

Exhibit 11 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for
KTUL, LLC
New Replacement Digital LPTV Translator Station
Caney, Kansas
Ch. 24 (Digital) 1 kW

KTUL, LLC (“*KTUL*”) is the licensee of digital television station KTUL(TV), Facility ID 35685, Tulsa, Oklahoma. In accordance with the procedures set forth in MB Docket No. 08-253¹, *KTUL* proposes herein to construct a new replacement digital LPTV translator station to aid in reception of KTUL(TV) and ABC Network programming in Caney, Kansas and the surrounding areas.

As the Commission is aware, after the cessation of analog television operations, problems have been encountered with digital television transmission on high-band VHF channels. Since the termination of the analog Channel 8 operation, *KTUL* has received calls from viewers regarding reception difficulties. To alleviate the reception difficulties with KTUL(TV) in the Caney, Kansas area, a replacement digital LPTV translator is proposed to provide some level of fill-in service².

Nature of the Proposal

The proposed antenna system for the replacement digital LPTV translator station is a Kathrein 770 881 non-directional antenna which will be side-mounted on an existing antenna support structure (ASR number 1062553). No change in structure overall height is necessary to carry out this proposal. Since no change to the structure’s overall height is proposed, no change to structure marking/lighting requirements will result.

The proposed digital facility will operate on Channel 24 using a “stringent” out of channel emission mask having a maximum effective radiated power (“ERP”) of 1 kW. The facility proposed

¹ See *Report and Order, Amendment of Parts 73 and 74 of the Commission’s Rules for Replacement Digital Low Power Television Translator Stations*, MB Docket No. 08-253, FCC 09-36, released May 8, 2009.

² *KTUL* also has a pending application for a replacement digital LPTV translator to serve McAlester, OK, see BDRTCDT-20110804ACB.

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herein will share a common antenna system with other area stations proposing new replacement digital LPTV translators for their respective stations³.

Exhibit 11 - Figure 1 depicts the coverage contours for the formerly authorized KTUL(TV) analog facility, the currently licensed digital facility, and the proposed translator facility. While the predicted coverage contours depict a relatively small loss area between the former analog and the current digital coverage, actual high-band VHF reception of the KTUL(TV) Channel 10 digital signal in the Caney area is difficult. Since the translator facility proposed herein will be sharing an antenna system with others, the use of a custom directional pattern for KTUL on Channel 24 is not possible. Therefore, it is respectfully requested that the extension of the translator service contour past that of the analog Grade B contour be considered “de minimus”⁴.

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 No. 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 (“OET-69”)⁵. 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, 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.

³ Another station owner, Griffin Licensing, L.L.C. will shortly be filing an application for this site and will also employ the antenna proposed herein for use by KTUL.

⁴ *Report and Order*, paragraphs 18 to 22.

⁵ 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.**

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Allocation Considerations

The nearest FCC monitoring station is at Grand Island, NE, at a distance of 490.4 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 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.

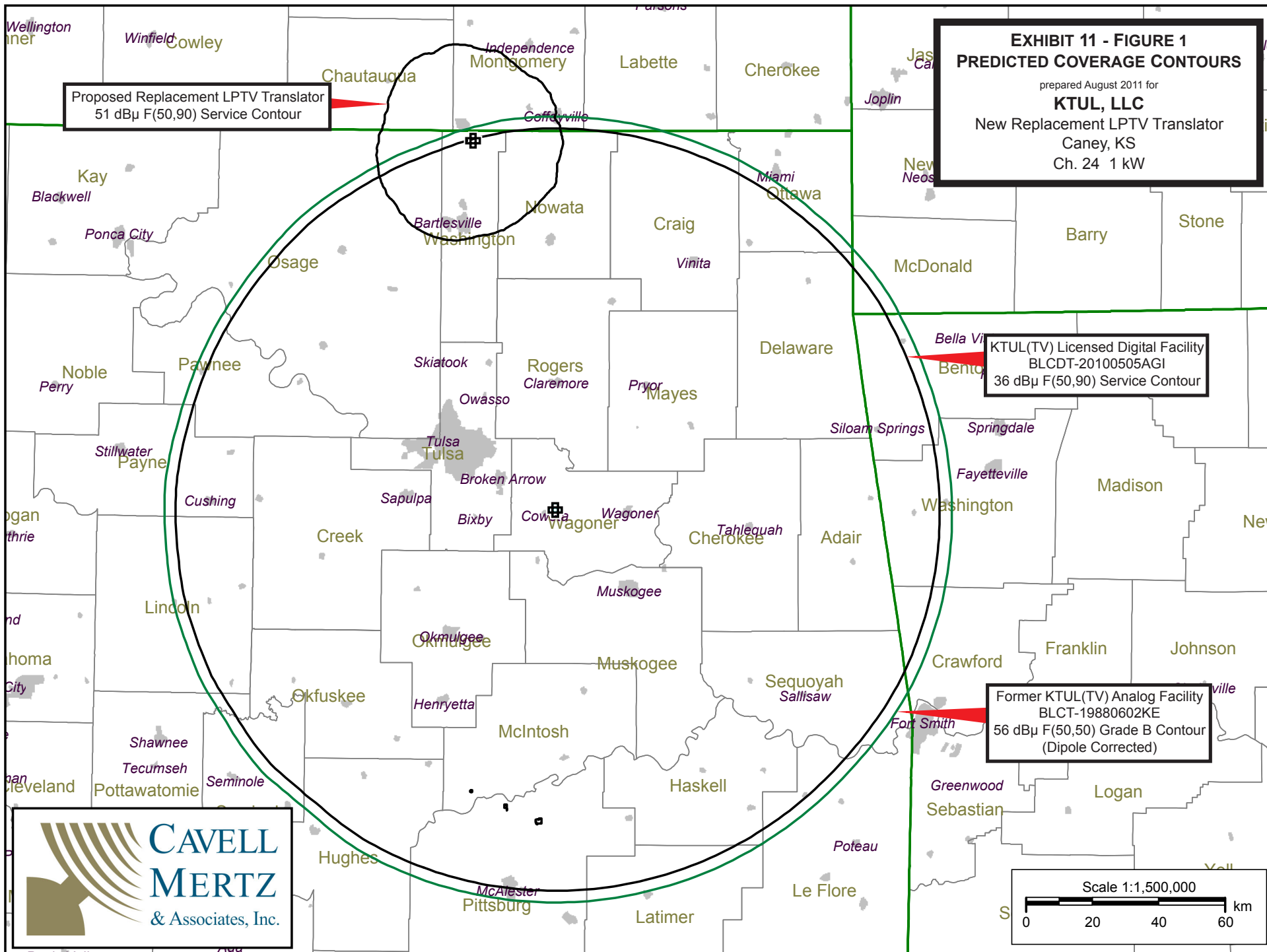


Exhibit 11 - Table I
INTERFERENCE STUDY RESULTS SUMMARY
 prepared for
KTUL, LLC
 New Replacement LPTV Translator Caney, KS
 Facility Id: 35685
 Ch. 24 1 kW

<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>
20	KTEW-LD	Ponca City, OK	BSTA-20080617ACG			---	No Interference	---
23	NEW	Emporia, KS	BNPDTL-20100930ARP			---	No Interference	---
23	NEW	Wichita, KS	BSFDTL-20060630CPN			---	No Interference	---
23	NEW	Wichita, KS	BSFDTL-20060630BKG			---	No Interference	---
23	K23LJ-D	Ponca City, OK	BNPDTL-20100216ABA			---	No Interference	---
23	NEW	Tulsa, OK	BDCC-20110429AAO			---	No Interference	---
24	K24JC-D	Springdale, AR	BNPDTL-20090825BUF	204,377	231	231	0	0.000 %
24	KFSM-TV	Van Buren, AR	BLCDT-20110517AEQ			---	No Interference	---
24	NEW	Chapman, KS	BNPDTL-20100514AHW			---	No Interference	---
24	NEW	Russell, KS	BNPDTL-20100514AHI			---	No Interference	---
24	KJOM-LP	Asbury, MO	BLTTL-20060109ABS			---	No Interference	---
24	K24JY-D	Columbia, MO	BNPDTL-20100208ABC			---	No Interference	---
24	KCTV	Kansas City, MO	BMPCDT-20100114AAA			---	No Interference	---
24	KCTV	Kansas City, MO	BLCDT-20050913ABH			---	No Interference	---
24	KCTV	Kansas City, MO	BPCDT-20080619AGA			---	No Interference	---
24	K24IW-D	Ardmore, OK	BNPDTL-20090825AUP			---	No Interference	---
24	KTUL	McAlester, OK	BDRTCDT-20110804ACB			---	No Interference	---
24	KOKH-TV	Oklahoma City, OK	BLCDT-20041207ACV			---	No Interference	---
24	K24JT-D	Paris, TX	BNPDTT-20091119ABR			---	No Interference	---
24	K24HO-D	Paris, TX	BDCCDTT-20061030APB			---	No Interference	---
25	NEW	Fayetteville, AR	BNPDTL-20100205AAL			---	No Interference	---
25	KOZJ	Joplin, MO	BLEDT-20060620ABP			---	No Interference	---
25	K25GJ	Muskogee, OK	BLTT-20051206ADA			---	No Interference	---
25	KGCT-CD	Nowata, OK	BLDTA-20091222AAA			---	No Interference	---
25	K25MA-D	Ponca City, OK	BNPDTL-20100216AAZ			---	No Interference	---
25	KUTU-CD	Tulsa, OK	BLTTL-20001120AAE			---	No Interference	---
25	KUTU-CD	Tulsa, OK	BLDTA-20110506AAV			---	No Interference	---
25	K25MB-D	Vian, OK	BNPDTL-20100504ALY			---	No Interference	---
32	KCLG-LP	Neosho, MO	BLTTA-20040922ADI			---	No Interference	---