

FCC Form 346
Minor Modification
Venture Technologies Group, LLC
W52DW
Port Jervis, NY, Channel 52
Facility ID 130475
Exhibit 8

Engineering Statement and Interference Analysis

This technical statement supports this application to make changes in W52DW on channel 52 in Port Jervis, NY. FCC File No. BNPTTL-20000831CEX, Facility ID 130475.

In this application, the Applicant is proposing to modify the ERP to 10kW and the antenna to an omnidirectional antenna. The proposed channel 52 facilities were studied using the Techware's tv_process-dlptv software on a Sun Blade 1500. The study performed a Longley-Rice study in accordance with FCC rules 74.705, 74.706 and 74.707.

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 analog 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.

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. To the degree it is deemed necessary, 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.