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Engineering Statement

This Engineering Statement has been prepared on behalf of King Broadcasting Company ("King"), applicant for a new TV translator station to provide service at Astoria, Oregon, on Channel 17+ (FCC File No. BNPTT-20000829ATD).

On May 25, 2001, the Commission released a list of mutually exclusive LPTV and TV translator applications submitted during the Auction No. 81 filing window ending August 31, 2001. The Astoria application appears on that list in Group Number M378. At the time, this MX group was comprised of the following applications:

BNPTTL-20000831BPI	Salt Creek	Ch. 16-	Michael Mattson
BNPTT-20000830BSR	Tillamook	Ch. 16N	Acme Television Licenses
BNPTTL-20000828AHW	Warrenton	Ch. 16z	Dean M. Mosely
BNPTTL-20000828AYS	Warrenton	Ch. 16z	Charles C. Townsend, III
BNPTT-20000829ATD	Astoria	Ch. 17+	King Broadcasting Company
BNPTTL-20000831BPZ	Eola	Ch. 17+	Michael Mattson

An analysis has been made of the relationships between the applications in this MX group. King's Astoria application does not have prohibited contour overlap with any application in Group Number M378 other than the Eola and Warrenton applications.

Eola Ch. 17+

The Eola application does not cause prohibited overlap to the Astoria application; the Eola 29 dBu F(50,10) contour does not overlap the Astoria 74 dBu F(50,50) contour. However, the Astoria 29 dBu F(50,10) contour does overlap the Eola 74 dBu F(50,50) contour.

The instant amendment changes the requested Astoria offset from “+” to “z”. As depicted on the attached co-channel allocation study map, this eliminates any conflict with the Eola application.

Warrenton Ch. 16z

The application by Dean M. Mosely was dismissed by the Commission on October 26, 2001. Therefore, the Astoria application no longer has any conflict with BNPTTL-20000828AHW.

Charles C. Townsend has amended his application BNPTTL-20000828AYS to specify the same transmitter site and directional antenna pattern as the Astoria application. The Astoria Ch. 17 power level would be just 2.55 dB higher than that of Warrenton Ch. 16. Therefore, the Astoria Ch. 17 signal will never exceed 15 dB above that of the Warrenton Ch. 16 signal, and no interference will be caused by Astoria Ch. 17 to Warrenton Ch. 16. Likewise, Warrenton Ch. 16 will not cause interference to Astoria Ch. 17.

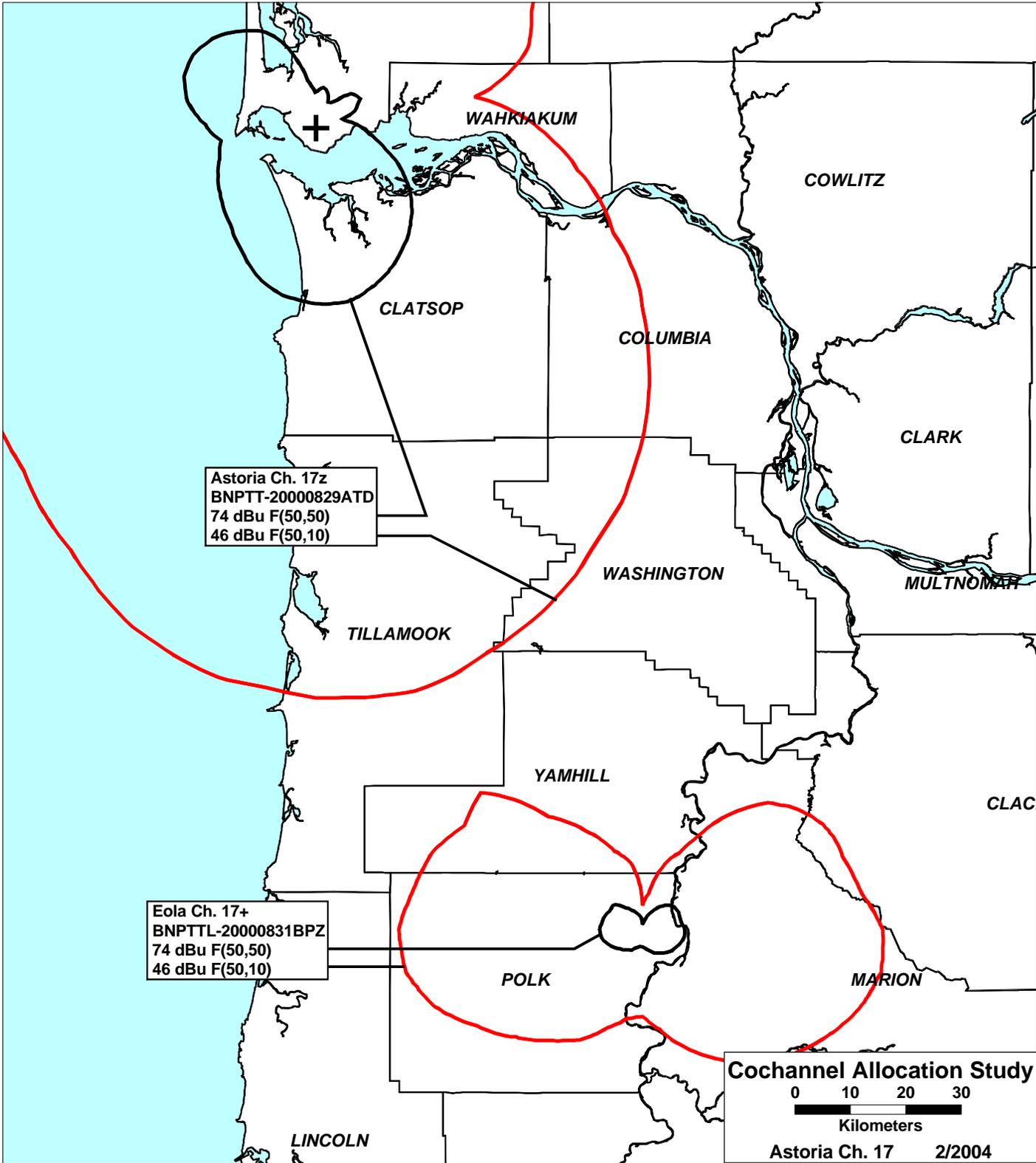
King therefore respectfully requests a waiver of §74.707 of the Commission’s Rules to the extent necessary to permit co-located operation of the Astoria Ch. 17 and Warrenton Ch. 16 facilities.

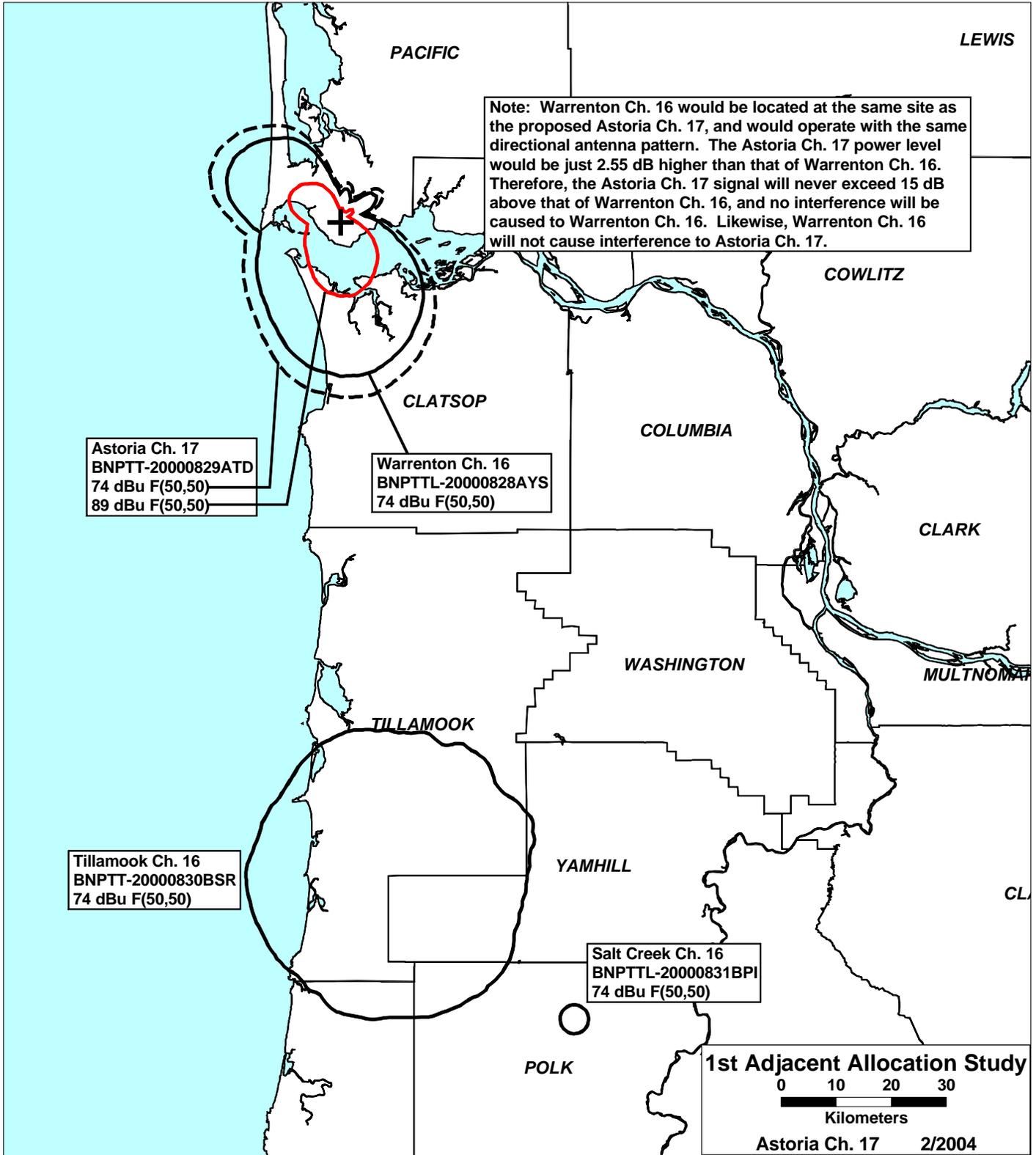
Conclusion

Therefore since King’s Astoria Ch. 17 application (as amended to specify a “z” offset) does not have prohibited contour overlap with any application in Group Number M378 other than Mr. Townsend’s Warrenton application, King respectfully requests that its application BNPTT-20000829ATD be removed from Group Number M378, and processed as a “singleton” application.

February 4, 2004

Erik C. Swanson





Note: Warrenton Ch. 16 would be located at the same site as the proposed Astoria Ch. 17, and would operate with the same directional antenna pattern. The Astoria Ch. 17 power level would be just 2.55 dB higher than that of Warrenton Ch. 16. Therefore, the Astoria Ch. 17 signal will never exceed 15 dB above that of Warrenton Ch. 16, and no interference will be caused to Warrenton Ch. 16. Likewise, Warrenton Ch. 16 will not cause interference to Astoria Ch. 17.

Astoria Ch. 17
BNPTT-20000829ATD
74 dBu F(50,50)
89 dBu F(50,50)

Warrenton Ch. 16
BNPTTL-20000828AYS
74 dBu F(50,50)

Tillamook Ch. 16
BNPTT-20000830BSR
74 dBu F(50,50)

Salt Creek Ch. 16
BNPTTL-20000831BPI
74 dBu F(50,50)

1st Adjacent Allocation Study
0 10 20 30
Kilometers
Astoria Ch. 17 2/2004