

Exhibit 11 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS
prepared for
Mountain Licenses, L.P.
K50DM Coeur d'Alene, Idaho
Facility ID 168364
Ch. 46 (Digital Companion) 0.75 kW

Mountain Licenses, L.P. (“*Mountain*”) is the licensee of Television Translator station K50DM, Channel 50, Coeur d’Alene, Idaho, Facility ID 58697 (file number BLTT-19940525JK). *Mountain* submitted a proposal for a digital companion channel for K50DM in the June 2006 filing window (file number BSFDTT-20060630CJN, Fac ID 168364).¹ The K50DM 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 K50DM digital companion antenna will be side mounted on an existing antenna support structure having an overall elevation of 36 meters above ground level. Although the structure is not registered with the FCC, it passes the FCC's TOWAIR program. Thus FAA notification and commensurate FCC structure registration is not necessary.

The proposed facility will operate on Channel 46 using a “simple” out of channel emission mask, with a directional antenna having a maximum effective radiated power of 0.75 kW. The proposed antenna is a Scala model 4DR-4-2HW, horizontally polarized. This is a standard “off the shelf” directional antenna and will be rotated 270 degrees. **Exhibit 11 – Figure 1** depicts the coverage contours of the licensed analog facility, the June 2006 “window” facility parameters, and the proposed digital companion facility. The service area overlap with each facility demonstrates compliance with the minor change criteria of §73.3572.

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.

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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").³ 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 Coordination

The proposed site is located 141 km from the nearest U.S. – Canadian border. The facility is 428.6 km from the nearest operating analog co-channel Canadian facility, and 214.3 km from the nearest DTV allotment (Ch. 46, Class LP, Passmore, BC). Utilizing the 16 dB front to back ratio for UHF, the resulting 35.5 dBu F(10,10)⁴ DTV-to-DTV interfering contour does not extend more than 130.2 km in the direction of Passmore, BC, and does not extend across the U.S. – Canadian border. Thus it is believed that the instant proposal complies with all international agreements at this time. As necessary, Canada coordination is expected.

³ 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.

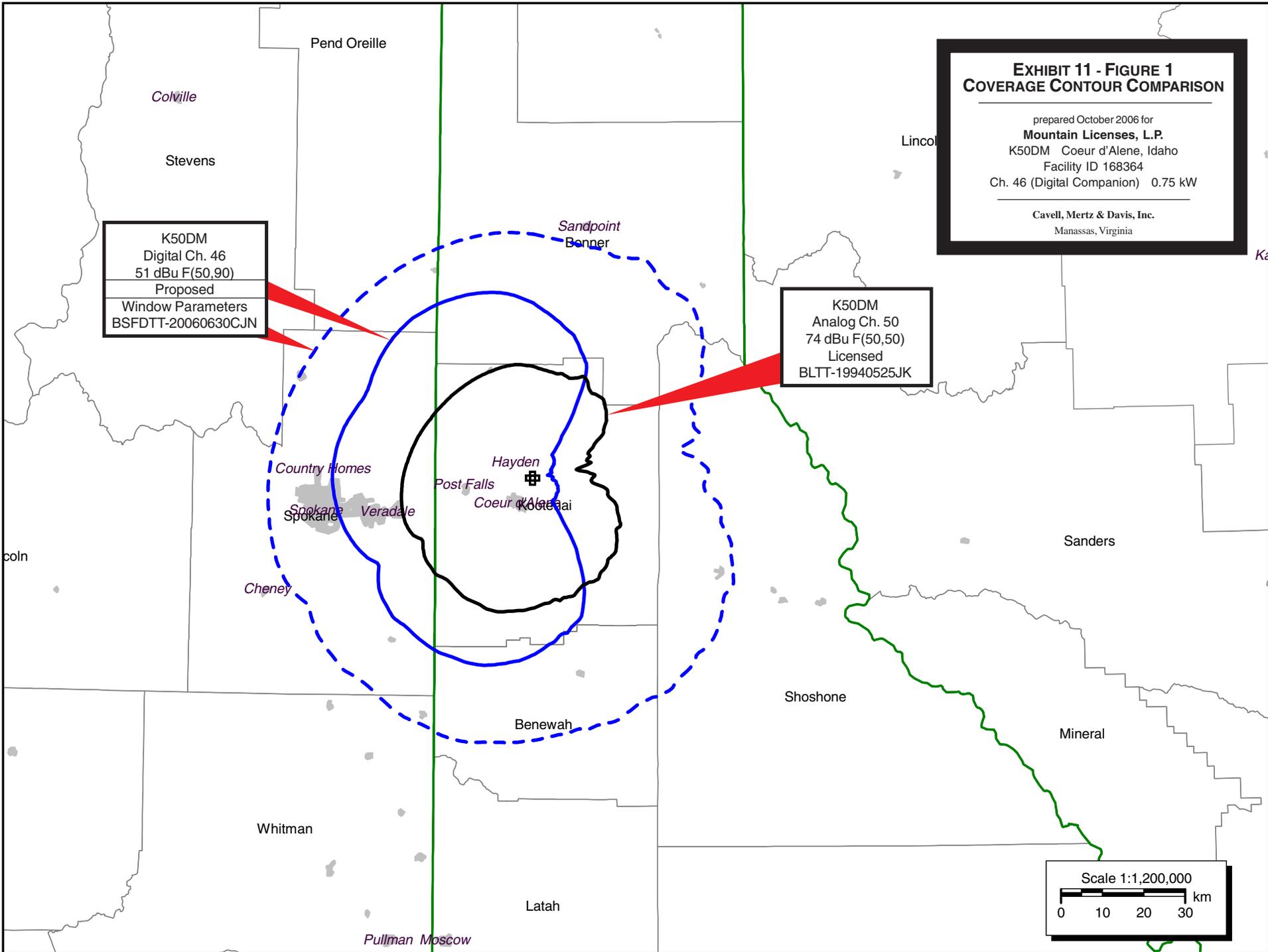
⁴ Letter of Understanding Between the Federal Communications Commission of the United States of America and Industry Canada Related to the use of the 54-72 MHz, 76-88 MHz, 174-216 MHz and 470-806 MHz Bands for the Digital Television Broadcasting Service Along the Common Border, Appendix 2.

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Other Allocation Matters

The nearest FCC monitoring station is 452.7 km distant at Ferndale, WA. 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. 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
Mountain Licenses, L.P.
 K50DM Coeur d'Alene, Idaho
 Facility ID 168364
 Ch. 46 (Digital Companion) 0.75 kW

Cavell, Mertz & Davis, Inc.
 Manassas, Virginia

K50DM
 Digital Ch. 46
 51 dBu F(50,90)
 Proposed
 Window Parameters
 BSFDTT-20060630CJN

K50DM
 Analog Ch. 50
 74 dBu F(50,50)
 Licensed
 BLTT-19940525JK

Scale 1:1,200,000
 0 10 20 30 km

Exhibit 11 - Table I
INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for

Mountain Licenses, L.P.

K50DM Coeur d'Alene, Idaho

Facility ID 168364

Ch. 46 (Digital Companion) 0.75 kW

Ch.	Call	City/State	Dist(km)	Status	Application Ref. No.	---Population (1990 Census)---	
						Baseline	New Interference
31	K31DS	COOLIN, ETC. ID	89.1	LIC	BLTT-19930914ID	---	none
32	K32HA	BONNERS FERRY ID	103.8	LIC	BLTT-20060511ABW	---	none
32	K55EB	SPOKANE WA	45.4	CP MOD	BMPTT-20051121AMM	---	none
38	KMNZ-LP	COEUR D'ALENE ID	0.0	LIC	BLTTL-20041115AFH	---	none
39	KHBA-LP	SPOKANE WA	45.8	CP	BPTTL-20050427ABS	---	none
42	K57CM	PRIEST LAKE ID	96.7	CP	BPTT-20030620AAM	---	none
43	K43GE	JULIAETTA ID	128.2	LIC	BLTT-20001124AAL	---	none
43	K43GZ	SPOKANE WA	45.8	LIC	BLTT-20051206ADC	---	none
44	K44EC	COEUR D'ALENE ID	0.0	LIC	BLTT-19961126JL	---	none
45	KCDT	COEUR D'ALENE ID	0.0	LIC	BLEDT-20030807AAT	---	none
45	K45FZ	LEWISTON ID	144.3	LIC	BLTT-20030605AEE	---	none
45	K45DQ	HOT SPRINGS MT	155.0	LIC	BLTT-19930628IF	---	none
46	K32HA	BONNERS FERRY, ETC. ID	103.8	APP	BSTA-20051107AAC	---	none
46	K46HZ	BONNES FERRY ID	103.8	LIC	BLTT-20060511ABX	---	none
46	K59BA	GRANGEVILLE ID	185.9	CP	BPTT-20030620AAP	---	none
46	K46EC	SALMON ID	355.0	LIC	BLTT-19950502IG	---	none
46	NEW	BOZEMAN MT	378.0	APP	BDCCDTL-20061004AAE	---	none
46	NEW	BOZEMAN MT	378.0	APP	BDCCDTL-20061004AAE	---	none
46	NEW	FERNDALE, ETC. MT	204.0	APP	BDCCDTT-20061013AED	---	none
46	NEW	HELENA MT	357.9	APP	BNPTTL-20000804ADK	---	none
46	NEW	KALISPELL MT	179.0	APP	BNPEDT-20060810ABD	---	none
46	NEW	KALISPELL MT	179.0	LIC	BPRM-20040325AHW	---	none
46	NEW	KALISPELL MT	179.0	APP	BNPEDT-20060809AJQ	---	none
46	NEW	PABLO/RONAN MT	184.0	APP	BDCCDTL-20060926AKI	---	none
46	K46AM	BAKER, ETC. OR	356.3	CP MOD	BMPTT-19810121LB	---	none

Exhibit 11 - Table I
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>
46	K46CU	HEPPNER, ETC. OR	363.0	LIC	BLTT-19980803JI	---	none
46	NEW	MOSES LAKE, ETC. WA	236.7	APP	BSFDTT-20060630BQF	---	none
46	K46HV	PULLMAN WA	103.3	CP	BNPTTL-20000829AQR	---	none
46	NEW	SEATTLE WA	393.2	APP	BDCCDTL-20061011ADL	---	none
46	K46FL	WALLA WALLA WA	241.1	LIC	BLTT-20020211AAA	---	none
47	KQUP-LP	COEUR D'ALENE ID	47.3	LIC	BLTTL-20051020AED	---	none
47	K47BW	LEWISTON, ETC. ID	144.3	LIC	BLTTL-19880523IH	---	none
47	NEW	KALISPELL MT	179.0	APP	BNPTTL-20000829AIX	---	none
47	NEW	REPUBLIC WA	181.5	CP	BNPTTL-20000830ASQ	---	none
48	K48HB	JULIAETTA ID	128.2	LIC	BLTT-20020122ABL	---	none
48	K48DX	SANDPOINT ID	66.7	LIC	BLTTL-19920709IC	---	none
49	K59GD	KELLOGG ID	51.4	CP	BPTT-20030620AAJ	---	none
50	K50GL	BONNERS FERRY, ETC. ID	103.8	LIC	BLTT-20040113ACC	---	none
50	K50DM	COEUR D'ALENE ID	0.0	LIC	BLTT-19940525JK	---	none
53	K53FF	COEUR D'ALENE ID	18.5	LIC	BLTT-19950607ID		