

Exhibit 11 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS
prepared for
Gray Television Licensee, Inc.
K50EZ Montrose, Colorado
Facility ID 167155
Ch. 49 (Digital Companion) 1.0 kW

Gray Television Licensee, Inc. (“Gray”) is the licensee of television translator station K50EZ, Channel 50, Montrose, Etc., Colorado, Facility ID 43670 (file number BLTT-19990504JA). Gray submitted a proposal for a digital companion channel for K50EZ in the June 2006 filing window (file number BSFDTT-20060630AOY, Facility ID 167155).¹ The K50EZ proposal was listed in a Public Notice² as not being mutually exclusive with any other proposal submitted in the filing window. The instant application is filed as required by the Public Notice to request a Construction Permit for the proposed digital companion facility.

The proposed K50EZ digital companion facility will utilize the same antenna as that authorized by the K50EZ analog facility under a Construction Permit (BPTT-20031208BEC), and is installed on the existing antenna support structure (ASR number 1240357) as specified in that authorization.³ No change in the structure’s overall height is contemplated as a result of this proposal.

The proposed facility will operate on Channel 49 using a “stringent” out of channel emission mask, with a non-directional antenna having an effective radiated power of 1.0 kW. The proposed antenna is a Scala model SL-8, horizontally polarized. **Exhibit 11 – Figure 1** depicts the coverage contours of the licensed and authorized analog facilities, and the proposed digital companion facility, which is equivalent to the June 2006 “window” facility parameters.

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 “LPTV and TV Translator Digital Companion Channel Applications Non-Mutually Exclusive Proposals (Auction No. 85),” Public Notice, DA 06-1748, released August 31, 2006.

³ An Application for License to cover the CP is pending (BLTT-20060724AAH).

Exhibit 11 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS
(Page 2 of 3)

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 number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 ("OET-69").⁴ 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 no new interference is predicted to full power, Class A stations, or 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 and Other Allocation Matters

The proposed site is located 1187 km from the nearest U.S. – Canadian border, and 724.7 km from the nearest U.S. – Mexican border, well beyond the suggested zones for international coordination.

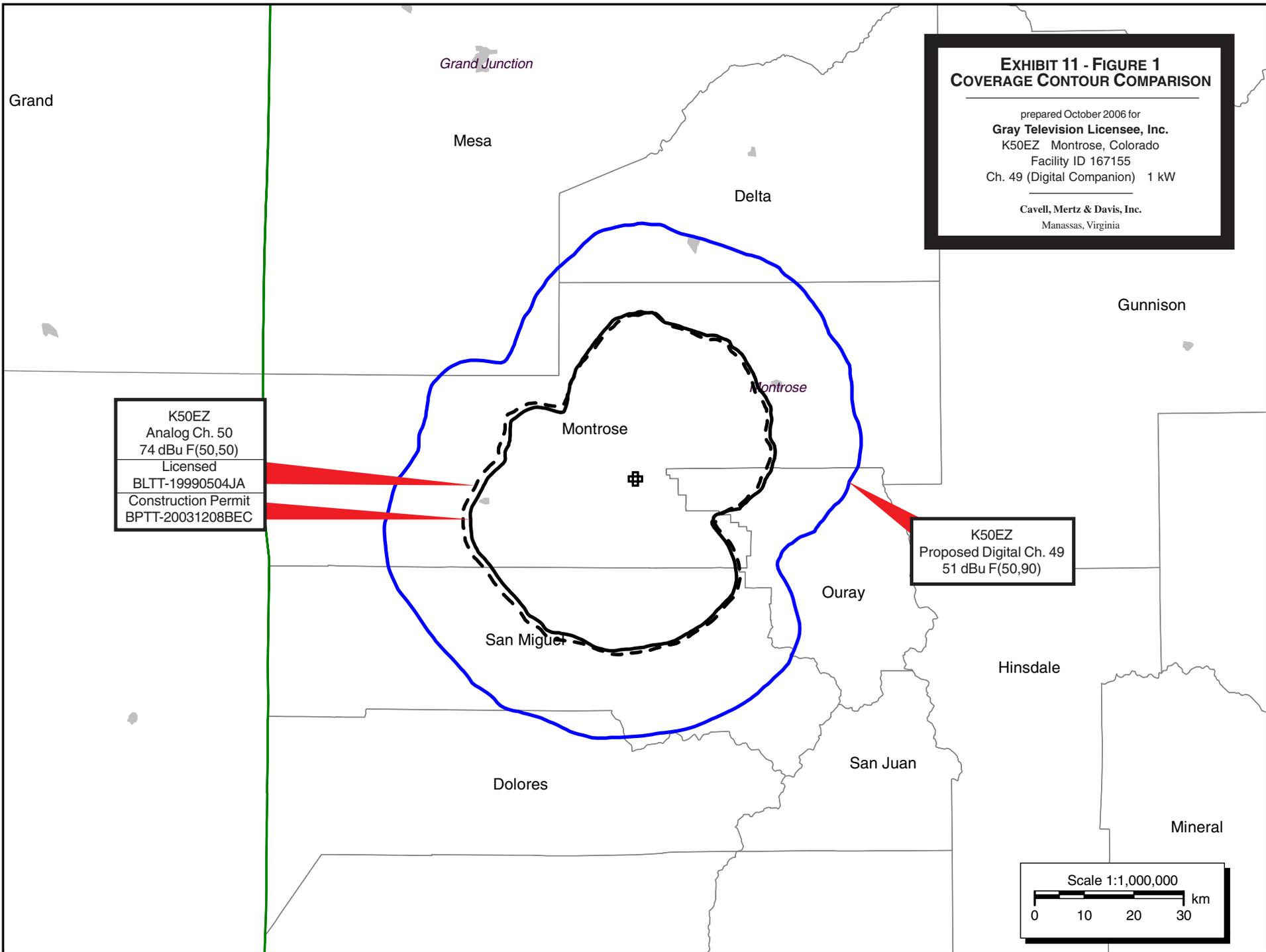
The nearest FCC monitoring station is 767.7 km distant at Douglas, AZ. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. The proposed site is also located outside the areas specified in §73.1030(a)(1) and §73.1030(b). Thus, notification of the instant proposal to the

⁴ 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 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS
(Page 3 of 3)

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.

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



**EXHIBIT 11 - FIGURE 1
COVERAGE CONTOUR COMPARISON**

prepared October 2006 for
Gray Television Licensee, Inc.
 K50EZ Montrose, Colorado
 Facility ID 167155
 Ch. 49 (Digital Companion) 1 kW

Cavell, Mertz & Davis, Inc.
 Manassas, Virginia

K50EZ
 Analog Ch. 50
 74 dBu F(50,50)
 Licensed
 BLTT-19990504JA
 Construction Permit
 BPTT-20031208BEC

K50EZ
 Proposed Digital Ch. 49
 51 dBu F(50,90)

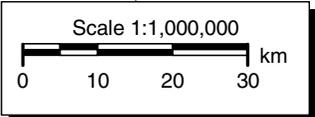


Exhibit 11 - Table I
INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for

Mountain Licenses, L.P.

K50EZ Montrose, Colorado

Facility ID 167155

Ch. 49 (Digital Companion) 1.0 kW

Ch.	Call	City/State	Dist(km)	Status	Application Ref. No.	---Population (1990 Census)---	
						Baseline	New Interference
34	K34IA	DOVE CREEK CO	87.9	LIC	BLTTL-20050802ADA	---	none
34	K34DH	REDALE, ETC. CO	0.2	LIC	BLTT-19920131BK	---	none
34	K57CR	RIFLE, ETC. CO	137.3	CP	BDISTT-20060324AFH	---	none
35	K35CH	CORTEZ, MANCOS, ETC. CO	105.7	LIC	BLTT-19890920IC	---	none
35	NEW	GRAND JUNCTION CO	96.1	APP	BNPTTL-20000829AWX	---	none
35	NEW	HERMOSA CO	113.5	APP	BNPTT-20000823AAK	---	none
41	K41DE	CORTEZ, ETC. CO	105.7	LIC	BLTTL-19921222JL	---	none
41	K41AH	CRESTED BUTTE, ETC. CO	124.7	LIC	BLTT-19841123IC	---	none
41	K41AE	GRAND JUNCTION, ETC. CO	86.0	LIC	BLTT-19810724IL	---	none
41	K41DU	PARLIN, ETC. CO	133.8	LIC	BLTT-19941109IM	---	none
42	K42DI	BAYFIELD & IGNACIO CO	140.5	LIC	BLTT-19940127JD	---	none
42	K42AD	BLANDING/MONTICELL UT	122.7	LIC	BLTT-20041018ACK	---	none
45	K45CY	CRESTED BUTTE, ETC. CO	124.7	LIC	BLTT-19961231JJ	---	none
45	K45DH	DURANGO CO	113.5	LIC	BLTT-19910621IF	---	none
45	K45IT	GRAND JUNCTION CO	96.1	LIC	BLTT-20050929AYX	---	none
45	K45AF	PARACHUTE, ETC. CO	126.8	LIC	BLTT-19921020JD	---	none
45	K45GM	BLANDING & MONTICELL UT	122.7	LIC	BLTT-20040205AET	---	none
46	K46FM	BAYFIELD CO	140.8	LIC	BLTT-20020405AAV	---	none
46	K46IE	CORTEZ-RED MESA CO	105.8	LIC	BLTT-20051024AAM	---	none
46	K46IK	GRAND JUNCTION CO	81.9	CP	BNPTTL-20000828ALG	---	none
46	NEW	GRAND JUNCTION CO	81.9	APP	BNPTTL-20000828ANM	---	none
46	K46DB	SAPINERO CO	81.8	LIC	BLTT-19930326JE	---	none
46	K46AF	BLANDING & MONTICELL UT	122.7	CP	BMJPTT-20000828AGZ	---	none
46	K46AF	BLANDING, ETC. UT	123.1	LIC	BLTT-19811222ID	---	none
47	K53DR	CORTEZ CO	110.2	APP	BPTT-20040805AAJ	---	none
47	K47BL	CRESTED BUTTE, ETC. CO	124.7	LIC	BLTT-19970113JE	---	none
47	K47KD	DURANGO CO	120.0	CP	BNPTTL-20000829AQX	---	none
47	K47JR	GRAND JUNCTION, ETC. CO	96.1	LIC	BLTT-20050930ADN	---	none
47	K47JI	BLANDING & MONTICELL UT	122.7	LIC	BLTT-20051207AAF	---	none

Exhibit 11 - Table I
INTERFERENCE ANALYSIS RESULTS SUMMARY
 (page 2 of 3)

Ch.	Call	City/State	Dist(km)	Status	Application Ref. No.	---Population (1990 Census)---	
						Baseline	New Interference
48	K48IC	CARBONDALE CO	142.1	LIC	BLTT-20050718AAP	---	none
48	K48BK	DOVE CREEK, ETC. CO	121.8	LIC	BLTT-19870330JJ	---	none
48	K48BK	DOVE CREEK, ETC. CO	105.7	APP	BPTT-20050909AFV	---	none
48	K48BK	DOVE CREEK, ETC. CO	105.7	APP	BSTA-20060524AHW	---	none
48	K48EC	MARVINE CREEK, ETC. CO	201.2	LIC	BLTT-19920817JE	---	none
48	K48CL	MEEKER CO	155.4	LIC	BLTT-19890320IU	---	none
48	K48HA	PAGOSA SPRINGS CO	158.1	LIC	BLTT-20040325ACK	---	none
48	K48EF	SAPINERO CO	81.8	LIC	BLTT-19930326JF	---	none
48	K48AW	SHIPROCK NM	173.6	LIC	BLTTL-19930708JF	---	none
49	K49ET	MANY FARMS AZ	221.1	LIC	BLTT-20011002AAQ	---	none
49	K49CJ	COLORADO SPRINGS CO	293.9	LIC	BLTTL-20000505AAL	---	none
49	K49EQ	CORTEZ, ETC. CO	105.7	LIC	BLTTL-19990503JA	---	none
49	K49BW	CRESTED BUTTE, ETC. CO	124.7	LIC	BLTT-19961231JL	---	none
49	NEW	DENVER CO	298.3	APP	BSFDTL-20060630CYF	---	none
49	K49IB	ESTES PARK CO	332.6	CP MOD	BMP TTL-20040505ABZ	---	none
49	K54IK	FORT COLLINS CO	357.4	APP	BPTTL-20051017ACB	---	none
49	K49IO	GRAND JUNCTION CO	96.1	LIC	BLTT-20050930AEL	---	none
49	NEW	MONTROSE CO	0.0	APP	BSFDTT-20060630AOY	---	none
49	K49AH	SILT CO	142.3	CP	BDFCDTT-20060331AWR	---	none
49	K49AH	SILT, ETC. CO	142.3	LIC	BLTT-19820426IK	---	none
49	K44HO	LOS ALAMOS/ESPANOLA NM	314.1	APP	BDISDTT-20061002BOL	---	none
49	NEW	BEAVER, ETC. UT	388.9	APP	BDCCDTT-20061010ANR	---	none
49	NEW	CAINEVILLE UT	235.2	APP	BDCCDTT-20061004AJN	---	none
49	K49BO	COLUMBIA, ETC. UT	284.7	LIC	BLTT-19870817IB	---	none
49	K49GB	EMERY UT	268.8	LIC	BLTT-20030806AAX	---	none
49	K49AG	GARFIELD, ETC. UT	327.9	LIC	BLTT-19971104ID	---	none
49	NEW	KOOSHAREM UT	316.4	APP	BDCCDTT-20061010ABT	---	none
49	NEW	MARYSVALE UT	349.0	APP	BDCCDTT-20061006ABA	---	none
49	NEW	ORANGEVILLE UT	273.9	APP	BDCCDTT-20061003AAE	---	none
49	K16EW	ORANGEVILLE UT	273.9	APP	BSTA-20060125AAJ	---	none
49	K49AO	RURAL JUAB, ETC. UT	340.2	LIC	BLTT-19811013IG	---	none

Exhibit 11 - Table I
INTERFERENCE ANALYSIS RESULTS SUMMARY
 (page 3 of 3)

Ch.	Call	City/State	Dist(km)	Status	Application Ref. No.	---Population (1990 Census)---	
						Baseline	New Interference
49	K49AO	RURAL JUAB, ETC. UT	340.1	CP	BDFCDTT-20060913ACE	---	none
49	NEW	RURAL SEVIER COUNTY UT	313.2	APP	BDCCDTT-20061010ABM	---	none
49	K49GD	SPANISH FORK UT	388.3	LIC	BLTT-20030203AZL	---	none
49	K49FY	SUMMIT COUNTY UT	398.3	LIC	BLTT-20041021AEU	---	none
49	K49FY	SUMMIT COUNTY UT	398.3	CP	BPTT-20040409ABH	---	none
49	K49AT	VERNAL, ETC. UT	240.9	LIC	BLTT-19820921IE	---	none
50	NEW	ASPEN CO	155.5	APP	BNPTTL-20000830AWY	---	none
50	K50IN	ASPEN CO	154.6	LIC	BLTT-20060417AEP	---	none
50	K50FS	BAYFIELD CO	140.5	LIC	BLTT-20011206AAM	---	none
50	K53DR	CORTEZ CO	110.2	CP	BPTT-20041221AAY	---	none
50	K50JH	CRESTED BUTTE CO	124.6	CP	BNPTTL-20000828ASB	---	none
50	NEW	DURANGO CO	116.2	APP	BNPTTL-20000828ASD	---	none
50	NEW	DURANGO CO	116.2	APP	BNPTTL-20000828ANI	---	none
50	K50AS	MARVINE CREEK CAMPGR CO	201.2	LIC	BLTT-19841218IB	---	none
50	K50EZ	MONTROSE, ETC. CO	0.6	LIC	BLTT-19990504JA	---	none
50	K50EZ	MONTROSE, ETC. CO	0.0	CP	BPTT-20031208BEC	---	none
50	K50AE	RIO BLANCO VALLEY CO	155.4	LIC	BLTT-19930125IN	---	none
50	NEW	FARMINGTON NM	184.2	APP	BNPTTL-20000828AYB	---	none
50	NEW	FARMINGTON NM	184.2	APP	BNPTTL-20000828ALO	---	none
51	K51DB	CORTEZ, ETC. CO	105.7	LIC	BLTT-19890920ID	---	none
51	K51IK	DELTA CO	71.4	CP	BNPTTL-20000830AMU	---	none
51	NEW	GRAND JUNCTION CO	96.1	APP	BNPTTL-20000829AXY	---	none
51	NEW	GRAND JUNCTION CO	96.1	APP	BNPTTL-20000810AAV	---	none
51	NEW	GRAND JUNCTION CO	87.3	APP	BNPTTL-20000807AES	---	none
51	NEW	MOAB UT	108.2	APP	BNPTTL-20000828APV	---	none
52	K52BC	DELTA, ETC. CO	49.0	LIC	BLTT-19851004IB	---	none
52	K52GA	IGNACIO CO	140.5	LIC	BLTT-20030204ACS	---	none
53	K53DR	CORTEZ CO	110.2	LIC	BLTT-19890919IJ	---	none
53	NEW	FRUITA CO	96.1	APP	BNPTTL-20000831BER	---	none
53	NEW	GRAND JUNCTION CO	96.1	APP	BNPTTL-20000810AAW	---	none
57	K57CR	RIFLE, ETC. CO	137.3	LIC	BLTTL-19880525IN	---	none