

2355 Ranch Drive  
Westminster, CO 80234  
Phone (303) 465-5742 Fax (303) 465-4067  
e-mail: STCL@comcast.net

***B. W. St. Clair***

---

## COMPREHENSIVE TECHNICAL EXHIBIT

**DISPLACEMENT APPLICATION**  
**K38IG, FCC ID 127289**  
**FCC FILE NUMBER BLTTL-20070319ACB**  
**MOSELY ENTERPRISES, LLC**

**Displacement Relief Sought.** The within application is filed seeking displacement relief from cochannel DTV facilities KVDA-DT, 139 km distant and KHCW-DT, 166 km distant. Accordingly, channel 33 is requested as a replacement for channel 38. The transmitter location and the community of license remain the same.

**Interference Study.** An OET 69 Longley-Rice study exhibit was performed for the above-captioned application. The study was performed on a Sun Blade computer running the official FCC Longley-Rice program provided by Techware, Inc. The study revealed that the subject application is in compliance with all applicable portions of §74.793.

**Border area with Mexico.** The application is filed within 320 km of the Mexican border, but does not have to go to the Mexican authorities for coordination as it is outside the 275 km distance specified for coordination of digital television facilities.

**Displacement CP replaced.** There is a previous displacement construction permit outstanding for the within facility. It is a displacement to channel 18, FCC File Number BDISTTL-20070402KPN. Use of this channel has been difficult since several adjacent channel filings in the same market and this CP has become untenable. Accordingly, it is requested that it be dismissed upon grant of the within application.

J. Randall McDonald  
September 15, 2009