

Exhibit 33 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**  
prepared for  
**West Central Minnesota Educational TV**  
KWCM-DT Appleton, Minnesota  
Facility ID 71549  
Ch. 31 288 kW 364 m

*West Central Minnesota Educational TV* (“*WCMET*”) is the permittee of KWCM-DT, Channel 31, Appleton, Minnesota (file number BPEDT-20000501AIK) and licensee of the paired analog KWCM-TV Channel 10 facility (BLET-19850318KE). KWCM-DT is authorized to operate with an effective radiated power (“ERP”) of 1000 kW and an antenna height above average terrain (“HAAT”) of 364 meters. KWCM-DT is presently operating with its authorized facility at reduced power (53.7 kW ERP) pursuant to Special Temporary Authority. Under the instant application, *WCMET* seeks to modify the KWCM-DT CP to specify a reduction in ERP to 288 kW and use the existing, authorized antenna system.

No change in site location is proposed. The authorized KWCM-DT antenna system is mounted on an existing antenna supporting structure, having FCC Antenna Structure Registration (“ASR”) number 1031878. This antenna supporting structure is also currently authorized for the paired analog TV station KWCM-TV.

**Proposed Directional Antenna System**

The authorized transmitting antenna is a Dielectric TFU-28DSC C170 employing 0.5 degree of electrical beam tilt. The antenna system has been installed in accordance with the manufacturer’s instructions. Said installation was supervised on-site by a competent technical representative of the applicant. The proposed horizontal plane directional pattern, expressed in terms of relative field and dBk, is depicted in **Exhibit 33 - Figure 1** (properly oriented to True North). The antenna’s vertical plane (elevation) pattern is supplied in **Exhibit 33 - Figure 2**.

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**Nature of the Proposal**

A map is supplied as **Exhibit 33 - Figure 3**, which depicts the standard predicted coverage contours. This map includes the boundaries of Appleton, KWCM-DT's principal community. As demonstrated thereon, the proposed facility complies with §73.625(a)(1), as the entire principal community will be encompassed by the 48 dBμ contour.

The map attached as **Exhibit 33 - Figure 4** supplies a comparison of the presently authorized and proposed 41 dBμ noise-limited DTV service contour locations. No extension in contour location will result, in compliance with the Commission's August 3, 2004 "freeze" concerning expansion in service area.<sup>1</sup>

KWCM-DT has successfully received a tentative post-transition channel assignment corresponding to the present KWCM-TV Channel 10, and will "carry-over" its replication facility back to Channel 10. As shown in the following table, the proposed facility would serve 86.4% of the target baseline service population, which satisfies the 80% baseline population match requirement of the DTV Channel Election process<sup>2</sup>.

KWCM-DT Population Match Determination<sup>3</sup>

<u>KWCM-TV Facility</u>	<u>ERP/HAAT</u>	<u>Interference-Free Service Population (2000 Census)</u>	<u>Percent Match of Target</u>
NTSC Ch. 10 (1997 baseline facility)	316 kW / 381 m	203,137	--
DTV Ch. 31 DTV Allotment	696.7 kW / 381 m	251,688	--
DTV Ch. 31 Proposed	288 kW / 364 m	175,484	86.4%

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<sup>1</sup>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.

<sup>2</sup>See Report and Order, "Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television," FCC 04-192, released September 7, 2004.

<sup>3</sup> Interference-free service population is population within contour less population subject to terrain blockage and interference per FCC OET Bulletin 69. Target population for "Percent Match" is the smaller of the 1997 NTSC facility and DTV allotment.

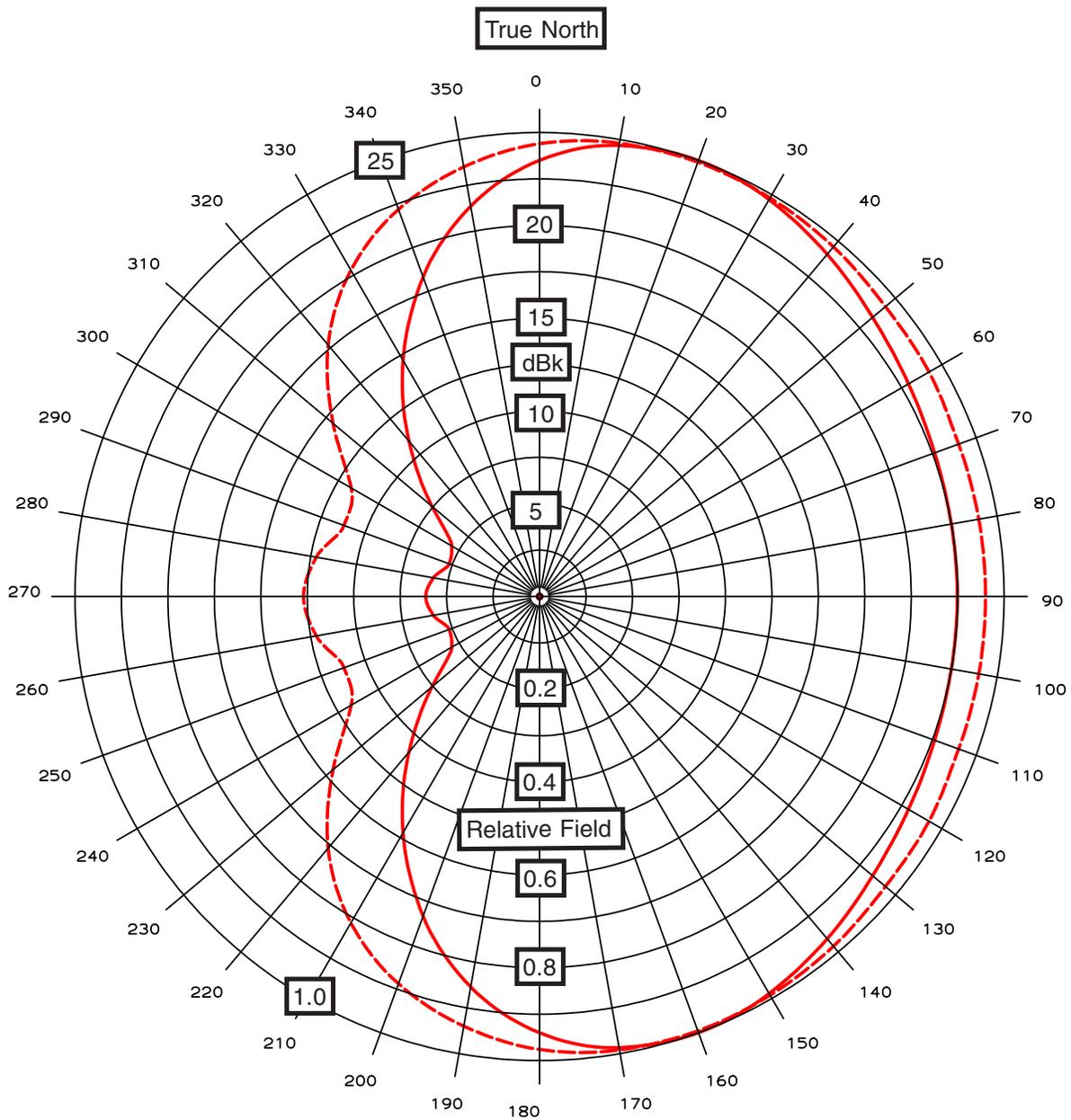
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**Allocation Matters**

Under the instant proposal, KWCM-DT will operate at its presently authorized site with reduced ERP. The resulting coverage and interfering contour locations are wholly within those of the authorized facility. The proposal's ERP/HAAT combination (288 kW / 364 m) does not exceed that which was allotted to KWCM-DT (697.7 kW / 381 m), therefore a detailed interference study per OET Bulletin 69 is not required. As a "checklist" facility, no consideration of Class A television stations is required.

The nearest FCC monitoring station is 511.4 km distant at Grand Island, NE. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. There are no AM broadcast facilities within 3.2 km (2 miles) of the KWCM-DT site, according to information extracted from the Commission's engineering database.

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



**EXHIBIT 33 - FIGURE 1**  
**ANTENNA HORIZONTAL PLANE**  
**RADIATION PATTERN**

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prepared April 2006 for  
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 KWCM-DT Appleton, Michigan  
 Facility ID 71549  
 Ch. 31 288 kW 364 m

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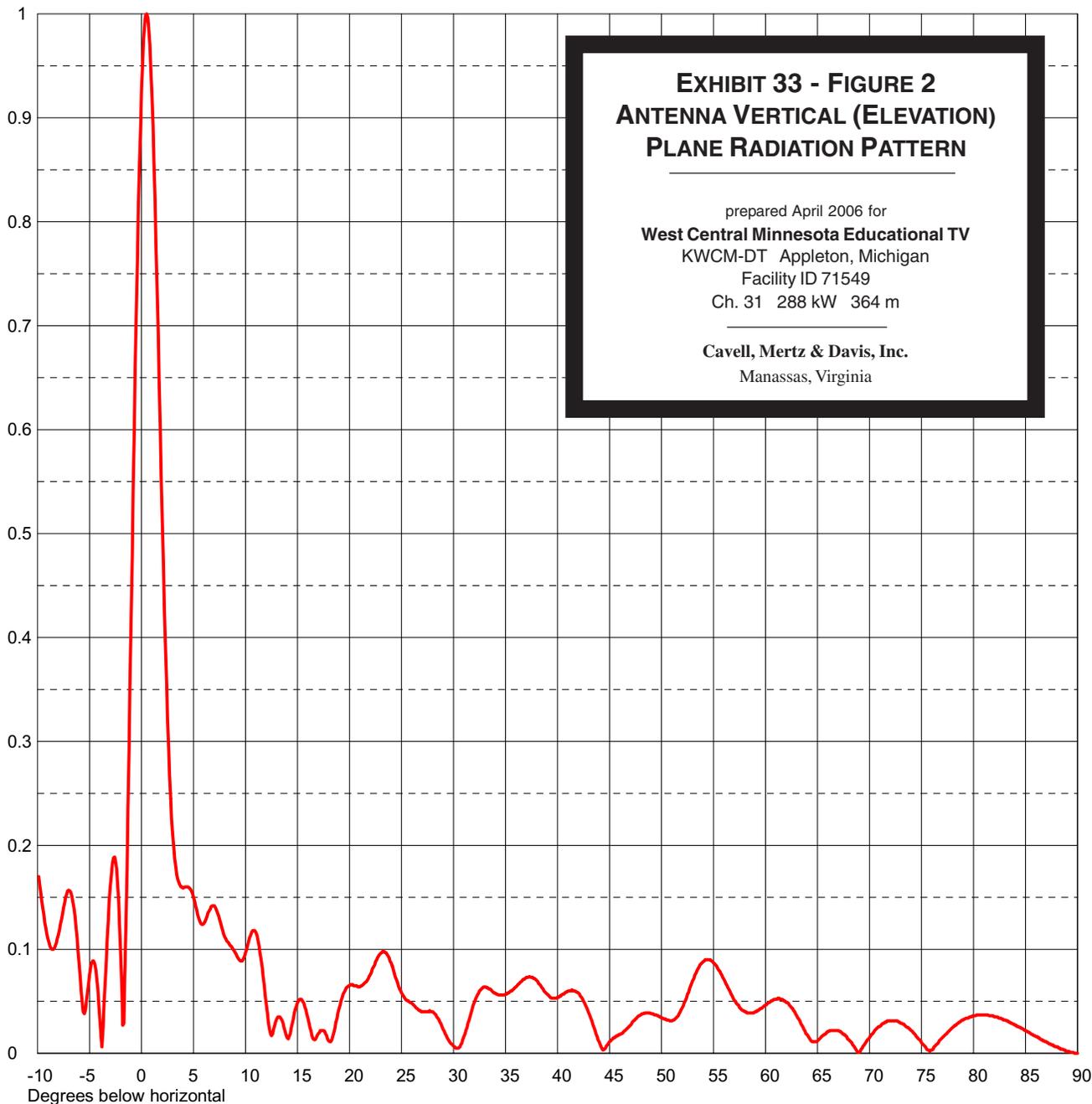
**Cavell, Mertz & Davis, Inc.**  
 Manassas, Virginia



Date 07 Apr 2006  
Call Letters KWCM-DT Channel 31  
Location Appleton, MN  
Customer Pioneer Public TV  
Antenna Type TFU-28DSC C170

### ELEVATION PATTERN

RMS Gain at Main Lobe	24.0 (13.80 dB)	Beam Tilt	0.50 Degrees
RMS Gain at Horizontal	20.6 (13.14 dB)	Frequency	575.00 MHz
Calculated / Measured	Calculated	Drawing #	28Q240050-90



**EXHIBIT 33 - FIGURE 2**  
**ANTENNA VERTICAL (ELEVATION)**  
**PLANE RADIATION PATTERN**

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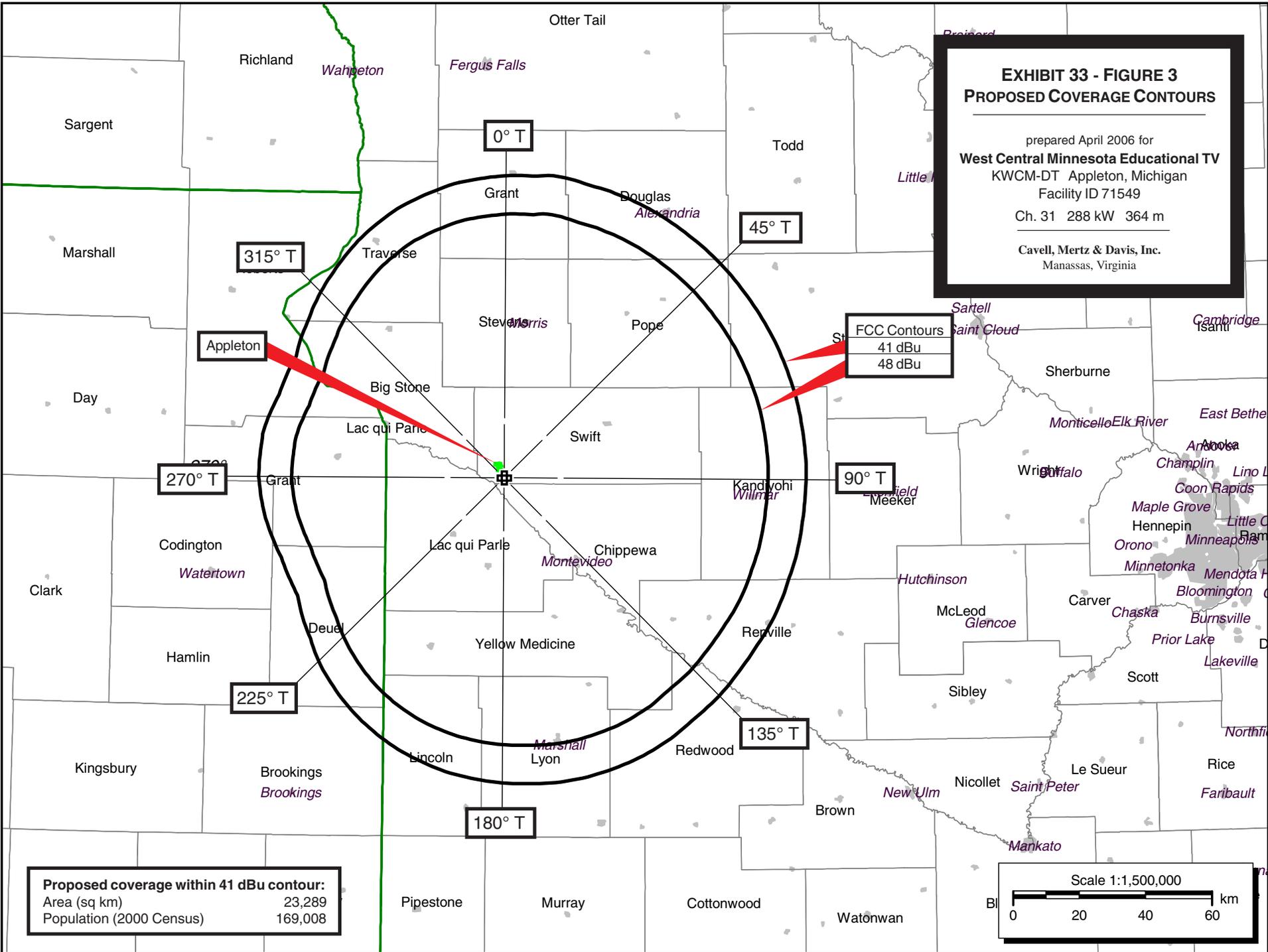
**Cavell, Mertz & Davis, Inc.**  
Manassas, Virginia

Remarks:

**EXHIBIT 33 - FIGURE 3**  
**PROPOSED COVERAGE CONTOURS**

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**EXHIBIT 33 - FIGURE 4  
COVERAGE CONTOUR COMPARISON**

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 Ch. 31 288 kW 364 m

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**Cavell, Mertz & Davis, Inc.**  
 Manassas, Virginia

Proposed KWCM-DT  
 288 kW 364 m  
 41 dBu

KWCM-DT (CP)  
 BPEDT-20000501A1K  
 1000 kW 364 m  
 41 dBu

