

Exhibit 42 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS
prepared for
Gray Television Licensee, Inc.
WHSV-DT Harrisonburg, Virginia
Facility ID 4688
Ch. 49 65 kW 639 m

Gray Television Licensee, Inc. (“Gray”) is the permittee of WHSV-DT, Channel 49, Harrisonburg, Virginia (file number BPCDT-19991028ADT) and licensee of the paired analog WHSV-TV Channel 3 facility (BLCT-2272). WHSV-DT is authorized to operate with an effective radiated power (“ERP”) of 88.2 kW and an antenna height above average terrain (“HAAT”) of 646 meters. Under the instant application, *Gray* seeks to modify the WHSV-DT CP to specify a reduction in ERP and HAAT.

WHSV-DT is presently operating pursuant to Special Temporary Authorization (“STA”, BDSTA-20030220ABJ) with an ERP of 65 kW and an antenna HAAT of 639 meters. The STA facility employs a non-directional antenna. Under the instant proposal, the WHSV-DT CP will be modified to specify the same antenna and operating parameters as the STA facility, at an ERP of 65 kW and a HAAT of 639 m.

All WHSV-DT facilities described herein specify the same transmitting location. No change in site location is proposed. The existing WHSV-DT antenna supporting structure is associated with FCC Antenna Structure Registration number 1017951. No tower or antenna construction work is necessary to carry out this proposal.

Exhibit 42 - Figure 1 depicts the predicted coverage contours for the proposed WHSV-DT facility. As shown thereon, the principal community coverage requirement of 48 dB μ will be met by the proposed facility. Furthermore, **Exhibit 42 - Figure 2** supplies a comparison of the presently authorized and proposed 41 dB μ DTV service contour locations. No extension in contour location

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will result, in compliance with the Commission's August 3, 2004 "freeze" concerning expansion in service area.¹

Allocation Matters

Under the instant proposal, WHSV-DT will operate at its presently authorized site with reduced ERP and HAAT from that as currently authorized. The proposal's ERP/HAAT combination (65 kW / 639 m) does not exceed that which was allotted to WHSV-DT (87.4 kW DA-minimum / 646 m), therefore a detailed interference study per OET Bulletin 69 is not required. The instant proposal does not involve prohibited contour overlap to any authorized Class A stations.

The nearest FCC monitoring station is 169.2 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. The WHSV-DT transmitter site is located inside the National Radio Astronomy Observatory ("NRAO") Quiet Zone, Green Bank, West Virginia. However, since the WHSV-DT ERP and HAAT will be reduced from authorized parameters under the instant proposal, it is believed that further coordination with the NRAO will not be required. There are no AM broadcast stations 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 Rules and policy with respect to allocation matters.

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



