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B. W. St. Clair

**Engineering Statement in Support
Of an Application to “Displace”
K06FI to Digital Operation on Ch 17.**

Re: BDISDTT-20101108ADM, K06FI

This is in reply to your letter of March 09, 2011.

You stated that the displacement channel change request was based on 73.3572(a)(4)(iv)A which refers to the distance from a full service digital station. However, the displacement request is based on a very different problem.

The viewers of K06FI on channel 06 are in many instances receiving interference from FM station KGVA, Harlem, MT. This station is on 88.1 MHZ immediately adjacent to the upper edge of channel 06. It is rated at 95 kW ERP, almost at the maximum permitted power for this class of FM station.

While the licensee of K06FI has tolerated this interference we are concerned that if this station is converted to digital on channel 06 that the interference from KGVA to the more fragile digital signal would be beyond tolerable limits. While interference to an analog signal is annoying, interference to a digital signal results in a complete failure of reception.

As the FM station has priority over K06FI we believe it is appropriate to ask for a displacement change to a new channel when there is troublesome interference. Please consider this displacement request accordingly.

If further information would be helpful please let me know.

Respectfully submitted,

B. W. St. Clair
Engineering Consultant
March 30, 2011