

### **Engineering Statement and Interference Analysis**

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

In this application, the Applicant is proposing to downgrade the ERP from 5.5 kw to 1.2 kw, and the antenna make and model and orientation. There is no change in the antenna location coordination or the radiation center AMSL of the facility. This application is minor in nature.

The proposed channel 33 facilities were studied using the Techware Inc.'s lptv\_process software on a Sun Blade 1500 and the results are attached hereto. The study performed a Longley-Rice study in accordance with FCC rules 74.705, 74.706 and 74.707 and is included as Attachment A.

### **Mexican Notification is Not Required**

Because the proposed facility is located in excess of 100 km from the Mexican border and is not in excess of 10 kw ERP in any horizontal or vertical angel, notification to and approval from Mexico is not required in order to grant this application.

### **TV Broadcast Analog System Protection**

As demonstrated, 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**

As demonstrated, 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.

#### **Class A, Low Power TV and TV Translator Station Protection**

As demonstrated, the proposed operation causes less than 0.5% interference to surrounding low power and Class A applications, 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.