

Exhibit 42 - Statement A
NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for
Gray Television Licensee, Inc.
WIFR-DT Freeport, Illinois
Facility ID 4689
Ch. 41 53 kW 220 m

Gray Television Licensee, Inc. (“Gray”), licensee of analog station WIFR(TV) Channel 23, Freeport, Illinois (file number BMLCT-20040615ABU) has a Construction Permit (“CP,” BMLCDT-20040310ACL) which authorizes construction of the paired WIFR-DT facility on Channel 41. Under the present CP, WIFR-DT would operate with a nondirectional effective radiated power (“ERP”) of 100 kW and an antenna height above average terrain (“HAAT”) of 176 meters. The instant application herein proposes to modify the CP to specify operation of WIFR-DT with a reduced ERP of 53 kW, and an increased antenna HAAT of 220 meters. No change in transmitter site is proposed.

Due to the increase in antenna height, the instant proposal also specifies a commensurate reduction in ERP to maintain the same 41 dBμ contour location as the presently authorized facility. In particular, the proposed 53 kW / 220 m facility is “equivalent” to the authorized operation (100 kW / 176 m) in that the resulting 41 dBu service contour location is essentially unchanged. An extension in contour is avoided in order to comply with the Commission’s August 3, 2004 “freeze”¹ concerning expansion in service area.

The proposed antenna system for WIFR-DT is mounted on the same antenna structure (ASR number 1209945) authorized in the CP and is the same transmitter site employed by the licensed WIFR(TV) analog Channel 23 facility. The instant application proposes to use a “common” omnidirectional antenna for both DTV Channel 41 and NTSC Channel 23 facilities, using the top-mounted antenna already utilized by WIFR(TV) Channel 23. No change in overall tower structure height is proposed.

¹*Public Notice* “Freeze on the Filing of Certain TV and DTV Requests for Allotment or Service Area Changes,” DA-04-2446, released August 3, 2004.

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The attached **Exhibit 42 - Figure 1** is a map which depicts the coverage contours for the proposed WIFR-DT facility. Per the Commission's requirements, the DTV service contour (41 dBμ) of the facility will completely encompass the principal community. **Exhibit 42 - Figure 1** also demonstrates that the enhanced principal community coverage requirement of 48 dBμ (required by December 31, 2004 for commercial stations) will also be met by the proposed facility.

Allocation Matters

Under the instant proposal, WIFR-DT will operate at its presently authorized site with a decreased ERP and an increased antenna HAAT. Although the proposed facility may be considered to be "equivalent" to the authorized WIFR-DT facility, pursuant to §73.622(f)(5) of the Commission's Rules a study per §73.623(c) was nonetheless conducted to evaluate interference to analog facilities, DTV stations, and Class A television stations that may be attributed to the proposed WIFR-DT facility.

In particular, the proposal's ERP/HAAT combination (53 kW / 220 m) exceeds that which was allotted to WIFR-DT (50 kW / 219 m). A detailed interference study per OET Bulletin 69² shows that the proposal complies with the Commission's 2% / 10% *de minimis* interference limits. The OET Bulletin 69 analysis also indicates that any interference caused to other stations will not be increased, when compared to the presently authorized facility (100 kW / 176 m).

Class A stations WOCH-LP (CP, Ch. 41, Chicago, IL) and WMLW-CA (Lic, Ch. 41, Milwaukee, WI) would continue to receive prohibited contour overlap from WIFR-DT under the instant proposal. OET Bulletin 69 analysis indicates that no interference will be experienced by

²FCC Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 ("OET-69"). The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A standard cell size of 2 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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these stations from WIFR-DT. Therefore, the instant proposal complies with established Commission policy regarding protection to Class A stations.

Other Allocation Considerations

The WIFR-DT site is located 498.4 km from the nearest Canadian border, much greater than the distance which requires international coordination.

The nearest FCC monitoring station is at Allegan, Michigan, at a distance of 295.3 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. There are no AM broadcast stations within 3.2 km (2 miles) of the WIFR-DT 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.

