

Engineering Statement and Interference Analysis

This long form application is being submitted pursuant to FCC Public Notice DA06-1748 released on August 31, 2006 whereas the proposed facility is not mutually exclusive with any other proposals submitted in the Auction 85 filing window.

The proposed channel 24 facility was studied using the Techware's tv_process_dlptv software on a Sun Blade 1500. 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 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.

TV Broadcast Analog System Protection

The instant application may be predicted to cause unmasked interference to the license of World Television Washington, LLC (WTV) for KBCB, channel 24 in Bellingham, WA (FCC File No. BLCT-20040128AKM). A waiver to allow any such interference to KBCB has been granted by WTV to the Applicant.

Other than as waived above, 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.

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 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.