

Exhibit 11-Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS
prepared for
Pacific and Southern Company, Inc.
WGCI-LP Skowhegan, Maine
Facility ID 39642
Ch. 4 (Digital) 0.08 kW

The *Pacific and Southern Company, Inc.* (“P&S”) is the licensee of Low Power Television Station (“LPTV”) WGCI-LP, Channel 4, Skowhegan, ME, Facility ID 39642 (see BLTVL-20051027AAP). *Pacific* proposes herein to “flash-cut” the WGCI-LP facility to digital operation at the licensed WGCI-LP site.

The proposed facility will operate on Channel 4 using a “stringent” out of emission mask. The currently authorized non-directional antenna will be utilized with no change in height. **Exhibit 11 – Figure 1** provides the 62 dBμ contour for the licensed analog facility along with the 43 dBμ service contour of the proposed digital facility. As demonstrated in **Exhibit 11 - Figure 1**, contour overlap exists between the licensed analog and proposed digital facilities. Therefore, the instant proposal is considered a minor change pursuant to Section 73.3572 of the Commission’s Rules.

Allocation Considerations

The instant proposal complies with the Commission’s interference protection requirements toward all NTSC, DTV, television translator, LPTV, and Class A stations. Detailed interference studies were 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 studies examined the change in interference as experienced by nearby pertinent stations that would result from the proposed facility.

The results of the interference study, summarized in **Exhibit 11-Table 1** (pre-transition operation) and **Exhibit 11-Table 2** (post-transition operation), show that any new interference

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 2 of 2

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.

Other Allocation Matters

The nearest FCC monitoring station is 59.2 km distant at Belfast, Maine. The proposed ERP is below the threshold minimum power level specified in §73.1030(c)(3)(iii) 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. Based on information extracted from the Commission's engineering database, there are no AM stations within 3.2 km of the proposed site.

The site is located within the 400 km border zones requiring international coordination. As shown in **Figure 2**, the worst-case interfering contour² of the proposed station will not reach areas of protected Canadian television station coverage as defined by the Letter of Understanding³. Thus, it is believed that the proposed facility complies with pertinent interference planning and separation criteria.

As described fully above, it is believed that the instant proposal complies with the Commission's allocation Rules and policies.

² A worst-case interfering contour of 13.2 dBμ F(10,10) was calculated based on the 47 dBμ Protected Coverage and the 33.8 dB D/U Ratio for DTV into NTSC stations specified on page 61 of the *Letter of Understanding*.

³ See *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*.

EXHIBIT 11 - FIGURE 1
COVERAGE CONTOUR COMPARISON
Ch. 4 (Digital) 0.08kW
Skowhegan, Maine

prepared February 2009 for
Pacific and Southern Company, Inc.

Cavell, Mertz & Associates, Inc.
Manassas, Virginia

Licensed WGCI-LP Facility
Analog Ch. 4
62 dBμ Contour

WGCI-LD Site

Proposed WGCI-LP Facility
Digital Ch. 4
43 dBμ Contour

Skowhegan

Waterville

Waldo

Kennebec

Augusta

Belfast

Bangor

Scale 1:500,000

0 7.0 14.0 21 km

070-00-00 W

45-00-00 N

Exhibit 11-Table 1
INTERFERENCE STUDY RESULTS SUMMARY
PRE-TRANSITION OPERATION

prepared for
Pacific and Southern Company, Inc.
 WGCJ-LP Skowhegan, Maine
 Facility ID 39642
 Ch. 4 (Digital) 0.08 kW

<u>Channel</u>	<u>Affected</u> <u>Station</u>	<u>City, State</u>	<u>File Number</u>	<u>Interference</u> <u>Population</u> <u>7th R&O facility</u> <u>(1990 Census)</u>	<u>Interference</u> <u>Population</u> <u>with Proposal</u> <u>(1990 Census)</u>	<u>New Interference</u>	
						<u>Population</u>	<u>Percentage</u>
3	W03AM(TV)	Harrison, ME	BDFCDTT-20060323ABI		-- No Interference --		
3	W03AM(TV)	Harrison, Etc., ME	BLTTV-19860131IA		-- No Interference --		
4	WBZ-TV(TV)	Boston, MA	BLCT-20010228ABA		-- No Interference --		
4	W04BH(TV)	Allagash, ME	BLTTV-4103		-- No Interference --		
4	W04BH(TV)	Allagash, ME	BDFCDTT-20060323ABD		-- No Interference --		
4	W04BS(TV)	Bethel, ME	BDFCDTT-20060330ABS		-- No Interference --		
4	W04BS(TV)	Bethel, Etc., ME	BLTTV-19850828IA		-- No Interference --		
4	W04AY(TV)	St. Francois, ME	BDFCDTT-20060323ABE		-- No Interference --		
4	W04AY(TV)	St. Francis, ME	BLTTV-3003		-- No Interference --		
4	W04BD(TV)	Glens Falls, NY	BLTT-3576		-- No Interference --		

Exhibit 11-Table 2
INTERFERENCE STUDY RESULTS SUMMARY
POST-TRANSITION OPERATION

prepared for
Pacific and Southern Company, Inc.
 WGCJ-LP Skowhegan, Maine
 Facility ID 39642
 Ch. 4 (Digital) 0.08 kW

<u>Channel</u>	<u>Affected Station</u>	<u>City, State</u>	<u>File Number</u>	<u>Calculated Baseline (2000 Census)</u>	<u>Interference Population 7th R&O facility (2000 Census)</u>	<u>Interference Population with Proposal (2000 Census)</u>	<u>New Interference</u>	
							<u>Population</u>	<u>Percentage</u>
3	W03AM(TV)	Harrison, ME	BDFCDTT-20060323ABI		-- No Interference --			
3	W03AM(TV)	Harrison, Etc., ME	BLTTV-19860131IA		-- No Interference --			
4	W04BH(TV)	Allagash, ME	BLTTV-4103		-- No Interference --			
4	W04BH(TV)	Allagash, ME	BDFCDTT-20060323ABD		-- No Interference --			
4	W04BS(TV)	Bethel, ME	BDFCDTT-20060330ABS		-- No Interference --			
4	W04BS(TV)	Bethel, Etc., ME	BLTTV-19850828IA		-- No Interference --			
4	W04AY(TV)	St. Francois, ME	BDFCDTT-20060323ABE		-- No Interference --			
4	W04AY(TV)	St. Francis, ME	BLTTV-3003		-- No Interference --			
4	W04BD(TV)	Glens Falls, NY	BLTT-3576		-- No Interference --			

