

Exhibit 6 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**

prepared for

**Vernon Snyder, III**  
K31GP Brookings, Etc., Oregon  
Facility ID 130825  
Ch. 31 2.15 kW

*Vernon Snyder, III* is the permittee of Low Power Television (“LPTV”) station K31GP, Channel 31, Brookings, Etc., Oregon (file number BNPTTL-20000829ARZ). The instant application herein seeks a modification of the Construction Permit (“CP”) to specify a new transmitter location, a different antenna system, and a decrease in effective radiated power (“ERP”). The instant proposal is also to utilize this facility as a translator for KMVU(TV), Ch 26, Medford, Oregon.

The proposed facility will operate on Channel 31 using a “minus” offset, with a directional antenna having a maximum ERP of 2.15 kW and a radiation center height of 55.5 meters AMSL. The proposed transmitting antenna location is within the community of Brookings, some 12 km northwest of the currently authorized site. **Exhibit 6 - Figure 1** depicts the protected contour of both the licensed and the proposed facility. The service area overlap shown demonstrates compliance with §73.3572 of the Rules for a minor change. The proposed site is not within the geographic restrictions as specified in the Public Notice<sup>1</sup> announcing the filing window underlying the current CP.

The proposed antenna system for K31GP is a directional antenna which will be side-mounted on a pole atop a building. The proposed antenna is a custom Scala model 2x4DR-4S. The proposed overall structure elevation is 8.1 meters above ground level and passes the FCC's TOWAIR program for the transmitter location. Further, the pole will extend 2.4 meters above the top of the building. Thus FAA notification and commensurate FCC structure registration is not necessary.

---

<sup>1</sup>*Scheduling of Limited Low Power Television / Translator / Class A Television Auction Filing Window From July 31 through August 4, 2000*, released May 1, 2000.

**Exhibit 6 - Statement A**  
**ALLOCATION CONSIDERATIONS**  
(page 2 of 2)

**Allocation Considerations**

The instant proposal complies with the Commission's standard contour overlap protection requirements toward all NTSC, DTV, television translator, LPTV, and Class A stations. Accordingly, it is believed that there will be no impact to NTSC facilities, DTV facilities, LPTV facilities, TV translator, or Class A television facilities as a result of the instant proposal.

**International and Other Considerations**

The proposed transmitter site is located 697.7 km from the U.S.-Canadian border, well beyond the distance for international coordination.

The nearest FCC monitoring station is at Livermore, California, at a distance of 526.9 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 K31GP 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.

