

Engineering Statement and Interference Analysis

This technical statement supports this application to make changes in K51HZ on channel 51 in Cherry Valley, CA. FCC File No. BNPTTL-20000830BDL, Facility ID 129642.

In this application, the Applicant is proposing to change the frequency offset, the maximum ERP towards radio horizon, the maximum ERP in any horizontal and vertical angle, the antenna manufacturer, make and the antenna rotation. The proposed channel 51 facilities were studied using the Techware Inc.'s tv_process_dlptv software for NTSC LPTV facilities on a Sun Blade 1500. The study performed a Longley-Rice study in accordance with FCC rules 74.705, 74.706 and 74.707. This application is minor in nature in that the transmitter site is not moving.

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.

This application does not cause any predicted interference to any of the other proposals. To the degree it is deemed necessary, 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.