

Exhibit 11 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for
United Communications Corporation
WNYF-CA Watertown, New York
Facility ID 168478
Ch. 35 (Digital Companion) 15 kW

United Communications Corporation (“*United*”) is the licensee of Class A Television station WNYF-CA, Channel 28, Watertown, NY, Facility ID 16743 (BLTTA-20010129AAT). *United* filed a proposal for a digital companion channel for WNYF-CA in the June 2006 filing window (file number BSFDTL-20060630CNX).¹ *United’s* proposal for WNYF-CA was listed in a Public Notice² as not being mutually exclusive with any other proposal submitted in the filing window. The instant application is filed as required by the Public Notice to request a Construction Permit for the proposed digital companion.³

The proposed WNYF-CA digital companion facility will employ an existing antenna which is side-mounted on a tower structure located 8.94 km from the licensed WNYF-CA analog facility. This existing tower structure is employed by WWNY-TV-DT (NTSC Ch. 7, DTV Ch. 35, Facility ID 68851), Carthage, NY and also licensed to *United*. The antenna is that which is currently authorized for WWNY-DT Ch. 35 (BMPCDT-20060628ABW).

The tower structure is registered with the Commission, Antenna Structure Registration (“ASR”) No. 1016048. No change in overall structure height will result from this instant proposal. Since no change to the structure’s overall height is proposed, FAA notification, commensurate modification of the FCC ASR, and changes in structure marking/lighting are not required.

¹ “*LPTV and TV Translator Digital Companion Channel Applications Filing Window for Auction No. 85,*” Public Notice, DA 06-874, released April 20, 2006.

² “*LPTV and TV Translator Digital Companion Channel Applications Non-Mutually Exclusive Proposals (Auction No. 85),* Public Notice, DA 06-1748, released August 31, 2006.

³ Although WNYF-CA is a Class A television station, the special Class A designation applies only to the analog WNYF-CA operation. In accordance with the “Report and Order”, *Amendment of Parts 73 and 74 of the Commission’s Rules to Establish Rules for Digital Low Power Television, Television Translator, and Television Boost Stations and to Amend Rules for Digital Class A Television Stations*, MB Docket No. 03-185, Released September 30, 2004, para. 141, the WNYF-CA companion digital channel proposed herein is classified as a “secondary service” and, therefore, the instant application is filed on FCC Form 346.

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The proposed facility will operate on Channel 35 using a “stringent” out of channel emission mask, with a directional antenna having a maximum effective radiated power of 15 kW. The proposed antenna, which is directional in the horizontal plane, is an Andrew model no. ATW18H3-HSC2-35S with 0.75° electrical beam tilt. **Exhibit 11 – Figure 1** depicts the coverage contours of the licensed analog (74 dBμ) and the proposed digital companion (51 dBμ) facilities. The service area overlap shown demonstrates compliance with the minor change criteria of §73.3572.

Allocation Considerations

The instant proposal complies with the Commission’s interference protection requirements toward all NTSC, DTV, television translator, LPTV, and Class A stations with the exception of co-owned WWNY-DT, Ch. 35, Carthage, NY. 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”)⁴. 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 to all stations studied with the exception of WWNY-DT, 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. With regard to WWNY-DT, interference in excess of the Commission’s interference limits is caused. However, the co-owned WWNY-DT has agreed to accept the interference predicted from the instant proposal as shown in **Exhibit 11 – Attachment 1**. As a practical matter, *United* will not commence operation of the proposed digital companion facility until after the end of the digital

⁴The 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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television transition period for the full power WWNY-DT facility. *United* has elected to carry over the coverage of the authorized WWNY-DT Ch. 35 facility to its analog Channel 7 (see BFRECT-20050124AIS), thus releasing Channel 35 for use by the facility proposed herein.

Other Allocation Matters

The nearest FCC monitoring station is 169.9 km distant at Canandaigua, NY. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. Based on information extracted from the Commission's engineering database, there are no AM stations within 3.2 km of the proposed site. The proposed transmitter site is not located within the bounds of the area specified in §73.1030(a)(1) concerning coordination with the National Radio Astronomy Observatory at Green Bank, WV. The site is located within the border zone with Canada, thus requiring international coordination as needed.

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

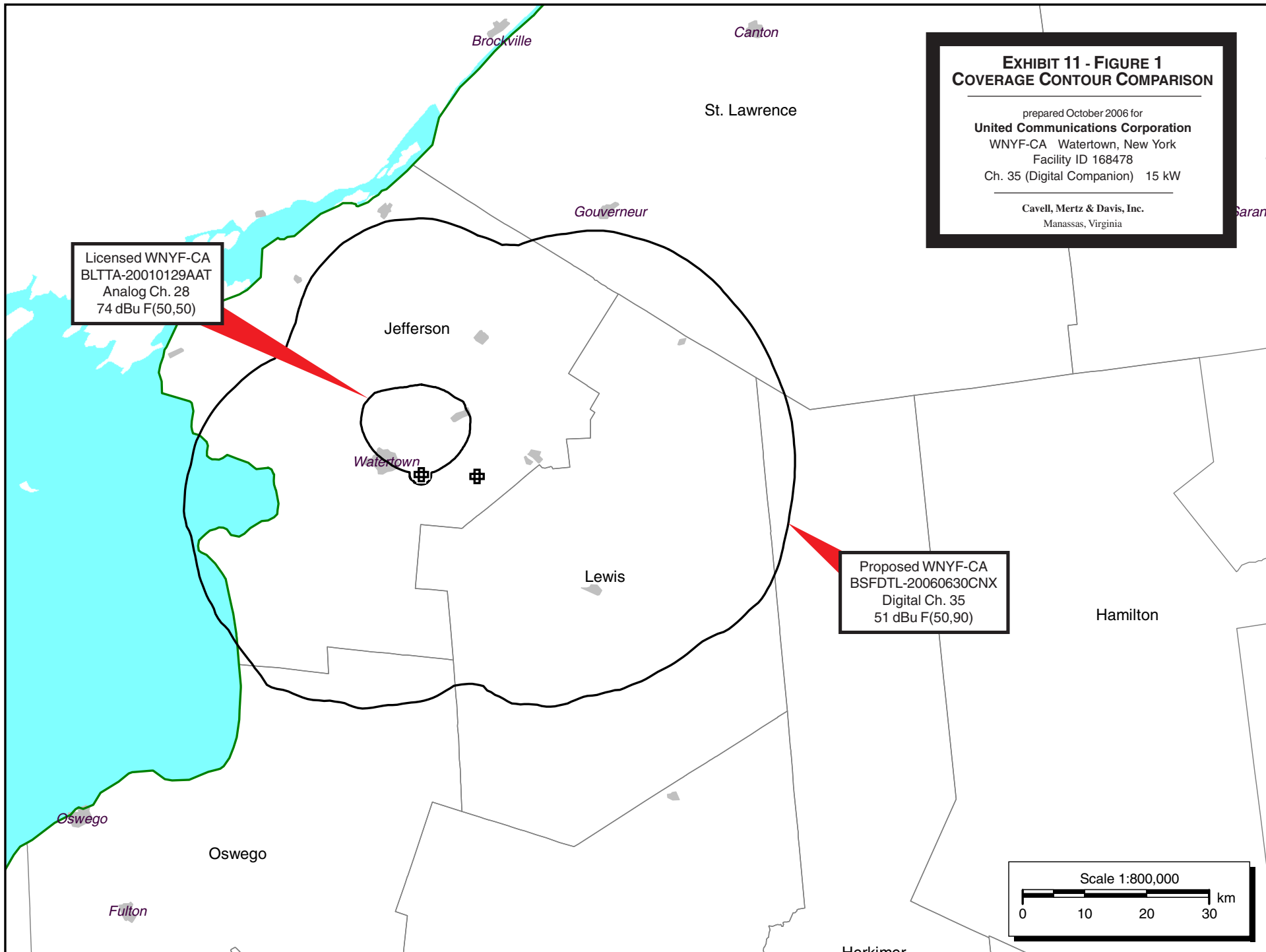


Exhibit 11 – Table 1
INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for
United Communications Corporation
WNYF-CA Watertown, New York
Facility ID 168478
Ch. 35 (Digital Companion) 15 kW

<u>Channel</u>	<u>Call Sign</u>	<u>City/State</u>	<u>Dist(km)</u>	<u>Status</u>	<u>Application Ref. No.</u>	<u>Baseline</u>	<u>New Interference</u>
20	W20BA	MASSENA NY	125.1	LIC	BLTT-19921215IG	---	none
20	NEW	OGDENSBURG NY	86.1	APP	BNPTTL-20000822ABH	---	none
20	WUTR	UTICA NY	100.3	LIC	BLCT-20050825ABH	---	none
27	WVVC-LP	UTICA NY	111	LIC	BLTTL-19960322JA	---	none
28	WNYF-LP	MASSENA NY	125.1	LIC	BLTT-19940406IG	---	none
28	W28CI	PITCAIRN NY	44.6	CP	BNPTTL-20000821AHK	---	none
28	WNYF-CA	WATERTOWN NY	8.9	LIC	BLTTA-20010129AAT	---	none
32	WNNY-LP	AUBURN NY	140.3	APP	BDISTTL-20060331BOL	---	none
33	WFXV	UTICA NY	104.5	LIC	BLCT-19970220KE	---	none
34	960910KE	LAKE PLACID NY	140.4	APP	BPET-19960910KE	---	none
34	WMHT	SCHENECTADY NY	202.8	LIC	BLEDT-20040108ALV	---	none
34	WBQZ-LP	WATERTOWN NY	17.5	CP	BPTTL-20030624ABM	---	none
34	WBQZ-LP	WATERTOWN NY	21.2	LIC	BLTTL-19950807JA	---	none
35	WVIT	NEW BRITAIN CT	344.2	LIC	BLCDDT-20041203AEF	---	none
35	W35BK	PLAINFIELD MA	280.2	LIC	BLTTL-19970909JG	---	none
35	WZMY-TV	DERRY NH	375.7	CP MOD	BMPCDDT-20060630ADT	---	none
35	NEW	SUSSEX NJ	327.2	APP	BDCCDDT-20060925ADV	---	none
35	W36AZ	SUSSEX NJ	327.2	CP	BPTT-JG0601SC	---	none
35	WWNY-TV	CARTHAGE NY	0	CP MOD	BMPCDDT-20060628ABW	277,720	97,890 (35.2%)
35	WNYX-LP	NEW YORK NY	385.4	CP	BDFCDTL-20060111ACR	---	none
35	WNYX-LP	NEW YORK NY	385.4	LIC	BLTTL-20050421AAP	---	none
35	WOBX-LP	SYRACUSE NY	105.6	LIC	BLTTA-20050922ACH	---	none

Exhibit 11 – Table 1
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<u>Channel</u>	<u>Call Sign</u>	<u>City/State</u>	<u>Dist(km)</u>	<u>Status</u>	<u>Application Ref. No.</u>	<u>Baseline</u>	<u>New Interference</u>
35	WOBX-LP	SYRACUSE NY	105.6	LIC	BLTTL-19980609JB	---	none
35	W53AM	UTICA NY	100.3	APP	BDISDTL-20060403AHV	189,705	0 (0.00%)
35	WYLN-LP	HAZLETON PA	332.3	LIC	BLTTL-19950324IE	---	none
35	W61CE	RUTLAND VT	212.9	CP	BDISTTL-20060105ABE	---	none
36	W29BJ	BURLINGTON/ONEONTA/C, NY	145.6	CP	BPTTL-20010711ADS	---	none
36	W36BN	MASSENA NY	125.1	LIC	BLTTL-19950822IK	---	none
36	WHSN-CA	ROCHESTER NY	175.1	LIC	BLTTA-20040225AAD	---	none
36	NEW	SYRACUSE NY	105.6	APP	BSFDTL-20060630DBT	---	none
38	W38CY	SYRACUSE NY	116.1	LIC	BLTT-20020726AAO	---	none
39	NEW	OGDENSBURG NY	84.6	APP	BNPTT-20000831AQL	---	none
43	WNYS-TV	SYRACUSE NY	125.2	LIC	BLCT-19961202LO	---	none



June 19, 2006

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WNYF-CA DTV Companion Channel Application

Dear Ms Dortch,

With regards to WNYF-CA's application to utilize channel 35 as a DTV companion channel, United Communication Corporation's WWNY-DT consents without any qualifications whatsoever, to interference occasioned by WNYF-CA operations on channel 35.

Thank you,

A handwritten signature in cursive script, appearing to read "Cathy Piresuk".

Cathy Piresuk
V.P. and General Manager
WWNY-TV/DT