

Exhibit 11 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for
Caballero Acquisition Inc.
KMMD-CA Salinas, California
Facility ID 167838
Ch. 39 (Digital Companion) 15 kW

Caballero Acquisition Inc. (“CAI”) is the licensee of Class A Television station KMMD-CA, Channel 3, Salinas, CA, Facility ID 18733 (BLTVA-20060524AGK). CAI filed a proposal for a digital companion channel for KMMD-CA in the June 2006 filing window (file number BSFDTL-20060630BPH).¹ CAI’s proposal for KMMD-CA 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.³

The transmitting antenna for the proposed KMMD-CA digital companion facility will be side-mounted on the existing 51.5 meter tower structure associated with the analog KMMD-CA facility. The tower was previously associated with FCC Antenna Structure Registration (“ASR”) number 1051048. The tower’s owner recently terminated the ASR, since the structure passes the FAA slope determination and therefore does not require registration (WT Bureau ASR reference 507986, June 6, 2006). Since no change to the structure’s overall height is proposed herein, FAA notification is not required.

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.

³ Although KMMD-CA is a Class A television station, the special Class A designation applies only to the analog KMMD-CA operation. The KMMD-CA companion digital channel proposed herein will be classified as a Low Power Television station, therefore the instant application is filed on FCC Form 346. (*Amendment of Parts 73 and 74 of the Commission’s Rules to Establish Rules for Digital Low Power Television, Television Translator, and Television Booster Stations and to Amend Rules for Digital Class A Television Stations*, MB Docket 03-15, FCC 04-220, Released September 30, 2004, at para 143.)

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The proposed facility will operate on Channel 39 using a “stringent” out of channel emission mask, with a directional antenna having a maximum effective radiated power of 15 kW. The proposed antenna is a PSI model PSILP8AER, an “off the shelf” directional antenna which will be rotated 340 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.

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”)⁴. 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 Matters

The nearest FCC monitoring station is 132.6 km distant at Livermore, CA. This exceeds the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the

⁴The 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.

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

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
Caballero Acquisition Inc.
 KMMD-CA Salinas, California
 Facility ID 167838
 Ch. 39 (Digital Companion) 15 kW

Cavell, Mertz & Davis, Inc.
 Manassas, Virginia

KMMD-CA
 Analog Ch. 3
 62 dBu F(50,50)
 Licensed
 BLTVA-20060524AGK

KMMD-CA
 Proposed Digital Ch. 39
 51 dBu F(50,90)
 Proposed Facility
 Window Parameters
 BSFDTL-20060630BPH

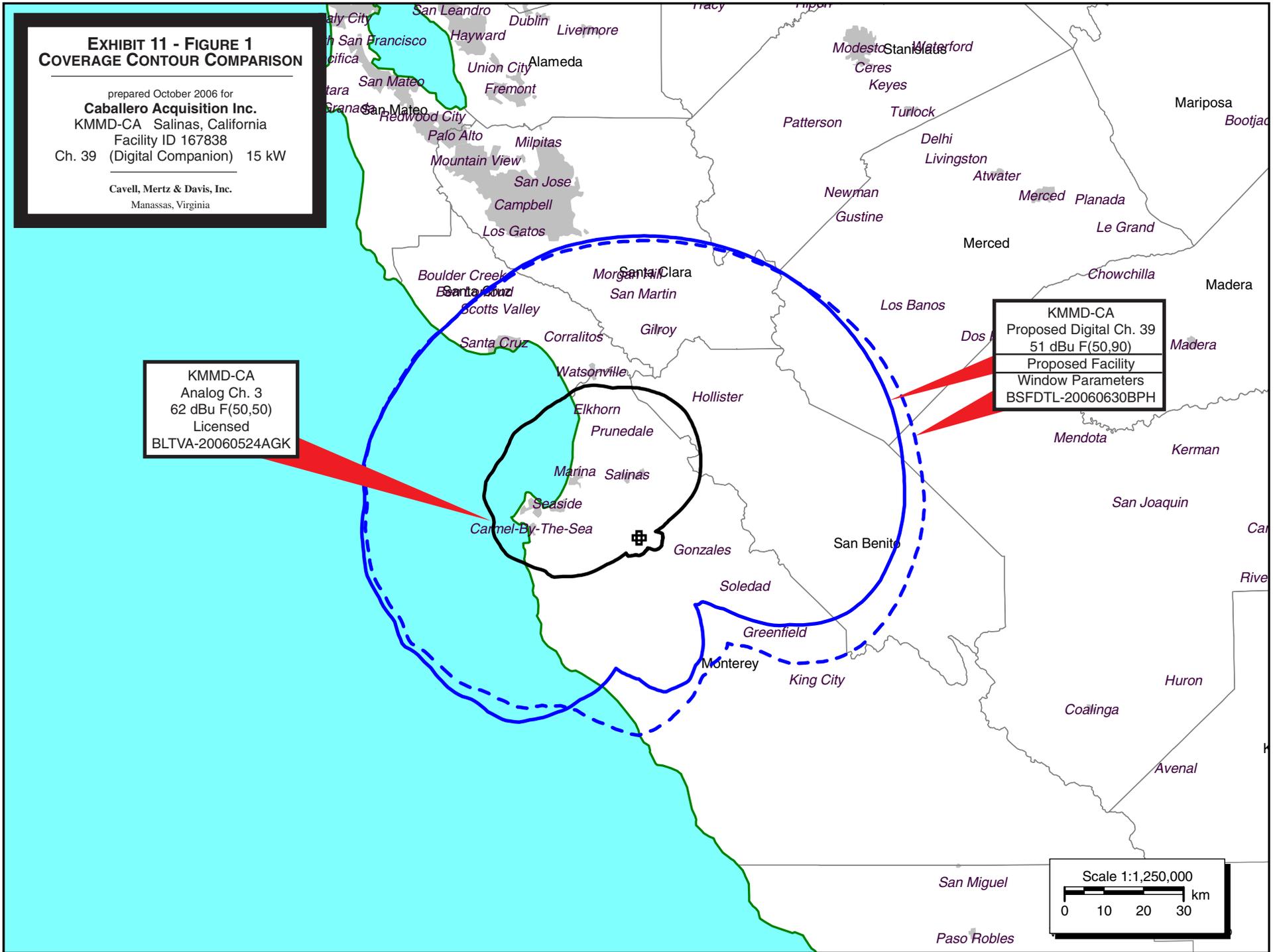
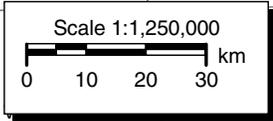


Exhibit 11 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for
Caballero Acquisition Inc.
 KMMD-CA Salinas, California
 Facility ID 167838
 Ch. 39 (Digital Companion) 15 kW

| <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> |
| 25 | KCAH | WATSONVILLE CA | 26.8 | APP | BPET-20040803ACB | --- | none |
| 25 | KCAH | WATSONVILLE CA | 26.8 | LIC | BLET-20030728AFA | --- | none |
| 31 | KBID-LP | FRESNO CA | 111.8 | LIC | BLTTL-20051222AFA | --- | none |
| 35 | KCBA | SALINAS CA | 26.8 | LIC | BLCT-19811022KE | 1,841,039 | 0 (0.00) |
| 36 | KICU-TV | SAN JOSE CA | 108.2 | LIC | BLCT-19881116KE | --- | none |
| 38 | KSEE | FRESNO CA | 203.8 | LIC | BLCDT-20050914AAZ | --- | none |
| 38 | KSEE-DR | FRESNO CA | 203.8 | LIC | BPRM-20040503AHI | --- | none |
| 38 | K27GZ | MARIPOSA CA | 179.7 | CP | BPTT-20040109AAS | --- | none |
| 38 | NEW | PASO ROBLES CA | 126.6 | APP | BSFDTT-20060630BCP | --- | none |
| 38 | K56AA | SALINAS CA | 0.7 | CP | BDISTTL-20060329AEJ | 506,301 | 2,197 (0.43%) |
| 38 | KCNS | SAN FRANCISCO CA | 154.4 | LIC | BMLCT-19980916KE | 5,968,621 | 969 (0.02%) |
| 39 | NEW | ATASCADERO CA | 145.7 | APP | BSFDTL-20060630CJS | 102,804 | 4 (0.00%) |
| 39 | KABE-LP | BAKERSFIELD CA | 297.4 | CP | BPTTL-20041129BEG | --- | none |
| 39 | KABE-LP | BAKERSFIELD CA | 297.4 | STA | BSTA-20041105BDJ | --- | none |
| 39 | 960328KH | BAKERSFIELD CA | 286.2 | APP | BPET-19960328KH | --- | none |
| 39 | KABE-LP | BAKERSFIELD CA | 297.4 | APP | BMP TTL-20060705ABY | --- | none |
| 39 | KMSG-LP | FRESNO CA | 209.7 | LIC | BLTTL-20060518ABZ | --- | none |
| 39 | K39HH | MAMMOTH LAKES CA | 265.5 | CP | BNPTTL-20000831BRT | --- | none |
| 39 | K57AK | RIDGECREST CA | 372.9 | CP | BDFCDTT-20051011ABF | --- | none |
| 39 | K57AK | RIDGECREST, ETC. CA | 372.9 | CP | BPTT-20041201BZR | --- | none |
| 39 | NEW | SACRAMENTO CA | 297.4 | APP | BSFDTL-20060630AUC | --- | none |
| 39 | KCNS | SAN FRANCISCO CA | 154.4 | LIC | BLCDT-20060221AES | 5,230,040 | 18,140 (0.35%) |
| 39 | NEW | SANTA BARBARA CA | 289.4 | APP | BSFDTT-20060630CYD | --- | none |
| 39 | K39AG | UKIAH CA | 314.9 | LIC | BLTT-19830125IN | --- | none |
| 39 | K39EZ | MINA/LUNING NV | 376.6 | LIC | BLTT-20000216AAL | --- | none |
| 39 | K39FF | RENO NV | 374.5 | LIC | BLTT-20010612ACH | --- | none |
| 39 | K39FF | RENO NV | 374.5 | CP | BDFCDTT-20060222AAP | --- | none |

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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> |
| 40 | KSCZ-LP | GREENFIELD CA | 89.2 | APP | BDISTTL-20051028ACT | --- | none |
| 40 | KTXL | SACRAMENTO CA | 193.3 | LIC | BLCT-19851112KI | --- | none |
| 40 | KMMC-LP | SAN FRANCISCO CA | 147.1 | LIC | BLTTL-20040812ABR | --- | none |
| 40 | KMMC-LP | SAN FRANCISCO CA | 147.1 | CP MOD | BMPPTTL-20040812AAU | --- | none |
| 42 | KSCZ-LP | COALINGA CA | 111.8 | LIC | BLTT-19950912IC | --- | none |
| 42 | KSCZ-LP | GREENFIELD CA | 89.2 | CP MOD | BMPPTTL-20060117ADL | --- | none |
| 43 | NEW | GLEN ARBOR CA | 71.7 | APP | BNPTTL-20000831CGG | --- | none |
| 43 | KMCE-LP | MONTEREY CA | 26.7 | LIC | BLTTL-20030711ABL | --- | none |
| 43 | KMCE-LP | SAN MARTIN, ETC. CA | 26.7 | STA | BSTA-20030714AGM | --- | none |
| 46 | KION-TV | MONTEREY CA | 0.1 | LIC | BMLCT-19820622KG | --- | none |