Exhibit 8 - Statement A

NATURE OF THE PROPOSAL
ALLOCATION CONSIDERATIONS

prepared for

Ramar Communications II, Ltd.

K56FB Albuquerque, New Mexico
Facility ID 55056
Ch. 47 150 kW (DA-MAX)

Ramar Communications II, Ltd. ("Ramar") is the licensee of Low Power Television ("LPTV") station K56FB, Channel 56, Albuquerque, New Mexico, Facility ID 55056 (BLTTL-19940909IF). A Construction Permit ("CP", BPTTL-20031229ABO) authorizes a change in K56FB's channel of operation, an increase in effective radiated power ("ERP"), and specifies a new directional antenna pattern. The application did not propose a change in transmitter site location, however revised site and antenna elevation data is specified to correspond to that which had recently become available. The CP for Channel 47 is a "displacement" per §73.3572(a)(4)(ii) of the Commission's Rules, as K56FB's licensed operation on Channel 56 is between Channels 52 and 69.

The instant application seeks to modify the CP to specify a different directional antenna system, maximum ERP towards the radio horizon, and maximum ERP at any angle. It is proposed to employ the same antenna system as already authorized for LPTV station KTEL-LP (Ch. 39, BPTTL-20031003ACO, Albuquerque, NM).

The instant proposal specifies use of additional beamtilt, involving a carefully specified vertical plane (elevation) antenna pattern, to permit a maximum effective radiated power ("ERP") of 150 kW (towards the nearby populated areas of Albuquerque, well below the radio horizon), while limiting the ERP towards the radio horizon.

Specifically, the proposed K56FB facility will employ an antenna system having 4 degrees of beamtilt. A maximum ERP (at any horizontal and vertical angle) of 150 kW is proposed. Towards the radio horizon, the maximum ERP at any azimuth is 62.8 kW. The manufacturer's antenna data provided herein reflects the calculated values on Channel 47 and varies slightly from the Channel 39 data for KTEL-LP.

The proposed antenna is a Kathrein model 4X1 K723147 panel array. A summary of the horizontal plane pattern, effective antenna height, calculated depression angles[1] to the radio horizon, derivation of the effective (radio horizon) horizontal plane pattern, and the distances to the 74 dBμ contour are provided in **Exhibit 8 - Table 1**. **Exhibit 8 - Figure 1** supplies a plot of the antenna's horizontal plane pattern within the main lobe (prior to considering radiation towards the radio horizon). A plot of the antenna's horizontal plane radiation pattern towards the radio horizon is supplied as **Exhibit 8 - Figure 2**. The maximum ERP towards the radio horizon at any azimuth is 62.8 kW. The directional antenna pattern as supplied in the "Tech Box" of the accompanying FCC Form 346 corresponds to the ERP towards the radio horizon (as expressed in **Exhibit 8 - Figure 2** and **Exhibit 8 - Table 1**).

The proposed transmitting antenna will side-mount on an existing tower structure, presently employed by the Channel 56 K56FB facility. No change in overall structure height (24 meters AGL) is proposed. According to the Commission's "TOWAIR" computer program, there are no landing areas within 8 km, so registration of the existing structure is not believed to be necessary.

Exhibit 8 - Figure 3 depicts the coverage contours of the licensed analog Channel 56 facility, the current Channel 47 CP, and the proposed Channel 47 facility. The service area overlap shown between the licensed, authorized, and the proposed facilities demonstrates compliance with §73.3572 for a minor change.

The Commission's August 3, 2004 "freeze" concerning expansion in service area[2] is not applicable. K56FB is eligible for Class A status and an application on FCC Form 302-CA is pending to convert the current Channel 47 CP to Class A status (BLTTA-20031229ABM). The Form 302-CA application will not be acted on until the freeze is lifted. Since Class A status has not

[1]The derivation of the depression angle to the radio horizon was made per §73.684(c)(1).

[2]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.

yet been granted to K56FB, the freeze does not apply. The instant application is filed as an LPTV facility, not Class A. The pending Form 302-CA will be amended upon grant of the instant application to specify the modified parameters sought herein.

Allocation Considerations

The instant proposal complies with the Commission's standard contour overlap protection requirements toward all NTSC, DTV, television translator, LPTV, and Class A stations except those summarized in **Exhibit 8 - Table 2**. 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")[3]. The interference study examined the change in interference as experienced by the stations subject to overlap that would result from the proposed facility. The results, summarized in **Exhibit 8 - Table 2**, show that any new interference does not exceed the Commission's 0.5 percent rounding tolerance.

Accordingly, the instant proposal complies with §§74.705 – 74.710 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 Douglas, AZ, at a distance of 508 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

[3]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.

AM broadcast stations located within 3.2 km (2 miles) of the proposed site, according to information extracted from the Commission's engineering database. The site is not located within the border zones requiring international coordination.

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

Exhibit 8 - Table 1

PROPOSED ANTENNA PATTERN AND DISTANCE TO CONTOUR

prepared for

Ramar Communications II, Ltd.

K56FB Albuquerque, New Mexico

Facility ID 55056

Ch. 47 150 kW (DA-MAX)

Transmitter Location (NAD-27):	35-12-51	N-Lat
	106-27-02	W-Lon
Antenna C/R Elevation:	3241.3	mAMSL
Maximum ERP (towards radio horizon):	62.8	kW
Maximum ERP (at any angle):	150	kW

Azimuth (degrees T)	Average Elevation (m AMSL)	Antenna Effective Height (m)	Antenna Main Lobe Horizontal Plane Relative Field	Depression Angle to Radio Horizon (degrees)	Vertical Plane Relative Field at Radio Horizon	ERP at Radio Horizon (kW)	Net Relative Field at Radio Horizon	Distance to 74 dBu Contour (km)
0	2066.3	1175.0	0.026	0.95	0.618	0.04	0.025	7.9
10	2106.0	1135.3	0.027	0.93	0.615	0.04	0.026	8.1
20	2089.2	1152.1	0.013	0.94	0.618	0.01	0.013	4.3
30	2087.5	1153.8	0.035	0.94	0.618	0.07	0.033	10.1
40	2015.6	1225.7	0.059	0.97	0.623	0.20	0.057	15.6
50	2047.3	1194.0	0.067	0.96	0.620	0.26	0.064	16.9
60	2080.3	1161.0	0.059	0.94	0.618	0.20	0.056	15.2
70	2073.2	1168.1	0.035	0.95	0.618	0.07	0.033	10.1
80	2125.4	1116.0	0.013	0.93	0.613	0.01	0.013	4.3
90	2145.8	1095.5	0.027	0.92	0.610	0.04	0.026	7.8
100	2186.4	1054.9	0.026	0.90	0.605	0.04	0.024	7.4
110	2248.6	992.7	0.018	0.87	0.600	0.02	0.016	5.5
120	2258.6	982.7	0.007	0.87	0.598	0.00	0.007	2.1
130	2317.8	923.5	0.000	0.84	0.593	0.00	0.001	0.4
140	2374.0	867.4	0.004	0.82	0.585	0.00	0.004	1.4
150	2397.6	843.7	0.029	0.80	0.582	0.04	0.026	7.6
160	2421.6	819.7	0.083	0.79	0.580	0.35	0.074	16.5
170	2457.4	783.9	0.178	0.78	0.575	1.57	0.158	24.8
180	2262.6	978.7	0.307	0.87	0.598	5.06	0.284	35.0
190	2069.0	1172.4	0.468	0.95	0.618	12.55	0.447	43.8
200	1878.6	1362.8	0.642	1.02	0.637	25.09	0.632	51.4
210	1815.2	1426.1	0.831	1.05	0.641	42.56	0.823	56.3
220	1775.1	1466.2	0.957	1.06	0.645	57.15	0.954	59.2
230	1740.5	1500.8	0.992	1.07	0.647	61.79	0.992	60.2
232	**1735.2**	**1506.1**	**1.000**	**1.07**	**0.647**	**62.79**	**1.000**	**60.4**
240	1712.1	1529.2	0.957	1.08	0.650	58.04	0.961	59.9
250	1694.5	1546.8	0.831	1.09	0.650	43.76	0.835	57.8
260	1683.8	1557.5	0.657	1.09	0.652	27.52	0.662	54.0
270	1683.5	1557.8	0.465	1.09	0.652	13.79	0.469	48.4
280	1686.1	1555.2	0.307	1.09	0.652	6.01	0.309	41.5
290	1700.1	1541.2	0.178	1.09	0.650	2.01	0.179	32.5
300	1736.8	1504.5	0.083	1.07	0.647	0.43	0.083	21.2
310	1768.5	1472.8	0.029	1.06	0.645	0.05	0.029	9.3
320	1802.6	1438.7	0.004	1.05	0.643	0.00	0.004	1.4
330	1845.3	1396.0	0.001	1.03	0.639	0.00	0.001	0.4
340	1857.4	1383.9	0.007	1.03	0.639	0.00	0.007	2.1
350	1929.3	1312.0	0.018	1.00	0.633	0.02	0.017	5.9

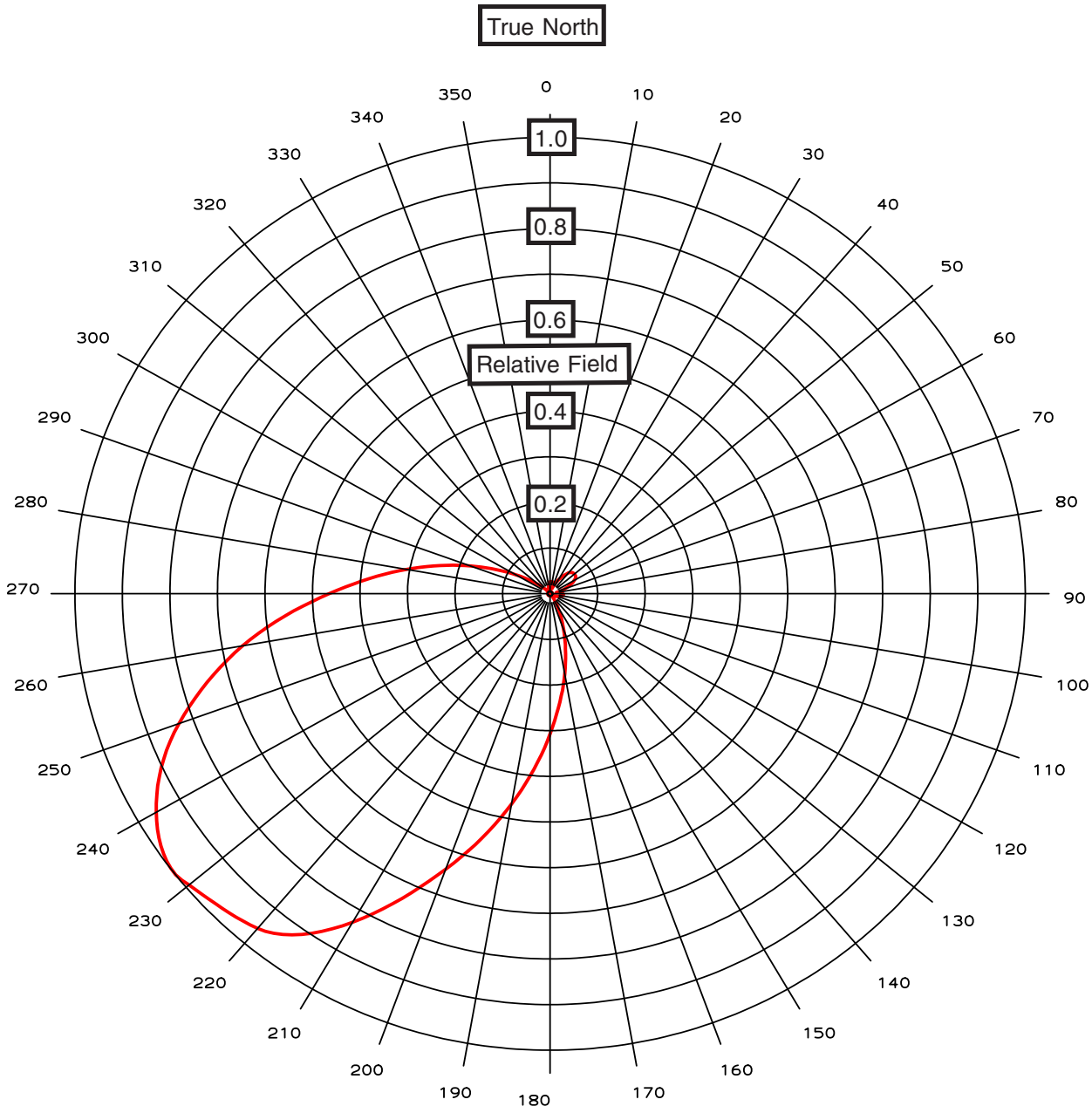

EXHIBIT 8 - FIGURE 1
ANTENNA RADIATION PATTERN
IN MAIN LOBE

prepared January 2007 for
Ramar Communications II, Ltd.
K56FB Albuquerque, New Mexico
Facility ID 55056
Ch. 47 150 kW (DA-MAX)

Cavell, Mertz & Davis, Inc.
Manassas, Virginia

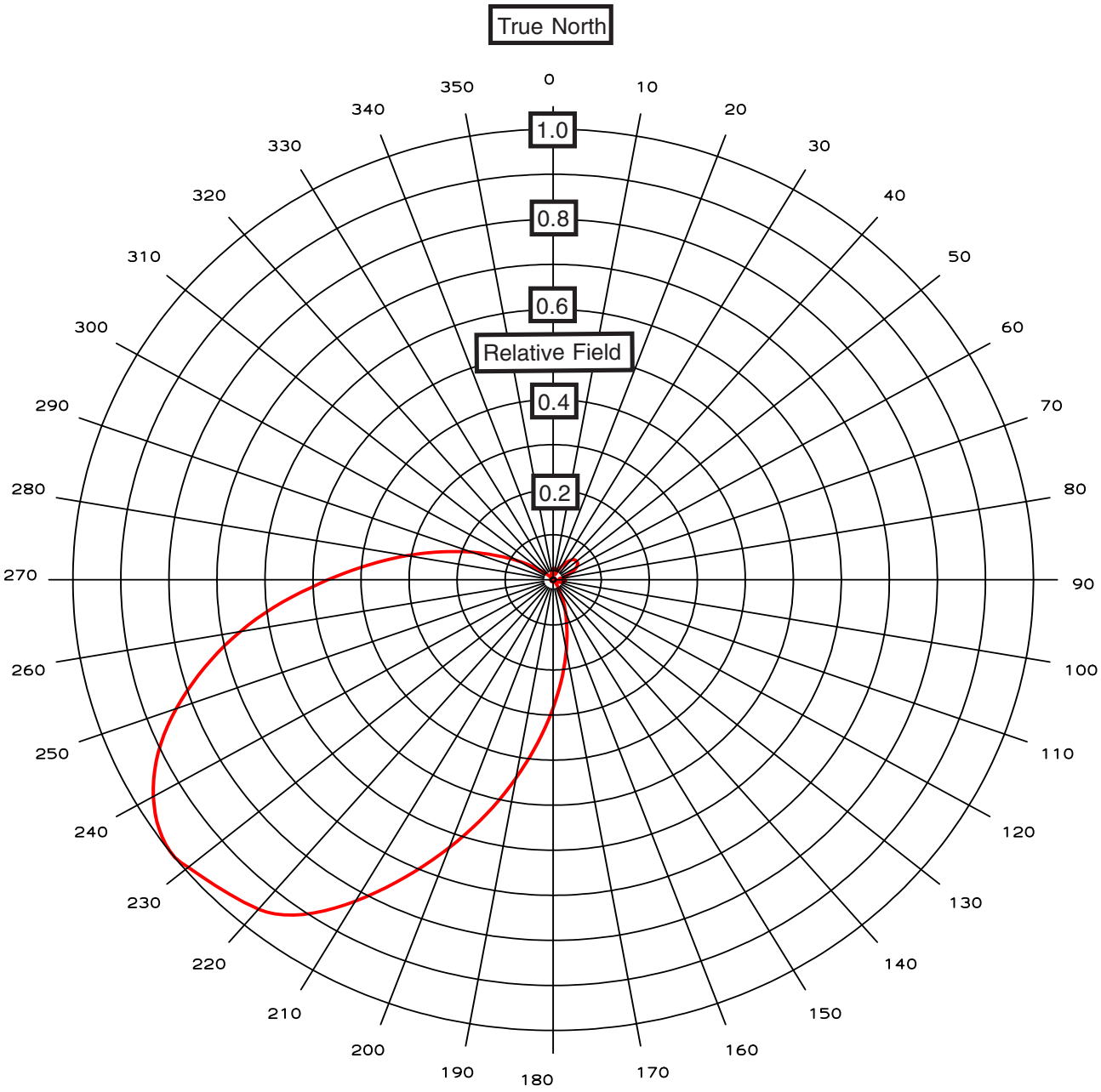

EXHIBIT 8 - FIGURE 2
ANTENNA RADIATION PATTERN
TO RADIO HORIZON

prepared January 2007 for

Ramar Communications II, Ltd.

K56FB Albuquerque, New Mexico

Facility ID 55056

Ch. 47 150 kW (DA-MAX)

Cavell, Mertz & Davis, Inc.

Manassas, Virginia

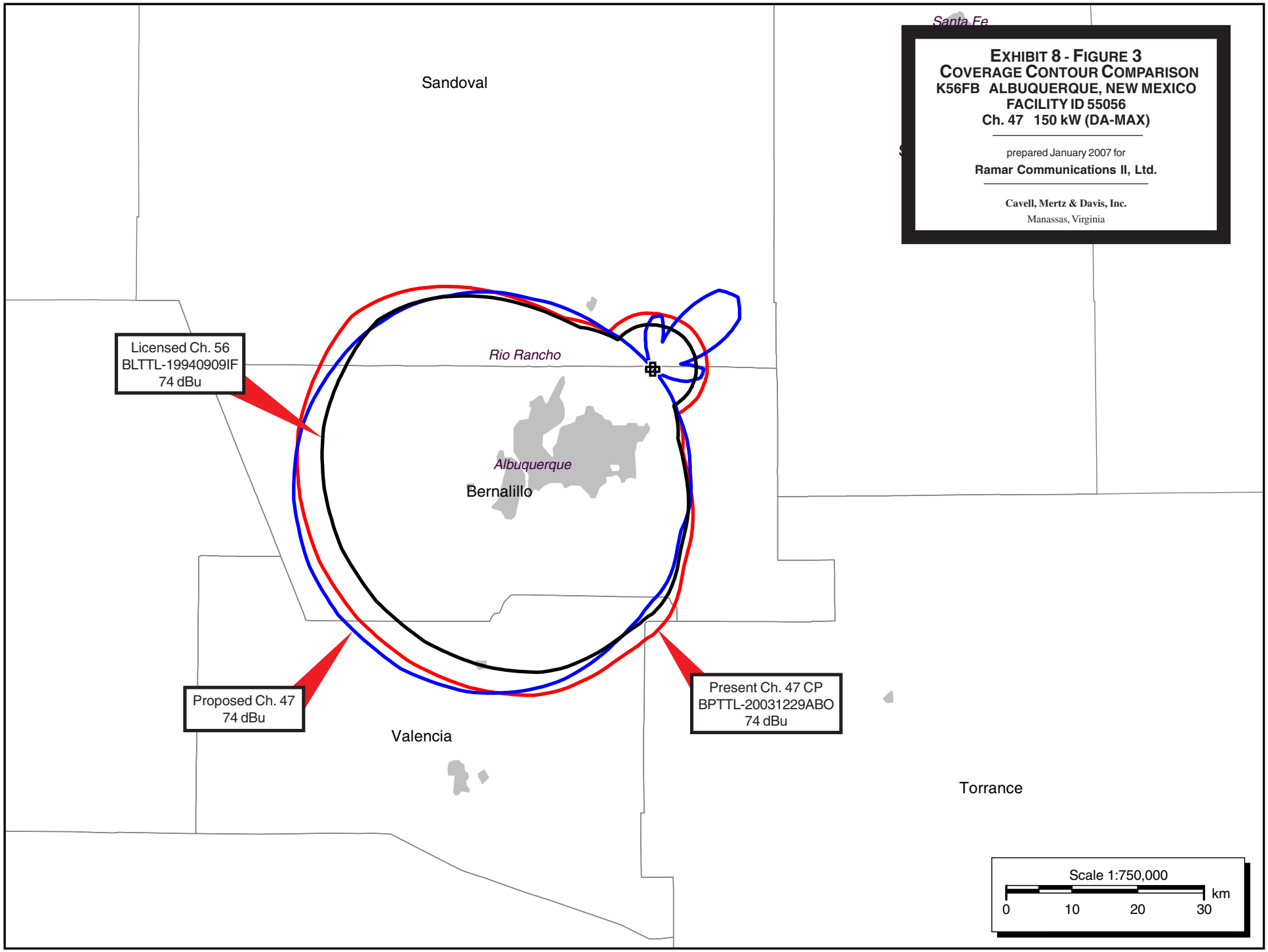
Santa Fe
Sandoval
EXHIBIT 8 - FIGURE 3
COVERAGE CONTOUR COMPARISON
K56FB ALBUQUERQUE, NEW MEXICO
FACILITY ID 55056
Ch. 47 150 kW (DA-MAX)
prepared January 2007 for
Ramar Communications II, Ltd.
Cavell, Mertz & Davis, Inc.
Manassas, Virginia
Licensed Ch. 56
BLTTL-19940909IF
74 dBu
Rio Rancho
Albuquerque
Bernalillo
Proposed Ch. 47
74 dBu
Present Ch. 47 CP
BPTTL-20031229ABO
74 dBu
Valencia
Torrance
Scale 1:750,000
km
0
10
20
30

Exhibit 8 - Table 2

INTERFERENCE ANALYSIS RESULTS SUMMARY

prepared for

Ramar Communications II, Ltd.

K56FB Albuquerque, New Mexico

Facility ID 55056

Ch. 47 150 kW (DA-MAX)

						---Population (1990 Census)----	
Ch.	Call	City/State	Dist(km)	Status	Application Ref. No.	Baseline	New Interference
32	KAZQ	ALBUQUERQUE NM	0.0	LIC	BLET-20031205ABN	---	none
46	K46GY	SANTA FE NM	0.0	LIC	BLTT-20030403AAN	15,028	0 (0.00%)
46	K46GY	SANTA FE NM	0.0	CP	BPTTL-20031003ACN	37,544	0 (0.00%)
48	KTFA-LP	ALBUQUERQUE NM	0.3	LIC	BLTTL-20031212ABM	---	none
50	KASY-TV	ALBUQUERQUE NM	0.1	LIC	BLCT-20011102ABA	---	none