

Exhibit 12 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**

prepared for  
**WYFF Hearst Television Inc.**  
W02AF Sylva, Etc., North Carolina  
Facility ID 53929  
Ch. 2 (Digital “Flash-Cut”) 50 W (Max-DA)

*WYFF Hearst Television Inc. (“Hearst”)* is the licensee of television translator station W02AF, Channel 2, Sylva, Etc., North Carolina, Facility ID 53929 (BLTTV-19781204IC). *Hearst* proposes herein to “flash-cut” W02AF to digital operation.

**Nature of the Proposal**

The antenna system proposed for the digital W02AF is a horizontally polarized, composite directional antenna with a pattern similar to that currently employed for the analog operation. Slight coordinate corrections are incorporated herein but the transmitter site location but the antenna will remain side-mounted on the same, existing antenna structure with no increase in height.

The proposed digital facility will operate on Channel 2 using a “stringent” out of channel emission mask. **Exhibit 12 - Figure 1** depicts the coverage contour of the proposed facilities. Because there is no change in output channel or site, the proposed facility is considered a minor change according to the criteria specified in §73.3572 of the Commission’s Rules.

**Allocation Considerations**

With one exception detailed below, 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”)<sup>1</sup>. The interference study examined the change in interference as experienced by nearby pertinent stations that would result from the proposed facility.

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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.**

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The results, summarized in **Exhibit 12 - Table I**, show that new interference generally 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.) The only exception is with respect to translator station W03AK-D, Ela, Etc., North Carolina (BLDTV-20120620ABW), which is also licensed to *Hearst*. Because the proposed facility and W03AK-D carry identical programming (both stations are translators for *Hearst's* WYFF(TV), Greenville, South Carolina), it is believed that most viewers who experience interference on one translator can merely tune to the other. *Hearst* therefore accepts this interference. Accordingly, the instant proposal complies with §74.793 regarding interference protection to digital television, low power television, television translator, and Class A television facilities.

**Other Allocation Considerations**

The proposed transmitter site is located 703 km from the U.S. - Canada border, which is outside the 100 km coordination distance specified in the September, 2000 Letter of Understanding.<sup>2</sup> Thus, coordination with Canadian authorities is not required. The nearest FCC monitoring station is at Powder Springs, Georgia at a distance of 216 km from the proposed site. This exceeds 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 stations located within 3.2 km 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.

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<sup>2</sup> "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 12, 2000.

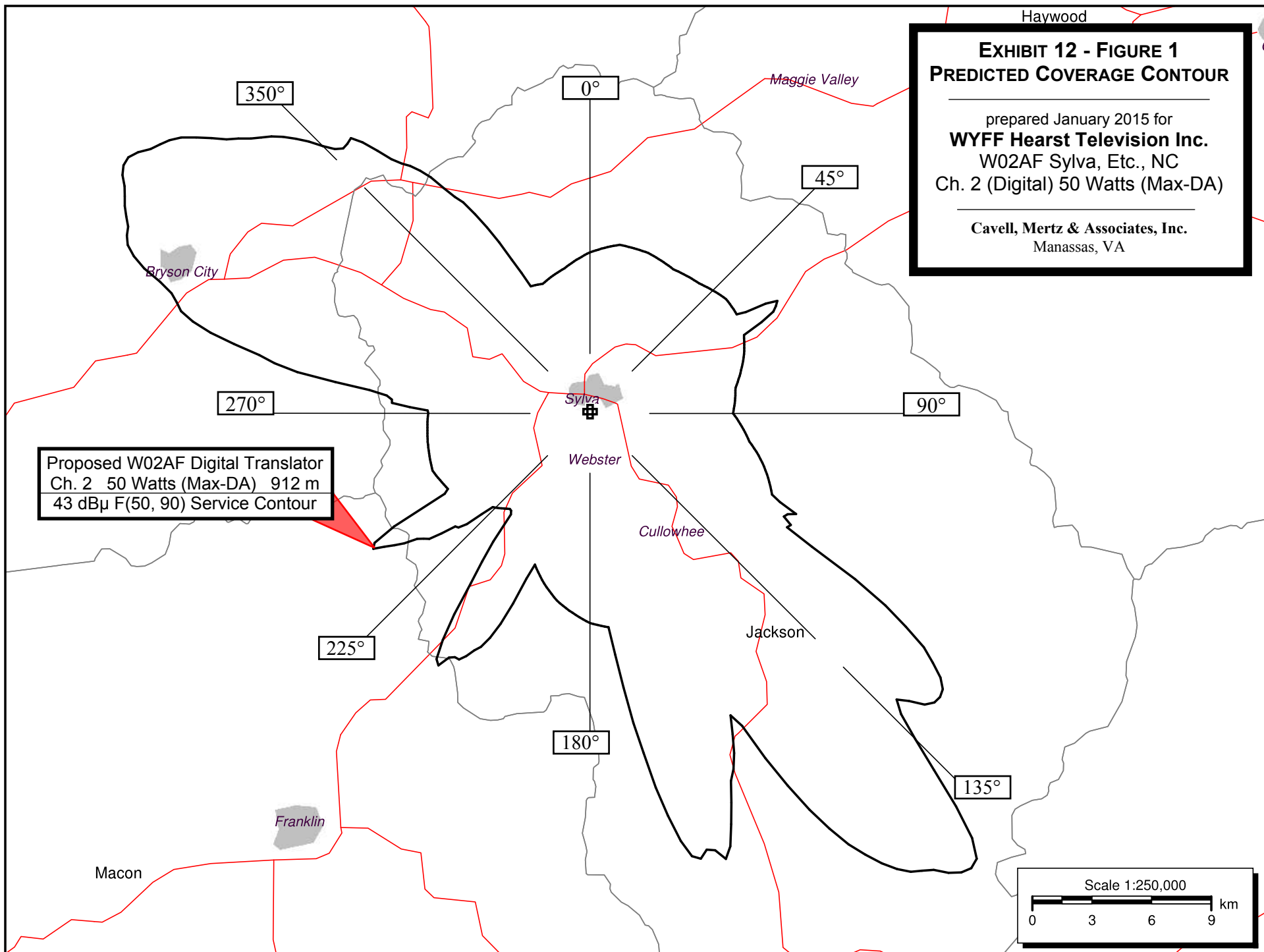


Exhibit 12 - Table 1  
**INTERFERENCE STUDY RESULTS**

prepared for

**WYFF Hearst Television Inc.**

W02AF Sylva, Etc., NC

Facility ID: 53929

Ch. 2 0.05 kW

<u>Channel</u>	<u>Affected Station</u>	<u>City, State</u>	<u>File Number</u>	<u>Calculated Baseline (2000 Census)</u>	<u>Interference Population without Proposal (2000 Census)</u>	<u>Interference Population with Proposal (2000 Census)</u>	<u>New Interference</u>	
							<u>Population</u>	<u>Percentage</u>
2	WBXA-CA	Birmingham, AL	BLTVA-20060407AAB			--- No Interference ---		
2	WESL-LP	Jamestown, KY	BLTVL-20070504AGP			--- No Interference ---		
2	W02AG-D	Brevard, NC	BLDTV-20120622ABF	70,179	1,408	1,633	225	0.321 %
2	DW02AT-D	Burnsville, NC	BLDTV-20120622ABG			--- No Interference ---		
2	W02AH	Mars Hill, NC	BLTTV-3255			--- No Interference ---		
3	W03AK-D	Ela, Etc., NC	BLDTV-20120620ABW	68,270	3,177	7,282	4,105	6.013 %
3	WWWB-LD	Clarkrange, TN	BLDVL-20120106ABC			--- No Interference ---		