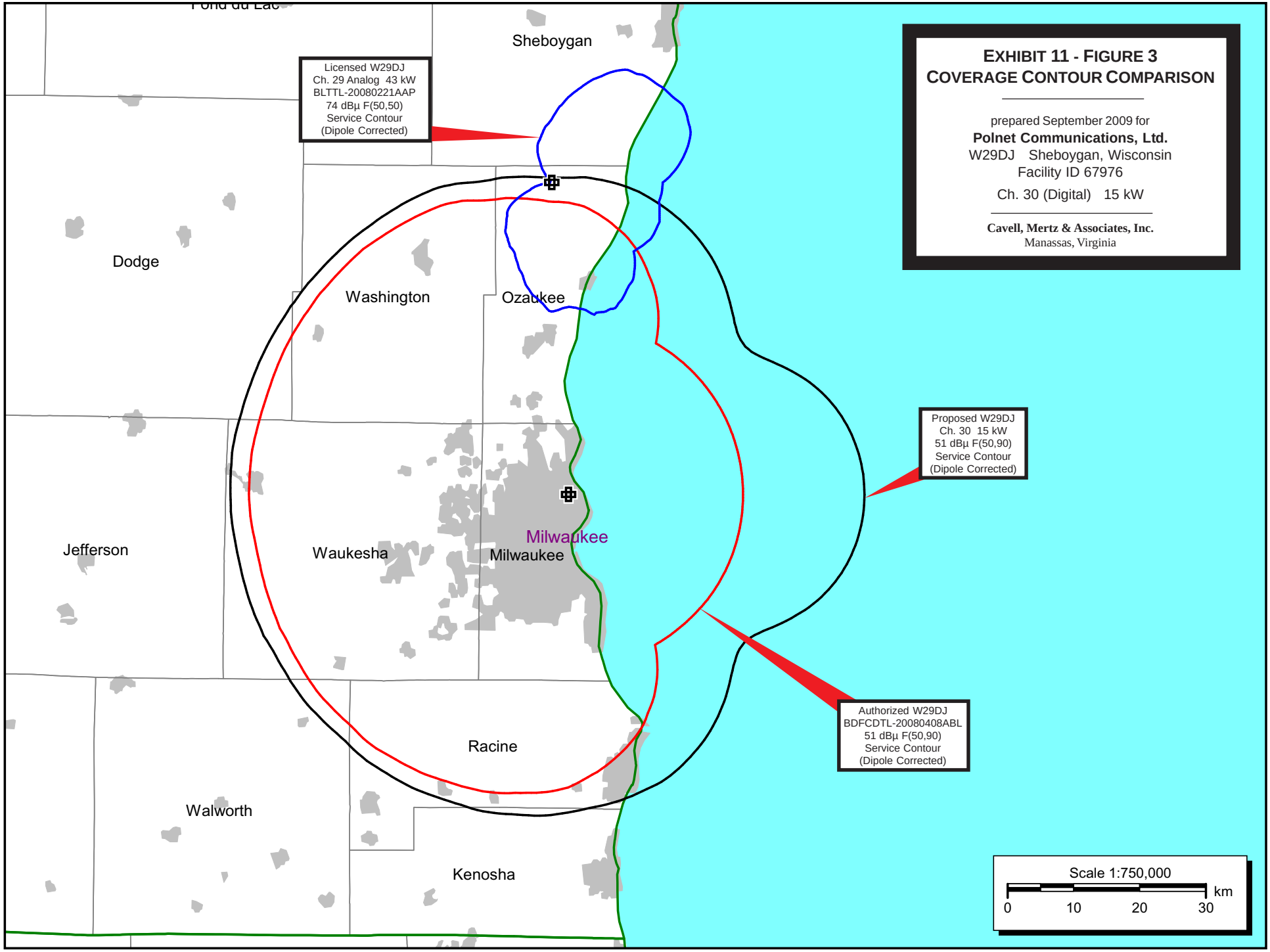
EXHIBIT 11 - FIGURE 3
COVERAGE CONTOUR COMPARISON
prepared September 2009 for
Polnet Communications, Ltd.
W29DJ Sheboygan, Wisconsin
Facility ID 67976
Ch. 30 (Digital) 15 kW
Cavell, Mertz & Associates, Inc.
Manassas, Virginia
Licensed W29DJ
Ch. 29 Analog 43 kW
BLTTL-20080221AAP
74 dBµ F(50,50)
Service Contour
(Dipole Corrected)
Proposed W29DJ
Ch. 30 15 kW
51 dBµ F(50,90)
Service Contour
(Dipole Corrected)
Authorized W29DJ
BDFCDTL-20080408ABL
51 dBµ F(50,90)
Service Contour
(Dipole Corrected)
Sheboygan
Dodge
Washington
Ozaukee
Jefferson
Waukesha
Milwaukee
Milwaukee
Racine
Walworth
Kenosha
Scale 1:750,000
0
10
20
30
km

Exhibit 11 - Table I

INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for

Polnet Communications, Ltd.

W29DJ Sheboygan, Wisconsin

Facility ID 67976

Ch. 30 (Digital) 15 kW

						----Population (2000 Census)----	
Ch.	Call	City/State	Dist(km)	Status	File Number	Baseline	New Interference
29	WMAQ-TV	Chicago, IL	137.1	LIC	BLCDT-20010531ACY	9,518,308	0 / 0.00%
29	WUHQ-LP	Grand Rapids, MI	180.0	LIC	BLTTL-20030404AAA	---	none
29	WOMS-CA	Muskegon, MI	149.3	CP	BDFCDTA-20060330ALZ	---	none
29	WOMS-CA	Muskegon, MI	149.3	LIC	BLTTA-20060926AEA	---	none
29	W65EE	Janesville, WI	111.3	CP	BPTT-20031218AAS	---	none
29	W29DJ	Sheboygan, WI	0.0	CP	BDFCDTL-20080408ABL	1,272,387	947 / 0.07%
29	W29DJ	Sheboygan, WI	0.0	CP	BPTTL-20080311ABX	1,159,992	751 / 0.06%
29	W29DJ	Sheboygan, WI	47.2	LIC	BLTTL-20080221AAP	---	none
30	WCRD-LP	Carthage, IL	136.4	CP	BDCCDTL-20061030AMS	---	none
30	W57DN	Elgin, IL	125.1	CP	BDISDTT-20060213ACF	---	none
30	WMBD-TV	Peoria, IL	305.2	CP MOD	BMPCDT-20060314ABP	---	none
30	WSPY-LP	Plano, IL	168.3	LIC	BLTTL-19900514IR	---	none
30	WEYI-TV	Saginaw, MI	339.4	LIC	BLCDT-20040123ASH	---	none
30	WWAZ-TV	Columbus, WI	100.9	CP	BDRTCT-20090223ABW	---	none
30	W30BU	Green Bay, WI	140.5	CP	BDFCDTL-20090806ACF	---	none
30	W30BU	Green Bay, WI	140.5	LIC	BLTTL-20030923AAD	---	none
30	WHLA-TV	La Crosse, WI	290.4	LIC	BMLEDT-20041013AAL	423,924	342 / 0.08%
31	WFLD	Chicago, IL	137.1	LIC	BLCDT-20050606ABF	9,710,886	790 / 0.01%
31	WFLD	Chicago, IL	137.1	CP	BPCDT-20080616AAN	9,710,886	4,532 / 0.05%
31	W52DB	Muskegon, MI	143.8	CP	BDISDTT-20060202AAB	---	none
31	W48BY	Beaver Dam, WI	85.6	APP	BPTTL-20011119AAV	---	none
31	WBWT-LP	Milwaukee, WI	0.0	CP	BDCCDTL-20061025ADF	1,452,551	28,032 / 1.93%
33	WFBN-LP	Rockford, IL	132.5	LIC	BLTTL-19890616II	---	none
33	WOHO-CA	Holland, MI	161.5	LIC	BLTTL-20001026AAA	---	none
34	WEDE-CA	Arlington Heights, IL	137.1	STA	BSTA-20040603ACT	---	none

Exhibit 11 - Table I

INTERFERENCE ANALYSIS RESULTS SUMMARY

Ch.	Call	City/State	Dist(km)	Status	File Number	---Population (2000 Census)---- Baseline	New Interference
34	W34BZ	Ludington, MI	166.2	LIC	BLTTL-20001218ABF	---	none
34	W58CO	Madison, WI	138.1	APP	BPTTL-20020307ABS	---	none
38	WMKG-CA	Muskegon, MI	143	LIC	BLTTL-20040824AAW	---	none
38	W38CT	Madison, WI	127.9	LIC	BLTT-20021203ACA	---	none
38	WBWT-LP	Milwaukee, WI	0	LIC	BLTTL-20070223AGI	---	none

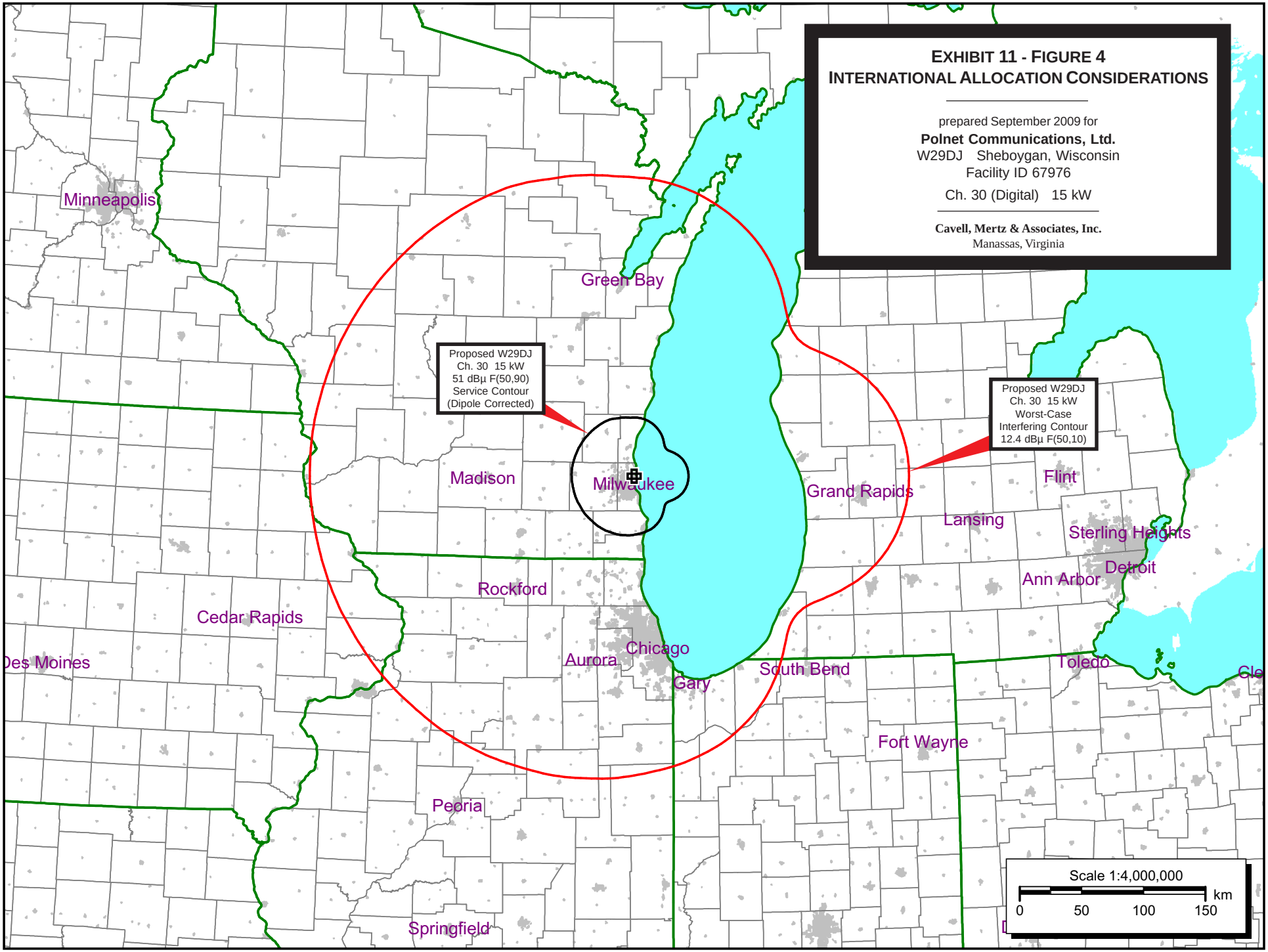
EXHIBIT 11 - FIGURE 4
INTERNATIONAL ALLOCATION CONSIDERATIONS
prepared September 2009 for
Polnet Communications, Ltd.
W29DJ Sheboygan, Wisconsin
Facility ID 67976
Ch. 30 (Digital) 15 kW
Cavell, Mertz & Associates, Inc.
Manassas, Virginia
Proposed W29DJ
Ch. 30 15 kW
51 dBµ F(50,90)
Service Contour
(Dipole Corrected)
Proposed W29DJ
Ch. 30 15 kW
Worst-Case
Interfering Contour
12.4 dBµ F(50,10)
Minneapolis
Green Bay
Madison
Milwaukee
Grand Rapids
Flint
Lansing
Sterling Heights
Detroit
Ann Arbor
Rockford
Cedar Rapids
Des Moines
Chicago
Aurora
Gary
South Bend
Toledo
Fort Wayne
Peoria
Springfield
Scale 1:4,000,000
km
0
50
100
150