

Interference

This technical statement supports this application for a new television translator station on channel 45 in Vail, CO. FCC File No. BNPTT-20000831AWT.

This instant application is a part of mutual exclusive group M326, as included in Attachment A to FCC Public Notice Low Power Television Auction No. 81 Mutual Exclusive Proposals Subject to Auction (DA 01-1289). Minimal interference to one or more of the other proposed co-channel facilities within M326 is predicted utilizing standard methodologies.

The proposed amended channel 32 facilities were studied using the RadioSoft ComStudy program version 2.2 and the results are attached hereto. The study performed a contour study in accordance with FCC rules 74.705, 74.706 and 74.707 and is summarized in Attachment A. The program lists in a column labeled "Clearance" the separation in kilometers between the proposed interfering contour and the protected contours of pertinent stations. In cases where either the contour protection or distance separation requirements are not met, the "Clearance" is a negative number. The "Total Pop" and "Old Pop" reflect the existing station's coverage without this proposed station. The "New Pop%" and "New Pop" show the effect of this proposal on the studied station. Interference is shown even if one person is affected. In Attachment B, the coverage contours of applicable stations along with non-interfered coverage, as calculated by Longley-Rice are in green, and interfered coverage, as calculated by Longley-Rice are in red.

TV Broadcast Analog System Protection

The “Clearance” to all analog television stations are positive numbers. Accordingly, FCC rule 74.705 is fully met and no waivers are required.

Digital TV Station Protection

The “Clearance” to all analog television stations are positive numbers. Accordingly, FCC rule 74.706 is fully met and no waivers are required.

Low Power TV and TV Translator Station Protection

The following is a summary of the calculated interference caused by the proposed Logan operation to pertinent surrounding low-power television (“LPTV”) allotments, assignments and applications as this proposal was originally submitted in a non-offset condition. Interference to these stations was studied by the Comstudy 2.2 program using a Longley-Rice routine. The factors applied follow OET 69 with a 1 km block size.

<u>Facility/ Call Sign</u>	<u>Location</u>	<u>Channel</u>	<u>Service Population</u>	<u>Interference Population</u>
Pitkin County Translator Dept BNPTT-20000830AWT Facility ID 129172	Carbondale, CO	45	5806	0 (0.0%)
K45CY	Crested Butte, CO	45	152	0 (0.0%)
K45AF	Parachute, CO	45	1207	0 (0.0%)
KDEV-LP	Aurora, CO	45	96215	0 (0.0%)
Dean M. Mosely BNPTTL-20000830AJN Facility ID 127534	Vernal, UT	45	3524	0 (0.0%)
Charles C. Townsend III BNPTTL-20000830ASO Facility ID 128873	Vernal, UT	45	3524	0 (0.0%)
K08HL	Fall River, CO	45	2053	0 (0.0%)

K55AU (Application)	Denver, CO	45	559619	0 (0.0%)
K55AU (CP)	Denver, CO	45	192896	0 (0.0%)
DK29DL	Maybell, CO	45	66	0 (0.0%)
K30BS (CP mod)	Redcliff, CO	30	301	0 (0.0%)
K63AB (CP)	Loveland, CO	45	123713	0 (0.0%)
K44DF	Eagle, CO	44	4489	0 (0.0%)
K63EI	Grand Junction, CO	45	46033	0 (0.0%)

Therefore, the proposed operation – as originally proposed -- causes less than 0.5% interference to the relevant, surrounding LPTV assignments, allotments and applications (i.e., “*de minimis*”), including those in MX Group 326. In the spirit of spectral efficiency, however, the applicant hereby amends his application to Zero Offset. 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 the LPTV allocation study based on use of the OET-69 procedures.

This application does not cause any predicted interference to any of the other proposals included within M326.

Because the predicted level of interference caused by any of the other proposed facilities within M326 is *de minimus* in nature, the applicant hereby accepts interference at the levels currently proposed by the other applicants within M326 and other approved facilities of the FCC in the event that they are granted stations pursuant to their proposals.

The applicant requests a waiver of Section 74.705, 74.706 and 74.707 and other applicable parts of the Rules and Regulations of the Federal Communications Commission in order to allow for the grant of this instant application.

Therefore, the applicant requests that the instant application be pulled from the mutual exclusive group M326 and be placed on a “singleton” grant list and that the construction permit for this station be granted with a condition of acceptance of interference as defined herein.