

Engineering Statement and Interference Analysis

This technical statement supports this application to make changes to the proposed digital displacement application from NTSC channel 45 to digital channel 35 in Banning, CA, FCC File No. BDISDTL-20060901AAT, Facility ID 129618.

In this application, the Applicant is proposing to modify the ERP to 0.01kW, the transmitter output power to 0.001kW, the transmitting antenna to a directional off-the-shelf MCI 955512 oriented towards 276 degrees and a simple out-of-channel emission mask.

The Applicant requests a waiver of Sections 74.706, 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h), 74.794(b) and 73.1030 and other applicable parts of the Rules and Regulations of the Federal Communications Commission that is deemed necessary 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, and all possible variance from FCC rules.

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, and all possible variance from FCC rules.

Class A, Low Power TV and TV Translator Station Protection

The proposed operation causes less than 0.5% interference to surrounding low power assignments and applications (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, and all possible variance from FCC rules.