

Engineering Statement and Interference Analysis

This technical statement supports this application to make changes in KBKF-LP on channel 26 in Glen Arbor, CA, FCC File No. BNPTTL-20000831AMM, Facility ID 127882.

Analog Displacement

KBKF-LP is displaced by KTFK-DT on channel 26 in Stockton, CA which is 139.6 km distance from the existing facility of KBKF-LP. Therefore, by way of this application, the Applicant applies for displacement relief and proposes to move KBKF-LP from analog channel 26 to analog channel 6. The proposed KBKF-LP facility is only 5.9 km distance from the existing facility.

The proposed channel 6 facilities were studied using the Techware's tv_process_d1ptv software on a Sun Blade 1500. The study performed a Longley-Rice study in accordance with 47.C.F.R Sections 74.705, 74.706, 74.707, 74.708, 74.709, and 74.710. This application is minor in nature because it is a displacement application where there is an overlap of the protected contours of the existing facility and that proposed herein and it continues to serve the areas specified in the geographic waiver granted pursuant to Exhibit 1 of the original application.

TV Broadcast Analog System Protection

The proposed operation causes less than 0.5% interference to surrounding analog assignments and allotments (i.e., "*de minimis*"). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC's interference standards. If necessary, a waiver of the FCC rules is respectfully requested for this analog allocation study based on use of the OET-69 procedures.

Digital TV Station Protection

The proposed operation causes less than 0.5% interference to surrounding digital assignments and allotments and facilities (i.e., "*de minimis*"). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC's interference standards. If necessary, a waiver of the FCC rules is respectfully requested for this digital allocation study based on use of the OET-69 procedures.

Low Power TV and TV Translator Station Protection

The proposed operation causes less than 0.5% interference to surrounding low power assignments and allotments (i.e., "*de minimis*"). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC's interference standards. If necessary, a waiver of the FCC rules is respectfully requested for this low power allocation study based on use of the OET-69 procedures.