

Exhibit 11 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for

Polnet Communications, Ltd.

WPVN-LD Aurora, Illinois

Facility ID 168237

Ch. 20 (Digital) 15 kW (MAX-DA)

Polnet Communications, Ltd. (“*Polnet*”) is the licensee of analog Class A television station WPVN-CA, Channel 24, Aurora, Illinois, Facility ID 72079 (BLTTL-19990716JA); permittee of the facility authorized in the analog construction permit (BPTTA-20090817ABN); and the licensee of the digital companion low power television station, WPVN-LD, Channel 20, Facility ID 168237 (BLDTL-20100315ABN)¹. *Polnet* proposes herein relocated the WPVN-LD digital companion Channel 20 operation to a new site.

Nature of the Proposal

The instant application qualifies as a minor change per §73.3572 of the Commission’s Rules in that the protected contour from the proposed facility overlaps the protected contour of the licensed facility. No change in the station channel is proposed. Further, the proposed site is 38.6 km (24 miles) from the licensed site complying with the new regulation that becomes effective later this month. Thus, the instant application may be described as a minor change.

The proposed antenna system for the digital WPVN-LD is a directional antenna (Dielectric Model TLP-8E, FCC antenna ID 19180, rotated 270°), which will be side-mounted on a existing decorative tower structure atop a building in downtown Chicago. The building and associated roof mounted tower has been registered with the Commission and has been assigned Antenna Structure Registration Number 1279395. No change in structure overall height is necessary to carry out this proposal. Since no change to the structure’s overall height is proposed, no change to structure marking/lighting requirements is required.

¹ The Commission’s engineering database also shows a construction permit specifying operation of WPVN-LD on Channel 22 (see BDCCDTL-20061025ABB). This construction permit has since expired and does not warrant any further consideration.

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The attached **Exhibit 11 - Figure 1** supplies a plot of the WPVN-LD horizontal plane (azimuth) relative field pattern for FCC Antenna ID 19180 after a rotation of 270° and properly oriented with respect to True North. **Exhibit 11 - Figure 2** supplies a plot of the vertical plane (elevation) relative field pattern.

The proposed digital facility will operate on Channel 20 using a “stringent” out of channel emission mask, a maximum effective radiated power of 15 kW, and an antenna height of 572.7 meters AMSL. **Exhibit 11 - Figure 3** depicts the 51 dBμ F(50,90) coverage contours of the licensed and proposed facilities.

Allocation Considerations

The instant proposal complies with the Commission’s interference protection requirements toward all 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 No. 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 (“OET-69”)². The interference study examined the change in interference as experienced by nearby pertinent stations that would result from the proposed facility.

In performing the OET-69 interference study, the licensed facility for the WPVN-LD digital companion facility (BLDTL-20100315ABN) and the currently pending displacement application (BDISDTA-20110325AAQ) were omitted from consideration. Further, the pending application for WGN-TV, Channel 19, Chicago, Illinois (see BPCDT-20080619AFN) was also omitted since it was dismissed by the Commission on March 23, 2011.

The interference study results, summarized in **Exhibit 11 - Table I**, shows that any new interference does not exceed the Commission’s interference limits (0.5 percent to full service and

² The 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.

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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.

International Coordination

The proposed transmitter site is located 370 km from the U.S.-Canadian border, which is greater than the 100 km required coordination distance specified for digital low power television stations in the Letter of Understanding³ and but is less than the 400 km coordination distance for full service facilities. As demonstrated in **Exhibit 11 – Figure 4**, the worst-case interfering contour of 12.4 dB μ F(50,10)⁴ does not reach the Canadian border. Thus, it is believed that international coordination will not be necessary for the instant proposal.

Other Allocation Considerations

The nearest FCC monitoring station is at Allegan, MI, at a distance of 159.2 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.

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

³ The Letter of Understanding Between the Federal Communications Commission of the United States of America and Industry Canada Related to the Use of the 54-72 MHz, 76-88 MHz, 174-216 MHz and 470-806 MHz Bands for the Digital Television Broadcasting Service Along the Common Border, September 29, 2000, paragraph 12.

⁴ Ibid., Appendix 2. The worst-case interfering contour for UHF digital facilities is the co-channel DTV into DTV interference, defined as 19.5 dB below the 39 dB μ protected contour using the F(10,10) contour. 7.1 dB μ is then subtracted from 19.5 dB μ F(10,10) to obtain the equivalent 12.4 dB μ F(50,10) worst-case interfering contour.

AZIMUTH PATTERN

Gain
Calculated / Measured

3.90 (5.91 dB)
Calculated

Frequency
Drawing #

509 MHz
TLP-E

North

0

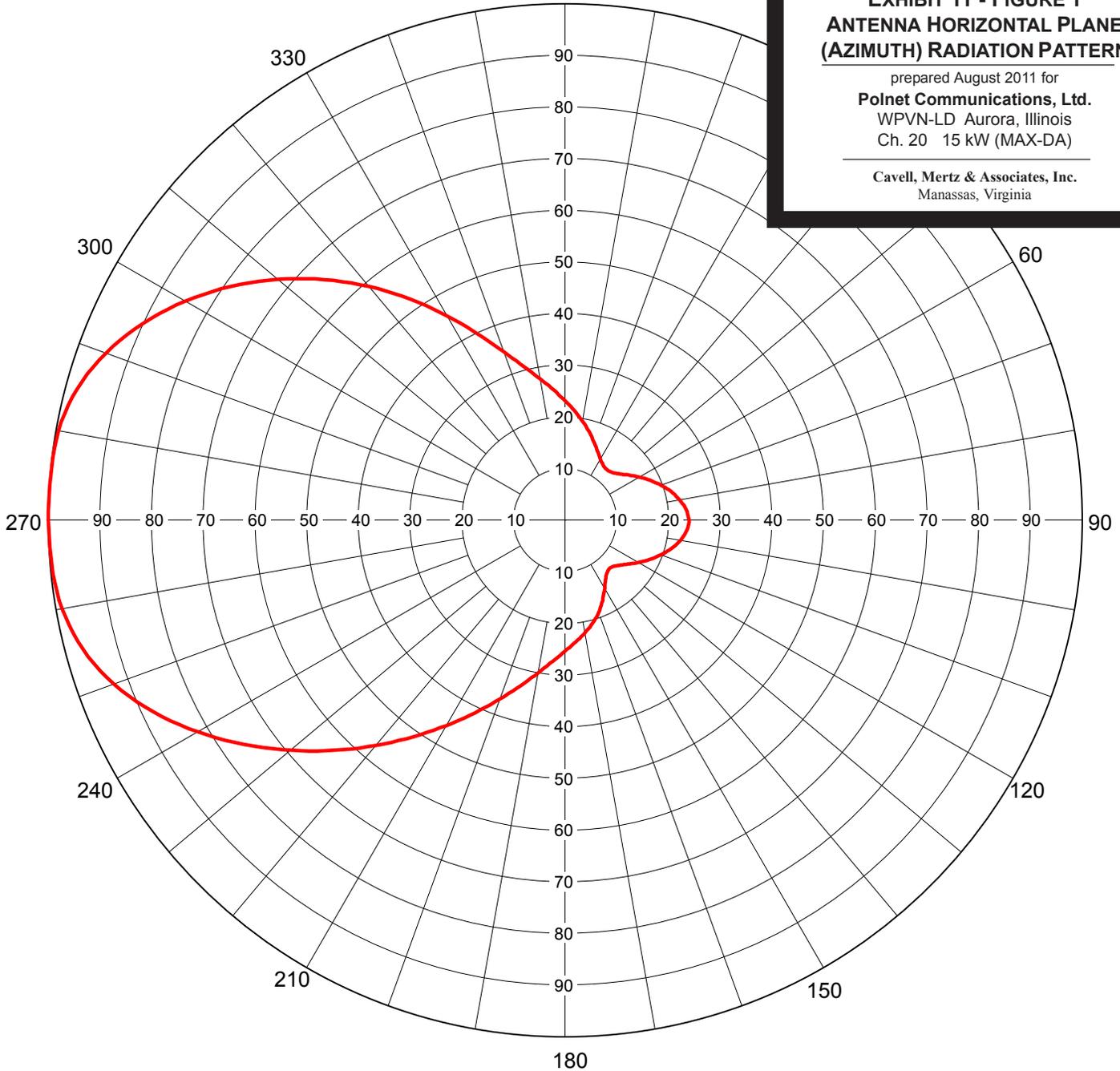


EXHIBIT 11 - FIGURE 1 ANTENNA HORIZONTAL PLANE (AZIMUTH) RADIATION PATTERN

prepared August 2011 for

Polnet Communications, Ltd.
WPVN-LD Aurora, Illinois
Ch. 20 15 kW (MAX-DA)

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

Remarks: Commission Standard Pattern ID 19180 after 270° rotation

ELEVATION PATTERN

RMS Gain at Main Lobe	8.0 (9.03 dB)	Beam Tilt	1.00 Degrees
RMS Gain at Horizontal	7.5 (8.75 dB)	Frequency	509.00 MHz
Calculated / Measured	Calculated	Drawing #	08L080100-90

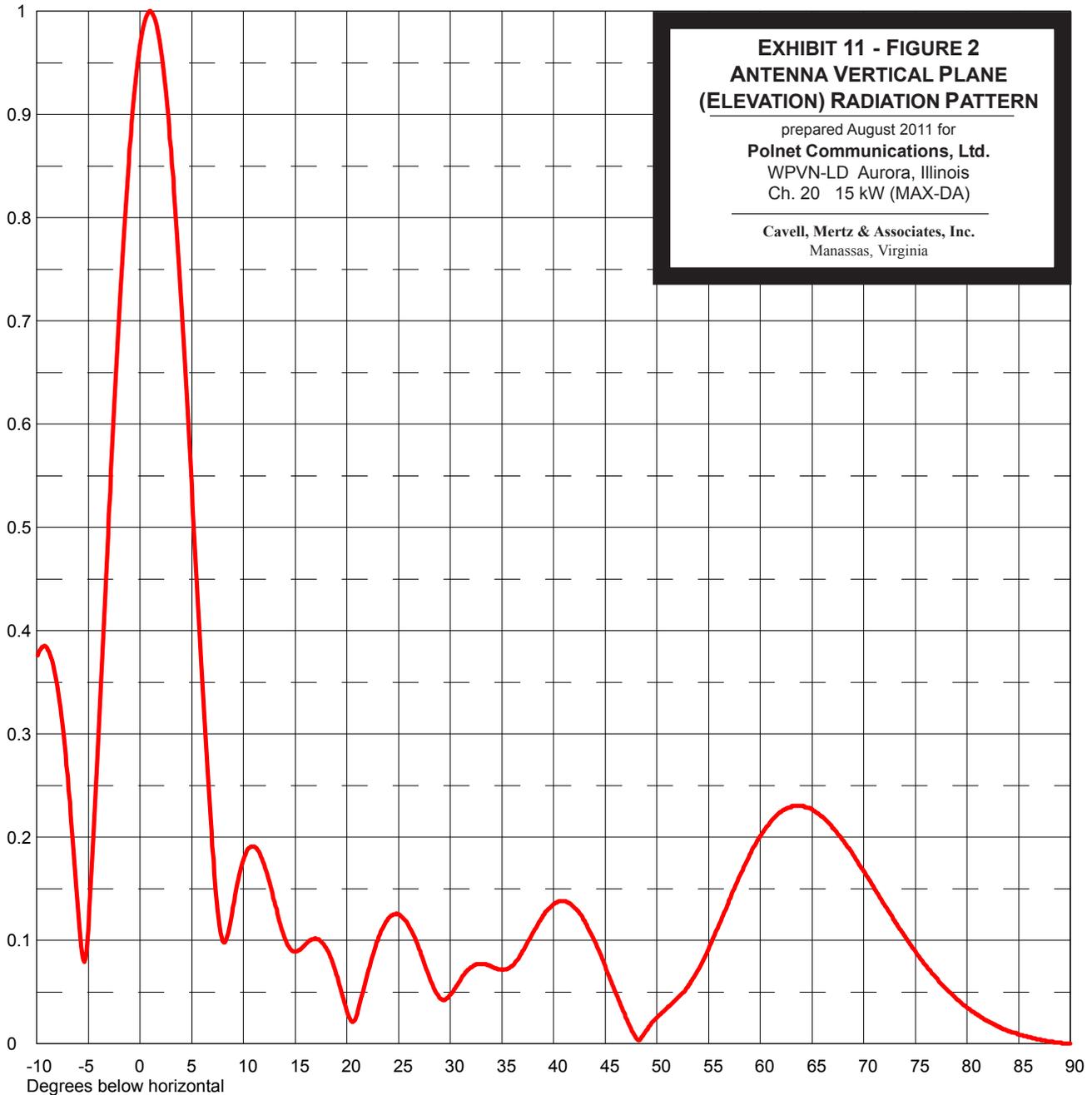


EXHIBIT 11 - FIGURE 2
ANTENNA VERTICAL PLANE
(ELEVATION) RADIATION PATTERN
 prepared August 2011 for
Polnet Communications, Ltd.
 WPVN-LD Aurora, Illinois
 Ch. 20 15 kW (MAX-DA)

 Cavell, Mertz & Associates, Inc.
 Manassas, Virginia

Remarks:

**EXHIBIT 11 - FIGURE 3
COVERAGE CONTOUR COMPARISON**

prepared August 2011 for
Polnet Communications, Ltd.
WPVN-LD Aurora, Illinois
Ch. 20 15 kW (MAX-DA)

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

WPVN-LD Licensed Facility
FCC File No. BLDL-20100315ABN
Ch. 20 10 kW
51 dBµ F(50,90) Service Contour

Proposed WPVN-CA Digital Facility
Ch. 20 15 kW (MAX-DA)
51 dBµ F(50,90) Service Contour

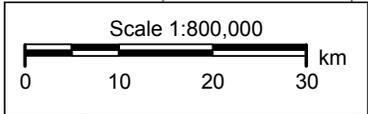
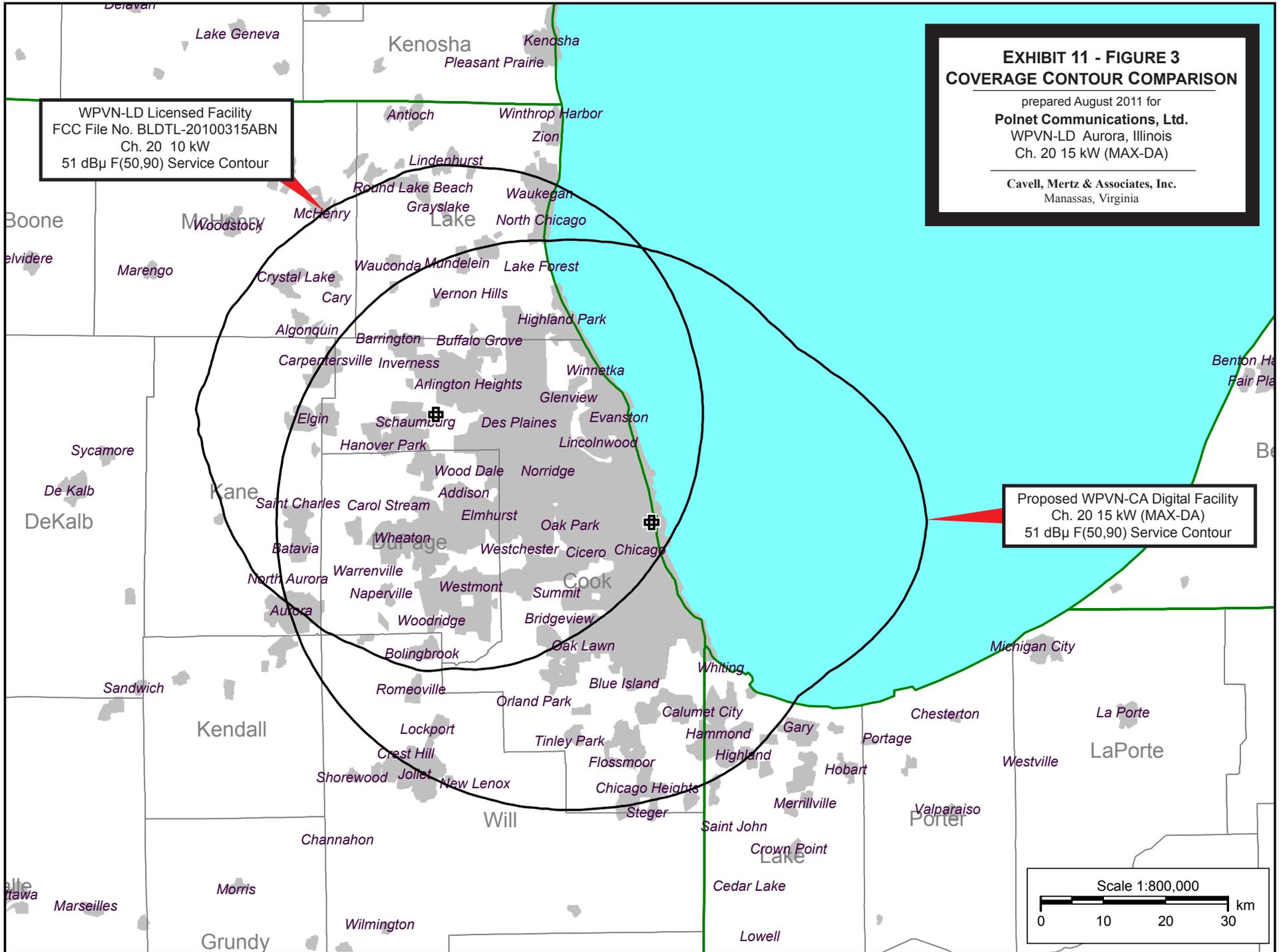


Exhibit 11 - Table I
INTERFERENCE STUDY RESULTS SUMMARY

prepared for
Polnet Communications, LTD.
 WPVN-LD Aurora, IL
 Facility Id: 168237
 Ch. 20 15 kW (MAX-DA)

<u>Channel</u>	<u>Affected Station</u>	<u>City, State</u>	<u>File Number</u>	<u>Calculated Baseline (2000 Census)</u>	<u>Interference Population without Proposal (2000 Census)</u>	<u>Interference Population with Proposal (2000 Census)</u>	<u>New Interference</u>	
							<u>Population</u>	<u>Percentage</u>
18	WEID-LP	Elkhart, IN	BLTT-20001011AEF			---	No Interference	---
18	WHNW-LD	Gary, IN	BSTA-20070309ACD			---	No Interference	---
19	W19DE-D	Champaign/Urbana, IL	BDCCDTL-20061026ACW			---	No Interference	---
19	WGN-TV	Chicago, IL	BMLCDT-20080201APP			---	No Interference	---
19	W19CX	Sterling-Dixon, IL	BLTT-20070806AFB			---	No Interference	---
19	W19CX	Sterling-Dixon, IL	BDFCDTT-20060330AMI			---	No Interference	---
19	WXMI	Grand Rapids, MI	BPCDT-20080619AKI			---	No Interference	---
19	WXMI	Grand Rapids, MI	BLCDT-20030117ABD			---	No Interference	---
19	WMTV	Madison, WI	BLCDT-20100413AAW			---	No Interference	---
20	K16EL	Davenport, IA	BDISDTL-20090813ACX			---	No Interference	---
20	NEW	Chillicothe, IL	BNPDTL-20100510AGG			---	No Interference	---
20	W20DG-D	Fort Wayne, IN	BNPDTL-20090825AVL			---	No Interference	---
20	WHMB-DR	Indianapolis, IN	BPRM-20080619AEU			---	No Interference	---
20	WHMB-TV	Indianapolis, IN	BPCDT-20090424ACR	2,522,189	2,398	2,398	0	0.000 %
20	WUVI-LD	West Lafayette, IN	BLDTL-20110120ADG	71,530	893	1,385	492	0.688 %
20	WUVI-LD	West Lafayette, IN	BSTA-20100706CUS	71,530	893	1,385	492	0.688 %
20	WOTV	Battle Creek, MI	BPCDT-20091104AEK	2,167,166	22,285	24,784	2,499	0.115 %
20	WOTV	Battle Creek, MI	BLCDT-20030721AHS	2,107,211	22,683	23,904	1,221	0.058 %
20	WHNE-LD	Flint, MI	BDISDTL-20101223ACD			---	No Interference	---
20	W20DK-D	Roscommon, MI	BNPDTL-20100223ACY			---	No Interference	---
20	W20DI-D	Traverse City, MI	BNPDTL-20100301ADA			---	No Interference	---
20	WOTH-LD	Cincinnati, OH	BLDTL-20110128AAX			---	No Interference	---
20	NEW	Findlay, OH	BDCCDTL-20061026AGA			---	No Interference	---
20	WLWD-LP	Springfield, OH	BLTT-20051219ADW			---	No Interference	---
20	WHA-TV	Madison, WI	BLEDT-20091229ACK	1,356,616	11,974	12,030	56	0.004 %
20	WMKE-LD	Milwaukee, WI	BDCCDTL-20061030AFR	1,449,643	30,135	40,310	10,175	0.702 %
21	WBKM-LP	Chana, IL	BDCCDTL-20061030AMY			---	No Interference	---
21	WYCC	Chicago, IL	BLEDT-20030501ABC	8,979,748	18,823	57,195	38,372	0.427 %
21	WMKE-LD	Milwaukee, WI	BDISDTL-20100406AAS			---	No Interference	---
22	W22AJ	Arlington Heights, IL	BLTT-19991020AAO			---	No Interference	---
23	WWME-CA	Chicago, IL	BLTTA-20040129AOW			---	No Interference	---
23	WWME-CA	Chicago, IL	BPTTA-20081023AAZ			---	No Interference	---
23	WWME-CA	Chicago, IL	BSTA-20041208ABO			---	No Interference	---

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24	WPVN-CA	Aurora, IL	BPTTA-20090817ABN			---	No Interference	---
24	WPVN-CA	Aurora, IL	BLTTL-19990716JA			---	No Interference	---
24	WHVI-LP	Valparaiso, IN	BLTTL-19921102JE			---	No Interference	---
24	WMLW-CA	Milwaukee, WI	BDISTTA-20081230ACP			---	No Interference	---

**EXHIBIT 11 - FIGURE 4
INTERNATIONAL ALLOCATION
CONSIDERATIONS**

prepared August 2011 for
Polnet Communications, Ltd.
WPVN-LD Aurora, Illinois
Ch. 20 15 kW (MAX-DA)

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

Proposed WPVN-LD Digital Facility
Ch. 20 15 kW (MAX-DA)
51 dBμ F(50,90) Service Contour
"Worst Case" Interfering Contour
12.4 dBμ F(50,10)

