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COMPREHENSIVE ENGINEERING EXHIBIT AMENDMENT OF LPTV CONSTRUCTION PERMIT APPLICATION

**AMENDMENT TO PENDING APPLICATION
K46GC, FCC ID 52216
FCC FILE NUMBER BPTTL-20040630ABG
SEATTLE STREAMING RADIO, LLC**

AMENDMENT TO PENDING APPLICATION. The within amendment is filed to modify certain parameters of BPTTL-20040630ABG. Revised portions of the application are as follows:

Section 3

- Item 5: Antenna coordinates revised to 34-24-45 North, 119-11-11 West.
- Item 6: Antenna structure registration number deleted - tower is unregistered.
- Item 7: Location Site HAMSL revised to 853 Meters
- Item 8: Overall tower HAGL revised to 30.0 Meters
- Item 9: Radiation center HAGL remains at 20.0 Meters
- Item 10: MERP toward radio horizon revised to 40.0 kW
- Item 11: MERP in any angle remains at 60.0 kW
- Item 12: Transmitting antenna revised to Directional off the Shelf; Mfr: PSI; Model PSILP16BE
Rotation revised to 195°.

DISPLACEMENT RELIEF. The within amended application continues to seek displacement relief arising from proximity to construction permit for KFTR-TV, BPCT-20020205AAB. Filed since the licensure of K46GC, this permit expands the service contour of KFTR-TV northward and places it for the first time over the community of Oxnard, CA. Thanks to topography, the interfering contour of K46GC is also over Oxnard and the result is a sharp increase in predicted interference received by KFTR-TV and a concomitant incremental increase in interference received by K46GC. Accordingly, in order to assure its survival, the licensee of K46GC requests displacement relief by means of a change of output channel from 46 to 55.

CONTINUED FOLLOWING

PAGE TWO
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INTERFERENCE ANALYSIS: The following unchanged data is submitted as an OET 69 Longley-Rice study exhibit for the above-captioned application amendment. The stations which exhibit contour overlap or short spacing and thus must be studied are:

FCC FILE NUMBER	CALLSIGN, DETAIL
BLCT-19830418KH	KTBN TV, Santa Ana, CA
BLCT-20010712AGN	KAZA TV, Avalon, CA
BLCDDT-20020906ABI	KUVI TV Bakersfield, CA
BLCDDT-20000302AAK	KFMB TV, San Diego, CA
BPCDDT-20000501ADY	KFMB TV CP, San Diego, CA
BLCT-20021213ABJ	KDOC TV, Anaheim, CA
BMPCT-20040128AHX	KDOC TV CP, Anaheim, CA
BMPTTL-20040326AKT	K55JW, Banning, CA
BMPTTL-20041119ABJ	K55JW, Banning, CA

Using a software program which matches the FCC's OET69 analysis program and run on a SUN computer, interference population loss from the within proposal to the listed facilities was shown to be less than 0.5%. Accordingly, waiver of §§74.705, 74.706 and 74.707 as appropriate is requested.

MEXICAN COORDINATION STATEMENT. This application amends a previously coordinated application in a manner which should not require further coordination. Its 19 dBu F50,10 interference contour toward Mexico does not exceed that of the previous application along radials which are less than 320 km in length between the revised transmitter site and the Mexican border.

J. R. McDonald
January 24, 2005