

Exhibit 11 – Statement A  
**NATURE OF THE PROPOSAL**  
**ALLOCATION AND ENVIRONMENTAL CONSIDERATIONS**

prepared for  
**Live Sports Radio, LLC**  
New-LD Eugene, Oregon  
Ch. 3 (Digital) 0.1 kW

*Live Sports Radio* (“*LSR*”) is submitting the instant application for a new digital Low Power Television station in response to the filing opportunity announced by the FCC’s Public Notice<sup>1</sup>. *LSR* proposes to operate non-directionally with an effective radiated power (“ERP”) of 100 Watts and an antenna height of 146.2 meters above mean sea level.

The proposed antenna, a non-directional, Scala model TVO-4-50, will be mounted above spectator seating at the existing Autzen Stadium, Eugene. **Exhibit 11 – Figure 1** depicts the 43 dBμ service contour of the proposed facility.

**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 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 (“OET-69”)<sup>2</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 I**, show that any new interference does not exceed the Commission’s interference limits (0.5 percent to full service and Class A stations; 2.0 percent to low-power stations.) Accordingly, the instant proposal complies with §74.793 regarding

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<sup>1</sup> Public Notice, *Commencement of Rural, First-Come, First-Served Digital Licensing for Low Power Television and TV Translators Beginning August 25, 2009 and Commencement of Nationwide, First-Come, First-Served Digital Licensing For Low Power Television and TV Translator Services Beginning January 25, 2010*, Released June 29, 2009, DA 09-1487.

<sup>2</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 - Statement A  
**ALLOCATION AND ENVIRONMENTAL CONSIDERATIONS**  
(page 2 of 4)

interference protection to digital television, low power television, television translator, and Class A television facilities.

Based on data extracted from the FCC's CDBS database, one or more AM broadcast stations are located within 3.2 km (2 miles) of the existing site. However, due to the proposed small antenna size and minimal structure height extension, it is believed that the proposed facility will have no impact to these stations. Therefore, it is respectfully requested that conditions not be applied regarding the notification of AM licensees or the measurements of AM broadcast antenna systems.

The nearest FCC monitoring station is at Ferndale, WA at a distance of 545.9 km from the proposed site. This exceeds by a great margin the minimum distance specified in §73.1030(c)(3)(iv) that would suggest consideration of the monitoring station.

It is thus believed that the facility proposed herein will satisfy all of the pertinent Commission Rules and Policies now in effect regarding allocation matters for a television translator facility.

### **Environmental Considerations**

The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of §1.1306 of the FCC Rules. Since the proposed overall height will not extend the height of an existing structure by more than 6.2 meters, it is believed that an aeronautical study is not necessary. Thus no change in current structure marking and lighting requirements is anticipated. Therefore, it is believed that this application may be categorically excluded from environmental processing pursuant to §1.1306 of the Commission's rules.

### **Human Exposure to Radiofrequency Radiation**

In keeping with §1.1307(b) of the Commission's Rules, the proposed operation has been evaluated for human exposure to radiofrequency energy using the procedures outlined by the Federal Communications Commission in FCC OET Bulletin 65 ("OET-65"). OET-65 describes a means of determining whether a proposed facility exceeds the radiofrequency exposure guidelines specified in

Exhibit 11 - Statement A  
**ALLOCATION AND ENVIRONMENTAL CONSIDERATIONS**  
(page 3 of 4)

§1.1310 of the Commission's Rules. Under present Commission policy, a facility may be presumed to comply with the limits in §1.1310 of the Commission's Rules if it satisfies the exposure criteria set forth in OET-65. Based upon that methodology, and as demonstrated in the following, the proposed transmitting system will comply with the cited adopted guidelines.

The antenna will be supported above spectator seating at Autzen Stadium, Eugene at an elevation at least five meters above publicly accessible areas. No other significant emitters of radiofrequency energy will be installed in the vicinity of the proposed antenna. Access to the areas within five meters is controlled and limited to occupational stadium maintenance personnel.

According to elevation pattern data provided by Scala, provided herein as **Exhibit 11 - Attachment 1**, the proposed four-bay, half-wavelength-spaced, horizontally polarized antenna has a relative field of 27.2 percent or less from 30 to 90 degrees below the horizontal plane (i.e.: below the antenna). Thus, a value of 27.2 percent relative field is used for this calculation. The "uncontrolled/general population" limit specified in §1.1310 for television Channel 3 (center frequency of 63 MHz) is 200  $\mu\text{W}/\text{cm}^2$ .

OET-65's formula for television transmitting antennas is based on the NTSC transmission standards, where the average power is normally much less than the peak power. For the DTV facility in the instant proposal, the peak-to-average ratio is different than the NTSC ratio. The DTV ERP figure herein refers to the average power level. The formula used for calculating DTV signal density in this analysis is essentially the same as equation (10) in OET-65:

$$S = (33.4098) (F^2) (ERP) / D^2$$

Where:

S	=	power density in microwatts/cm <sup>2</sup>
ERP	=	total (average) ERP in Watts
F	=	relative field factor
D	=	distance in meters

Using this formula and the above assumptions, the proposed facility would contribute a maximum power density of 27.5  $\mu\text{W}/\text{cm}^2$  or 13.8 percent of the general population/uncontrolled

Exhibit 11 - Statement A  
**ALLOCATION AND ENVIRONMENTAL CONSIDERATIONS**  
(page 4 of 4)

MPE limit, at publicly accessible areas five meters below the antenna. At locations away from the antenna, the calculated RF power density is lower, due to the increasing distance. Thus, the proposed facility complies with §1.1307(b) of the Commission's Rules regarding exposure to radiofrequency radiation.

Accordingly, it is believed that the impact of the proposed operation should not be considered to be a factor at or near ground level as defined under §1.1307(b).

### **Safety of Stadium Workers and the General Public**

As demonstrated herein, excessive levels of RF energy attributable to the proposal will not be caused at publicly accessible areas near the antenna supporting structure. Consequently, stadium spectators and members of the general public will not be exposed to RF levels in excess of the Commission's guidelines. Nevertheless, appropriate RF exposure warning signs will continue to be posted and access will be restricted by appropriate means.

With respect to worker safety, it is believed that based on the preceding analysis, excessive exposure would not occur in areas at ground level. A site exposure policy is employed protecting maintenance workers from excessive exposure when work must be performed on the structure or in areas where high RF levels may be present. Such protective measures include, but are not limited to, restriction of access to areas where levels in excess of the guidelines may be expected, power reduction, or the complete shutdown of facilities when work or inspections must be performed in areas where the exposure guidelines would otherwise be exceeded. *LSR* will coordinate with other licensees utilizing this site. On-site RF exposure measurements may also be undertaken to establish the bounds of safe working areas.

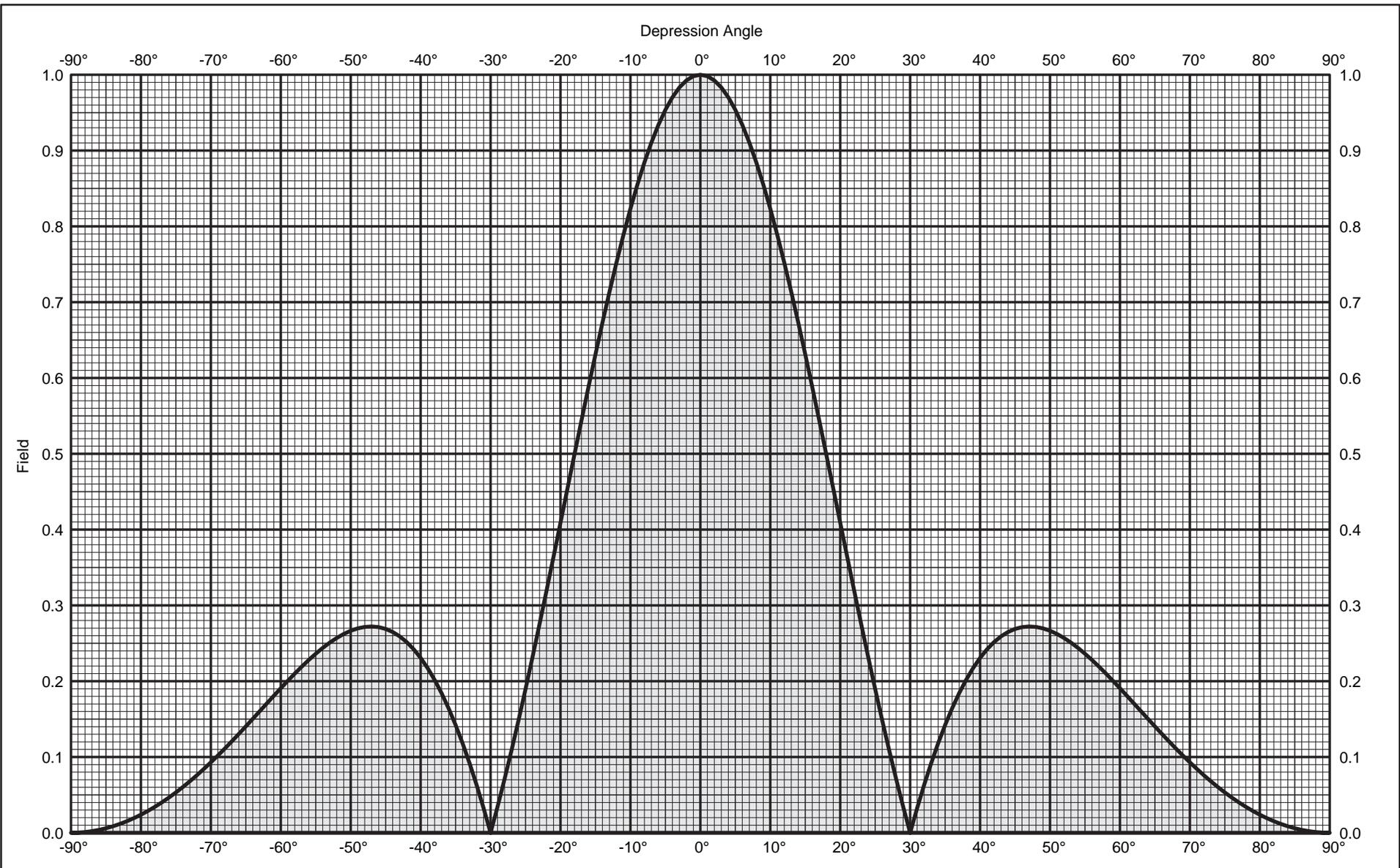
### **Conclusion**

Based on the preceding, it is believed that the instant proposal may be categorically excluded from environmental processing under §1.1306 of the Rules; hence preparation of an Environmental Assessment is not required.

Exhibit 11 - Table 1  
**INTERFERENCE STUDY RESULTS**  
 prepared for  
**Live Sports Radio, LLC**  
 New-LD Eugene, Oregon  
 Ch. 3 0.1 kW

<u>Channel</u>	<u>Affected Station</u>	<u>City, State</u>	<u>File Number</u>	<u>Calculated Baseline (2000 Census)</u>	<u>Interference Population without Proposal (2000 Census)</u>	<u>Interference Population with Proposal (2000 Census)</u>	<u>New Interference</u>	
							<u>Population</u>	<u>Percentage</u>
2	K02EK	Applegate Valley, OR	BLTTV-1105			---	No Interference	---
2	K02JF	Butte Falls, OR	BLTTV-19790320IB			---	No Interference	---
2	K02DV	Cave Junction, Etc., OR	BLTTV-3706			---	No Interference	---
2	K02GL	Dorena, Etc., OR	BLTTV-3651			---	No Interference	---
2	K02QN-D	Eugene, OR	BNPDVL-20090825ASH	285,905	16	332	316	0.111 %
2	K02FT	Gold Hill, OR	BLTTV-4699			---	No Interference	---
2	K02JL	La Pine, OR	BLTTV-19790205JH			---	No Interference	---
2	K02JG	Prospect, OR	BLTTV-197902261A			---	No Interference	---
2	K02NW	Reedsport, OR	BLTTV-19990503JD			---	No Interference	---
2	K02DB	Scottsburg, OR	BLTTV-4743			---	No Interference	---
2	K02IQ	Squaw Valley, Etc., OR	BLTTV-5085			---	No Interference	---
2	K02JJ	Williams, OR	BLTTV-19781030IM			---	No Interference	---
3	K03HX-D	Etna, CA	BLDTV-20081001ACJ			---	No Interference	---
3	KIEM-TV	Eureka, CA	BPCDT-20080617ADN			---	No Interference	---
3	K03CT	Lewiston, Etc., CA	BLTTV-4961			---	No Interference	---
3	K03FU	Mountain Gate, Etc., CA	BLTTV-19810713IN			---	No Interference	---
3	KACX-LP	Red Bluff, CA	BLTVL-20061003AFI			---	No Interference	---
3	KACX-LP	Red Bluff - Redding, CA	BMPTVL-20080909ACU			---	No Interference	---
3	K03CQ	Mapleton, OR	BLTTV-1798			---	No Interference	---
3	K03BZ	Rogue River, OR	BLTTV-4263			---	No Interference	---
3	K03EI	Tolo, Etc., OR	BLTTV-20070503AAQ			---	No Interference	---
3	K03AX	Umatilla River Valle, OR	BLTTV-1235			---	No Interference	---
4	K04ER	Applegate Valley, OR	BLTTV-1797			---	No Interference	---
4	K04EO	Ashland, Etc., OR	BLTTV-4907			---	No Interference	---
4	K04HK	Black Butte Ranch, OR	BLTTV-198004041A			---	No Interference	---
4	K04JQ	Butte Falls, OR	BLTTV-19800702IC			---	No Interference	---
4	K04CX	Cascadia, OR	BLTTV-1253			---	No Interference	---
4	K04GR	Dorena, Etc., OR	BLTTV-3627			---	No Interference	---
4	K04DR	Eugene, OR	BLTVL-20021106AAI	1,110	91	91	0	0.000 %
4	K04JZ	Gold Hill, OR	BLTTV-19810526ID			---	No Interference	---
4	K04EY	Grants Pass, Etc., OR	BDFCDTV-20091109ABH			---	No Interference	---
4	K04EY	Grants Pass, Etc., OR	BLTTV-19790222IC			---	No Interference	---
4	K04ES	Klamath Falls, OR	BLTTV-1139			---	No Interference	---
4	K04BJ-D	La Pine, OR	BLDTV-20090821ABK			---	No Interference	---
4	KDLN-LP	Newport, OR	BLTVL-20050307ABU			---	No Interference	---
4	K04OS-D	Reedsport, OR	BLDTV-20100210AAB			---	No Interference	---
4	K21GX	Salem, OR	BDISDVL-20090130ARC			---	No Interference	---
4	K04MG	Wedderburn, Etc., OR	BDFCDTV-20090709AAZ			---	No Interference	---
4	K04MG	Wedderburn, Etc., OR	BLTTV-19820907IF			---	No Interference	---
4	K04JP	Williams, OR	BLTTV-19800702IB			---	No Interference	---





TVO-4 four bay crossed dipole array  
 Any single channel 2 - 13  
 Gain: 3.0 dBd  
 Horizontal Polarization

Vertical Stack (0.5 wavelength)  
 Vertical plane Pattern

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