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***B. W. St. Clair***

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## **ENGINEERING STATEMENT**

### **IN SUPPORT OF APPLICATION FOR LPTV CONSTRUCTION PERMIT**

**IN RE:**  
**MINOR CHANGE TO LICENSED FACILITY**  
**K46GC, FCC ID 52216**  
**FCC FILE NUMBER BLTTL-20010301AAT**  
**SEATTLE STREAMING RADIO, LLC**

**MINOR CHANGE TO LICENSED FACILITY.** The within application is filed as a minor change to licensed facility, seeking a change of transmitter location (Grade A contour overlap exists between the licensed and proposed facility), a change of antenna and a change of effective radiated power. Additionally, a change of channel is requested pursuant to a request for displacement relief, following.

**DISPLACEMENT RELIEF.** The within application seeks 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 westward and places it for the first time over the community of Oxnard, CA and into contact with the K46GC interfering contour. The result is a sharp increase in predicted interference received by KFTR-TV. Prior to the CP, no interference was received by KFTR-TV; subsequent to it, over 52,000 persons suffer interference. Additionally, there is an 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.

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

<b>FCC FILE NUMBER</b>	<b>CALLSIGN, DETAIL</b>
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-20000501ADV	KFMB TV CP, San Diego, CA
BLCT-20021213ABJ	KDOC TV, Anaheim, CA
BPCT-20030226AAY	KDOC TV CP, Anaheim, CA
BMPTTL-20040326AKT	K55JW, Banning, CA
BMPTTL-20040428ABD	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.

J. R. McDonald  
June 29, 2004