

Exhibit 11 - Statement A  
**ALLOCATION CONSIDERATIONS**  
prepared for  
**POW, Inc.**  
K228DD Glenwood Springs, Colorado  
Facility ID 53154  
Ch. 228D 0.02 kW (DA-MAX)

*POW, Inc.* (“*POW*”), licensee of FM translator station K228DD, Glenwood Springs, Colorado, proposes herein to modify the K228DD facility. The modification involves replacement of the presently authorized omnidirectional antenna with a directional antenna. No change in maximum effective radiated power (“ERP”) or antenna location is proposed. Operation with vertical polarization is proposed herein, in lieu of the present horizontally polarized operation. Additionally, the associated primary facility will be KSNO-FM (Ch. 280A, Facility ID 57337, Snowmass Village, CO). The translator will continue to operate on Channel 228D.

As shown in the attached **Exhibit 11 - Figure 1**, the proposed K228DD 60 dB $\mu$  contour falls entirely within the 60 dB $\mu$  contour of KSNO-FM. Mountainous terrain blocks line of sight coverage from the KSNO-FM antenna to the Glenwood Springs area. Hence, the translator will provide “fill-in” service for KSNO-FM.

The proposed translator transmitting antenna will side-mount on an existing tower structure. No change in overall structure height (11.6 meters AGL) is proposed. The site is located at the top of a mountain. Although the existing structure (and the ground elevation at the mountaintop) “fails” the FAA’s “slope test” with respect to Glenwood Springs Municipal Airport, 5 km distant (according to the Commission’s “TOWAIR” computer program), registration of the existing structure is not believed to be necessary. Specifically, under §17.4(a)(2), since this antenna structure had not been assigned painting or lighting requirements prior to July 1, 1996, registration is not required, and no antenna structure registration is known to exist for this structure.<sup>1</sup>

---

<sup>1</sup>A nearby antenna structure of the same height as that employed by K228DD is registered with the Commission (ASR number 1208243).

Exhibit 11 - Statement A  
**ALLOCATION CONSIDERATIONS**  
(page 2 of 2)

The proposal conforms to the allocation requirements of §74.1204 of the Commission's rules, as described herein. A detailed allocation study showed that no prohibited contour overlap would result from the proposed operation with any other facility, except to a proposed Low Power FM ("LPFM") station as discussed below.

An application (BNPL-20010117AAY) is pending for a new LPFM facility on Channel 228L1 at Basalt, CO. The attached **Exhibit 11 - Figure 2** depicts the 60 dBμ F(50,50) protected contour for the LPFM facility (assuming a "maximum" facility, per §74.1204(a)(4)) and the interfering 40 dBμ F(50,10) contours for the licensed and proposed K228DD facility. As shown thereon, the licensed K228DD facility causes overlap to the LPFM facility. The existing (licensed) overlap involves an area of 30 sq. km and 2767 persons. Under the instant proposal, as shown in **Exhibit 11 - Figure 2**, this overlap not increase, and will remain essentially the same. Thus, the proposal complies with §74.1204(b)(3) and (4) of the Commission's Rules regarding "existing" overlap.

Further, the LPFM application does not meet the required minimum distance separation requirement to K228DD. The LPFM site is located 30.2 km from K228DD, while §73.807(d)(1) requires a minimum distance separation of 39 km to K228DD.<sup>2</sup> Thus, it is believe that the LPFM facility cannot be authorized at its proposed location and should not be a factor for the modification of K228DD. Even considering the LPFM application, though, the instant proposal complies with the Commission's protection requirements with respect to LPFM stations.

Based on the foregoing, it is believed that the instant proposal satisfies the Commission's requirements regarding allocation matters.

---

<sup>2</sup>The maximum antenna height above average terrain along any of the 12 radials for the licensed K228DD facility's antenna, determined as described under §74.1235(b), is 399 meters at 270 degrees True. The resulting 60 dBμ contour distance along this bearing is 13.8 km, and for this "class" of translator station §73.807(d)(1) requires 39 km separation for co-channel stations.



