

Engineering Statement and Interference Analysis

This technical statement supports this amendment to modify BDFCDVL-20110818ACO, a digital flash cut application for low power television station WLFM-LP, Channel 6, Chicago, Illinois, Facility ID 128239.

The proposed facility was studied using the Techware's tv_process_2010 software on a Sun Blade 1500 using the post transition database and the 2000 US Census. In this amendment, VTG proposes to modify the ERP, the transmitter output power, the antenna, antenna orientation and requests that this application be processed using the followings:

- Full Power DTV Emission Mask¹
- Cell Size for Service Analysis of 0.5 km per side
- Distance Increments for Longley-Rice Analysis of 0.5 km

This application does not cause any predicted interference to any of the other proposals. It is believed that the proposed facility complies with the requirements of Sections 74.709, 74.793(e)-(h), 74.794(B), 73.1030 and other applicable parts of the Rules and Regulations of the Federal Communications Commission. However, to the degree that it is deemed necessary, the Applicant requests a waiver of these other applicable Commission rules in order to allow for the grant of this instant application.

Digital TV Station Protection

The proposed facility causes less than 0.5% interference to surrounding digital authorized 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.

Class A, Low Power TV and TV Translator Station Protection

The proposed facility causes less than 0.5% interference to surrounding low power and Class A authorized 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.

¹ *Heading J (Use of Full Power DTV Emission Mask), Paragraph 68 of the Second Report and Order In the Matter of Amendment of Parts 73 and 74 of the Commission's Rules to Establish Rules for Digital Low Power Television, Television Translator, and Television Booster Stations and to Amend Rules for Digital Class A Television Stations, MB Docket No. 03-185. Released and adopted on July 15, 2011. Effective on August 26, 2011.*