

Exhibit 11 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**  
prepared for  
**Hawaii Public Television Foundation**  
K56BD Kilauea Military Camp, Hawaii  
Facility ID 26419  
Ch. 41 0.3 kW

*Hawaii Public Television Foundation* (“*Hawaii PTV*”) is the licensee of television translator station K56BD, Channel 56, Kilauea Military Camp, HI, Facility ID 26419 (BLTT-19810803JE). K56BD’s licensed operation on Channel 56 is displaced pursuant to §73.3572(a)(4)(ii). *Hawaii PTV* proposes herein to change K56BD to Channel 41 and to “flash cut” to digital operation. No change in actual antenna site location is specified, however the K56BD site data (ground elevation, overall structure height) are corrected herein to correspond to current topographical data.

The proposed digital facility will operate on Channel 41 using a “simple” out of channel emission mask, with a directional antenna having an effective radiated power of 0.3 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 K56BD will be side-mounted on the same existing antenna support structure as the licensed K56BD facility. The tower structure is not presently registered with the Commission, as it is an existing structure of less than 61 meters overall height above ground and there are no known landing areas within 8 km. No marking or lighting specifications are presently required. Since no change to the structure’s overall height is proposed, FAA notification and commensurate FCC registration are 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

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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.

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 Waipahu, HI, at a distance of 348.4 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 - FIGURE 1  
COVERAGE CONTOUR COMPARISON**

prepared March 2006 for  
**Hawaii Public Television Foundation**  
K56BD Kilauea Military Camp, Hawaii  
Facility ID 26419  
Ch. 41 (Digital) 0.3 kW

Cavell, Mertz & Davis, Inc.  
Manassas, Virginia

Hawaii

Licensed Ch. 56 Analog  
74 dBu F(50,50)

Proposed Ch. 41 Digital  
51 dBu F(50,90)

Scale 1:500,000

0 7 14 21 km

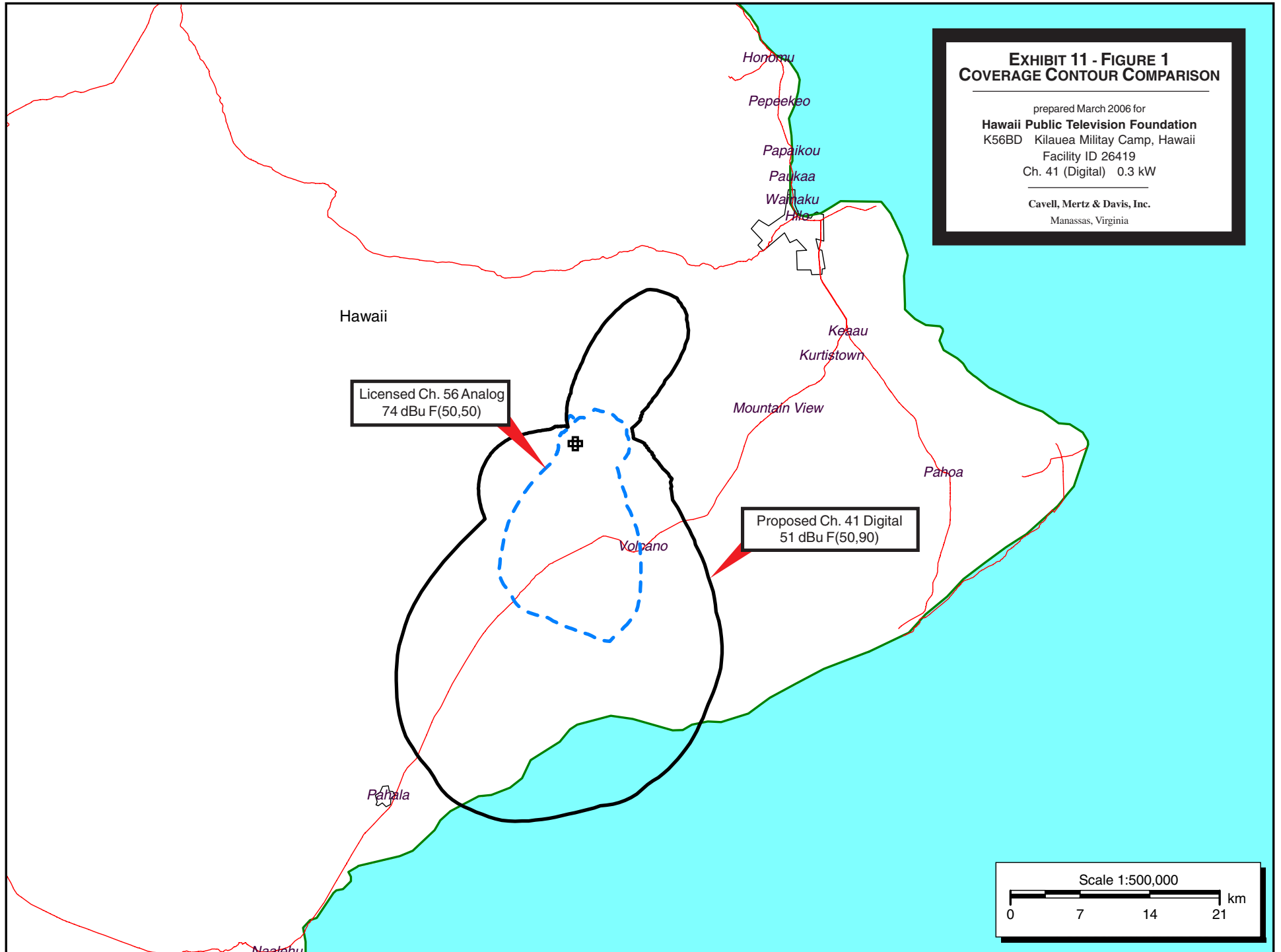


Exhibit 11 - Table 1  
**INTERFERENCE ANALYSIS RESULTS SUMMARY**

prepared for  
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Ch. 41 (Digital) 0.3 kW

<u>Ch.</u>	<u>Call</u>	<u>City/State</u>	<u>Dist(km)</u>	<u>Status</u>	<u>Application Ref. No.</u>	---Population (1990 Census)---	
						<u>Baseline</u>	<u>New Interference</u>
26	NEW	HILO HI	33.5	APP	BNPTTL-20000828BHM	---	none
26	K26HL	HOLUALOA HI	67.0	CP	BNPTTL-20000824AAS	---	none
34	K34HC	HILO HI	40.3	LIC	BLTT-20050831ADJ	---	none
38	WDCN-LP	HILO HI	19.8	CP	BNPTTL-20000821AHQ	---	none
38	K38HU	KAILUA-KONA HI	67.9	LIC	BLTT-20050831ADU	---	none
41	KPXO	KANEOHE HI	325.1	CP	BPCDT-19991022AAZ	---	none
42	NEW	HILO HI	20.3	APP	BNPTT-20000830ATB	---	none
43	NEW	HILO HI	20.0	APP	BNPTTL-20000829AVO	---	none
44	NEW	HILO HI	33.5	APP	BNPTTL-20000828AVJ	---	none
44	NEW	HILO HI	33.5	APP	BNPTTL-20000828AFF	---	none
44	NEW	LAILUA-KONA HI	67.8	APP	BNPTTL-20000828AIT	---	none
45	K45CT	HILO HI	17.4	LIC	BLTT-19940307IE	---	none
45	K45CT	HILO HI	33.5	CP	BMJPTT-20000824AEG	---	none
48	NEW	HILO HI	33.5	APP	BNPTTL-20000828AVK	---	none
49	K49IA	HILO HI	20.2	CP	BNPTTL-20000831CLA	---	none
49	NEW	KAILUA-KONA HI	67.9	APP	BNPTTL-20000831CEF	---	none