

Exhibit 11 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for
Gray Television Licensee, Inc.
K57CB Romeo, Etc., CO
Facility ID 35038
Ch. 31 (Digital) 0.62 kW

Gray Television, Inc. (“Gray”) is the licensee of television translator station K57CB, Channel 57, Romeo, Etc., CO, Facility ID 35038 (BLTT-19810226IY). K57CB’s licensed operation on Channel 57 is displaced pursuant to §73.3572(a)(4)(ii). *Gray* proposes herein to change K57CB to Channel 31 and “flash cut” to digital operation. No change in actual antenna site location is specified, however the K57CB site data (coordinates, ground elevation, overall structure height) are corrected herein to correspond to the existing antenna structure employed.

The proposed facility will operate on Channel 31 using a “simple” out of channel emission mask, with a directional antenna having an effective radiated power of 0.62 kW at the present transmitting antenna location. **Exhibit 11 - Figure 1** depicts the coverage contours of the licensed (74 dBμ) and the proposed (51 dBμ) facilities. The use of the same transmitter site and the service area overlap shown demonstrates compliance with §73.3572 for a minor change.

The proposed antenna system for K57CB will be mounted on the same existing antenna support structure as the licensed K57CB facility. The tower structure is not presently registered with the Commission as it is an existing structure of less than 61 meters overall height above ground level and there are no known landing areas within 8 km. No marking or lighting specifications are presently required and no change in structure height is proposed. Therefore, FAA notification and commensurate FCC registrations are not necessary.

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,

Exhibit 11 - Statement A
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(Page 2 of 2)

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.

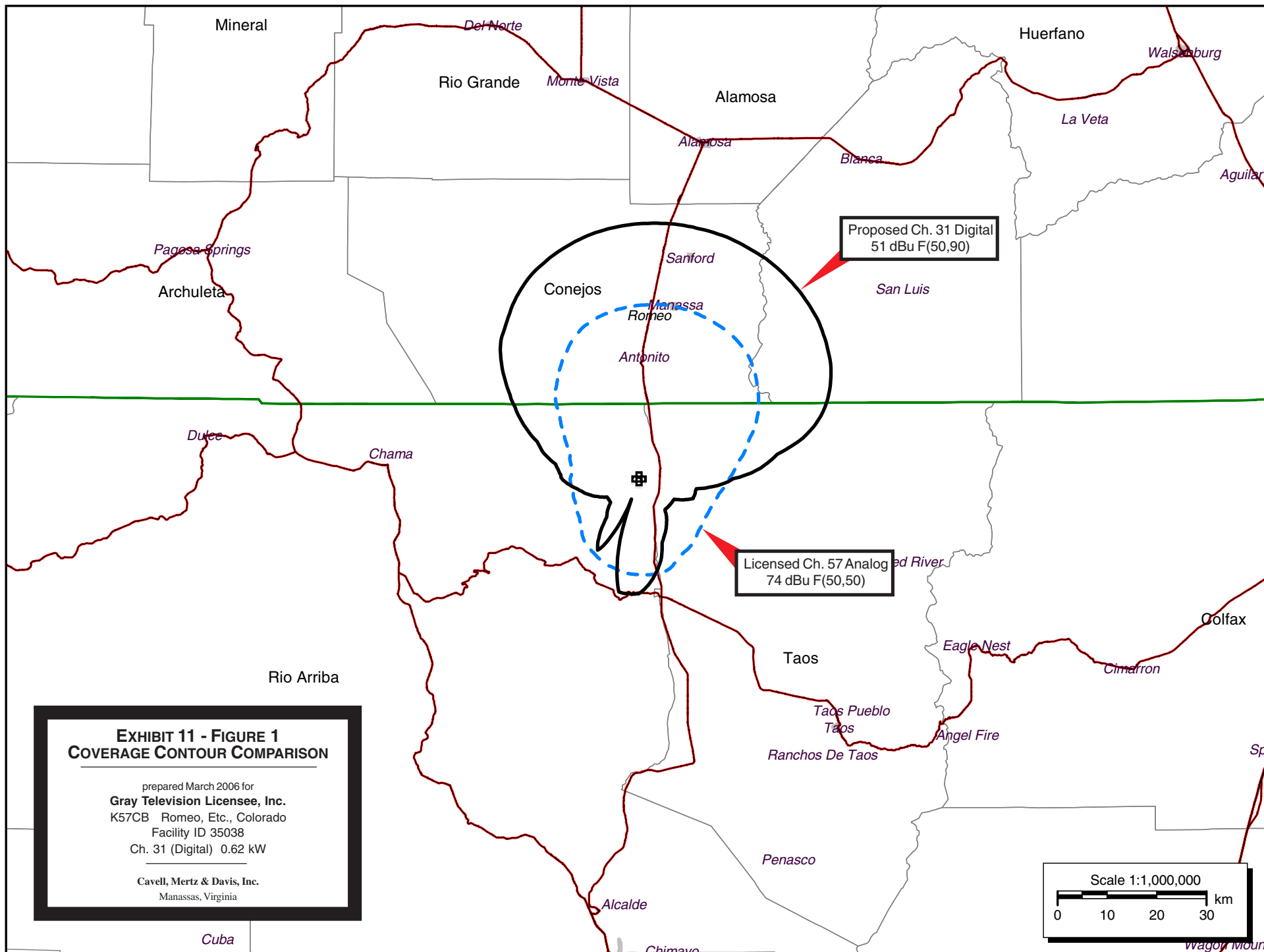
The results, summarized in **Exhibit 11 - Table 1**, show that any new interference does not exceed the Commission’s interference limits (0.5 percent to full power and Class A stations, and 2.0 percent to secondary stations). Accordingly, the instant proposal complies with §74.793 regarding interference protection to analog and digital television, low power television, television translator, and Class A television facilities.

Other Allocation Considerations

The nearest FCC monitoring station is at Douglas, AZ, at a distance of 682.4 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. The proposed K57CB site is approximately 367 km from the Table Mountain Radio Receiving Zone. 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.

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 - FIGURE 1
COVERAGE CONTOUR COMPARISON**

prepared March 2006 for
Gray Television Licensee, Inc.
K57CB Romeo, Etc., Colorado
Facility ID 35038
Ch. 31 (Digital) 0.62 kW

Cavell, Mertz & Davis, Inc.
Manassas, Virginia

Exhibit 11 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY
 prepared for
Gray Television Licensee, Inc.
 K57CB Romeo, Etc., CO
 Facility ID 35038
 Ch. 31 (Digital) 0.62 kW

<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>
16	K16FM	Eagle Pass, CO	98.6	CP	BNPTT-20000816ACT	---	none
28	KSPK-LP	Walsenburg, CO	136.0	LIC	BLTTTL-20050315AGL	---	none
28	K28GF	Cimarron, NM	80.6	LIC	BLTT-20050727AIJ	---	none
28	K28ER	Dulce & Lumberton, NM	85.6	LIC	BLTT-19970421JC	---	none
28	K28GV	Tres Piedras, NM	0.3	LIC	BLTT-20031014AIH	---	none
30	K30DL	Blue Mesa, CO	183.9	LIC	BLTT-19920206IF	---	none
30	K30HJ	Cortez, Etc., CO	195.3	LIC	BLTTTL-20050802ACR	---	none
30	KYNM-LP	Albuquerque, NM	187.1	LIC	BLTTA-20050203ADT	---	none
30	K30GJ	Colfax, NM	80.6	LIC	BLTT-20031103ACV	---	none
30	K30EK	Dulce & Lumberton, NM	85.6	LIC	BLTT-19970626JB	---	none
30	NEW	Farmington, NM	198.1	APP	BNPTT-20000830BPF	---	none
30	K30HS	Taos, NM	66.6	CP	BNPTTL-20000831ARW	---	none
31	K31CW	Carbondale, CO	308.9	LIC	BLTT-19920414ID	---	none
31	K31CT	Cortez, CO	195.3	LIC	BLTTTL-20050802ACX	---	none
31	KDVR	Denver, CO	326.2	LIC	BLCT-19830818KM	---	none
31	K31FV	Durango & Hermosa, CO	168.5	APP	BDFCDTT-20060323AIN	---	none
31	K31FV	Durango & Hermosa, CO	168.5	LIC	BLTT-20031205ABL	---	none
31	K31DW	Mesa, CO	312.6	LIC	BLTT-19940803IB	---	none
31	K31FS	Pagosa Springs, CO	101.5	LIC	BLTT-20040421ADE	---	none
31	K31GC	Forrest, Etc., NM	305.5	LIC	BLTT-20050202ADK	---	none
31	K31HB	Gallina, NM	97.2	LIC	BLTT-20030925ATT	---	none
31	NEW	Gallup, NM	287.6	APP	BNPTT-20000831ARZ	---	none
31	K31EO	Mora, NM	116.3	LIC	BLTT-20030721AEH	---	none
31	K31FX	Pie Town, NM	333.6	LIC	BLTT-20031114ADI	---	none
31	K31FX	Pie Town & Quemado, NM	333.6	APP	BPTT-20060320AGW	---	none
32	KAZQ	Albuquerque, NM	186.9	LIC	BLET-20031205ABN	---	none

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(K57CB 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>
32	K32GN	Farmington, NM	196.3	CP	BNPTT-20000830BEK	---	none
33	K33FK	Angel Fire, NM	75.0	LIC	BLTT-20000622AEJ	---	none
33	K33BN	Taos, NM	66.6	LIC	BLTT-20050912AAD	---	none
34	K34GI	Trinidad, CO	139.9	LIC	BLTTL-20050613ABW	---	none
34	K34FD	Chama, Etc., NM	52.1	LIC	BLTT-20000414ABN	---	none
34	K34HF	Cuba, NM	119.5	CP	BNPTT-20000831AOF	---	none
35	NEW	Pagosa Springs, CO	102.9	APP	BNPTTL-20000828BDL	---	none
35	NEW	Pagosa Springs, CO	102.9	APP	BNPTTL-20000828ASL	---	none
35	K35GY	Cuba, NM	119.5	CP	BNPTTL-20000829AGH	---	none
35	K35BZ	Eagle Nest, NM	74.3	LIC	BLTTV-19881219IG	---	none
35	NEW	Espanola, NM	108.0	APP	BNPTT-20000831CFV	---	none
38	K38EC	Eagle Nest, NM	80.6	LIC	BLTT-20040827AAS	---	none
39	KENY-LP	Alamosa, CO	69.0	LIC	BLTTL-20050318ACO	---	none
39	K39EJ	Espanola, NM	107.3	LIC	BLTT-19970507JU	---	none