

Exhibit 11 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for
Gray Television Licensee, Inc.
WVAW-LP Charlottesville, Virginia
Facility ID 4687
Ch. 16 (Digital) 15 kW

Gray Television, Inc. (“Gray”) is the licensee of Low Power Television (“LPTV”) station WVAW-LP, Channel 16, Charlottesville, VA, Facility ID 4687 (BLTTL-20040902ABJ). *Gray* proposes herein to “flash cut” WVAW-LP to digital operation. No change in site location or antenna height is specified.

The proposed facility will operate on Channel 16 using a “stringent” out of channel emission mask, with a nondirectional antenna having an effective radiated power of 15 kW at the presently licensed transmitting antenna location. **Exhibit 11 - Figure 1** depicts the coverage contours of the licensed (74 dBμ) and the proposed (51 dBμ) facilities. The use of the same transmitter site and the service area overlap shown demonstrates compliance with §73.3572 for a minor change.

The proposed antenna system for WVAW-LP will be side-mounted on an existing antenna support structure. The tower structure is not registered with the Commission due to its overall height (57.9 meters above ground level), and no change in overall structure height will result. Since no change to the structure’s overall height is proposed, FAA notification, commensurate FCC Antenna Structure Registration, and structure marking/lighting 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

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(“OET-69”)¹. The interference study examined the change in interference as experienced by nearby pertinent stations that would result from the proposed facility.

The interference analysis is based on the use of a nominal 0.5 km cell size, which provides a finer resolution than the Commission’s standard 2 km cell size. **Commission processing using a 0.5 km cell size is requested.** The results, summarized in **Exhibit 11 - Table 1**, 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 Matters

The WVAW-LP site is located 163.6 km from the reference coordinates for the Washington, DC region use of land mobile facilities within television Channel 17’s spectrum, first adjacent to the proposed use of Channel 16. The instant proposal complies with §74.709(d)(3), as demonstrated in **Exhibit 11 - Figure 2**, in that the proposed LPTV facility 76 dBμ F(50,10) contour does not overlap any part of the land mobile protected area (a 130 km radius from the Washington, DC land mobile reference coordinates).

The nearest FCC monitoring station is 195.2 km distant at Laurel, MD. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. Based on information extracted from the Commission’s engineering database, there are no AM stations within 3.2 km of the proposed site. The WVAW-LP transmitter site is not located within the bounds of the area specified in §73.1030(a)(1) concerning

¹The 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.** 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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coordination with the National Radio Astronomy Observatory at Green Bank, WV. The site is not located within the border zones requiring international coordination.

As described fully above, it is believed that the instant proposal complies with the Commission's allocation Rules and policies.

Exhibit 11 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for
Gray Television Licensee, Inc.
WVAW-LP Charlottesville, Virginia
Facility ID 4687
Ch. 16 (Digital) 15 kW

Cell Size for Service Analysis 0.5 km/side

| <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> |
| 14 | W14CY | CHARLOTTESVILLE VA | 46.5 | CP | BNPTTL-20000831BRH | --- | none |
| 14 | NEW | WOODSTOCK VA | 98.2 | APP | BNPTTL-20000831ANU | --- | none |
| 15 | WFDC-TV | ARLINGTON VA | 161.6 | CP | BPCDT-19991028ADH | --- | none |
| 15 | WFLV-LP | FARMVILLE VA | 74.3 | LIC | BLTTL-19941205JC | --- | none |
| 15 | WBRA-TV | ROANOKE VA | 171.5 | LIC | BLET-19901107KE | --- | none |
| 15 | NEW | ELKINS WV | 158.0 | APP | BNPTT-20000831COO | --- | none |
| 15 | W15AD | WARDENSVILLE, ETC. WV | 129.0 | LIC | BLTT-19890724IO | --- | none |
| 16 | WJAL | HAGERSTOWN MD | 216.5 | CP | BPCDT-19991101ADQ | 709,474 | 2,743 (0.39%) |
| 16 | WBOC-TV | SALISBURY MD | 254.4 | LIC | BLCT-20000918ABE | --- | none |
| 16 | WMJF-LP | TOWSON MD | 225.9 | LIC | BLTTA-20050909ADB | --- | none |
| 16 | WMJF-LP | TOWSON MD | 225.9 | LIC | BLTTL-20001204AAA | --- | none |
| 16 | WGPX | BURLINGTON NC | 219.2 | LIC | BLCT-19980410KG | 1,563,336 | 613 (0.04%) |
| 16 | W16CF | CHARLOTTE NC | 361.8 | LIC | BLTT-20041025ACE | --- | none |
| 16 | W16BT | ZANESVILLE OH | 371.8 | LIC | BLTT-20021211AAM | --- | none |
| 16 | WQEX | PITTSBURGH PA | 302.0 | APP | BPCT-20050125AGF | --- | none |
| 16 | WQEX | PITTSBURGH PA | 302.0 | CP | BPCT-20030108ABB | --- | none |
| 16 | WQEX | PITTSBURGH PA | 302.0 | LIC | BMLCT-20031003ACD | --- | none |
| 16 | WHRO-TV | HAMPTON-NORFOLK VA | 218.1 | CP MOD | BMPEDT-20000428ADG | 1,536,730 | 2,413 (0.16%) |
| 16 | WAZC-LP | LURAY VA | 73.9 | LIC | BLTTL-20020508AAB | --- | none |
| 16 | W16CE | CHARLESTON WV | 280.8 | LIC | BLTTL-20030606ABF | --- | none |
| 16 | W16CG | CLARKSBURG WV | 216.0 | CP | BNPTTL-20000818ABN | --- | none |
| 17 | WXOB-LP | RICHMOND VA | 94.2 | CP | BPTTA-20030818AAO | --- | none |

Exhibit 11 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY
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Cell Size for Service Analysis 0.5 km/side

| <u>Ch.</u> | <u>Call</u> | <u>City/State</u> | <u>Dist(km)</u> | <u>Status</u> | <u>Application Ref. No.</u> | ---Population (1990 Census)--- | |
|------------|-------------|------------------------|-----------------|---------------|-----------------------------|--------------------------------|-------------------------|
| | | | | | | <u>Baseline</u> | <u>New Interference</u> |
| 17 | WXOB-LP | RICHMOND VA | 94.2 | LIC | BLTTA-20020809AAN | --- | none |
| 17 | WFXR-TV | ROANOKE VA | 171.4 | CP MOD | BMPCDT-20051208AAY | 828,022 | 418 (0.05%) |
| 17 | W17AL | MATHIAS, ETC. WV | 99.9 | LIC | BLTT-19871117IB | --- | none |
| 18 | W18AA | SOUTHERN ROCKINGHAM VA | 52.0 | LIC | BLTT-19891129JF | --- | none |
| 19 | WCAV | CHARLOTTESVILLE VA | 0.0 | CP MOD | BMPCT-20031219AAK | --- | none |
| 19 | WTLU-CA | LYNCHBURG VA | 92.9 | LIC | BLTTL-19930114JL | --- | none |
| 19 | W21AC | ROCKINGHAM COUNTY VA | 78.5 | CP | BPTT-20030623AGI | --- | none |
| 23 | NEW | HARRISONBURG VA | 65.4 | APP | BNPTTL-20000818AAS | --- | none |
| 23 | W23CP | LURAY VA | 83.2 | APP | BMPTTL-20040520AAB | --- | none |
| 23 | W23CP | LURAY VA | 73.0 | CP | BNPTTL-20000831CJR | --- | none |
| 23 | WCVE-TV | RICHMOND VA | 93.4 | LIC | BLET-20030520AKD | --- | none |
| 24 | WAZH-CA | HARRISONBURG VA | 101.3 | LIC | BLTTL-19960823JC | --- | none |
| 24 | NEW | WOODSTOCK VA | 98.2 | APP | BNPTTL-20000831AOC | --- | none |

**EXHIBIT 11 - FIGURE 2
LAND MOBILE ALLOCATION MAP**

prepared March 2006 for
Gray Television Licensee, Inc.
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Facility ID 4687
Ch. 16 (Digital) 15 kW

Cavell, Mertz & Davis, Inc.
Manassas, Virginia

Washington, DC
Land Mobile Ch. 17
Reference Point
130 km Protected Radius

Proposed WVAW-LP
Digital Ch. 16
76 dBu F(50,10)

