

Exhibit 33 - Statement A
PROPOSED ANTENNA SYSTEM
ALLOCATION CONSIDERATIONS

prepared for
Kentucky Authority for Educational Television
WKLE-DT Lexington, Kentucky
Facility ID 34207
Ch. 42 45.8 kW (MAX-DA) 258 m

Kentucky Authority for Educational Television (“KET”) is the licensee of WKLE-DT, Channel 42, Lexington, Kentucky (file number BLEDT-20011121ABJ) and of the paired analog WKLE(TV) Channel 46 facility (BLET-353). WKLE-DT is licensed to operate with a maximum effective radiated power (“ERP”) of 48 kW and an antenna height above average terrain (“HAAT”) of 252 meters. Under the instant application, *KET* seeks to increase the WKLE-DT HAAT to 258 meters and reduce the ERP to 45.8 kW. No change in directional pattern or transmitter site location is proposed. The existing WKLE-DT antenna supporting structure is associated with FCC Antenna Structure Registration (“ASR”) number 1044040.

The existing, authorized WKLE-DT antenna is a Dielectric model TLP-24B with 0.75 degrees of electrical beam tilt, and will continue to be employed. The existing antenna will be repositioned at a higher elevation on the existing WKLE-DT tower structure in order to provide space for an FM station’s antenna.¹ The antenna’s horizontal plane directional pattern, expressed in terms of relative field and power, is supplied in **Exhibit 33 - Figure 1**, properly oriented relative to True North. **Exhibit 33 - Figures 2 and 2A** graphically present the theoretical vertical plane (elevation) pattern.

A map is supplied as **Exhibit 33 - Figure 3**, which depicts the standard predicted coverage contours. This map includes the boundaries of Lexington, WKLE-DT’s principal community, based on U.S. Census data. As demonstrated thereon, the proposed facility complies with §73.625(a)(1), as the entire principal community will be encompassed by the 48 dB μ contour.

¹A Construction Permit (BPED-20050922AFT) authorizes WUKY(FM) (Ch. 217C1, Lexington, KY) to relocate to the same tower structure as WKLE-DT.

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Allocation Matters

Under the instant proposal, WKLE-DT will operate at its presently authorized site with reduced ERP and increased HAAT. The proposal's ERP/HAAT combination (45.8 kW MAX-DA / 258 m) does not exceed that which was allotted to WKLE-DT (50 kW / 265 m), using the formula and method described in §73.622(f)(3). Therefore a detailed interference study per OET Bulletin 69 is not required. As a "checklist" facility, no consideration of Class A television stations is required. Additionally, the proposed facility will not exceed the WKLE-DT reference allotment, in compliance with the Commission's August 3, 2004 "freeze" concerning expansion in service area.²

DTV Channel Election

In accordance with the DTV Channel Election process,³ *KET* certified, on FCC Form 381, that WKLE-DT would operate with the present licensed facility after the transition period. *KET* subsequently elected, on FCC Form 382, continued operation on the allotted Channel 42 after the transition period. At the time Form 381 was filed, *KET* did not anticipate that the instant modification would be needed to accommodate a new FM antenna. Furthermore, the proposed modified WKLE-DT facility will be virtually identical to the licensed facility. The attached **Exhibit 33 - Figure 4** depicts the 41 dB μ coverage contours of the licensed and proposed WKLE-DT facilities. As shown thereon, the proposed WKLE-DT 41 dB μ contour is indistinguishable from the licensed 41 dB μ contour. It is therefore believed that the proposed facility is consistent with the WKLE-DT Channel Election certifications.

²Public Notice "Freeze on the Filing of Certain TV and DTV Requests for Allotment or Service Area Changes," DA 04-2446, released August 3, 2004.

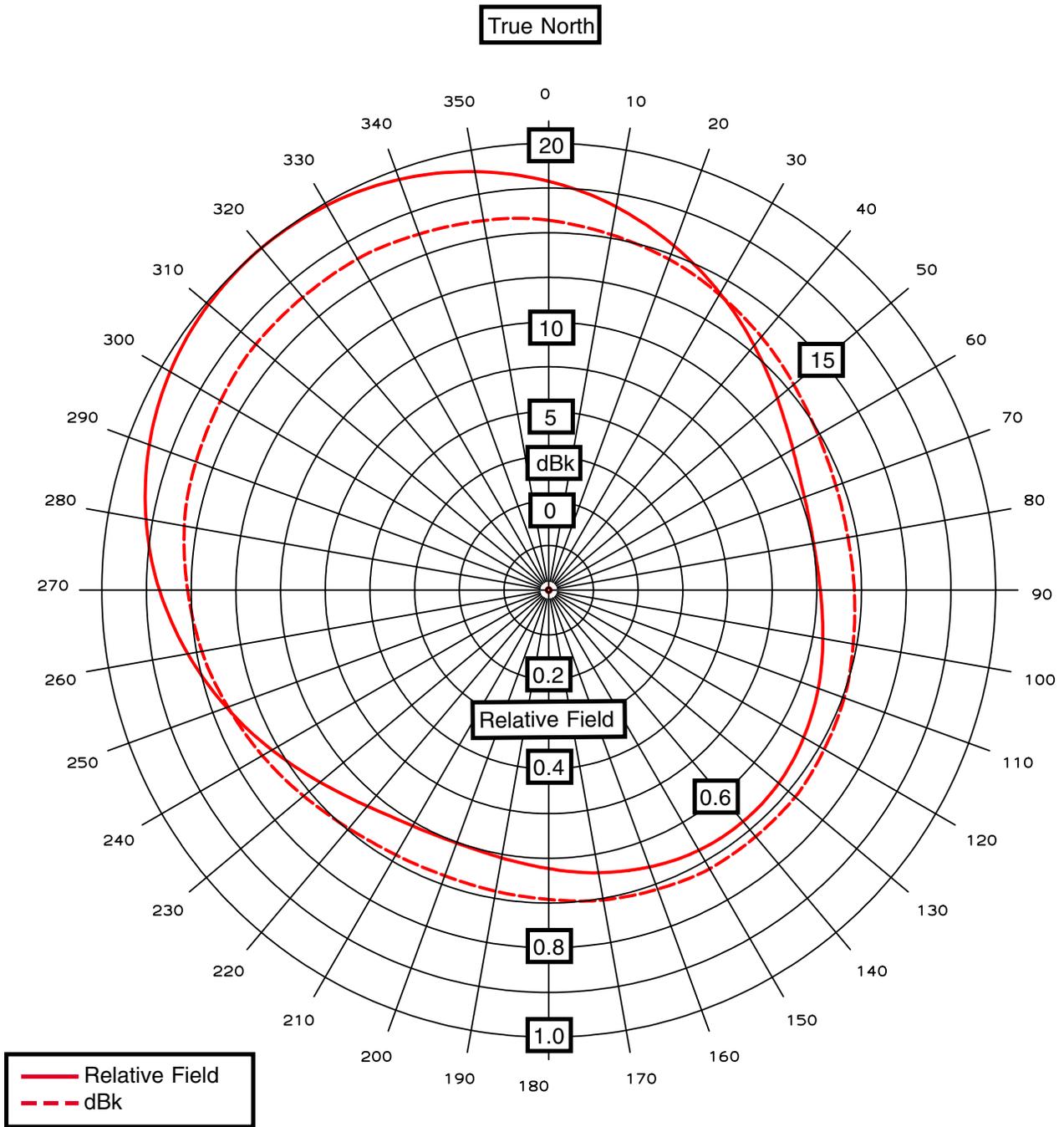
³See Report and Order, "Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television," FCC 04-192, released September 7, 2004.

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Other Allocation Matters

The nearest FCC monitoring station is 447.1 km distant at Powder Springs, GA. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. There are no AM broadcast stations within 3.2 km (2 miles) of the proposed site, according to information extracted from the Commission's engineering database.

Thus, this proposal is believed to be in compliance with the current Commission Rules and policy with respect to allocation matters.



**EXHIBIT 33 - FIGURE 1
ANTENNA HORIZONTAL PLANE
RADIATION PATTERN**

prepared November 2005 for
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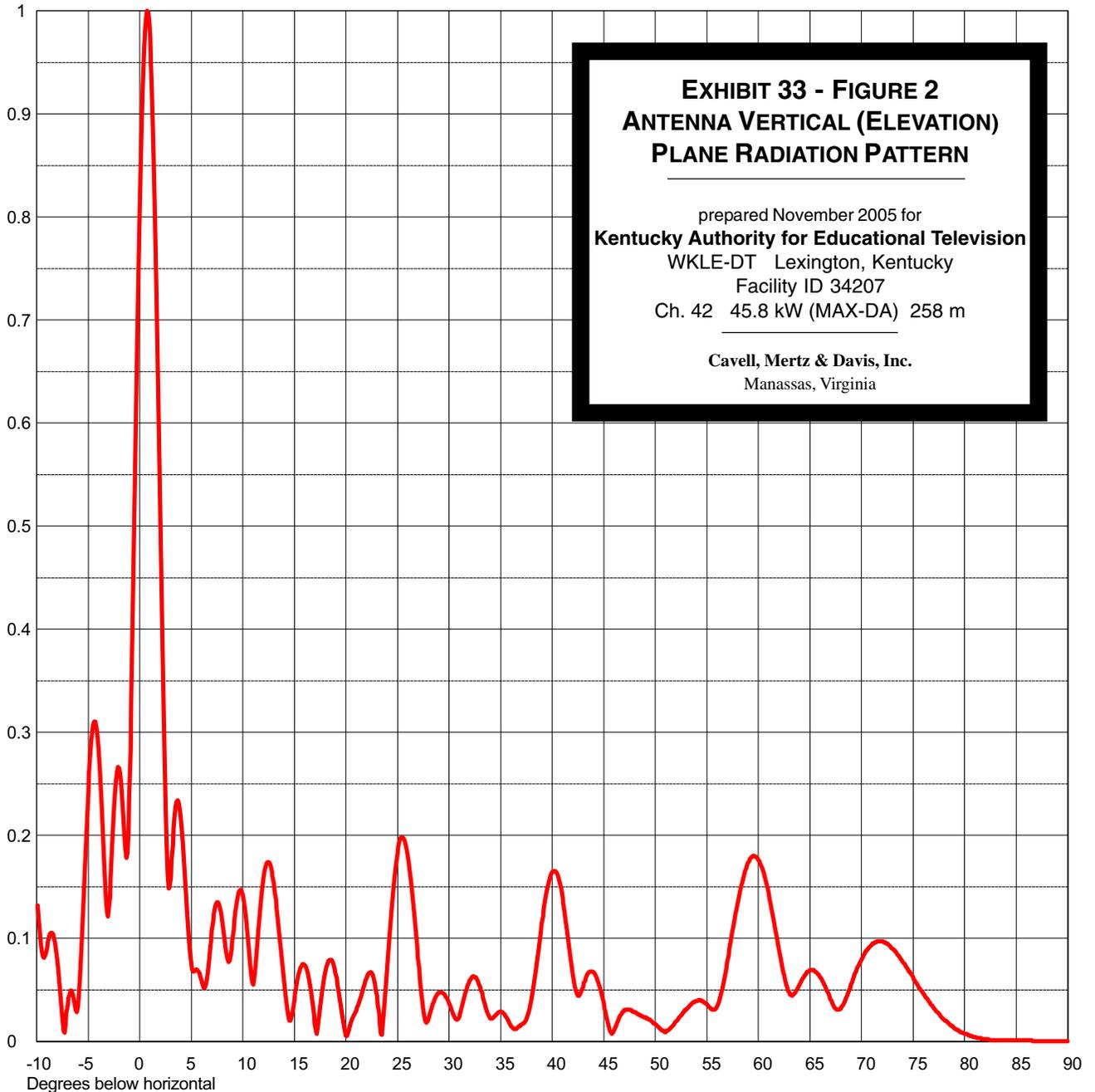
Cavell, Mertz & Davis, Inc.
 Manassas, Virginia



Proposal Number **14019** Revision **2**
Date **08 Aug 2001**
Call Letters **WKLE-DT** Channel **42**
Location **Lexington, KY**
Customer **KET**
Antenna Type **TLP-24B**

ELEVATION PATTERN

RMS Gain at Main Lobe	22.5 (13.52 dB)	Beam Tilt	0.75 Degrees
RMS Gain at Horizontal	14.6 (11.64 dB)	Frequency	641.00 MHz
Calculated / Measured	Calculated	Drawing #	24L225075-90



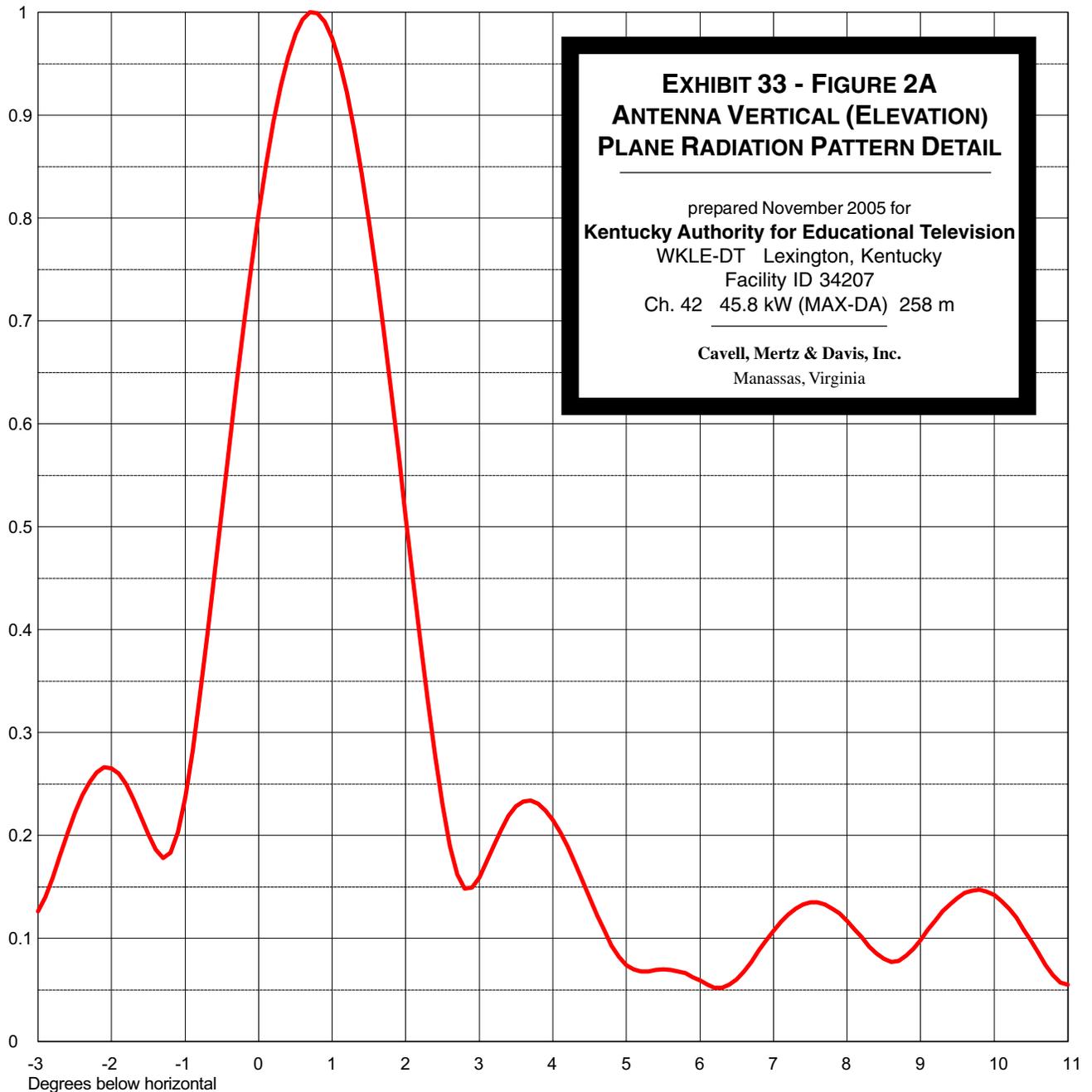
Remarks:



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Call Letters **WKLE-DT** Channel **42**
Location **Lexington, KY**
Customer **KET**
Antenna Type **TLP-24B**

ELEVATION PATTERN

RMS Gain at Main Lobe	22.5 (13.52 dB)	Beam Tilt	0.75 Degrees
RMS Gain at Horizontal	14.6 (11.64 dB)	Frequency	641.00 MHz
Calculated / Measured	Calculated	Drawing #	24L225075



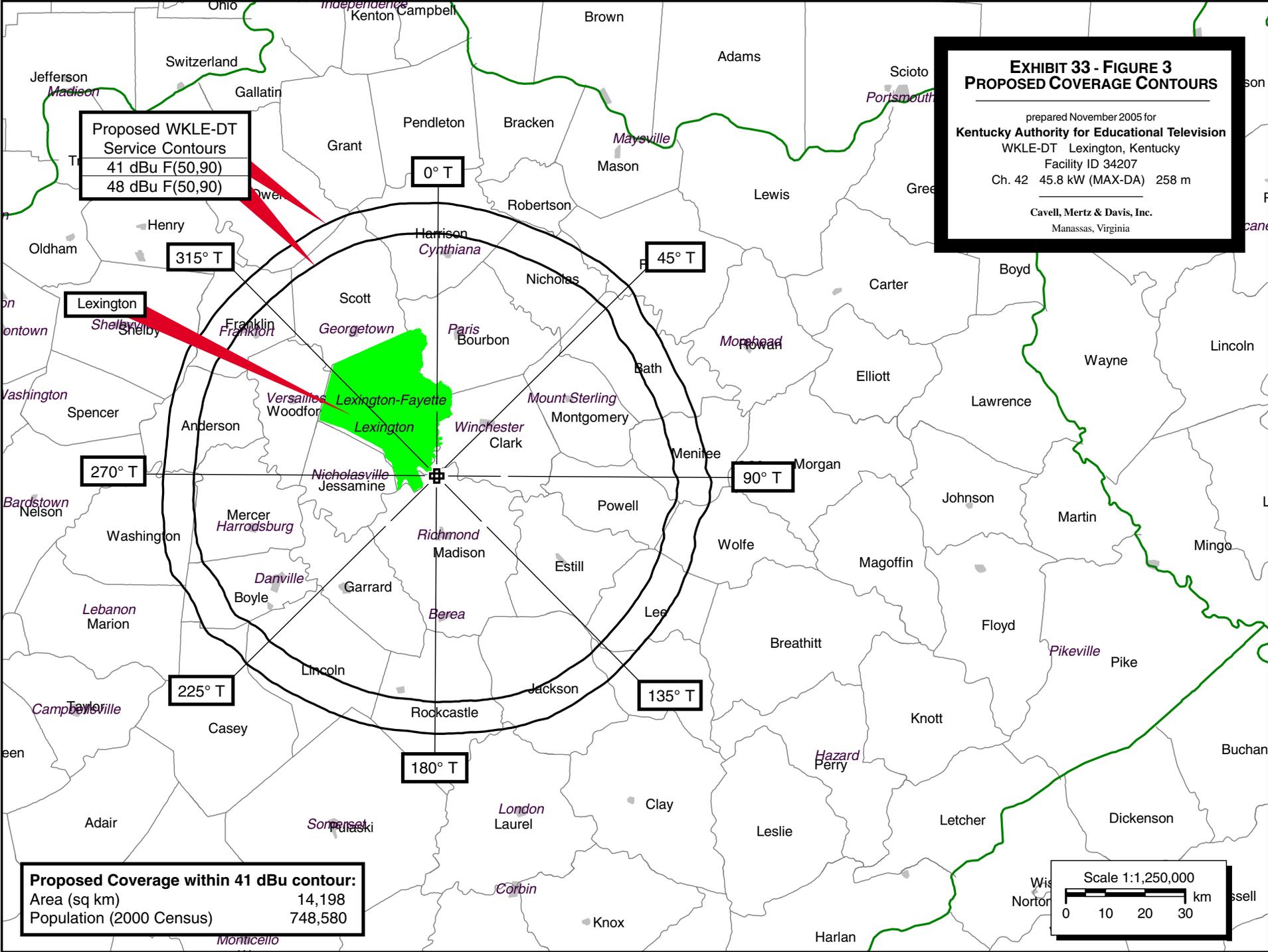
Remarks:

EXHIBIT 33 - FIGURE 3
PROPOSED COVERAGE CONTOURS

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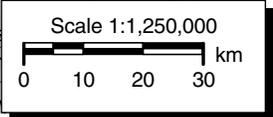
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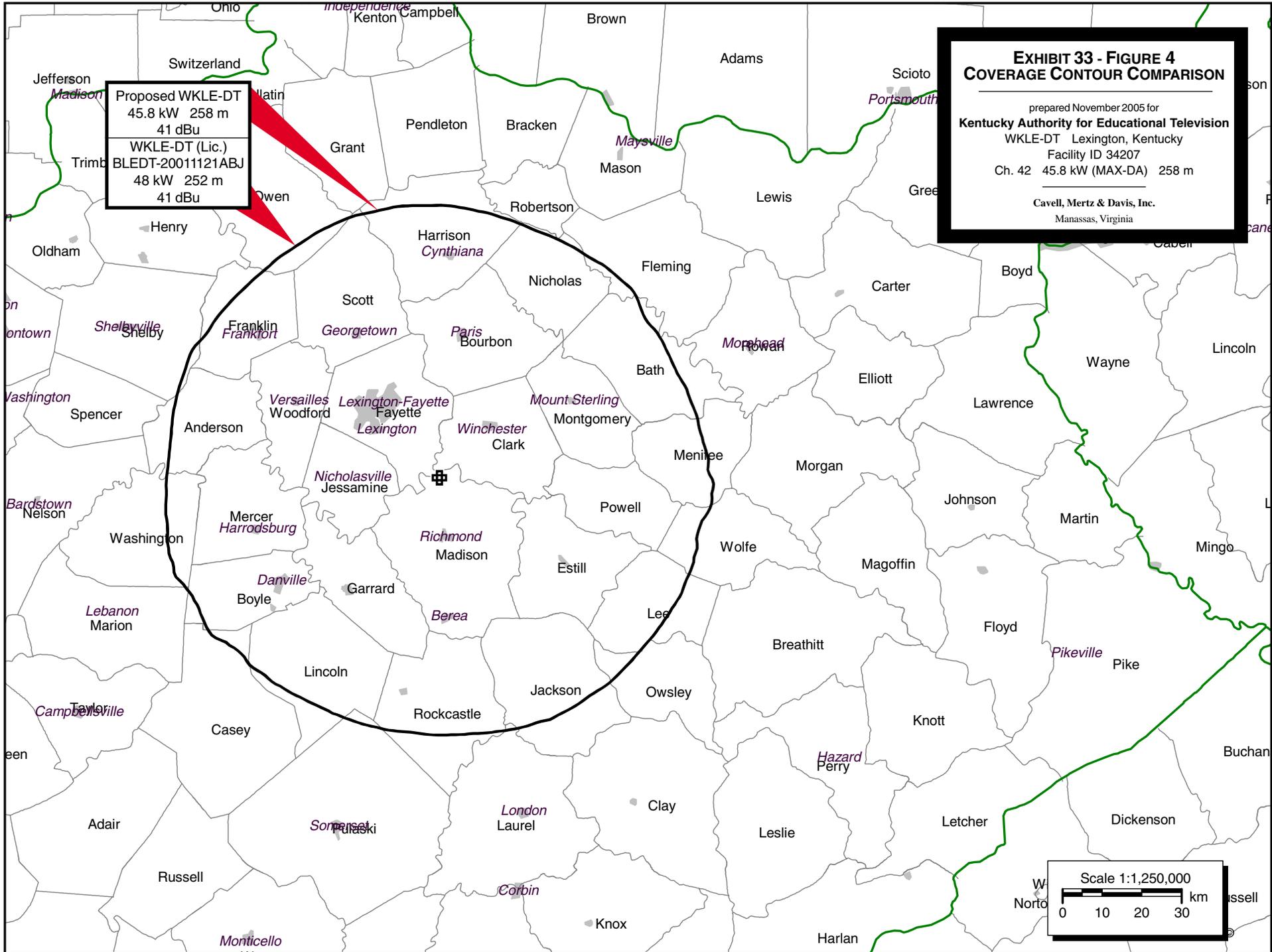
Proposed WKLE-DT
Service Contours
 41 dBu F(50,90)
 48 dBu F(50,90)



Proposed Coverage within 41 dBu contour:

Area (sq km)	14,198
Population (2000 Census)	748,580





Proposed WKLE-DT
45.8 kW 258 m
41 dBu
WKLE-DT (Lic.)
BLEDT-20011121ABJ
48 kW 252 m
41 dBu

EXHIBIT 33 - FIGURE 4
COVERAGE CONTOUR COMPARISON

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