

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

prepared for  
**KUTV Holdings, Inc.**  
K22FS Beaver, Etc., UT  
Facility ID 35839  
Ch. 22 (Digital) 0.25 kW

*KUTV Holdings, Inc.* (“KUTV”) is the licensee of television translator station K22FS, Channel 22, Beaver, Etc., UT, Facility ID 35839 (BLTT-20030116AAV). *KUTV* is seeking authorization to flash-cut to digital operation on Channel 22 while staying at the same site location and antenna mounting location with no increase in overall height. The instant application provides corrected geographic coordinates and updates the elevation data for K22FS.

The proposed facility will operate on Channel 22 using a “simple” out of channel emission mask, with a non-directional antenna having an effective radiated power of 0.25 kW on the existing K22FS antenna support structure. **Exhibit 11 - Figure 1** depicts the coverage contours of the licensed (74 dBμ) and the proposed (51 dBμ) facilities. The use of the same site and the service area overlap shown demonstrates compliance with §73.3572 for a minor change.

The proposed antenna system for K22FS will be side-mounted on the existing K22FS antenna support structure with no increase in overall structure height and no Antenna Structure Registration number. This overall structure elevation passes the FCC’s TOWAIR program for the transmitter location, thus FAA notification and commensurate FCC structure registration are not necessary.

**Allocation Considerations**

The instant proposal complies with the Commission’s interference protection requirements toward all domestic 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*,

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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 new interference would not be caused to any other station. 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 Livermore, CA, at a distance of 747.7 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 proposed facility is 1164 km from the U.S. Canadian Border and 656.7 km from the U.S. Mexican Border. No international coordination is required. 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 August 2006 for  
**KUTV Holdings, Inc.**  
K22FS Beaver, Etc., Utah  
Facility ID 35839  
Ch. 22 (Digital) 0.25 kW

Cavell, Mertz & Davis, Inc.  
Manassas, Virginia

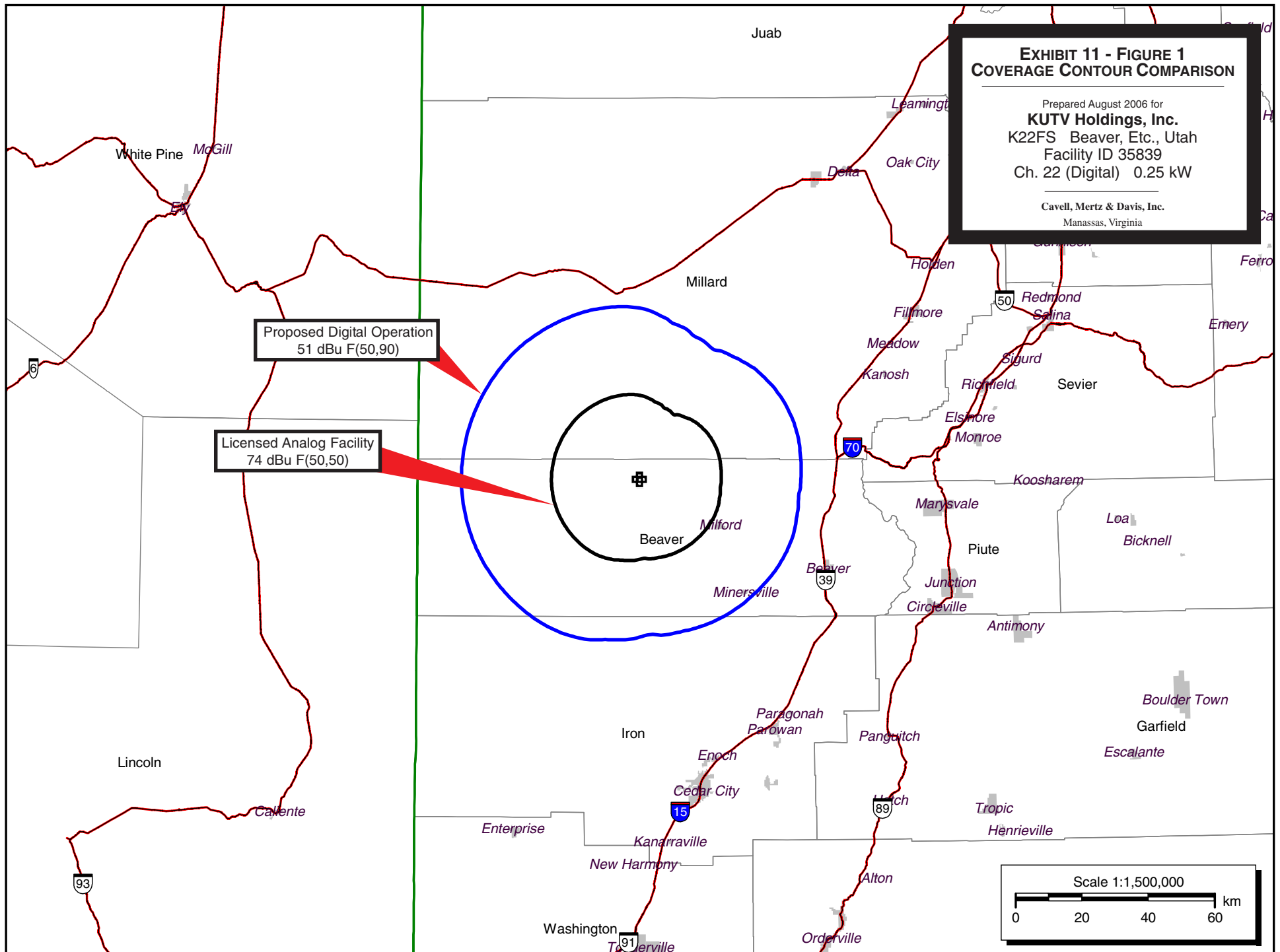


Exhibit 11 Table I

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**INTERFERENCE ANALYSIS RESULTS SUMMARY**

prepared for

**KUTV Holdings, Inc.**

K22FS Beaver, Etc., Utah

Facility ID 35839

Ch. 22 (Digital) 0.25 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>
15	K15FQ	Milford, Etc., UT	0.3	LIC	BLTT-20030724ADV	---	none
15	K15FF	Salina & Redmond,, UT	128.7	LIC	BLTT-20030815ADF	---	none
18	NEW	Cedar City, UT	126.0	APP	BNPTTL-20000831EBI	---	none
18	K18FU	Rural Beaver County, UT	0.3	LIC	BLTT-20021210ABE	---	none
18	K18FT	Rural Garfield Count, UT	105.6	LIC	BLTT-20030903ABZ	---	none
18	K18HO	Salina & Redmond, UT	128.7	LIC	BLTT-20050207ABK	---	none
19	K19DO	Modena, Beryl, Etc., UT	99.1	LIC	BLTT-19940316JF	---	none
20	NEW	Cedar City, UT	108.5	APP	BNPTTL-20000831EBK	---	none
20	K20GE	Garfield, Etc., UT	105.6	LIC	BLTT-20030903ACA	---	none
20	K20GH	Milford, Etc., UT	0.3	LIC	BLTT-20030905AAK	---	none
21	NEW	Alton, UT	143.4	APP	BSFDTT-20060630BLZ	---	none
21	NEW	Apple Valley, UT	156.6	APP	BSFDTT-20060630ANC	---	none
21	NEW	Circleville, UT	98.0	APP	BSFDTT-20060630BQN	---	none
21	NEW	Emery, UT	187.4	APP	BSFDTT-20060630ARO	---	none
21	NEW	Escalante, UT	168.8	APP	BSFDTT-20060630BOJ	---	none
21	NEW	Fillmore, Etc., UT	101.1	APP	BSFDTT-20060630AND	---	none
21	NEW	Fremont, UT	144.3	APP	BSFDTT-20060630ALQ	---	none
21	NEW	Garfield County, UT	105.6	APP	BSFDTT-20060630BOV	---	none
21	NEW	Hatch, UT	123.2	APP	BSFDTT-20060630BVG	---	none
21	K21GW	Hurricane, Leeds, Toqu, UT	138.7	LIC	BLTT-20040518ABW	---	none
21	NEW	Mayfield, UT	149.7	APP	BSFDTT-20060630CWJ	---	none
21	K21EI	Modena, Etc., UT	99.1	LIC	BLTT-19940411JI	---	none

**Cavell, Mertz Davis, Inc.**

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21	NEW	Mount Pleasant, UT	199.3	APP	BSFDDT-20060630CBR	---	none
21	K21FL	Salina & Redmond, UT	128.7	LIC	BLTT-20030815ADL	---	none
21	NEW	Scipio, UT	124.7	APP	BSFDDT-20060630BSW	---	none
21	NEW	Tropic, Etc., UT	138.8	APP	BSFDDT-20060630CAG	---	none
21	NEW	Virgin, UT	144.3	APP	BSFDDT-20060630AKS	---	none
22	K22GM	Battle Mountain,, NV	373.2	LIC	BLTT-20041206AEZ	---	none
22	KVMY	Las Vegas,, NV	318.0	CP	BPCDT-19991014ABL	---	none
22	KVMY	Las Vegas, NV	318.0	APP	BMPCDT-20060630AAJ	---	none
22	K22DR	Laughlin, NV	385.9	LIC	BLTT-19911118JJ	---	none
22	K22GW	Wells, NV	329.1	LIC	BLTT-20050310AEP	---	none
22	NEW	Alton, Etc., UT	143.4	APP	BSFDDT-20060630AOC	---	none
22	KUWB-LP	Bloomington, UT	163.9	LIC	BLTT-20030904AAN	---	none
22	NEW	Duchesne, UT	296.3	APP	BSFDDT-20060630ANT	---	none
22	NEW	Fremont, UT	144.3	APP	BSFDDT-20060630ALR	---	none
22	K22GP	Henrieville, UT	156.0	LIC	BLTT-20040212ADI	---	none
22	NEW	Huntsville, UT	321.1	APP	BSFDDT-20060630CNO	---	none
22	K22EC	Juab, UT	166.0	LIC	BLTT-19930914II	---	none
22	960627KM	Logan, UT	380.0	APP	BPET-19960627KM	---	none
22	961001KL	Logan, UT	387.3	APP	BPET-19961001KL	---	none
22	NEW	Mayfield, UT	149.7	APP	BSFDDT-20060630CWI	---	none
22	NEW	Mexican Hat, UT	337.2	APP	BSFDDT-20060630BUL	---	none
22	K22FW	Mount Pleasant, UT	199.3	LIC	BLTT-20040316ACZ	---	none

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22	NEW	Navajo Mtn.Sch.,Etc., UT	277.1	APP	BSFDTT-20060630BVC	---	none
22	NEW	Oljeto, UT	307.4	APP	BSFDTT-20060630BUV	---	none
22	K22FX	Orangeville, Etc., UT	200.8	LIC	BLTT-20030806AAW	---	none
22	NEW	Randolph & Woodruff, UT	391.1	APP	BSFDTT-20060630AOS	---	none
22	NEW	Roosevelt, Etc., UT	335.4	APP	BSFDTT-20060630BQX	---	none
22	K22FT	Rural Garfield Cnty, UT	105.6	LIC	BLTT-20030827AFL	---	none
22	K22DM	Rural Summit County, UT	302.1	LIC	BLTT-20040223AOW	---	none
22	K15FF	Salina, UT	128.7	APP	BSTA-20060127AAM	---	none
22	NEW	Salina & Redmond, UT	128.7	APP	BSFDTT-20060630AVY	---	none
22	NEW	Spring Glen, UT	240.9	APP	BSFDTT-20060630BEI	---	none
22	K22DE	Tooele, UT	255.2	LIC	BLTT-19910607IE	---	none
22	NEW	Virgin, UT	143.6	APP	BSFDTT-20060630AMZ	---	none
22	NEW	Wendover, UT	256.1	APP	BNPTTL-20000831EEX	---	none
23	NEW	Ely, NV	162.4	APP	BNPTTL-20000830AXM	---	none
23	NEW	Mesquite, NV	171.4	APP	BNPTTL-20000831EAI	---	none
23	NEW	Cannonville, UT	138.8	APP	BSFDTT-20060630CAH	---	none
23	NEW	Emery, UT	187.4	APP	BSFDTT-20060630ARP	---	none
23	NEW	Escalante, UT	168.8	APP	BSFDTT-20060630BOK	---	none
23	NEW	Fillmore, UT	101.1	APP	BSFDTT-20060630BSE	---	none
23	K16EQ	Garfield, UT	105.6	APP	BSTA-20060126AAG	---	none
23	NEW	Hatch, UT	123.2	APP	BSFDTT-20060630ANO	---	none
23	K23DP	Kanab, UT	175.7	LIC	BLTT-19930830IK	---	none

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23	NEW	Leamington, UT	140.4	APP	BSFDTT-20060630BTD	---	none
23	NEW	Loa, Etc., UT	138.9	APP	BSFDTT-20060630AME	---	none
23	K23DV	Modena, Beryl, Etc., UT	99.1	LIC	BLTT-19940316JG	---	none
23	NEW	Mount Pleasant, UT	199.3	APP	BSFDTT-20060630AYU	---	none
23	NEW	Rural Garfield Count, UT	105.6	APP	BSFDTT-20060630BOQ	---	none
23	K23FK	Salina & Redmond, UT	128.7	LIC	BLTT-20030815ADN	---	none
23	NEW	Scipio, Holden, UT	124.7	APP	BSFDTT-20060630BSR	---	none
23	K23FQ	Toquerville & Leeds, UT	136.8	LIC	BLTT-20030919ABT	---	none
23	NEW	Virgin, UT	143.4	APP	BSFDTT-20060630BGI	---	none
24	K24GY	Ely, NV	134.9	LIC	BLTT-20050608ABJ	---	none
24	K24FE	Beaver, Etc., UT	0.3	LIC	BLTT-20030826AOP	---	none
24	K24FD	Rural Garfield, Etc., UT	105.6	LIC	BLTT-20030814ABQ	---	none
24	K24GK	Salina, UT	128.7	LIC	BLTT-20040914ABC	---	none
25	K22FT	Garfield County, UT	105.6	APP	BSTA-20060125AAE	---	none
25	K25GY	Modena, Etc., UT	99.1	LIC	BLTT-20030207AAZ	---	none
26	K26HY	Ely, NV	134.9	LIC	BLTT-20050608ABK	---	none
26	NEW	Cedar City, UT	108.5	APP	BNPTTL-20000831EBO	---	none
26	K26GD	Garfield County, UT	105.6	LIC	BLTT-20030814AKD	---	none
26	K26EA	Milford, Etc., UT	0.3	LIC	BLTT-19931130JE	---	none
29	K29FQ	Delta, UT	123.6	LIC	BLTT-20040422AAU	---	none
29	K29FA	Modena, UT	99.1	LIC	BLTT-20030207ABA	---	none
29	K29GJ	Tropic & Cannonville, UT	138.8	LIC	BLTT-20051209AEW	---	none

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30	K30CN	Ely, NV	134.9	LIC	BLTT-19890626II	---	none
30	K30GA	Garfield County, UT	105.6	LIC	BLTT-20030814AKE	---	none
30	K30GC	Rural Beaver, Etc., UT	0.3	LIC	BLTT-20030207ACA	---	none