

Engineering Statement and Interference Analysis

This technical statement supports this application to modify low power television station WXOX-LP, which is licensed to operate on channel 44 in Cleveland, Ohio, Facility ID 6699. In this application, the Applicant is proposing to modify its license from an NTSC analog facility on channel 44 to a DTV digital facility on channel 44. This is not a request for a paired facility but instead a digital flash cut application. The proposed channel 44 facilities were studied using the Techware's tv_process_dlptv software on a Sun Blade 1500. It is believed that the proposed facility complies with the rule sections of 74.709, 74.793(e)-(h), 74.794(b) and 73.1030 and other applicable parts of the Rules and Regulations of the FCC. 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 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.

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.