Engineering Statement and Interference Analysis

This technical statement supports this application to make changes in W55DK, Channel 55, Port Jervis, NY, FCC File No. BLTTL-20070223AHM, Facility ID 130477.

Analog Displacement

W55DK was displaced off of channel 55 and was forced to cease operation on November 19, 2008 pursuant to Qualcomm's November 13, 2008 letter as attached in Exhibit 1 of this application. During the period that W55DK is silent, VTG, the Applicant herein and Licensee of W55DK, has been searching for a displacement channel as well as contacting Qualcomm about letting W55DK go on the air for a short period if time so that it can keep its license until VTG finds a displacement channel; however, Qualcomm's yet to confirm that they would give the permission.

In this application, VTG proposes to move W55DK to analog channel 49, a channel that is available in the post-digital transition universe. The proposed facility on analog channel 49 has a zero offset and is identical to the licensed facility on channel 55. The only change proposed here is to move from analog channel 55 to analog channel 49. The proposed channel 49 facilities were studied using the Techware's tv_process_lptv software on a Sun Blade 1500 using the post transition data and the 2000 US Census. 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, see Attachment A.

In light of the fact that W55DK will have been silent on November 19, 2009, eight days from the filing of this application, VTG hereby requests an immediate grant of this analog displacement application.

To the degree it is deemed necessary, the applicant requests a waiver of Section 74.705, 74.706, 74.707, 74.708, 74.709 & 74.710 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.

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.