

Exhibit 11 – Statement A
NATURE OF THE PROPOSAL
ALLOCATION AND ENVIRONMENTAL CONSIDERATIONS
prepared for
Live Sports Radio, LLC
New-LD Manhattan, Kansas
Ch. 3 (Digital) 0.3 kW

Live Sports Radio (“*LSR*”) is submitting the instant application for a new digital Low Power Television station in response to the filing opportunity announced by the FCC’s Public Notice¹. *LSR* proposes to operate non-directionally with an effective radiated power (“ERP”) of 300 Watts and an antenna height of 352.3 meters above mean sea level.

The proposed antenna, a non-directional, Scala model TVO-4-50, will be mounted above spectator seating at the existing Bill Snyder Family Football Stadium. **Exhibit 11 – Figure 1** depicts the 43 dB μ service contour of the proposed facility.

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 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 (“OET-69”)². 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 any new interference does not exceed the Commission’s interference limits (0.5 percent to full service and Class A stations; 2.0 percent to low-power stations.) Accordingly, the instant proposal complies with §74.793 regarding

¹ Public Notice, *Commencement of Rural, First-Come, First-Served Digital Licensing for Low Power Television and TV Translators Beginning August 25, 2009 and Commencement of Nationwide, First-Come, First-Served Digital Licensing For Low Power Television and TV Translator Services Beginning January 25, 2010*, Released June 29, 2009, DA 09-1487.

² 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.

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interference protection to digital television, low power television, television translator, and Class A television facilities.

Based on data extracted from the FCC's CDBS database, no AM broadcast stations are located within 3.2 km (2 miles) of the existing site. The nearest FCC monitoring station is at Grand Island, NE at a distance of 246.9 km from the proposed site. This exceeds by a great margin the minimum distance specified in §73.1030(c)(3)(iv) that would suggest consideration of the monitoring station.

It is thus believed that the facility proposed herein will satisfy all of the pertinent Commission Rules and Policies now in effect regarding allocation matters for a television translator facility.

Environmental Considerations

The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of §1.1306 of the FCC Rules. Since the proposed overall height will not extend the height of an existing structure by more than 6.2 meters, it is believed that an aeronautical study is not necessary. Thus no change in current structure marking and lighting requirements is anticipated. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission's rules.

Human Exposure to Radiofrequency Radiation

In keeping with §1.1307(b) of the Commission's Rules, the proposed operation has been evaluated for human exposure to radiofrequency energy using the procedures outlined by the Federal Communications Commission in FCC OET Bulletin 65 ("OET-65"). OET-65 describes a means of determining whether a proposed facility exceeds the radiofrequency exposure guidelines specified in §1.1310 of the Commission's Rules. Under present Commission policy, a facility may be presumed to comply with the limits in §1.1310 of the Commission's Rules if it satisfies the exposure criteria set forth in OET-65. Based upon that methodology, and as demonstrated in the following, the proposed transmitting system will comply with the cited adopted guidelines.

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The antenna will be supported above spectator seating at Bill Snyder Family Football Stadium at an elevation at least five meters above publicly accessible areas. No other significant emitters of radiofrequency energy will be installed in the vicinity of the proposed antenna. Access to the areas within five meters is controlled and limited to occupational stadium maintenance personnel.

According to elevation pattern data provided by Scala, provided herein as **Exhibit 11 - Attachment 1**, the proposed four-bay, half-wavelength-spaced, horizontally polarized antenna has a relative field of 27.2 percent or less from 30 to 90 degrees below the horizontal plane (i.e.: below the antenna). Thus, a value of 27.2 percent relative field is used for this calculation. The “uncontrolled/general population” limit specified in §1.1310 for television Channel 3 (center frequency of 63 MHz) is 200 $\mu\text{W}/\text{cm}^2$.

OET-65’s formula for television transmitting antennas is based on the NTSC transmission standards, where the average power is normally much less than the peak power. For the DTV facility in the instant proposal, the peak-to-average ratio is different than the NTSC ratio. The DTV ERP figure herein refers to the average power level. The formula used for calculating DTV signal density in this analysis is essentially the same as equation (10) in OET-65:

$$S = (33.4098) (F^2) (ERP) / D^2$$

Where:

- S = power density in microwatts/cm²
- ERP = total (average) ERP in Watts
- F = relative field factor
- D = distance in meters

Using this formula and the above assumptions, the proposed facility would contribute a maximum power density of 82.4 $\mu\text{W}/\text{cm}^2$ or 41.2 percent of the general population/uncontrolled MPE limit, at publicly accessible areas five meters below the antenna. At locations away from the antenna, the calculated RF power density is lower, due to the increasing distance. Thus, the proposed facility complies with §1.1307(b) of the Commission’s Rules regarding exposure to

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radiofrequency radiation.

Accordingly, it is believed that the impact of the proposed operation should not be considered to be a factor at or near ground level as defined under §1.1307(b).

Safety of Stadium Workers and the General Public

As demonstrated herein, excessive levels of RF energy attributable to the proposal will not be caused at publicly accessible areas near the antenna supporting structure. Consequently, stadium spectators and members of the general public will not be exposed to RF levels in excess of the Commission's guidelines. Nevertheless, appropriate RF exposure warning signs will continue to be posted and access will be restricted by appropriate means.

With respect to worker safety, it is believed that based on the preceding analysis, excessive exposure would not occur in areas at ground level. A site exposure policy is employed protecting maintenance workers from excessive exposure when work must be performed on the structure or in areas where high RF levels may be present. Such protective measures include, but are not limited to, restriction of access to areas where levels in excess of the guidelines may be expected, power reduction, or the complete shutdown of facilities when work or inspections must be performed in areas where the exposure guidelines would otherwise be exceeded. *LSR* will coordinate with other licensees utilizing this site. On-site RF exposure measurements may also be undertaken to establish the bounds of safe working areas.

Conclusion

Based on the preceding, it is believed that the instant proposal may be categorically excluded from environmental processing under §1.1306 of the Rules; hence preparation of an Environmental Assessment is not required.

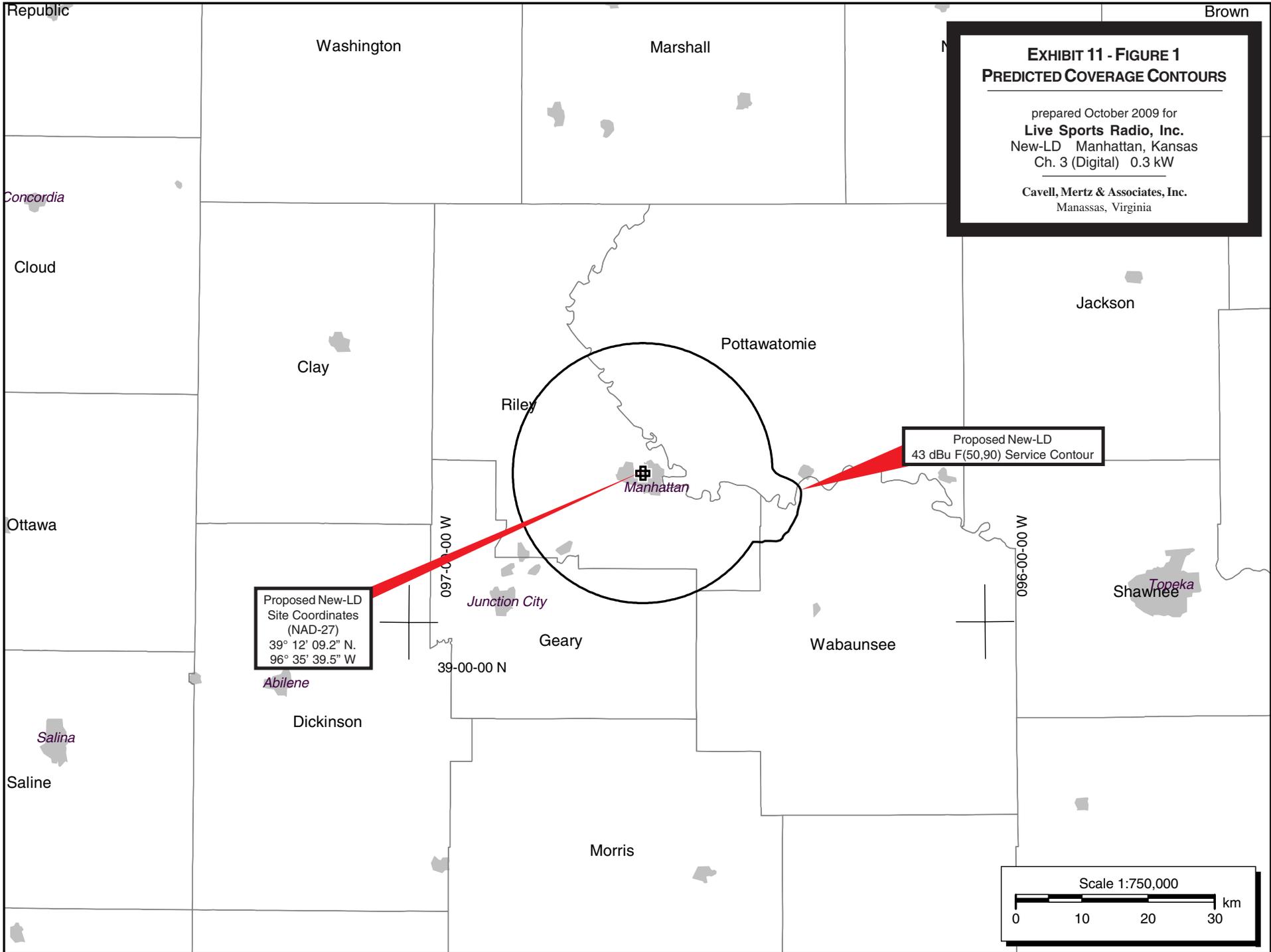


Exhibit 11 - Table 1
INTERFERENCE STUDY RESULTS
 prepared for
Live Sports Radio, LLC
 New-LD Manhattan, KS
 Ch. 3 0.3 kW

<u>Channel</u>	<u>Affected Station</u>	<u>City, State</u>	<u>File Number</u>	<u>Calculated Baseline (2000 Census)</u>	<u>Interference Population without Proposal (2000 Census)</u>	<u>Interference Population with Proposal (2000 Census)</u>	<u>New Interference</u>		
							<u>Population</u>	<u>Percentage</u>	
4	KSNB-DR	Superior, NE	BPRM-20080801BCW				---	No Interference	---
4	KSNB-TV	Superior, NE	BMPCDT-20080317ACS				---	No Interference	---

Exhibit 11 - Table 2
ANTENNA / LINE SYSTEM GAINS AND LOSSES
 prepared for
Live Sports Radio, LLC
 New-LD 0.3 kW

Proposed Effective Radiated Power:	0.3 kW	-5.229 dBk
<hr/>		
<u>Antenna System</u>		
Scala TVO-4	Max Power Gain:	1.9953 3.000 dB
	Antenna Input Power:	0.2 kW -8.229 dBk
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<u>Line and Other Losses</u>		
	Efficiency:	89.13%
	Loss:	0.500 dB
	Total Efficiency:	89.13%
	Total Loss:	0.500 dB
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<u>Transmitter Power Output:</u>	0.169 kW	-7.729 dBk