Exhibit 11 - Statement A

NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for

Hawaii Public Television Foundation

K67BA Hakalau, Hawaii
Facility ID 26422
Ch. 50 (Digital) 0.1 kW

Hawaii Public Television Foundation ("Hawaii PTV") is the licensee of television translator station K67BA, Channel 67, Hakalau, HI, Facility ID 26422 (BLTT-2183). K67BA's licensed operation on Channel 67 is displaced pursuant to §73.3572(a)(4)(ii). *Hawaii PTV* proposes herein to change K67BA to Channel 50 and to "flash cut" to digital operation. No change in actual antenna site location is specified, however the K67BA site data (coordinates, ground elevation, overall structure height) are corrected herein to correspond to current topographical data.

The proposed digital facility will operate on Channel 50 using a "simple" out of channel emission mask, with a directional antenna having an effective radiated power of 0.1 kW at the presently licensed transmitting antenna location. **Exhibit 11 - Figure 1** depicts the coverage contours of the licensed (74 dBµ) and the proposed (51 dBµ) facilities. The use of the same transmitter site and the service area overlap shown demonstrates compliance with §73.3572 for a minor change.

The proposed antenna system for K67BA will be side-mounted on the same existing antenna support structure as the licensed K67BA facility. The tower structure is not presently registered with the Commission, as it is an existing structure of less than 61 meters overall height above ground and there are no known landing areas within 8 km. No marking or lighting specifications are presently required. Since no change to the structure's overall height is proposed, FAA notification and commensurate FCC registration are not necessary.

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")[1]. 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 Considerations

The nearest FCC monitoring station is at Waipahu, HI, at a distance of 335 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 site is not located within the border zones requiring international coordination.

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

[1]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.

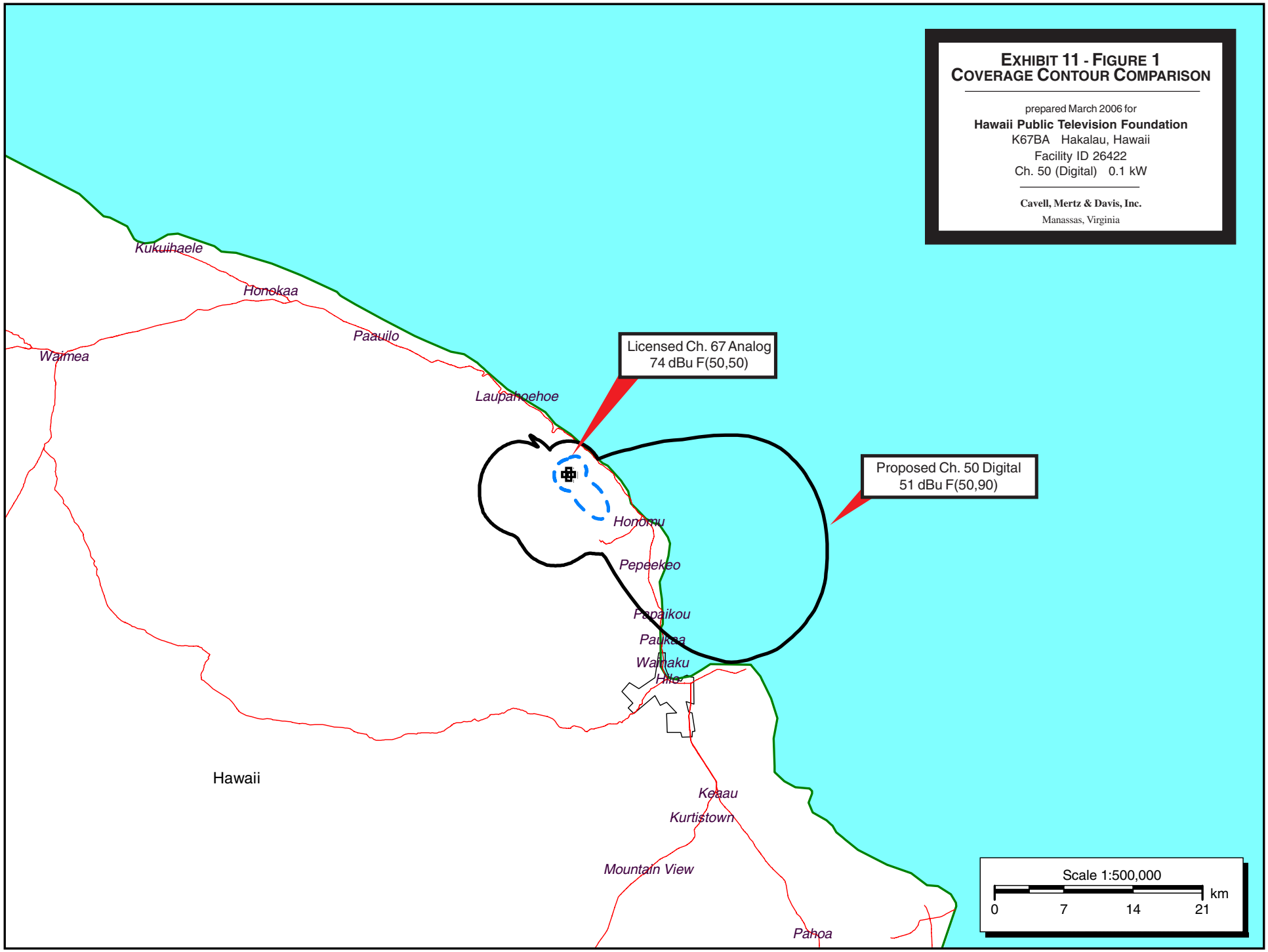
EXHIBIT 11 - FIGURE 1
COVERAGE CONTOUR COMPARISON
prepared March 2006 for
Hawaii Public Television Foundation
K67BA Hakalau, Hawaii
Facility ID 26422
Ch. 50 (Digital) 0.1 kW
Cavell, Mertz & Davis, Inc.
Manassas, Virginia
Kukuihaele
Honokaa
Paauilo
Waimea
Laupahoehoe
Licensed Ch. 67 Analog
74 dBu F(50,50)
Proposed Ch. 50 Digital
51 dBu F(50,90)
Honomu
Pepeekeo
Papaikou
Paukaa
Wainaku
Hilo
Hawaii
Keaau
Kurtistown
Mountain View
Pahoa
Scale 1:500,000
km
0
7
14
21

Exhibit 11 - Table 1

INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for

Hawaii Public Television Foundation

K67BA Hakalau, Hawaii

Facility ID 26422

Ch. 50 (Digital) 0.1 kW

Ch.	Call	City/State	Dist(km)	Status	Application Ref. No.	---Population (1990 Census)---- Baseline	New Interference
42	NEW	HILO HI	37.4	APP	BNPTT-20000830ATB	---	none
43	NEW	HILO HI	37.0	APP	BNPTTL-20000829AVO	---	none
47	KHIK-LP	KAILUA-KONA HI	79.7	CP	BNPTTL-20000829AXA	---	none
48	NEW	HILO HI	23.8	APP	BNPTTL-20000828AVK	---	none
48	K48IY	WAILUKU HI	125.7	CP	BNPTTL-20000831CDZ	---	none
49	K49IA	HILO HI	37.6	CP	BNPTTL-20000831CLA	---	none
49	NEW	KAHULUI HI	146.5	APP	BNPTTL-20000828AGJ	---	none
49	NEW	KAHULUI HI	146.5	APP	BNPTTL-20000828AHJ	---	none
49	NEW	KAILUA-KONA HI	79.6	APP	BNPTTL-20000831CEF	---	none
49	NEW	WAILUKU HI	148.1	APP	BNPTTL-20000829AWV	---	none
50	KKAI	KAILUA HI	303.2	CP	BPCT-20040616ABK	---	none
50	KKAI	KAILUA HI	310.3	LIC	BLCT-20040512AEF	---	none
51	KAUI-LP	WAILUKU HI	147.8	LIC	BLTTL-19990412JD	---	none
51	KAUI-LP	WAILUKU HI	145.9	CP	BPTTL-20040816AAF	---	none
51	KAUI-LP	WAILUKU HI	145.9	APP	BMPTTL-20060320AHB	---	none