

SAINTE PARTNERS II, L.P.
TL K14IK - Bakersfield, CA

EXHIBIT 13
Form 346; Section III

The applicant is presently authorized, under File No. BPTTL-910503F9, to construct a new Channel 14 LPTV station near Corcoran, California. But since Channel 14 has been allocated to Land Mobile service in the Los Angeles, California, area and the County of Los Angeles has strenuously objected to a Channel 14 LPTV facility anywhere in the southern San Joaquin Valley, it is now proposed to change to Channel 11z on a displacement basis.

A review of all available records indicates that interference might occur with regard to various facilities; in this instance, the attached Exhibit 13A shows that analyses per O.E.T. Bulletin No. 69 indicate population loss to any such station of less than 0.5%. It does, however, appear that clarification may be necessary with regard to co-channel (and short spaced) K11FU at Springville, California. Although Exhibit 13A indicates a status of "Clean" toward K11FU, the normally shown population counts and percentages are not provided. In this instance, attention is directed to the attached Exhibit 1, which shows both the F.C.C. and Longley-Rice derived 68 dBu areas of K11FU. The ComStudy program--conforming to O.E.T. Bulletin No. 69--counts population only in areas in which Longley-Rice predicts a specified (in this case, 68 dBu) signal strength. Since such a miniscule area is in this case uninhabited, the ComStudy program, having nothing with which to work, automatically returns the N/C (Not Calculated) symbol in the population related column.

But in point of fact, intervening terrain is such that interference is

not expected to take place with the proposed K14IK operation--a statement particularly true if K11FU were to convert to offset operation. The attached Exhibit 2 shows the service and interference contours of the existing and proposed stations (assuming offset operation) while the attached Exhibits 2A/2B show the peaks and ridges of California's Sierra Nevada, which provide a natural barrier to TV signals from Mt. Adelaide toward the K11FU service area.

Finally, in the remote event that interference should arise, Sainte Partners would--at its sole expense--convert K11FU to plus offset operation. (grantable and operationally viable per the attached Exhibit 3).

Respectfully submitted,



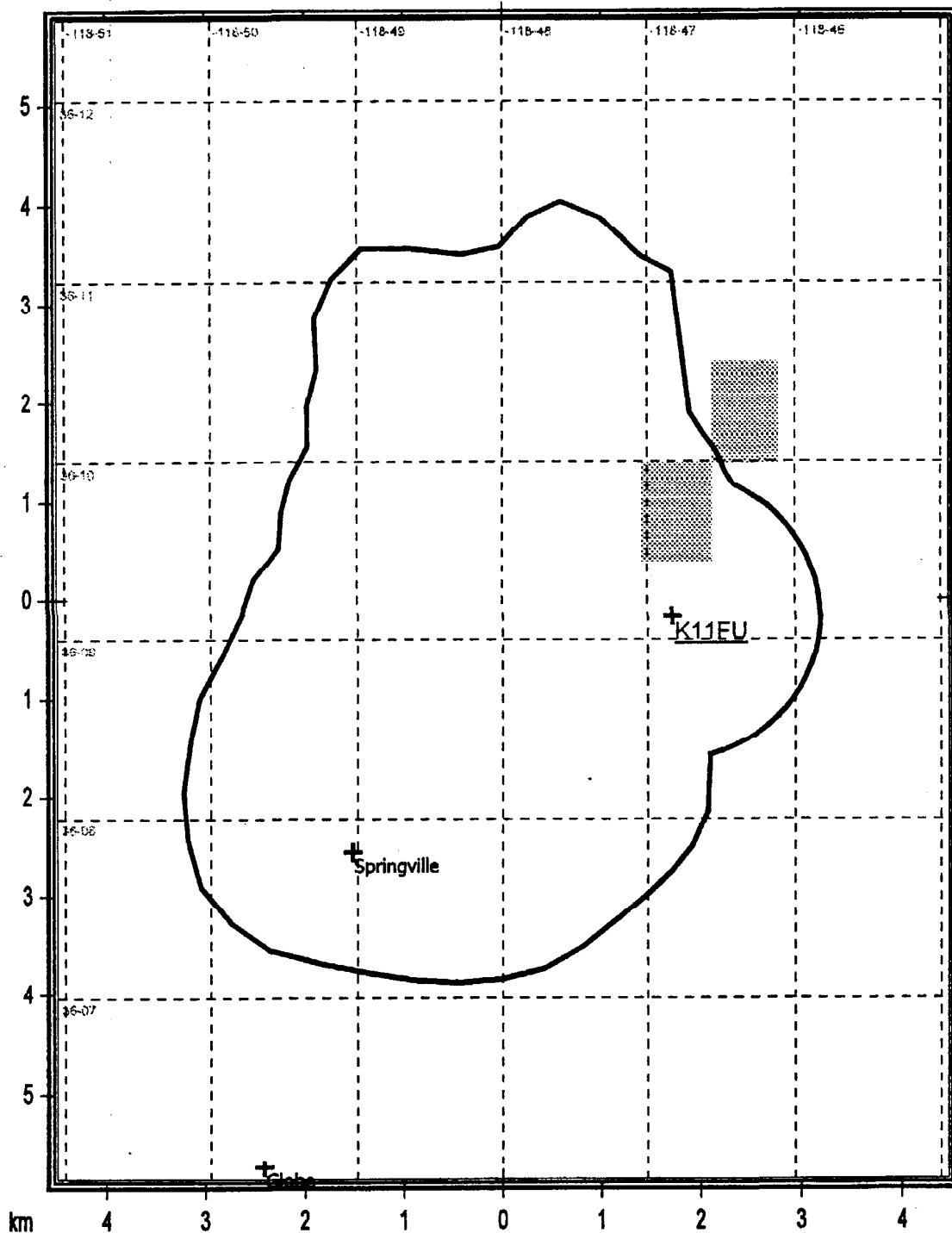
Mel Freedman
Engineer for Sainte Partners II, L.P.

10 May 2002

Summary of Channel 11 Z: Lat: 35-26-16.0 N Lon: 118-44-28.0 W ERP: 3.000 kW ComStudy 2.2 RadioSoft

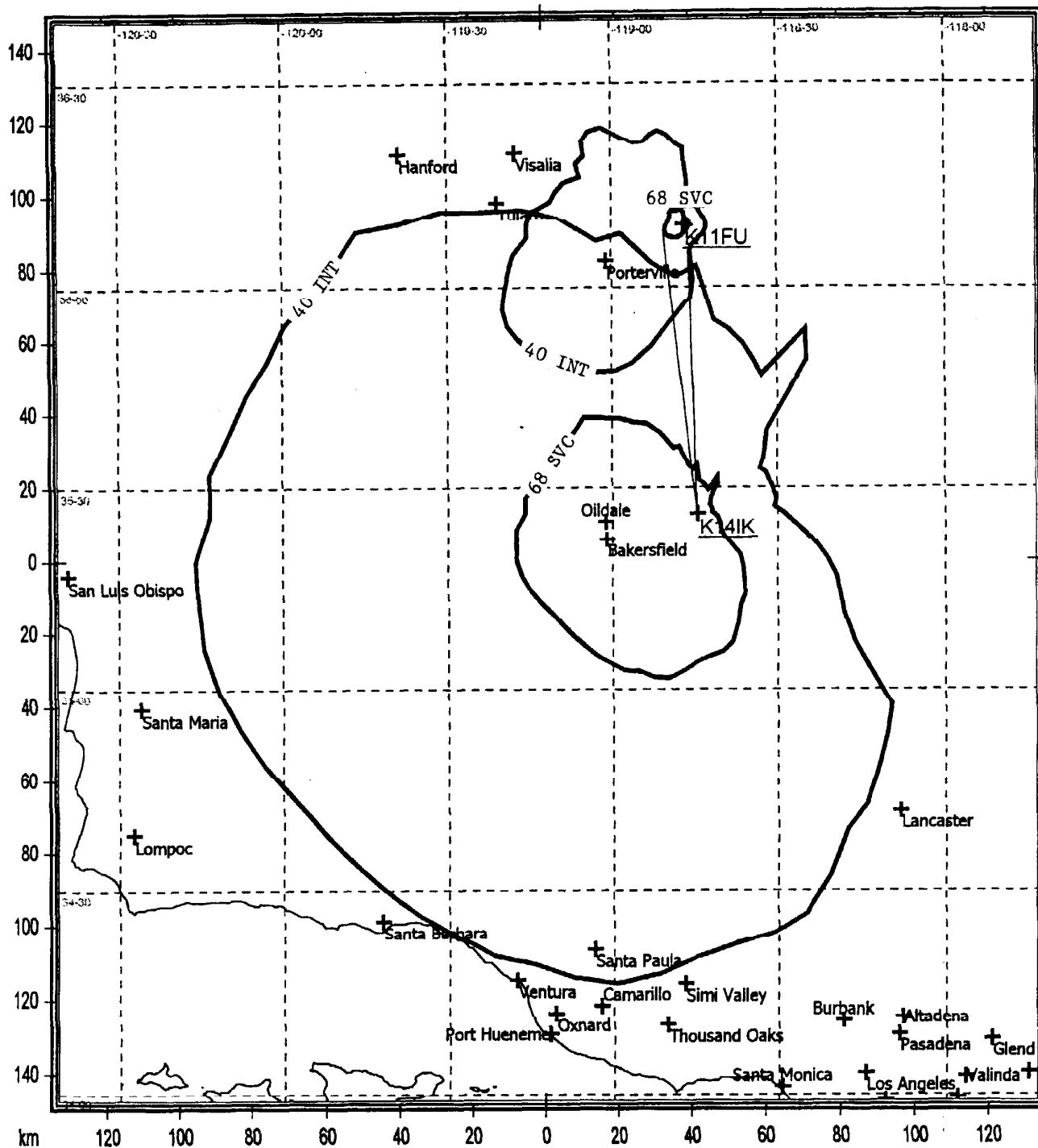
Callign	City	Class	Status	ERP	Sep Type	Status	Dist	Prtd	Clearance	DVU	Rx Gain	Rx F/B	Zone	Band	Ch#	Adj	Matrix	Svc Con	Sic	Stem	Cont'd	Siren	Old Pop	New Pop	Total Pop	New Pop
KTTV	LOS ANGELES	NTSC	LC	168,000	OM	Interf	148.4		206.8	45	0.0	8.0	2	VHI	11 Z	Co	LR	F(50.50)56	F(50.10)11	0.0%	0.4%	0.0%	0.4%	1235634	1231410	1231410
8810K	LOS ANGELES	NTSC	APP	168,000	OM	Overlap	148.4		206.8	45	0.0	8.0	2	VHI	11 Z	Co	LR	F(50.50)56	F(50.10)11	N/C	N/C	N/C	N/C	N/C	N/C	N/C
KTTV	LOS ANGELES	NTSC	LC	168,000	OM	Interf	148.4		204.2	45	0.0	8.0	0	VHI	11	Co	LR	F(50.50)56	F(50.10)11	0.0%	0.4%	0.0%	0.4%	1228223	1224343	1224343
KERO-D	BAKERSFIELD	TV	OP	4,800	OM	Clean	13.5		88.6	49	8.0	12.0	2	VHI	10	A+1	LR	F(50.50)56	F(50.10)84	0.0%	0.0%	0.0%	0.0%	834212	834212	834212
KERO-T	BAKERSFIELD	TV	USED	4,800	OM	Clean	13.5		81.6	49	8.0	12.0	2	VHI	10	A+1	LR	F(50.50)56	F(50.10)84	0.0%	0.0%	0.0%	0.0%	861218	861218	861218
K11FU	SPRINGFIELD	TV	LC	0.008	OM	Clean	78.5		67.0	45	0.0	8.0	0	VHI	11	Co	LR	F(50.50)56	F(50.10)23	N/C	N/C	N/C	N/C	N/C	N/C	N/C
KCOY-T	SANTA ANTONIO	NTSC	LC	115,000	OM	Clean	143.8		24.6	3	0.0	8.0	2	VHI	12 +	A+1	LR	F(50.50)56	F(50.10)82	0.0%	0.0%	0.0%	0.0%	301184	301184	301184
NEW	CALIFORNIA	TV	APP	3,000	OM	Clean	22.7		15.6	3	0.0	8.0	0	VHI	12	A+1	LR	F(50.50)56	F(50.10)71	0.0%	0.0%	0.0%	0.0%	258451	258451	258451
K12HL	LAKE ISLE	TV	LC	0.008	OM	Clean	40.2		31.6	3	0.0	8.0	0	VHI	12	A+1	LR	F(50.50)56	F(50.10)71	N/C	N/C	N/C	N/C	N/C	N/C	N/C
K11ML	BRIDGE	TV	LC	0.035	OM	Clean	105.9		33.0	45	0.0	8.0	0	VHI	11	Co	LR	F(50.50)56	F(50.10)23	N/C	N/C	N/C	N/C	N/C	N/C	N/C
K100C	LAKE ISLE	TV	LC	0.005	OM	Clean	40.2		33.5	13	0.0	8.0	0	VHI	10	A+1	LR	F(50.50)56	F(50.10)81	N/C	N/C	N/C	N/C	N/C	N/C	N/C
KNTV	SAN JOSE	NTSC	LC	182,000	OM	Clean	334.5		42.6	28	0.0	8.0	2	VHI	11 +	Co	LR	F(50.50)56	F(50.10)28	N/C	N/C	N/C	N/C	N/C	N/C	N/C
KMSZ-L	FRESNO	TV	APP	3,000	OM	Clean	153.3		80.8	28	0.0	8.0	0	VHI	11 -	Co	LR	F(50.50)56	F(50.10)40	N/C	N/C	N/C	N/C	N/C	N/C	N/C
NEW	SANTA ANTONIO	NTSC	LC	0.000	OM	Clean	150.2		92.9	13	0.0	8.0	2	VHI	10 -	A+1	LR	F(50.50)56	F(50.10)68	N/C	N/C	N/C	N/C	N/C	N/C	N/C
NEW	SANTA ANTONIO	NTSC	LC	0.000	OM	Clean	150.2		92.9	13	0.0	8.0	2	VHI	10 -	A+1	LR	F(50.50)56	F(50.10)68	N/C	N/C	N/C	N/C	N/C	N/C	N/C
K11KD	MAMMOTH	TV	LC	0.008	OM	Clean	244.9		98.8	45	0.0	8.0	0	VHI	11	Co	LR	F(50.50)56	F(50.10)23	N/C	N/C	N/C	N/C	N/C	N/C	N/C
KLVZ-D	LAS VEGAS	TV	CP	105,000	OM	Clean	343.0		125.7	2	8.0	12.0	2	VHI	11	Co	LR	F(50.50)38	F(50.10)15	N/C	N/C	N/C	N/C	N/C	N/C	N/C
K100I	ATASCAPITO	TV	APP	0.210	OM	Clean	178.9		140.7	13	0.0	8.0	0	VHI	10 -	A+1	LR	F(50.50)56	F(50.10)81	N/C	N/C	N/C	N/C	N/C	N/C	N/C
KLVZ	LAS VEGAS	TV	CP	105,000	OM	Clean	343.0		143.2	2	8.0	12.0	2	VHI	11	Co	LR	F(50.50)36	F(50.10)15	N/C	N/C	N/C	N/C	N/C	N/C	N/C
K100Q	LOMPOSA	TV	LC	0.162	OM	Clean	173.3		144.3	12	0.0	8.0	0	VHI	10 Z	A+1	LR	F(50.50)56	F(50.10)80	N/C	N/C	N/C	N/C	N/C	N/C	N/C
K120Z	FRESNO	TV	LC	0.263	OM	Clean	164.6		158.4	8	0.0	8.0	0	VHI	12 -	A+1	LR	F(50.50)56	F(50.10)74	N/C	N/C	N/C	N/C	N/C	N/C	N/C
K110Q	OASIS	TV	LC	0.055	OM	Clean	245.0		171.4	45	0.0	8.0	0	VHI	11	Co	LR	F(50.50)56	F(50.10)23	N/C	N/C	N/C	N/C	N/C	N/C	N/C
K11NG	SILVER	TV	LC	0.010	OM	Clean	282.1		172.7	45	0.0	8.0	0	VHI	11	Co	LR	F(50.50)56	F(50.10)23	N/C	N/C	N/C	N/C	N/C	N/C	N/C
K11HS	BRIDGE	TV	LC	0.033	OM	Clean	332.7		178.7	45	0.0	8.0	0	VHI	11	Co	LR	F(50.50)56	F(50.10)23	N/C	N/C	N/C	N/C	N/C	N/C	N/C
K11WJ	BAKER	TV	LC	0.112	OM	Clean	285.3		185.2	45	0.0	8.0	0	VHI	11	Co	LR	F(50.50)56	F(50.10)23	N/C	N/C	N/C	N/C	N/C	N/C	N/C
K12KM	FIFTEEN	TV	LC	0.003	OM	Clean	193.9		186.3	3	0.0	8.0	0	VHI	12	A+1	LR	F(50.50)56	F(50.10)71	N/C	N/C	N/C	N/C	N/C	N/C	N/C
K10JT	FIFTEEN	TV	LC	0.003	OM	Clean	193.9		189.1	13	0.0	8.0	0	VHI	10	A+1	LR	F(50.50)56	F(50.10)81	N/C	N/C	N/C	N/C	N/C	N/C	N/C
K12LJ	NEWBELLEVILLE	TV	LC	0.008	OM	Clean	199.0		192.7	3	0.0	8.0	0	VHI	12	A+1	LR	F(50.50)56	F(50.10)71	N/C	N/C	N/C	N/C	N/C	N/C	N/C
K10KX	NEWBELLEVILLE	TV	LC	0.008	OM	Clean	199.0		195.1	13	0.0	8.0	0	VHI	10	A+1	LR	F(50.50)56	F(50.10)81	N/C	N/C	N/C	N/C	N/C	N/C	N/C

TT K11FU - SPRINGVILLE, CA - CHANNEL 11N - 0.008 kW

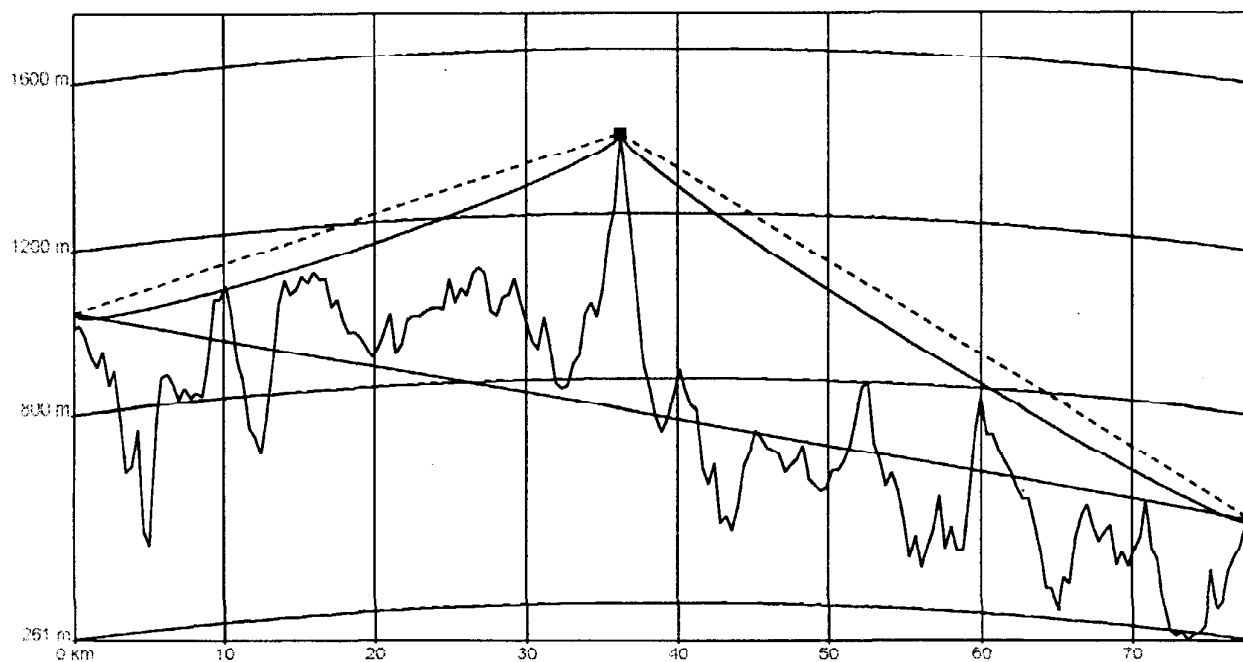


F.C.C. SERVICE/LONGLEY-RICE 68 dBu AREAS

TL K14IK - BAKERSFIELD, CA - CHANNEL 11Z - 3.0 KW



SERVICE/INTERFERENCE CONTOURS AS CAPTIONED

ComStudy 2 Path Profile**TX**

Lat: 35-26-16.0 N
 Lon: 118-44-28.0 W
 AMSL: 1010 m
 Tower AGL: 37 m

RX

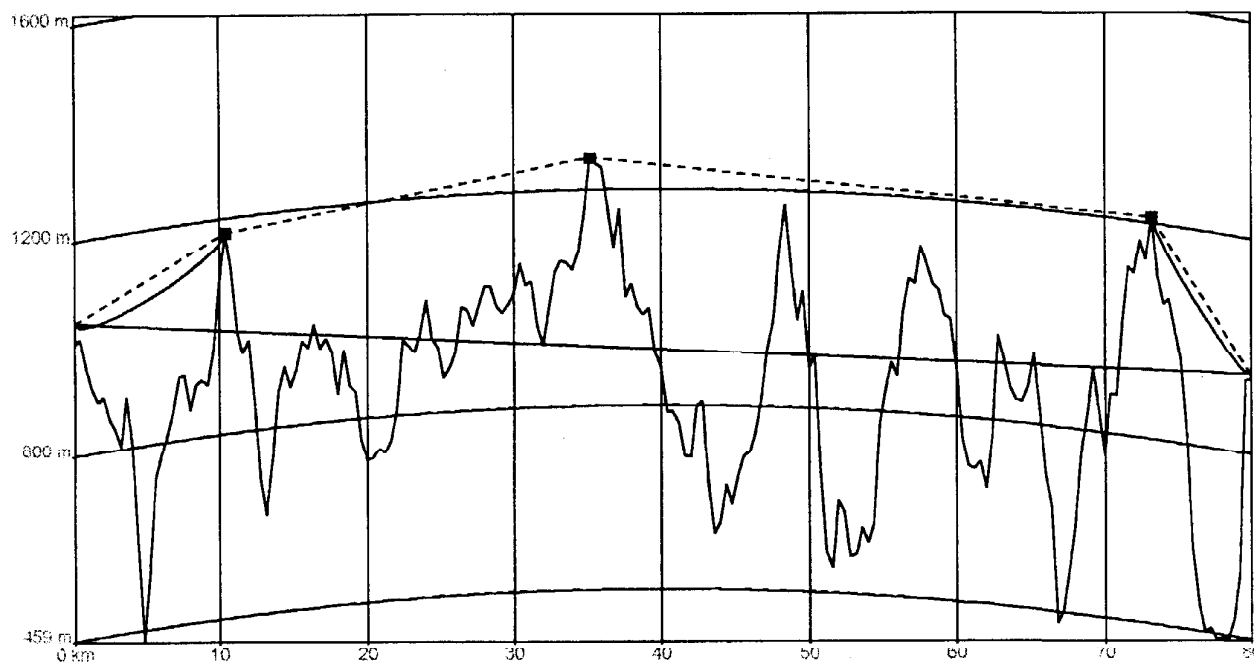
Lat: 36-08-03.8 N
 Lon: 118-50-16.3 W
 AMSL: 538 m
 Tower AGL: 9 m

Profile Info

Distance: 77.94 Km
 Bearing: 353.59 deg
 # of points: 200
 K value: 1.333
 Frequency: 201.0000
 Clearance: 0.6

Losses

Base Loss: 143.9 dB
 Fade Margin: N/A
 Diffraction: 11.5 dB
 Fresnel: 2.8 dB

ComStudy 2 Path Profile**TX**

Lat: 35-25-16.0 N
 Lon: 118-44-28.0 W
 AMSL: 1010 m
 Tower AGL: 37 m

RX

Lat: 36-09-25.4 N
 Lon: 118-45-54.7 W
 AMSL: 940 m
 Tower AGL: 9 m

Profile Info

Distance: 80.00 Km
 Bearing: 358.40 deg
 # of points: 200
 K value: 1.333
 Frequency: 201.0000
 Clearance: 0.6

Losses

Base Loss: 144.4 dB
 Fade Margin: N/A
 Diffraction: 67.4 dB
 Fresnel: 0.0 dB

