

Exhibit 11 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for
Gray Television Licensee, Inc.
K51GC Salina, KS
Facility ID 65527
Ch. 51 (Digital) 15 kW

Gray Television Licensee, Inc. (“Gray”) is the licensee of television translator station K51GC, Channel 51, Salina, KS, Facility ID 65527 (BLTT-20030805AHW). *Gray* proposes herein to “flash cut” to digital operation. No change in site location or antenna height is specified.

The proposed facility will operate on Channel 51 using a “simple” out of channel emission mask, with a nondirectional antenna having an effective radiated power of 15 kW at the presently licensed 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 existing K51GC antenna system will continue to be employed on its existing antenna support structure. The tower structure is registered with the Commission (ASR #1039952), and no change in overall structure height will result. Since no change to the structure’s overall height is proposed, FAA notification is 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, *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.

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.

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(page 2 of 2)

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 Grand Island, NE, at a distance of 240.1 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 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.

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

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

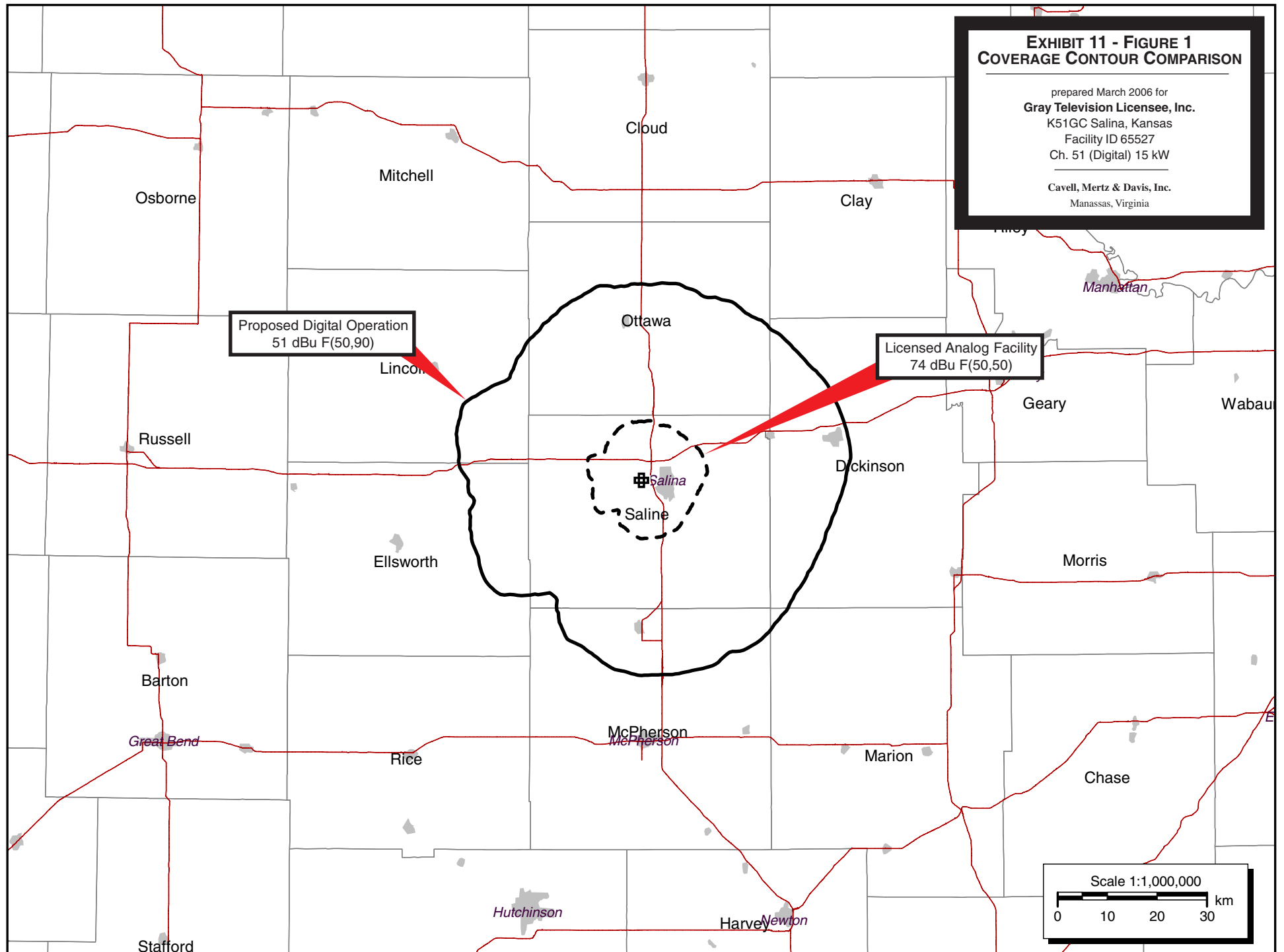


Exhibit 11 - Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for
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<u>Ch.</u>	<u>Call</u>	<u>City/State</u>	<u>Dist(km)</u>	<u>Status</u>	<u>Application Ref. No.</u>	---Population (1990 Census)---	
						<u>Baseline</u>	<u>New Interference</u>
36	KSCC	HUTCHINSON KS	101.1	LIC	BLCT-20010116AHT	---	none
49	KTQW-CA	WICHITA KS	131.4	LIC	BLTTA-20040621AAX	---	none
51	KSMI-LP	WICHITA KS	130.6	LIC	BLTTL-20040430AGX	---	none
51	KPXE	KANSAS CITY MO	273.5	LIC	BMLCDT-20041112AAI	---	none
51	KOWH	LINCOLN NE	239.1	CP MOD	BMPCT-20051108AHQ	---	none
51	KSBI	OKLAHOMA CITY OK	360.8	CP	BPCDT-19991028AFH	---	none
51	K51EB	SEILING OK	325.0	LIC	BLTTL-19940608II	---	none
51	KOPE-LP	TULSA OK	344.1	LIC	BLTTL-20020910ABH	---	none
51	K51BC	FOLLETT TX	357.1	LIC	BLTT-19880613IJ	---	none
52	K52HZ	MANHATTAN KS	100.4	CP MOD	BMPTT-20050607ABZ	---	none