

Exhibit 11 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for
WSET, Inc.
W05AA Roanoke, VA
Facility ID 73989
Ch. 5 (Digital) 0.3 kW

WSET, Inc. (“*WSET*”) is the licensee of television translator station W05AA, Channel 5, Roanoke, VA, Facility ID 73989 (BLTTV-19820929JK). *WSET* proposes herein to “flash cut” to digital operation. The present licensed W05AA transmitting antenna will continue to be used. No change in site location is specified. When and if Commission staff is prepared to grant the instant Channel 5 flash cut application, *WSET* requests that the Commission dismiss W05AA's current construction permit. See BDFCDTT-20060328ABO.

WSET also proposes herein to correct the W05AA antenna height above mean sea level (“AMSL”). The present antenna height AMSL of 624.5 meters is based on a ground elevation of 609.6 meters (2000 feet) AMSL. That ground elevation is based on topographic data dating back to 1960, when the original construction permit application for W05AA was filed, and before 7.5-minute topographic data was available for the Roanoke, VA area. Current 7.5-minute topographic data shows that the ground elevation at the W05AA antenna site is 591.3 meters (1940 feet). Accordingly, the center of radiation AMSL has been recalculated to reflect the current, more accurate topographic elevation data. The W05AA antenna height above ground level (“AGL”) is 14.9 meters (49 feet) and will remain unchanged. The correction of site elevation and antenna height AMSL are as follows:

	<u>Licensed</u>	<u>Corrected</u>
Site Elevation AMSL (m)	609.6	591.3
Antenna Height AGL (m)	14.9	14.9 (unchanged)
Antenna Height AMSL (m)	624.5	606.2

WSET also proposes herein to correct the FCC’s engineering database entry for W05AA to reflect the present actual directional antenna pattern. No actual change in the existing directional antenna pattern is proposed. According to information in the W05AA license records, and based on information provided by a technical representative of the applicant, W05AA has operated with a composite directional antenna consisting of four vertically stacked yagis since it was first

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constructed. The current CDBS database entry for the licensed facility correctly indicates directional operation. However, the horizontal plane pattern of this existing antenna has been omitted from the W05AA record entry in the Commission's engineering database. The existing and proposed directional horizontal plane relative field pattern, based on W05AA license data and information provided by the antenna manufacturer, is tabulated in **FCC Form 346, Section III, Item 11c**. The attached **Exhibit 11 – Figure 1** supplies a plot of the W05AA directional pattern. **Exhibit 11 – Figure 2** supplies a plot of the vertical (elevation) plane pattern.

The proposed digital facility will operate on Channel 5 using a “simple” out of channel emission mask with a directional antenna having a maximum effective radiated power of 0.3 kW at the presently licensed transmitting antenna location. **Exhibit 11 - Figure 3** depicts the coverage contours of the licensed (62 dB μ) and the proposed (43 dB μ) facilities. The use of the same transmitter site and the service area overlap shown demonstrates compliance with §73.3572 for a minor change.

The W05AA antenna system is located on an existing antenna support structure and no change to the structure's overall height is proposed. The tower structure is less than 60.96 meters tall and is not located within 8 km of any airport or heliport. Therefore, FAA notification and registration with the Commission are not required.

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.

¹The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. **A cell size of**

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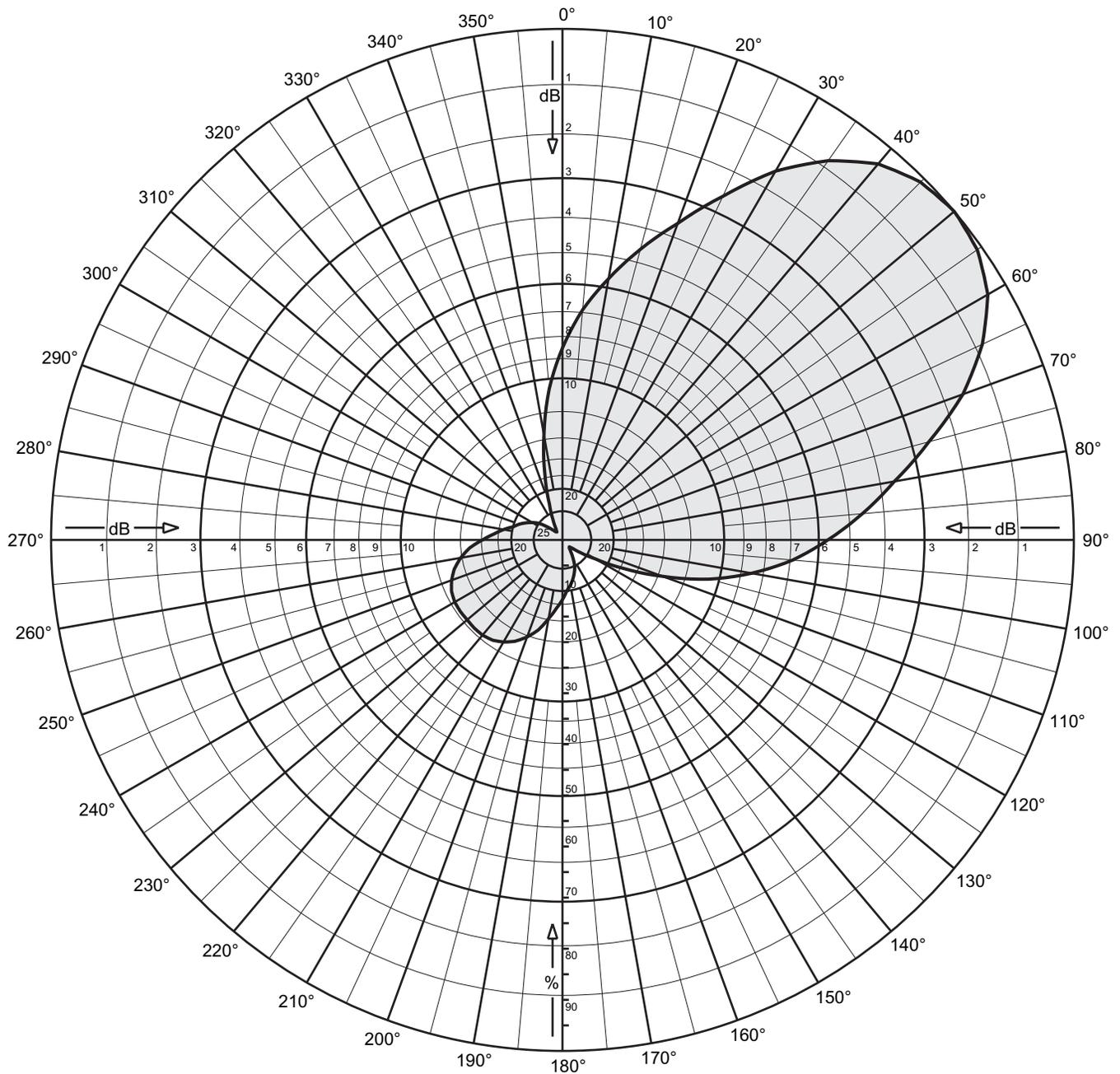
The results, summarized in **Exhibit 11 - Table I**, show that any new interference does not exceed the Commission's interference limits (0.5 percent to full power and Class A stations, and 2.0 percent to secondary stations). Accordingly, the instant proposal complies with §74.793 regarding interference 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 Laurel, MD, at a distance of 354.8 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 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.

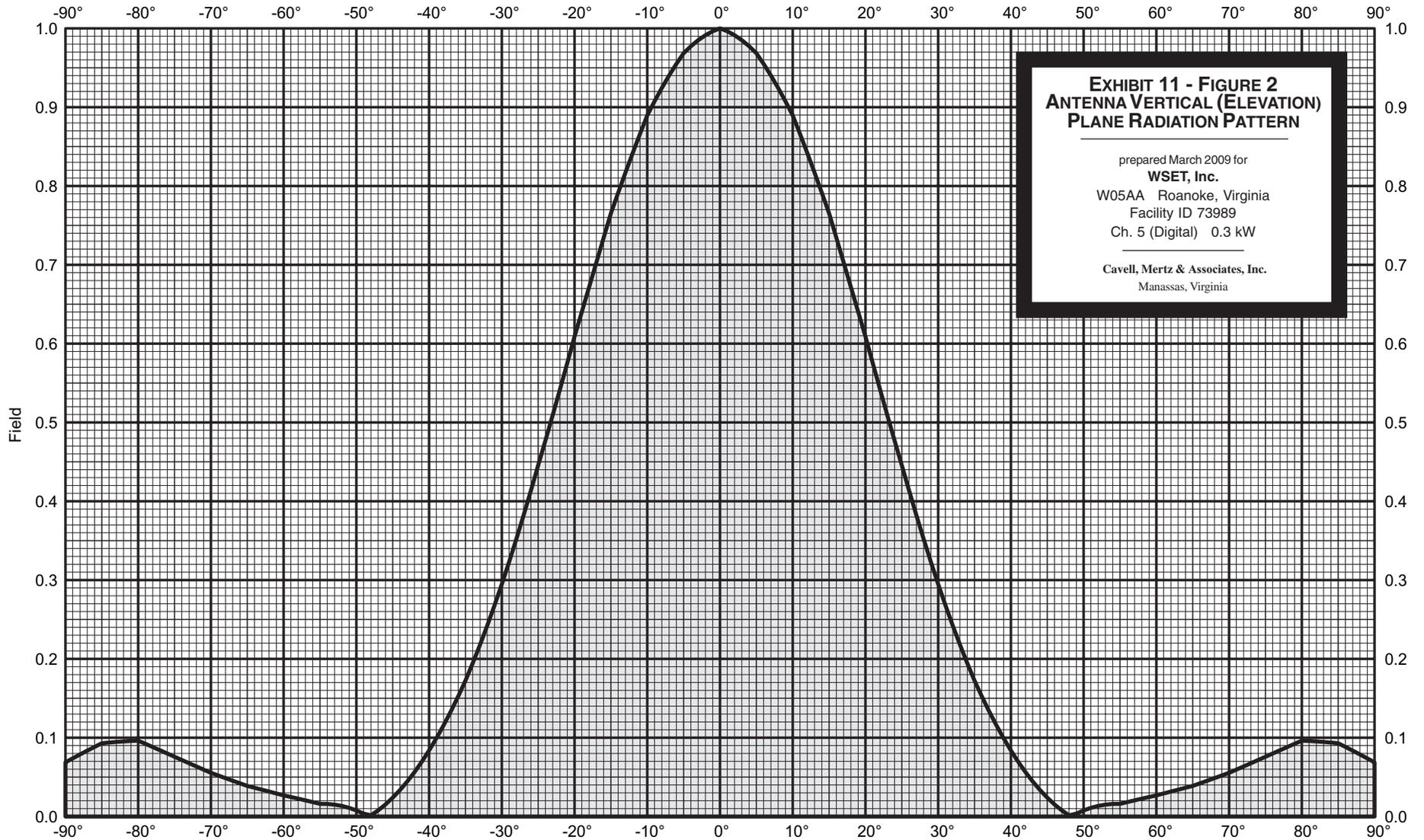


**EXHIBIT 11 - FIGURE 1
ANTENNA HORIZONTAL PLANE
RADIATION PATTERN**

prepared March 2009 for
WSET, Inc.
W05AA Roanoke, Virginia
Facility ID 73989
Ch. 5 (Digital) 0.3 kW

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

Depression Angle



KATHREIN
SCALA DIVISION
Post Office Box 4580 Phone:(541)779-6500
Medford, OR 97501 (USA) Fax:(541)779-3991
<http://www.kathrein-scala.com>

Four HDCA-10 Yagi Antennas

Oriented two each at 30 & 70 degrees

Peak gain: 12.4 dBd.

Horizontal Polarization

Vertical Stack

Vertical plane Pattern

**EXHIBIT 11 - FIGURE 3
COVERAGE COVERAGE COMPARISON**

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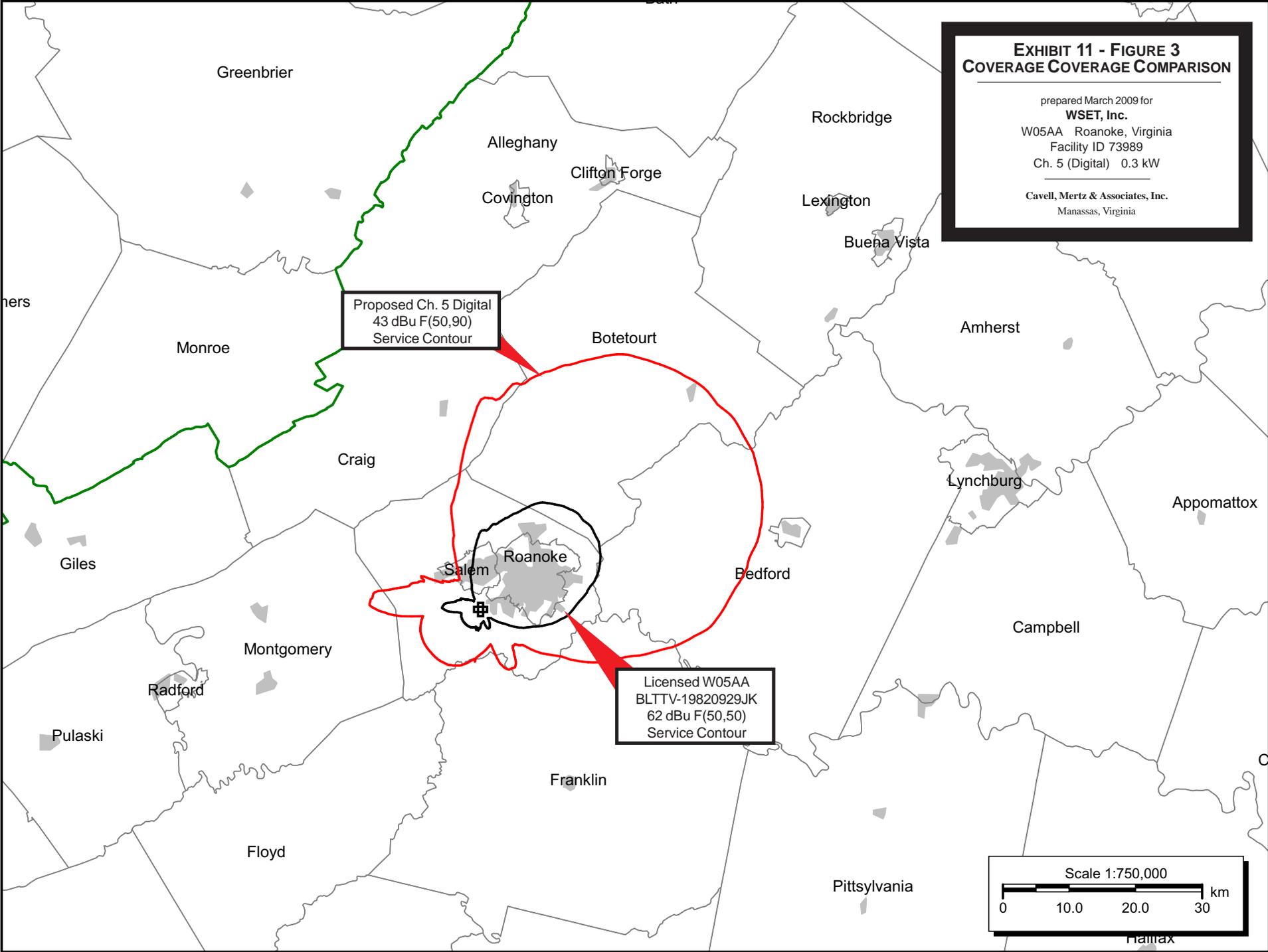


Exhibit 11 - Table I
INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for

WSET, Inc.

W05AA Roanoke, VA

Facility ID 73989

Ch. 5 (Digital) 0.3 kW

<u>Ch.</u>	<u>Call</u>	<u>City/State</u>	<u>Dist(km)</u>	<u>Status</u>	<u>File Number</u>	<u>---Population (2000 Census)---</u>	
						<u>Baseline</u>	<u>New Interference</u>
5	WTTG	WASHINGTON DC	322.4	CP	BPCT-20060519ACI	---	none
5	WTTG	WASHINGTON DC	322.4	LIC	BMLCT-223	---	none
5	W05AU	BAT CAVE, ETC. NC	281.4	LIC	BLTTV-19950519IB	---	none
5	W05AP	BRASSTOWN, ETC. NC	428.7	LIC	BLTTV-3796	---	none
5	W05AR	BRYSON CITY, ETC. NC	365.0	LIC	BLTTV-19810409KF	---	none
5	W05AF	CHEROKEE NC	352.5	LIC	BLTTV-1180	---	none
5	W05BI	MOREHEAD CITY NC	409.6	LIC	BLTTV-19910822JI	---	none
5	WRAL-TV	RALEIGH NC	219.5	LIC	BLCT-19901114KF	---	none
5	W05AE	SYLVA, ETC. NC	349.0	LIC	BLTTV-19820607ID	---	none
5	W05AC	TRYON, ETC. NC	294.3	LIC	BLTTV-19791115IW	---	none
5	W05AO	PICKENS SC	349.6	LIC	BLTTV-19821005IG	---	none
5	WCYB-TV	BRISTOL VA	202.9	CP	BPCDT-20080327AFS	1,714,894	0 / 0.00%
5	WCYB-TV	BRISTOL VA	202.9	LIC	BLCT-20020708AAW	---	none
5	WJGN-CA	CHESAPEAKE VA	330.3	LIC	BLTVA-20010926ABL	---	none
5	WDOB-LP	HARRISONBURG VA	174.1	APP	BMPTTV-20030108ABD	---	none
5	WDTV	WESTON WV	231.3	CP MOD	BMPCDT-20080618ACH	---	none
5	WDTV	WESTON WV	207.4	LIC	BLCT-1745	---	none
6	WVVA	BLUEFIELD WV	100.4	LIC	BMLCT-19880907KE	686,953	0 / 0.00%
6	WVVA	BLUEFIELD WV	100.4	CP	BPCT-20010725ADN	686,953	0 / 0.00%
6	WDTV-DR	WESTON WV	207.4	LIC	BPRM-20001002ADW	---	none