

Exhibit 6 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for
Caballero Acquisition Inc.
KGBS-CA Austin, Texas
Facility ID 38562
Ch. 32 86 kW

Caballero Acquisition Inc. (“CAI”) is the licensee of Class A television station KGBS-CA, Channel 32, Austin, TX, Facility ID 38562 (BLTTA-20040217ACL). Under a pending *Application for Construction Permit* (BPTTA-20060403AOU), CAI has proposed to increase effective radiated power (“ERP”) to 88.5 kW in order to overcome incoming digital television station interference. That application is hereby amended by providing a slightly different directional antenna pattern and a slight decrease to the proposed ERP.

The original application specified continued use of the licensed directional antenna pattern. Subsequent to filing that application, CAI learned that the existing antenna system is not capable of handling the proposed increase in ERP. A replacement antenna has been designed to mimic the licensed antenna pattern as closely as possible, however its directional pattern does vary slightly from the licensed pattern.

The pending application is amended herein to specify the replacement directional antenna system (PSI model number PSILP14MOY-32) and operation at 86 kW ERP. A coverage contour comparison is provided as **Exhibit 6 – Figure 1**, which shows that the amended proposal’s coverage contour is wholly within that of the original application.

As with the original application, no change in site location, antenna height, or channel is specified, however the KGBS-CA transmitter site geographic coordinates are corrected to correspond to the associated antenna structure registration.

Additionally, the proposed power increase would result in an extension of the KGBS-CA protected service contour, which is currently prohibited by the Commission’s August 3, 2004

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“freeze” concerning expansion in service area.¹ Good cause exists for the power increase, due to the extent of incoming interference experienced by the KGBS-CA facility as described herein. If a waiver of Commission Rule or policy is required, then one is requested on behalf of the applicant.

Special Temporary Authority (“STA,” BSTA-20060403AOY) was granted on May 2, 2006 authorizing KGBS-CA to operate with the facilities described in the pending application. A request to modify the STA is being filed contemporaneously to match the changed antenna pattern and ERP described herein.

KGBS-CA is presently licensed to operate with a maximum ERP of 14 kW. A first-adjacent digital television station, KVUE-DT (BLCDT-20050624AAI, Ch. 33, Austin, TX) is located 0.4 km distant from KGBS-CA and is licensed to operate with 1000 kW ERP. The KVUE-DT 1000 kW ERP is 18.5 dB in excess of the 14 kW KGBS-CA ERP, which exceeds the 17 dB desired-to-undesired ratio in §73.623(c) that would be required to avoid interference from an upper-DTV into first-adjacent analog TV facility. The likelihood of interference is further predicted by a detailed interference study pursuant to FCC OET Bulletin 69, as shown in the following.²

¹*Public Notice* “Freeze on the Filing of Certain TV and DTV Requests for Allotment or Service Area Changes,” DA 04-2446, released August 3, 2004.

²Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004.

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KGBS-CA as currently licensed:

Results for: 32N TX AUSTIN	BLTTA	20040217ACL	LIC
	POPULATION	AREA (sq km)	
within Noise Limited Contour	514291	940.8	
not affected by terrain losses	514291	940.8	
lost to NTSC IX	304486	503.4	
lost to additional IX by ATV	189321	391.3	
lost to all IX	493807	894.8	

Potential Interfering Stations Included in above Scenario 2

31N TX AUSTIN	BLTTTL	20010403AAM	LIC
32N TX ABILENE	BLCT	19990329KF	LIC
47N TX WEST LAKE HILLS	BLTTTL	20050124ADH	LIC
32A TX HOUSTON	DTVPLN	DTVP0883	PLN
32A TX KERRVILLE	BPCDT	19991029ACH	CP
33A TX AUSTIN	BLCDDT	20050624AAI	LIC

The OET Bulletin 69 analysis shows that out of 514,291 persons within the KGBS-CA service contour, 493,807 persons (96.02 percent) are subject to interference, leaving only 20,484 persons with interference-free service.

As proposed herein, the KGBS-CA ERP will be raised to 86 kW. This ERP is 10.7 dB below the KVUE-DT 1000 kW ERP, and provides 6.3 dB margin before interference would occur (based on the same 17 dB U/D ratio). Analysis per OET Bulletin 69 shows that the resulting facility would be much less affected by incoming interference as shown below.

KGBS-CA as proposed:

Results for: 32N TX AUSTIN	USERRECORD01	APP
	POPULATION	AREA (sq km)
within Noise Limited Contour	620681	1948.3
not affected by terrain losses	618551	1936.0
lost to NTSC IX	120178	644.6
lost to additional IX by ATV	6868	28.0
lost to all IX	127046	672.6

Potential Interfering Stations Included in above Scenario 2

31N TX AUSTIN	BLTTTL	20010403AAM	LIC
36N TX AUSTIN	BLCT	19971202KF	LIC
47N TX WEST LAKE HILLS	BLTTTL	20050124ADH	LIC
32A TX HOUSTON	DTVPLN	DTVP0883	PLN
32A TX KERRVILLE	BPCDT	19991029ACH	CP
33A TX AUSTIN	BLCDDT	20050624AAI	LIC

Here, OET Bulletin 69 analysis indicates that the final interference-free population would be 491,505, which is 95.6 percent of the licensed KGBS-CA service contour population. Thus, it is

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shown that in order for KGBS-CA to achieve interference-free coverage within 95.6 percent of its presently licensed contour population, the power must be raised to 86 kW with the antenna pattern as proposed herein. For this reason, the applicant is requesting the power increase and replacement antenna despite the freeze on such applications.

The replacement KGBS-CA antenna system will be side-mounted on an existing antenna support structure at the same elevation as the licensed KGBS-CA antenna. The tower structure is registered with the Commission (ASR #1059965), and no change in overall structure height will result. Since no change to the structure's overall height is proposed, FAA notification is not necessary.

Allocation Considerations

The instant proposal complies with the Commission's standard contour overlap protection requirements toward all NTSC, DTV, television translator, LPTV, and Class A stations except those summarized in **Exhibit 6 – Table 1**. 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")³. The interference study examined the change in interference as experienced by the stations subject to overlap that would result from the proposed facility. The interference study employed a finer cell size and profile step resolution than the Commission's standard values. **Commission processing using a cell size of 0.5 km and a distance increment (step size) of 0.5 km is requested.** The results, summarized in **Exhibit 6 - Table 1**, show that any new interference does not exceed the Commission's 0.5 percent rounding tolerance.

³The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. **A cell size of 0.5 km was employed at a distance increment (step size) of 0.5 km.** 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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Accordingly, the instant proposal complies with §§73.6011 – 73.6014 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 Kingsville, TX, at a distance of 319.1 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 located 308 km from the U.S. - Mexican border, which is just within the 320 km international coordination zone. According to FCC CDBS database and international agreement allotment listings, there are no co-channel Mexican stations within 400 km of KGBS-CA. Similarly, due to the distance to the border, all first-adjacent and "taboo" channel Mexican stations are well removed from the area where KGBS-CA might have an impact. Therefore, no impact to any Mexican station is expected.

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

**EXHIBIT 6 - FIGURE 1
COVERAGE CONTOUR COMPARISON**

prepared August 2006 for
Caballero Acquisition Inc.
KGBS-CA Austin, Texas
Facility ID 38562

Ch. 32 86 kW

Cavell, Mertz & Davis, Inc.
Manassas, Virginia

Proposed KGBS-CA
86 kW
74 dBu F(50,50)

KGBS-CA (App.)
BPTTA-20060403AOU
88.5 kW
74 dBu F(50,50)

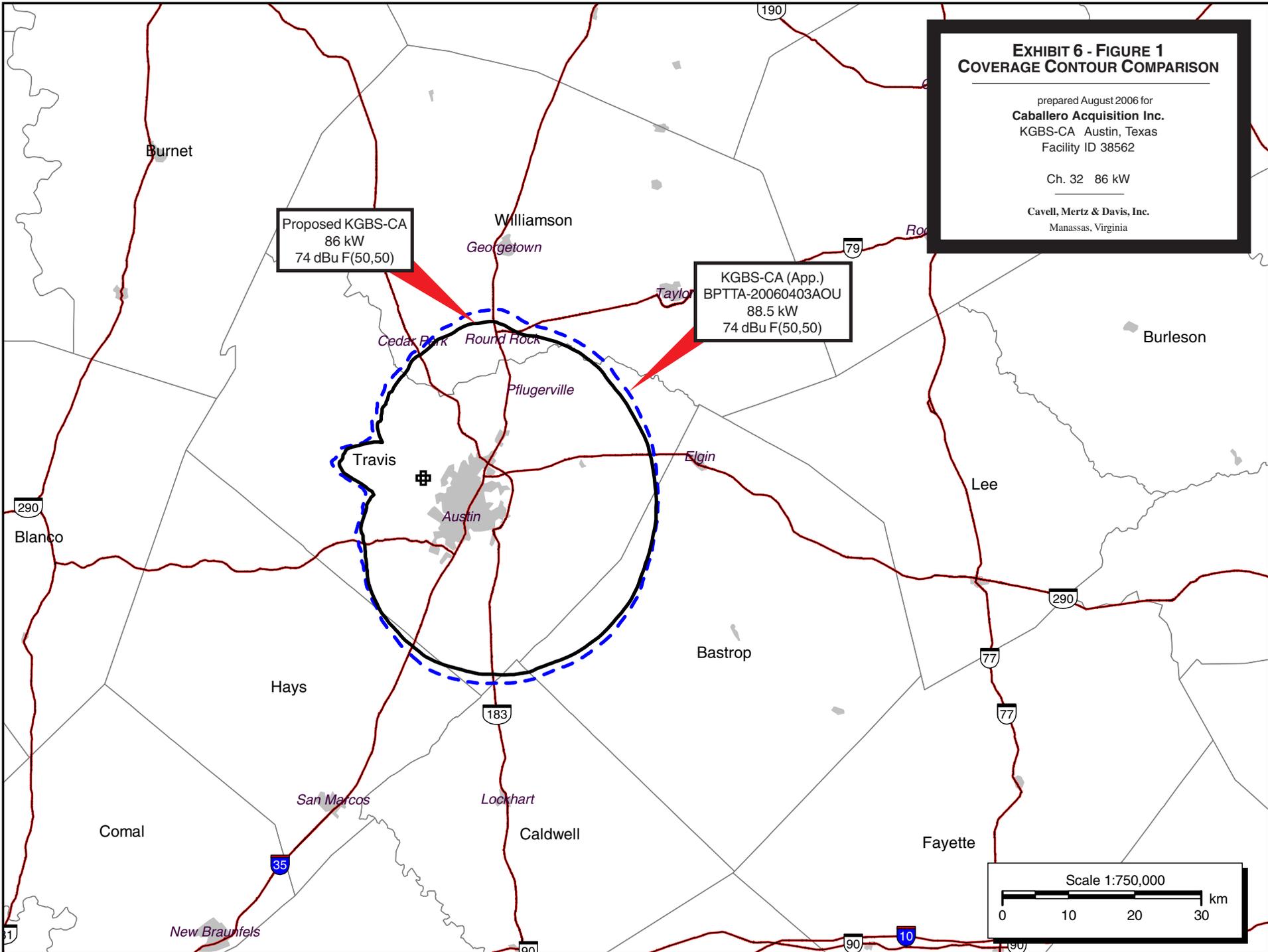


Exhibit 6 - Table 1

INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for

Caballero Acquisition Inc.

KGBS-CA Austin, Texas

Facility ID 38562

Ch. 32 86 kW

<u>Ch.</u>	<u>Call</u>	<u>City/State</u>	<u>Dist(km)</u>	<u>Status</u>	<u>Application Ref. No.</u>	<u>---Population (1990 Census)---</u>	
						<u>Baseline</u>	<u>New Interference</u>
17	KVAT-LP	GARFIELD TX	0.5	LIC	BLTTL-20041214AEC	408,813	1919 (0.47%)
18	KLRU(TV)	AUSTIN TX	0.5	APP	BPET-20020429ABA	---	none
18	KLRU(TV)	AUSTIN TX	0.3	LIC	BLET-19790424KG	---	none
31	KAKW-CA	AUSTIN TX	0.5	LIC	BLTTL-20010403AAM	445,840	1956 (0.44%)
32	NEW(TV)	CONVERSE TX	97.4	ADD	BPRM-19960725AAR	---	none
32	KDAF-DT	DALLAS TX	259.8	LIC	BLCDT-20010606ABJ	4,049,737	0 (0.00%)
32	KDAF-DT	DALLAS TX	264.4	PLN	DTVPLN-DTVP0882	---	none
32	KTRK-DT	HOUSTON TX	237.2	LIC	BLCDT-20000215AAP	3,898,920	62 (0.00%)
32	KTRK-DT	HOUSTON TX	237.2	PLN	DTVPLN-DTVP0883	3,898,920	225 (0.01%)
32	KMYS-DT	KERRVILLE TX	131.4	PLN	DTVPLN-DTVP0884	1,503,521	203 (0.01%)
32	KMYS-DT	KERRVILLE TX	131.3	CP	BPCDT-19991029ACH	1,503,521	237 (0.02%)
33	KVUE-DT	AUSTIN TX	0.3	PLN	DTVPLN-DTVP0918	---	none
33	KVUE-DT	AUSTIN TX	0.3	LIC	BLCDT-20050624AAI	---	none
36	KXAN-TV	AUSTIN TX	0.7	LIC	BLCT-19971202KF	1,102,705	0 (0.00%)