

Exhibit 11 - Statement A
ENGINEERING STATEMENT
prepared for
United Communications Corporation
WNYF-CD Watertown, NY
Facility ID 168478
Ch. 35 15 kW

United Communications Corporation (“*United*”) is the licensee of analog Class A television station WNYF-CA¹, Channel 28-, Facility ID 16743, Watertown, New York and digital companion LPTV station WNYF-LD², Channel 35, Facility ID 168478, Watertown, New York. *United* herein seeks, in accordance with the *Second Report and Order*³, to transfer the primary status of the analog facility to that of the digital companion facility.

Nature of the Proposal

No change in the existing facility is proposed. The specifications provided in FCC Form 302-CA, Section III – Engineering, “Tech Boxes” 1 to 6 are identical to those provided in the license application for the WNYF-LD facility.

Allocation Considerations

The proposed facility provides the requisite protections to land mobile operations in the region. Specifically, land mobile operations are authorized on Channel 18 in the Elmira-Corning, NY metropolitan area. With operation on Channel 35, WNYF-LD does not operate on the same or either of the adjacent channels. Thus, the proposed Class A television operation complies with §73.6020 of the Commission’s Rules.

The instant proposal complies with the Commission’s interference protection requirements toward all 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 No. 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*,

¹ See BLTTA-20010129AAT

² See BLDLTL-20090924ABW

³ See paragraph 53, *Second Report and Order, 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 No. 03-185, FCC 11-110, released July 15, 2011.

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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.

In performing the OET-69 interference study, the licensed facility for the WPVN-LD digital companion facility (BLDTL-20090924ABW) was omitted from consideration.

The interference study results, summarized in **Exhibit 11 - Table I**, shows that any new interference does not exceed the Commission’s interference limits (0.5 percent to full service and Class A stations, and 2.0 percent to secondary stations). Accordingly, the instant proposal complies with §§73.6011 to 73.6014 of the Commission’s Rules regarding interference protection to analog and digital television, low power television, television translator, and Class A television facilities.

Since the instant application requests the conveyance of primary status from the analog facility to its digital companion facility, no further allocation or environmental considerations are provided as all facilities under consideration have been authorized by the Commission.

⁴ 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.**

Exhibit 11 - Table 1
INTERFERENCE STUDY RESULTS
 prepared for
United Communications Corporation
 WNYF-CD Watertown, NY
 Facility Id: 168478
 Ch. 35 15 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>
20	DW20BA	Massena, NY	BLTT-19921215IG			--- No Interference ---		
20	W20CV	Ogdensburg, NY	BLTTL-20110318AEZ			--- No Interference ---		
28	WNYF-CA	Watertown, NY	BLTTA-20010129AAT			--- No Interference ---		
34	WMHT	Schenectady, NY	BLEDT-20040108ALV			--- No Interference ---		
34	WONO-CD	Syracuse, NY	BDCCDTL-20111129FZS			--- No Interference ---		
35	WVIT	New Britain, CT	BLCDT-20041203AEF	4,229,671	175,251	175,293	42	0.001 %
35	WBIN-TV	Derry, NH	BLCDT-20070126ACX			--- No Interference ---		
35	WNYX-LD	New York, NY	BLDTL-20090908ACQ			--- No Interference ---		
35	WOBX-LP	Syracuse, NY	BLTTA-20050922ACH			--- No Interference ---		
35	DW53AM	Utica, NY	BDISDTL-20060403AHV	165,251	1,432	1,759	327	0.198 %
35	WYLN-LP	Hazleton, PA	BLTTL-19950324IE			--- No Interference ---		
36	NEW	Oneida, NY	BDCCDTL-20130828AFJ			--- No Interference ---		
36	WHSB-LP	Rochester, NY	BLTTL-20040225AAD			--- No Interference ---		