

Engineering Statement and Interference Analysis

This application proposes a digital companion channel facility to be associated with Class A television station WEPT-CA in Kinderhook, NY, Facility ID 30429, FCC File No. BLTTA-20130917AFA.

The transmitter site of the proposed facility is 26.5 miles from the above referenced site of FCC File No. BLTTA-20130917AFA and the protected contours of the instant application and the above referenced facility overlap. This proposed facility on channel 22 was studied using the Techware's tv_process_2010 software on a Sun Blade 1500 using the post transition data, the 2010 U.S. Census, and a current station data base. The Applicant requests that the Commission processes this instant application using the standard Longley-Rice analysis settings:

- Cell Size for Service Analysis is 1.0 km/side
- Distance Increments for Longley-Rice Analysis is 1.00 km

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.

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.

Class A, Low Power TV and TV Translator Station Protection

The proposed facility is predicted to cause 3.24% interference to W22BN, 22, Danbury, CT, FCC File No. BLTTL-19940912JB, Facility ID 15585, which is more than the standard 2.0% *de minimus* requirement. However, the license for that station expired in 2007 and no renewal was ever filed. In fact the last application filed at the FCC for that facility was an extension of an STA filed in April 2003 (FCC File No. BERSTA-20030411ACT.) The facility should be taken out of the database.

Except as referenced below, 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.