

Exhibit 11 - Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION CONSIDERATIONS**  
prepared for  
**Hawaii Public Television Foundation**  
K69CF Hawaiian Ocean VW Est., Hawaii  
Facility ID 26436  
Ch. 35 (Digital) 0.75 kW

*Hawaii Public Television Foundation* (“*Hawaii PTV*”) is the licensee of television translator station K69CF, Channel 69, Hawaiian Ocean VW Est., HI, Facility ID 26436 (BLTT-19810803JF). K69CF’s licensed operation on Channel 69 is displaced pursuant to §73.3572(a)(4)(ii). *Hawaii PTV* proposes herein to change K69CF to Channel 35 and to “flash cut” to digital operation. No change in actual antenna site location is specified, however the K69CF site data (ground elevation, overall structure height) are corrected herein to correspond to current topographical data.

The proposed digital facility will operate on Channel 35 using a “simple” out of channel emission mask, with a directional antenna having an effective radiated power of 0.75 kW at the presently licensed transmitting antenna location. **Exhibit 11 - Figure 1** depicts the coverage contours of the licensed (74 dB $\mu$ ) and the proposed (51 dB $\mu$ ) 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 K69CF will be side-mounted on the same existing antenna support structure as the licensed K69CF 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 and there are no known landing areas within 8 km. No marking or lighting specifications are presently required. Since no change to the structure’s overall height is proposed, FAA notification and commensurate FCC registration 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, *Longley-Rice Methodology*

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*for Evaluating TV Coverage and Interference*, February 6, 2004 (“OET-69”)<sup>1</sup>. 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 Waipahu, HI, at a distance of 357.6 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 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 site is not located within the border zones requiring international coordination.

According to information extracted from the Commission’s engineering database, an on-channel booster for standard AM station KIPA (620 kHz, Naalehu, HI) is located nearby to the proposed site. As necessary, isolation circuits will be employed to mitigate any objectionable interference by the proposed operation to KIPA.

Thus, this proposal is believed to be in compliance with the current Commission’s Rules and policy with respect to allocation matters.

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<sup>1</sup>The 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  
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Cavell, Mertz & Davis, Inc.  
Manassas, Virginia

Licensed Ch. 69 Analog  
74 dBu F(50,50)

Proposed Ch. 35 Digital  
51 dBu F(50,90)

Pāhala

Naalehu

Scale 1:500,000



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>	<u>---Population (1990 Census)---</u>	
						<u>Baseline</u>	<u>New Interference</u>
32	NEW	HILO HI	86.6	APP	BNPTTL-20000824AAQ	---	none
32	NEW	HILO HI	104.5	APP	BNPTTL-20000830BDJ	---	none
32	K32GJ	KAILUA-KONA HI	83.1	CP	BNPTT-20000830BPA	---	none
34	K34HC	HILO HI	110.0	LIC	BLTT-20050831ADJ	---	none
35	KHNL	HONOLULU HI	365.9	APP	BMPCDT-20050629ABP	---	none
35	KHNL	HONOLULU HI	339.3	CP	BPCDT-19991029AFK	---	none
36	KAIH-TV	WAILUKU HI	199.1	CP	BPCDT-19991101AEI	---	none
38	WDCN-LP	HILO HI	86.6	CP	BNPTTL-20000821AHQ	---	none
38	K38HU	KAILUA-KONA HI	83.1	LIC	BLTT-20050831ADU	---	none
42	NEW	HILO HI	87.1	APP	BNPTT-20000830ATB	---	none
43	NEW	HILO HI	87.0	APP	BNPTTL-20000829AVO	---	none