

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

prepared for  
**Gray Television Licensee, Inc.**  
K55AF Cozad, NE  
Facility ID 7895  
Ch. 24 (Digital) 1.1 kW

*Gray Television, Inc.* (“Gray”) is the licensee of television translator station K55AF, Channel 55, Cozad, NE, Facility ID 7895 (BLTT-1573). K55AF’s licensed operation on Channel 55 is displaced pursuant to §73.3572(a)(4)(ii). *Gray* proposes herein to change K55AF to Channel 24 and “flash cut” to digital operation. No change in site location or antenna height is specified.

The proposed facility will operate on Channel 24 using a “simple” out of channel emission mask, with a directional antenna having an effective radiated power of 1.1 kW at the presently licensed transmitting antenna location. **Exhibit 11 - Figure 1** depicts the coverage contours of the licensed (74 dBμ) and the proposed (51 dBμ) 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 K55AF will be side-mounted on an existing antenna support structure. The tower structure is registered with the Commission (ASR #1041787), 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, 2004

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(“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 111.8 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. The site is not located within the border zones requiring international coordination.

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.

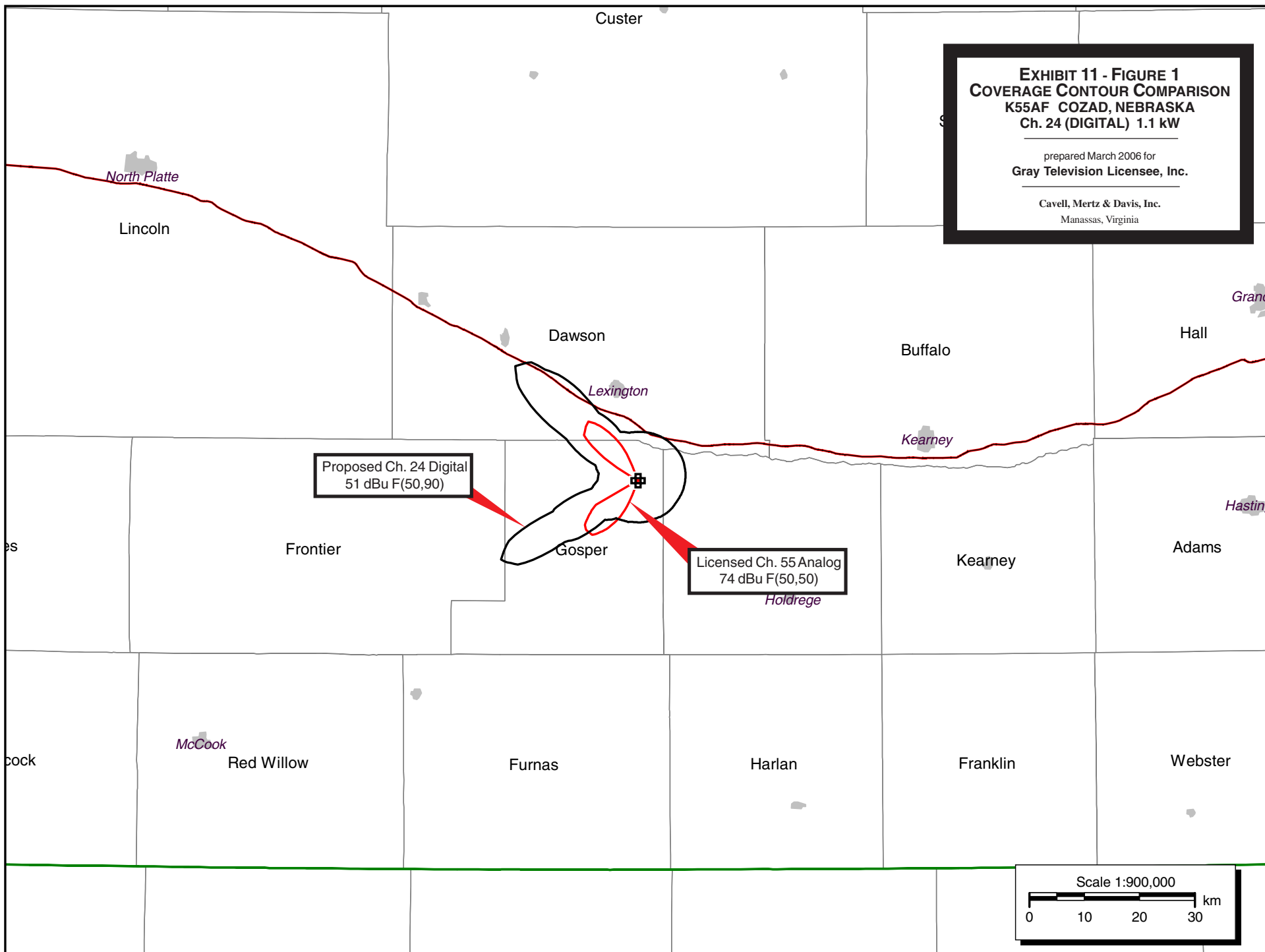


Exhibit 11 - Table 1  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**

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

K55AF Cozad, NE  
Facility ID 7895  
Ch. 24 (Digital) 1.1 kW

						---Population (1990 Census)---	
<u>Ch.</u>	<u>Call</u>	<u>City/State</u>	<u>Dist(km)</u>	<u>Status</u>	<u>Application Ref. No.</u>	<u>Baseline</u>	<u>New Interference</u>
17	KTVG	Grand Island, NE	82.3	APP	BMPCT-19960724KF	---	none
17	KTVG	Grand Island, NE	95.6	LIC	BLCT-19990126KG	---	none
20	NEW	Kearney, NE	52.3	ADD	BPRM-19960725AAG	---	none
23	K23BU	Goodland, KS	204.4	LIC	BLTT-19901226IU	---	none
24	K24FU	Pleasant Valley, CO	204.5	LIC	BLTT-20050713ACA	---	none
24	K49FP	Columbus-Fremont, NE	248.5	LIC	BLTTL-19950807JE	---	none
24	K24EZ	Idalia & S.Yuma Cty, CO	256.9	LIC	BLTT-20011009AAM	---	none
24	KTNE-TV	Alliance, NE	311	LIC	BLEDT-20040310ABN	---	none
24	K68AV	Blair, NE	314.5	CP	BPTT-20031008ACK	---	none
24	KKAZ-CA	Omaha, NE	319.4	LIC	BLTTA-20030402AFC	---	none
24	KSAS-TV	Wichita, KS	369.2	LIC	BLCT-19850827KG	---	none
25	K25CV	Hays, KS	193.7	LIC	BLTT-20030806AAG	---	none
28	K28GC	Gothenburg, NE	56.1	LIC	BLTT-20011115AAI	---	none
32	K32BY	Oberlin, KS	123.5	LIC	BLTT-19901226IV	---	none