

Engineering Statement and Interference Analysis

This technical statement supports this application to make changes in K33HU, which is licensed to operate on channel 33 in Banning, California. FCC File No. BNPTTL-20000831AVX, Facility ID 128327.

In this application, the Applicant is proposing modify its license from an NTSC analog facility on channel 33 to a DTV digital facility on channel 33. This is not a request for a paired facility but instead is a digital flash cut application. In this application, the Applicant is proposing to modify the antenna, its height, orientation and ERP. The transmitter output power is 0.08 kW. The station will propose to operate on channel 33 with “Stringent” masking, in order to take advantage of the d/u ratios that pertain to adjacent-channel interference relationships.

The proposed channel 33 facilities were studied using the Techware’s tv_process_dlptv software on a Sun Blade 1500. The study performed a Longley-Rice study in accordance with the provisions of Section 74 Subpart G of the Commission rules to assure that the proposed facility will not cause interference with other authorized or pending analog (NTSC) and digital (DTV) full-power TV or authorized low power television (LPTV), TV translator, and Class A stations.

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 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. It is believed that the proposed facility complies with the requirements Sections 73.1030, 74.705, 74.706, 74.707, 74.709, 74.793(e)-(h), 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.