

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

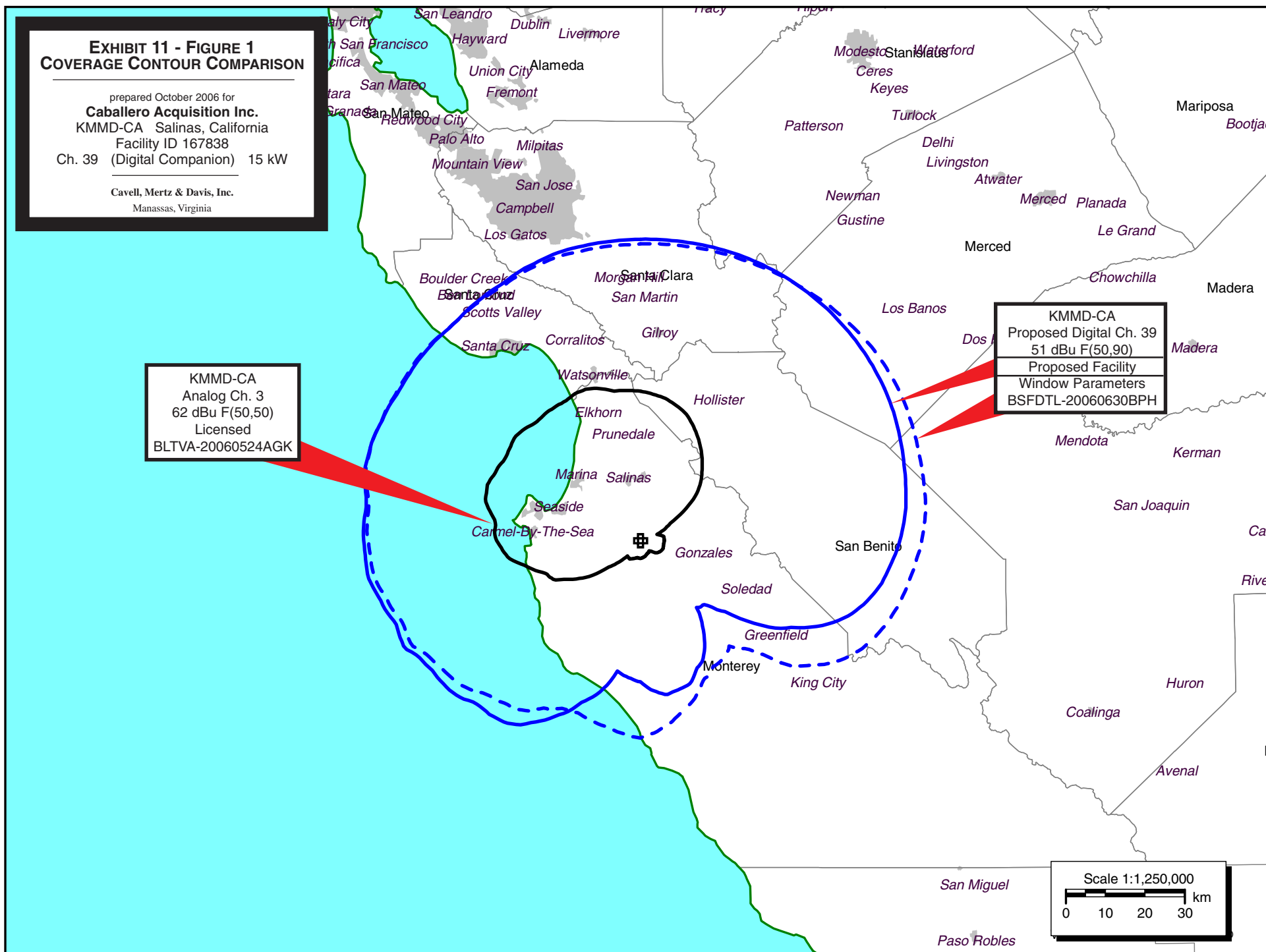
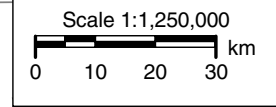


Exhibit 11 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for
Caballero Acquisition Inc.
 KMMD-CA Salinas, California
 Facility ID 167838

Ch. 39 (Digital Companion) 15 kW

						---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>
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

Exhibit 11 - Table 1
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						---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>
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
						---	none