

Exhibit 11 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for
TV Alabama, Inc.
WBMA-LP Birmingham, Alabama
Facility ID 60214
Ch. 11 (Digital) 0.3 kW

TV Alabama, Inc. (“*TV Alabama*”) is the licensee of television translator station WBMA-LP, Channel 58, Birmingham, AL, Facility ID 60214 (BLTTV-19820929JK). The instant application herein seeks a minor modification of the License as a displacement to “flash cut” to digital operation. No change in site location is specified. When and if Commission staff is prepared to grant the instant Channel 11 displacement application, *TV Alabama* requests that the Commission dismiss WBMA-LP's current construction permit. See BDISDTL-20060324ABZ.

The instant application qualifies as a “displacement” application per §73.3572(a)(4)(ii) of the Commission’s Rules due to its licensed Channel 58 assignment. Therefore, TV Alabama requests use of Channel 11 as a minor modification for WBMA-LP under the displacement rules.

TV Alabama herein also seeks to correct the WBMA-LP transmitter site coordinates and antenna support structure overall height above ground, in order to comply with the Commission's Antenna Structure Registration ("ASR") program. Based on information provided by a technical representative of the applicant, WBMA-LP is located on a tower structure bearing ASR number 1055008. The coordinates of this structure as indicated in the ASR record differ from the WBMA-LP licensed coordinates by two seconds longitude. Additionally, the overall structure height as indicated in the ASR record differs from the overall structure height reported in the Commission's database by 35 meters. Accordingly, a coordinate correction of two seconds longitude and an overall structure height correction of 35 meters are specified. No actual change in the existing WBMA-LP site or in the overall structure height above ground level is proposed. The correction of coordinates (NAD-27) and structure height are as follows:

Exhibit 11 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS
(Page 2 of 3)

	<u>Licensed</u>	<u>Corrected</u>
N-Latitude	33° 26' 28"	33° 26' 28"
W-Longitude	86° 53' 00"	86° 53' 02"
Overall AGL (m)	215.8	180.8

The proposed digital facility will operate on Channel 11 using a “simple” out of channel emission mask with a non-directional antenna having a maximum effective radiated power of 0.3 kW at the presently licensed transmitting antenna location. **Exhibit 11 - Figure 1** depicts the coverage contours of the licensed (74 dBμ) and the proposed (43 dBμ) facilities. The use of the same transmitter site and the service area overlap shown demonstrates compliance with §73.3572 for a minor change.

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

The results, summarized in **Exhibit 11 - Table I**, 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.

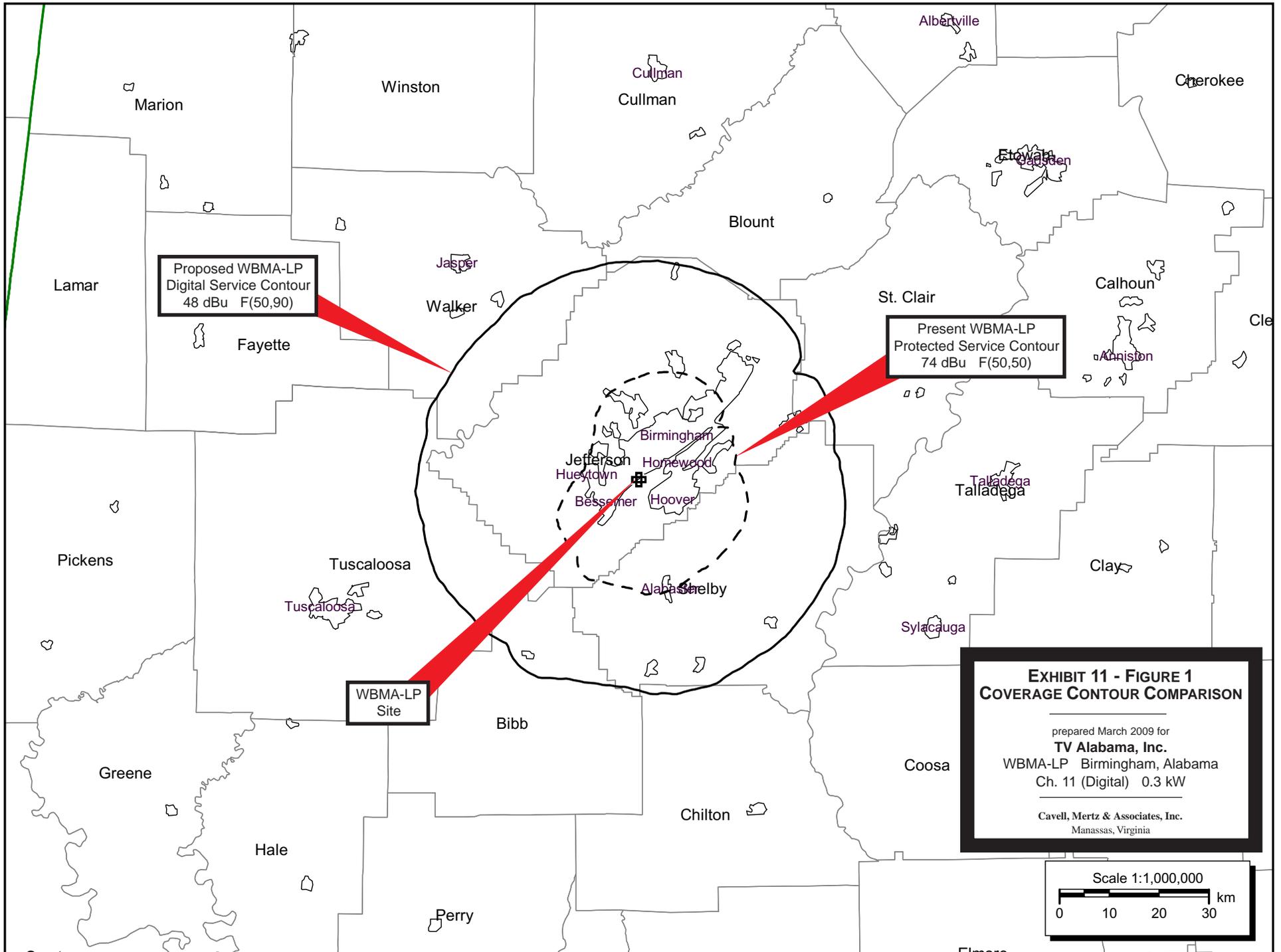
¹The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. **A cell size of 1 km was employed.** Comparisons of various results of this computer program (run on a Sun processor) to the Commission's implementation of OET-69 show excellent correlation.

Exhibit 11 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS
(Page 3 of 3)

Other Allocation Considerations

The nearest FCC monitoring station is at Powder Springs, GA, at a distance of 205.7 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 not located within the border zones requiring international coordination.

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



Proposed WBMA-LP
Digital Service Contour
48 dBu F(50,90)

Present WBMA-LP
Protected Service Contour
74 dBu F(50,50)

WBMA-LP
Site

**EXHIBIT 11 - FIGURE 1
COVERAGE CONTOUR COMPARISON**

prepared March 2009 for
TV Alabama, Inc.
WBMA-LP Birmingham, Alabama
Ch. 11 (Digital) 0.3 kW

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

Scale 1:1,000,000
0 10 20 30 km

Exhibit 11 - Table I
INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for
TV Alabama, Inc.
 WBMA-LP Birmingham, Alabama
 Facility ID 60214
 Ch. 11 (Digital) 0.3 kW

Ch.	Call	City/State	Dist(km)	Status	Application Ref. No.	---Population (1990 Census)---	
						Baseline	New Interference
10	WBIQ	BIRMINGHAM AL	8.6	CP	BPEDT-20080306ABA	1,227,405	187 / 0.02%
10	WDIQ	DOZIER AL	214.7	CP MOD	BMPEDT-20080619AGY	---	none
10	WDIQ	DOZIER AL	214.7	APP	BPRM-20060619ABS	---	none
10	WXFL-LD	FLORENCE, ETC. AL	167.8	CP	BDCCDVL-20061017ABI	---	none
10	WMAB-TV	MISSISSIPPI STATE MS	210.5	CP	BPEDT-20080619AGS	---	none
10	WMAB-TV	MISSISSIPPI STATE MS	210.5	LIC	BLEDT-20030326ABX	---	none
10	WMAB-DT	MISSISSIPPI STATE MS	210.5	LIC	BPRM-20010629ACP	---	none
10	WLLP-CA	LAWRENCEBURG TN	217.2	LIC	BLTVL-19891205ID	---	none
11	WTZT-CA	ATHENS AL	149.2	LIC	BLTVL-19991019AAP	---	none
11	WTZT-CA	ATHENS AL	153.7	CP	BPTVA-20030808AAD	---	none
11	WDIQ-DR	DOZIER AL	214.7	LIC	BPRM-20000328AAJ	183,134	0 / 0.00%
11	WDIQ	DOZIER AL	214.7	LIC	BLEDT-20060619AAT	141,709	0 / 0.00%
11	WXIA-TV	ATLANTA GA	238.8	LIC	BMLCT-19960208KF	---	none
11	WJSP-DR	COLUMBUS GA	213.4	APP	BPRM-20080619ALS	662,089	0 / 0.00%
11	WTVM-DR	COLUMBUS GA	232.4	APP	BPRM-20080620AOM	950,160	0 / 0.00%
11	WTVM	COLUMBUS GA	232.4	CP	BPCDT-20090204ACL	950,160	0 / 0.00%
11	WWCG-LP	COLUMBUS GA	202.8	LIC	BLTVL-20080324AAP	---	none
11	W22AC	HARTWELL & ROYSTON GA	376.8	CP	BDISDTT-20060403ANT	---	none
11	WKUG-LD	GLASGOW KY	416.1	CP	BDCCDVL-20061017AAP	---	none
11	WTOK-TV	MERIDIAN MS	209.2	LIC	BLCT-2503	---	none
11	WTOK-TV	MERIDIAN MS	209.2	CP	BPCDT-20080501AAQ	281,457	0 / 0.00%
11	WTOK-TV	MERIDIAN MS	209.2	CP MOD	BMPCDT-20080618ACJ	372,425	0 / 0.00%
11	WEBU-LP	WEBB MS	324.9	LIC	BLTVL-19880822IF	---	none
11	WEBU-LP	WEBB MS	298.7	CP	BPTVL-20080701AEP	---	none
11	W11AN	BRYSON CITY, ETC. NC	384.3	LIC	BLTTV-4960	---	none
11	W11AJ	FRANKLIN NC	358.9	LIC	BLTTV-19811211IC	---	none
11	W11AQ	ROBBINSVILLE, ETC. NC	347.8	LIC	BLTTV-19821008IB	---	none
11	WJDP-LD	GATLINBURG TN	394.9	CP	BDCCDVL-20061019ADF	---	none
11	W11BD	LEBANON TN	312.1	LIC	BLTVL-19870219IA	---	none

Exhibit 11 - Table I
INTERFERENCE ANALYSIS RESULTS SUMMARY
 (page 2 of 2)

<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>
11	W11DG	LEXINGTON TN	272.2	CP	BNPTVL-20000828AJX	---	none
11	WDNM-LD	MEMPHIS TN	332.9	CP	BDCCDVL-20061023ABX	---	none
11	WETV-LP	MURFREESBORO TN	270.5	CP	BPTVA-20030822AGE	---	none
11	WETV-LP	MURFREESBORO TN	270.5	LIC	BLTVL-20000203AAU	---	none
11	WETV-LP	MURFREESBORO TN	270.5	CP	BDFCDVA-20060331ABV	---	none
12	WBXA-LD	BIRMINGHAM AL	5.7	CP	BDCCDVL-20061027AAL	542,059	0 / 0.00%
12	WSFA	MONTGOMERY AL	176.4	CP MOD	BMPCDT-20080620ABY	915,502	0 / 0.00%
12	WSFA	MONTGOMERY AL	176.3	LIC	BLCT-2576	924,853	0 / 0.00%
12	WMAE-TV	BOONEVILLE MS	219.4	CP MOD	BMPEDT-20080619AGQ	---	none