

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of TRINITY BROADCASTING NETWORK, applicant for a new television translator to operate on Channel 44 in Lubbock, Texas, in support of an amendment to its Application for Construction Permit BNPTT-20000830BGE. The purpose of this amendment is to extricate the application from Auction No. 81, MX Grouping 38.

We started by conducting a computer analysis of the interference situation for the proposed facility, the results of which are shown in Exhibit B. The study is based on contour protection requirements of Sections 74.705, 74.706, and 74.707 of the FCC's Rules with respect to analog full-power, digital full-power, and low power television stations, respectively. It concludes that the facility proposed herein meets these requirements except to two stations: a proposed LPTV station on Channel 44 in Seminole, Texas (BNPTT-20000831ASK); and, a new LPTV station proposal on Channel 45 in Lubbock (BNPTTL-20000830BMR). Both of these facilities are also in MX Grouping 38.

We then conducted detailed interference studies using the Longley-Rice methodology contained in the Commission's *OET Bulletin No. 69*, with respect to these facilities of concern. The software utilizes a 1-square kilometer cell size, calculates signal strength at 0.1 kilometer increments along each radial studied, and employs the 1990 U.S. Census to count population within cells. In addition, the program does not attribute interference to the proposed facility in cells within the protected contour of the station under study where interference from another source (other than Trinity's proposed station) already is predicted to exist (also known as "masking"). The results of these studies

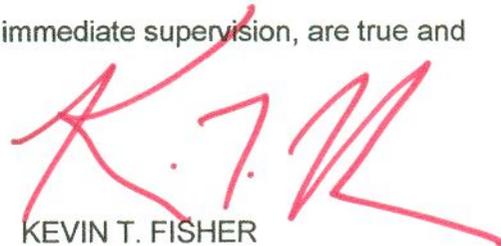
EXHIBIT A

are provided in Exhibit C. They conclude that the facility proposed herein causes no significant new interference to either of the potentially affected stations.

As a result, waiver of Section 74.707 of the Commission's Rules with respect to interference to BNPTT-20000831ASK (Seminole) and BNPTTL-20000830BMR (Lubbock) is requested and believed to be justified based on the aforementioned Longley-Rice studies.

In addition, Trinity hereby agrees to accept interference to its Channel 44 proposal in Lubbock from any other facility in MX Group 38. As a result, it is requested that Trinity's application BNPTT-20000830BGE be removed from the group and subsequently granted.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.


KEVIN T. FISHER

November 17, 2003

SMITH AND FISHER

EXHIBIT B

PROPOSED STATION
CH. 44 - LUBBOCK TX

REFERENCE
33 34 48 N
101 50 46 W

LPTV Pwr = 5 kW, HAMS COR= 1074 M

DISPLAY DATES
DATA 11-08-03
SEARCH 11-17-03

..... Channel 44Z, 650 MHz

Call	Channel	Location	Dist	Azi	FCC	Margin
NEW*	AP 45-	Lubbock	TX 6.36	199.1	> 037.37	-31.01
NEW*	AP 44Z	Seminole	TX 119.96	217.9	> 132.37	-12.41
K59GC*	CPM 44-	Plainview	TX 72.08	9.6	> 070.46	1.85
K44GW	CP 44Z	Hereford	TX 149.70	340.5	> 139.03	10.67
NEW	AP 29Z	Littlefield	TX 62.62	314.2	> 026.42	36.20
NEW	AP 44Z	Sweetwater	TX 181.16	132.9	> 144.80	36.36
K44AK	LI 44N	Memphis, Etc.	TX 177.70	39.4	> 138.27	39.43
K29FW	CP 29-	Plainview	TX 71.15	9.9	> 021.10	50.05
NEW	AP 44Z	Sweetwater	TX 195.49	134.2	> 144.05	51.44
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KIDT-L	CP 44Z	Stamford	TX 190.02	111.6	> 134.83	55.19
NEW	AP 45Z	Plainview	TX 70.57	357.2	> 013.88	56.69
NEW	AP 45N	Hobbs	NM 100.43	193.7	> 043.51	56.92
K44FG	LI 44-	Snyder	TX 125.19	134.9	> 059.61	65.58
NEW	AP 44Z	Abilene	TX 223.34	128.5	> 156.06	67.28
NEW	AP 44Z	Abilene	TX 229.64	120.6	> 157.12	72.52

* Actual radials antenna height and directional patterns used (if any)

INTERFERENCE SUMMARY
 PROPOSED TRANSLATOR
 CHANNEL 44 – LUBBOCK, TEXAS
 [AMENDMENT TO BNPTT-20000830BGE]

<u>Call Sign</u>	<u>Status</u>	<u>City, State</u>	<u>Ch.</u>	<u>Longley-Rice Service Population</u>	<u>Unmasked Interference From Proposed Facility</u>	<u>%</u>
New-T BNPTT-20000831ASK	Appl.	Seminole, TX	44	8,842	0	0
*New-T BNPTT-20000830BMR	Appl.	Lubbock, TX	45	226,019	0	0

*Study utilized 1.0-kilometer cell size and 0.1-kilometer increment spacing