

Exhibit 11 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for
Mountain Licenses, L.P.
KBWU-LP Richland, Etc., Washington
Facility ID 58685
Ch. 36 (Digital) 6.5 kW

Mountain Licenses, L.P. ("MLLP") is the licensee of television translator station KBWU-LP, Channel 66, Richland, Etc., WA, Facility ID 58685 (BLTTL-19920508IE). KBWU-LP is displaced on Channel 66 and has been granted a Construction Permit ("CP") to move to Channel 36 (BPTTL-20040301AAY). The instant application seeks authorization to modify the CP to specify a flash-cut to digital operation on Channel 36 with an effective radiated power ("ERP") of 6.5 kW. *MLLP* is proposing to use the same directional antenna system, site and mounting location as authorized in its Channel 36 CP.

The proposed facility will operate on Channel 36 using a "stringent" out of channel emission mask. **Exhibit 11 - Figure 1** depicts the coverage contours of the licensed (74 dBμ), authorized (74 dBμ), and 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 KBWU-LP will be side-mounted on an existing antenna support structure with no increase in overall structure height (no ASR number). This overall structure elevation passes the FCC's TOWAIR program for the transmitter location, thus FAA notification and commensurate FCC structure registration are not necessary.

Allocation Considerations

The instant proposal complies with the Commission's interference protection requirements toward all domestic 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, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*,

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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.

Canadian Considerations

Based on the Canadian allotments and procedures stated in the *Letter of Understanding*² (“*LOU*”) regarding full power digital television stations along the U.S. - Canadian Border, no Canadian facility would be impacted by the proposed KBWU-LP facility on Canadian soil. The KBWU-LP transmitter site is located 322 km from the U.S. – Canadian Border. A study using pertinent TV propagation curves (per “Step 2” of the *LOU*) is provided in **Exhibit 11 - Figure 2** which shows that the worst case, 12.4 dBμ F(50,10) co-channel interfering contour for the proposed KBWU-LP does not reach the U.S. - Canada Border. Thus no approval by the Canadian Administration would appear to be required. Based on the above summary, the instant proposal complies with the U.S. - Canadian *LOU* for coordination of full power digital television stations.

Other Allocation Considerations

The nearest FCC monitoring station is at Ferndale, WA, at a distance of 408.6 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

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.

² *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 2000.

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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.

**EXHIBIT 11 - FIGURE 1
COVERAGE CONTOUR COMPARISON**

prepared August 2006 for
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Cavell, Mertz & Davis, Inc.
Manassas, Virginia

Proposed Ch. 36 (Digital)
51 dBu F(50,90)

Authorized Ch. 36 (Analog)
74 dBu F(50,50)

Licensed Ch. 66 (Analog)
74 dBu F(50,50)

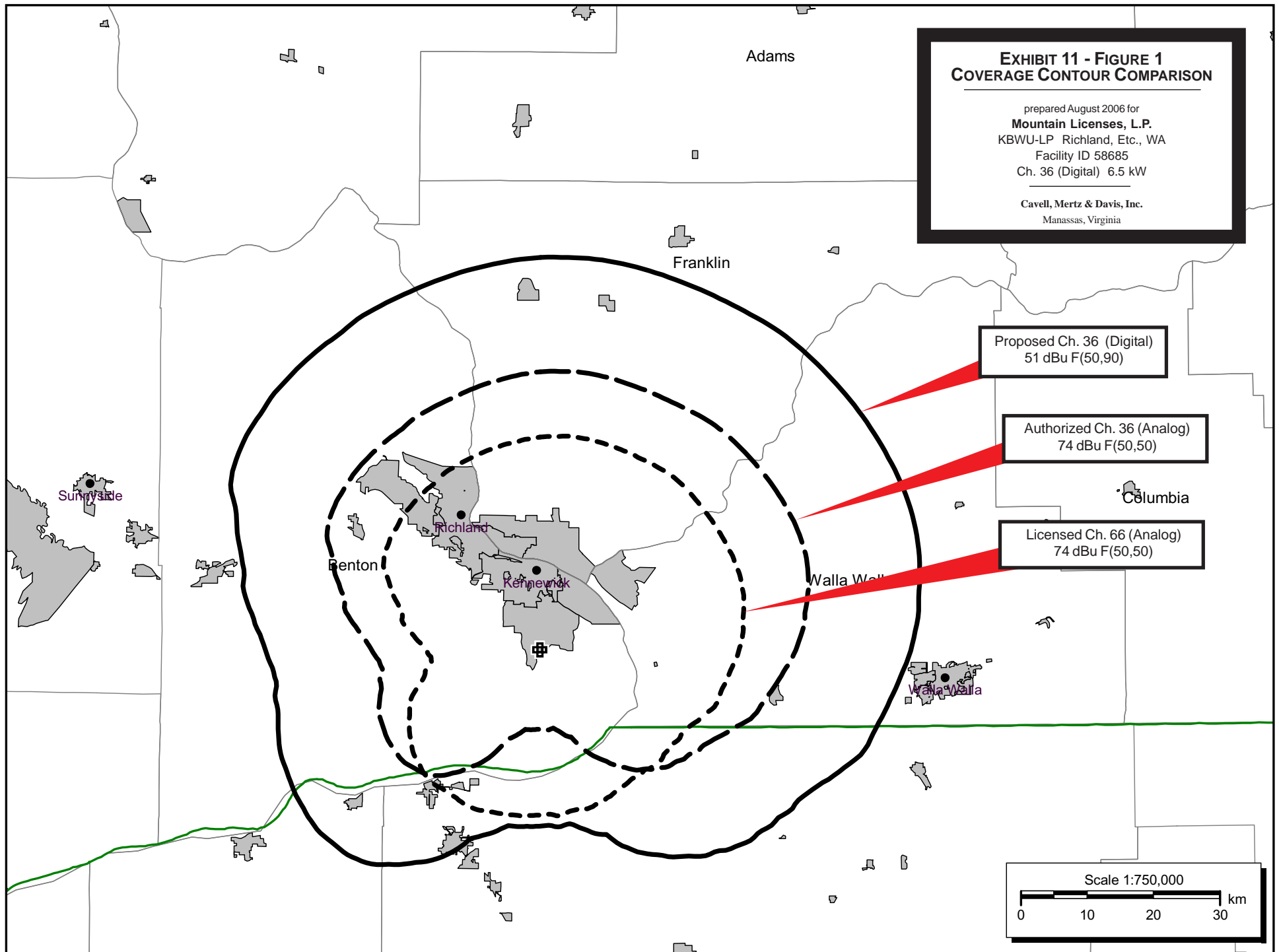


Exhibit 11 Table I

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INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for

Mountain Licenses, L.P.

KBWU-LP Richland, Etc., Washington

Facility ID 58685

Ch. 36 (Digital) 6.5 kW

						---Population (1990 Census)---	
<u>Ch.</u>	<u>Call</u>	<u>City/State</u>	<u>Dist(km)</u>	<u>Status</u>	<u>Application Ref. No.</u>	<u>Baseline</u>	<u>New Interference</u>
21	K21EK	Walla Walla, WA	74.8	LIC	BLTTL-20020604AAX	---	none
22	K59BO	Pendleton, OR	71.4	CP	BDISTT-20060315AET	---	none
22	K22BI	Walla Walla, WA	74.8	LIC	BLTTL-19900813IG	---	none
28	K28GD	Heppner, Etc., OR	99.9	LIC	BLTT-20020419ABE	---	none
29	K29EL	La Grande, OR	139.8	LIC	BLTT-20011212AAF	---	none
29	K29EG	Milton, Etc., OR	71.5	LIC	BLTT-20030107ABA	---	none
29	K29FF	Kennewick, Etc., WA	0	LIC	BLTTL-20040616AAO	---	none
29	KIMA-TV	Yakima, WA	116.1	LIC	BLCT-2586	---	none
32	K32DE	Pendleton, Etc., OR	99.9	LIC	BLTT-19950127JH	---	none
33	K33FS	Elgin, OR	139.8	LIC	BLTT-20011212AAB	---	none
33	K33CJ	Wasco/Heppner, OR	115.8	LIC	BLTTL-19980903JE	---	none
33	K33EJ	Walla Walla, WA	75.3	LIC	BLTTL-19980428JG	---	none
34	K34DI	La Grande, OR	99.9	LIC	BLTT-19920304II	---	none
35	K35BW	Lewiston, ID	164.7	LIC	BLTT-19890203IC	---	none
35	KUID-TV	Moscow, ID	177.6	APP	BPET-20041019ABU	---	none
35	KUID-TV	Moscow, ID	186.8	LIC	BPRM-20020805ABD	---	none
35	K35GA	La Grande, OR	139.8	LIC	BLTT-20011212AAE	---	none
35	K35FO	Milton-Freewater, OR	71.5	LIC	BLTT-20020724AAD	7,525	0 (0.00%)
35	K35HE	The Dalles, OR	159.7	CP	BNPTT-20000830BSN	---	none
35	KAPP	Yakima, WA	116.2	LIC	BLCT-2022	221,031	0 (0.00%)
36	KTMF	Missoula, MT	404	CP MOD	BMPCDT-20060707AEZ	---	none

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36	DK36BW	Thompson Falls, MT	331	APP	BSTA-20060308ALU	---	none
36	K36BA	Burns, OR	281.2	LIC	BLTT-19880222IE	---	none
36	NEW	Chemult, OR	372.1	APP	BSFDTT-20060630CDK	---	none
36	K36FJ	Eugene, OR	390.3	LIC	BLTTL-20020806AAT	---	none
36	K36FG	Hood River, Etc., OR	193.5	LIC	BLTT-20020311AAM	---	none
36	K36DP	Pendleton, Etc., OR	99.9	LIC	BLTT-19950512IH	507	0 (0.00%)
36	K66AZ	Prineville, OR	233.8	APP	BDISTTL-20060329AGX	---	none
36	K36GU	Rockaway & Vicinity, OR	374	LIC	BLTT-20030610AAE	---	none
36	KORS-CA	Salem, OR	336.4	LIC	BLTTA-20020722ABK	---	none
36	K67BF	Wallowa, OR	156.2	CP	BPTT-20050527AWK	---	none
36	K36DG	Longview, WA	286.8	LIC	BLTT-19931202IF	---	none
36	K36DG	Longview, WA	286.9	CP MOD	BMPTT-20050825AEV	---	none
36	K36DG	Longview, WA	286.9	CP	BDFCDTT-20060328AJU	---	none
36	KSKN	Spokane, WA	216.4	CP MOD	BMPCDT-20031110AMP	435,894	16 (0.00%)
36	KSKN	Spokane, WA	216.4	LIC	BLCDDT-20050113ACT	435,894	16 (0.00%)
36	KSTW	Tacoma, WA	294.1	LIC	BLCDDT-20050509ABV	---	none
36	NEW	Yakima, WA	116.2	APP	BSFDTT-20060630CKP	202,069	0 (0.00%)
37	NEW	Lewiston, ID	164.7	APP	BSFDTT-20060630COI	---	none
38	K38AH	Pendleton, Etc., OR	99.9	LIC	BLTT-19950612II	---	none
39	K39FD	Elgin, OR	139.8	LIC	BLTT-20011212AAC	---	none
39	K39ES	Heppner, Etc., OR	115.8	LIC	BLTT-19980803JH	---	none
39	K39DM	Ellensburg, WA	133.2	CP	BPTTL-20060127ARI	---	none

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39	K39DM	Ellensburg, WA	133.2	LIC	BLTTL-19930628IE	---	none
39	K39DL	Moses Lake, WA	84.7	LIC	BLTTL-19980107JB	---	none
39	K39FU	Yakima, WA	115.1	LIC	BLTTL-20040616AAS	---	none
40	K40FM	Milton-Freewater, OR	71.5	LIC	BLTT-20030108AAW	---	none
43	K43CP	Elgin, OR	108.6	LIC	BLTT-19890131IM	---	none
43	K43FH	Heppner, Etc., OR	115.8	LIC	BLTT-19980803JJ	---	none
43	K43HZ	Moses Lake, Etc., WA	84.6	LIC	BLTT-20060428ACH	---	none
43	K43GY	Yakima, Etc., WA	115.1	LIC	BLTTL-20040615ACA	---	none

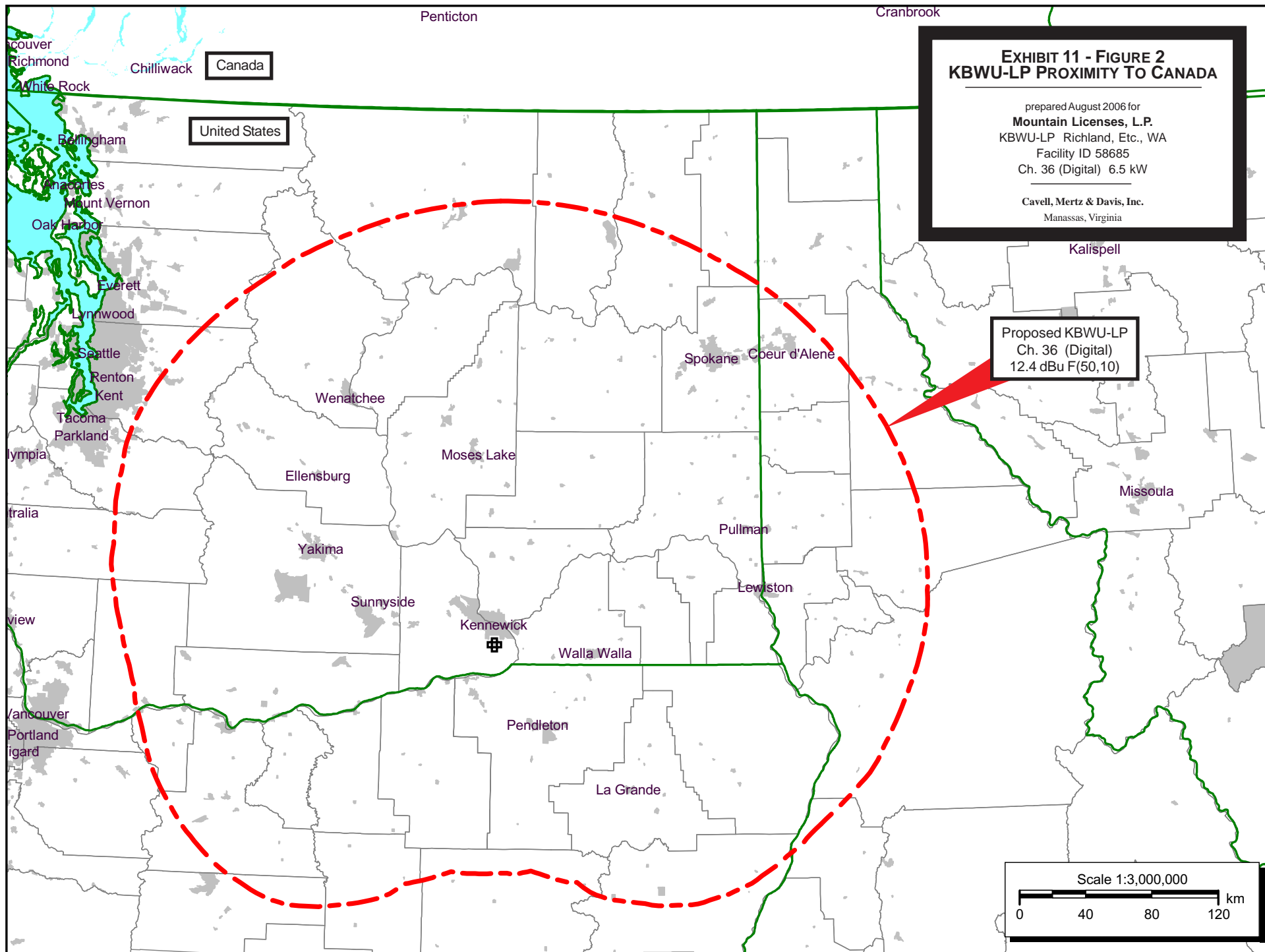


EXHIBIT 11 - FIGURE 2
KBWU-LP PROXIMITY TO CANADA

prepared August 2006 for
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Cavell, Mertz & Davis, Inc.
Manassas, Virginia

Proposed KBWU-LP
Ch. 36 (Digital)
12.4 dBu F(50,10)

