

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

This technical statement supports this application to make changes in K47IA on channel 47 in Bakersfield, CA. FCC File No. BMPTTL-20030609AFX, Facility ID 128230.

In this amendment, the Applicant is proposing to change the transmitter facilities of K47IA. However, there is no change in the output channel of the proposed facility. The previously filed application to modify the K47IA Construction Permit (BMPTTL-20030609AFX), filed in June 2003, the applicant proposed to move the transmitter location of the station to a site that is within an area that may have required coordination with Mexico. This amendment to that application moves the transmitter location to Adelaide Mt., a site that does not require Mexico concurrence.

The entire 74 dBu protected contour of the authorized CP of K47AI is within the proposed 74 dBu protected contour of the proposed facility. Therefore, this application, as amended, is minor in nature.

The proposed channel 47 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 contour study in accordance with FCC rules 74.705, 74.706 and 74.707 and are included as Attachment A.

#### **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.

#### **Low Power TV and TV Translator Station Protection**

As demonstrated, 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. 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.