

Exhibit 13 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**

prepared for  
**Northern Lights Media, Inc.**  
K27AI Ninilchik, Etc., Alaska  
Facility ID 62647  
Ch. 27 (Digital “Flash-Cut”) 110 W (Max-DA)

*Northern Lights Media, Inc.* (“NLM”) is the licensee of television translator station K27AI, Channel 27, Ninilchik, Etc., Alaska, Facility ID 62647 (BLTTV-19821207IF). *NLM* proposes herein to “flash-cut” K27AI to digital operation.

### **Nature of the Proposal**

The antenna system proposed for the digital K27AI is the same directional antenna currently employed for the analog operation. The two Scala PR-TV-27 antennas will remain side-mounted on an existing antenna structure (Antenna Structure Registration number 1003111).

The proposed digital facility will operate on Channel 27 using a “simple” out of channel emission mask at the authorized K27AI site. **Exhibit 13 - Figure 1** depicts the coverage contour of the proposed facilities. Because there is no change in output channel or site, the proposed facility is considered a minor change according to the criteria specified in §73.3572 of the Commission’s Rules.

### **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”)<sup>1</sup>. The interference study examined the change in interference as experienced by nearby pertinent stations that would result from the proposed facility.

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<sup>1</sup> 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.**

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The results, summarized in **Exhibit 13 - Table I**, show 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 §74.793 regarding interference protection to digital television, low power television, television translator, and Class A television facilities.

**International Coordination**

The proposed transmitter site is located 596 km from the U.S. - Canada border, which is outside the 100 km coordination distance specified in the September, 2000 Letter of Understanding.<sup>2</sup> Thus, coordination with Canadian authorities is not required.

**Other Allocation Considerations**

The nearest FCC monitoring station is at Ferndale, Washington, at a distance of 2,255 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.

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

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<sup>2</sup> "Letter of Understanding Between the Federal Communications Commission of the United States Of America and Industry Canada Related to the use of the 54-72 MHz, 76-88 MHz, 174-216 MHz and 470-806 MHz Bands for the Digital Television Broadcasting Service Along the Common Border", September 12, 2000.

**EXHIBIT 13- FIGURE 1  
PREDICTED COVERAGE CONTOUR**

prepared April 2012 for  
**Northern Lights Media, Inc.**  
K27AI Ninilchik, Etc., Alaska  
Ch. 27 (Digital) 110 Watts (Max-DA)

Cavell, Mertz & Associates, Inc.  
Manassas, Virginia

Proposed K27AI Digital Translator  
Ch. 27 110 Watts(Max-DA) 146.9 m  
51 dBu F(50,90)(Dipole Corrected) Service Contour

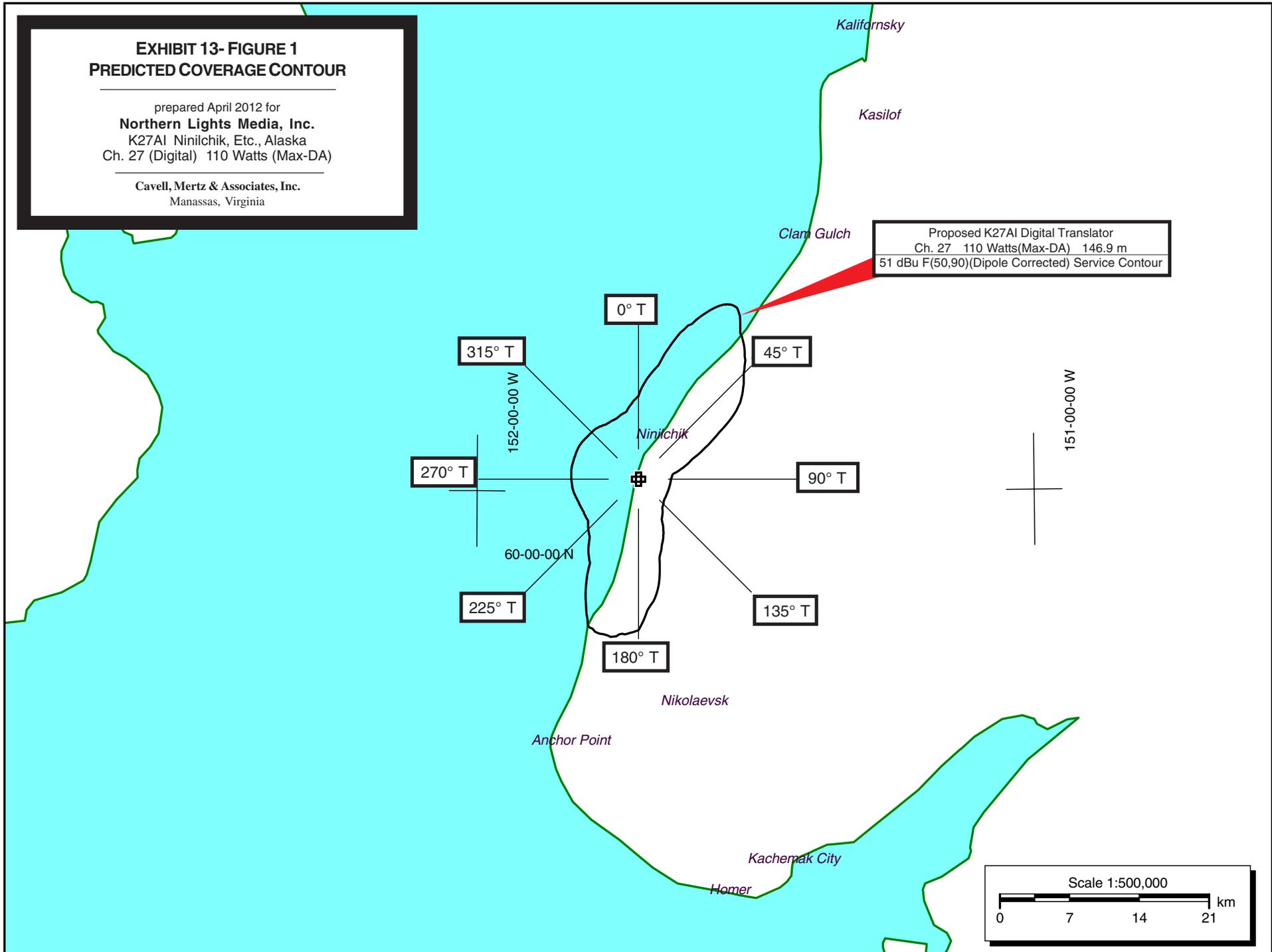


Exhibit 13 - Table I  
**INTERFERENCE STUDY RESULTS**

prepared for  
**Northern Lights Media, Inc.**  
 K27AI Ninilchik, Etc., AK  
 Facility ID: 62647  
 Ch. 27 0.11 kW 146.9 m

<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>
26	NEW	Anchorage, AK	BNPDTL-20101005AAL			---	No Interference	---
28	KTVA	Anchorage, AK	BLCDT-20061113AAT			---	No Interference	---
31	K31AG	English Bay, AK	BLTT-19840302IC			---	No Interference	---