

Interference

This technical statement supports this application for a new low-power television station on channel 32 in Chico, CA. FCC File No. BNPTTL-20000831APB.

This instant application is a part of mutual exclusive group M130, as included in Attachment A to FCC Public Notice Low Power Television Auction No. 81 Mutual Exclusive Proposals Subject to Auction (DA 01-1289). This application is part of this group only because it is either co-channel or adjacent channel to one or more of the other proposed facilities within M130 and minimal interference to such other facilities is predicted utilizing standard methodologies.

The proposed channel 32 facilities were studied using the RadioSoft ComStudy program version 2.2 and the results are attached hereto. The study performed a contour study in accordance with FCC rules 74.705, 74.706 and 74.707 and is summarized in Attachment A. The program lists in a column labeled "Clearance" the separation in kilometers between the proposed interfering contour and the protected contours of pertinent stations. In cases where either the contour protection or distance separation requirements are not met, the "Clearance" is a negative number. The "Total Pop" and "Old Pop" reflect the existing station's coverage without this proposed station. The "New Pop%" and "New Pop" show the effect of this proposal on the studied station. Interference is shown even if one person is affected. In Attachment B, the coverage contours of applicable stations along with non-interfered coverage, as calculated by Longley-Rice are in green, and interfered coverage, as calculated by Longley-Rice are in red.

In addition, the proposed channel 32 facilities were studied using the Techware Inc.'s lptv_process software on a Sun Blade 1500 and the results are attached hereto as Attachment C.

TV Broadcast Analog System Protection

The "Clearance" to all analog television stations are positive numbers. Accordingly, FCC rule 74.705 is fully met and no waivers are required.

Digital TV Station Protection

The following is a summary of the calculated interference caused by the proposed Chico operation to pertinent surrounding digital television ("DTV") allotments and assignments. Interference to these stations was studied by the Comstudy 2.2 program using a Longley-Rice routine. The factors applied follow OET 69 with a 1 km block size.

<u>Facility/ Call Sign</u>	<u>Location</u>	<u>Channel</u>	<u>Service Population</u>	<u>Interference Population</u>
KTVN	Reno	32	349,005	0 (0.0%)

Therefore, the proposed operation causes less than 0.5% interference to the relevant, surrounding digital 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 the LPTV allocation study based on use of the OET-69 procedures.

Low Power TV and TV Translator Station Protection

The following is a summary of the calculated interference caused by the proposed Chico operation to pertinent surrounding low-power television ("LPTV") allotments and assignments. Interference to these stations was studied by the Comstudy 2.2 program using a Longley-Rice routine. The factors applied follow OET 69 with a 1 km block size.

<u>Facility/ Call Sign</u>	<u>Location</u>	<u>Channel</u>	<u>Service Population</u>	<u>Interference Population</u>
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Telecom Wireless, LLC File No. BNPTTL-20000830BTC Facility ID 131286	Chico	33	126,125	0 (0.0%)
Paul Strieby and Matt Tuter File No. BNPTTL-20000731AFG Facility Id 130268	Chico	33	1,774	0 (0.0%)
Three Angels Broadcasting Network, Inc. File No. BNPTTL-2000831BRW Facility ID 129293	Chico	32	27,323	0 (0.0%)

Therefore, the proposed operation causes less than 0.5% interference to the relevant, surrounding LPTV 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 the LPTV allocation study based on use of the OET-69 procedures.

This application does not cause any predicted interference to any of the other proposals included within M130.

Because the predicted level of interference caused by any of the other proposed facilities within M130 is *de minimus* in nature, specifically that from the above-referenced application of Paul Strieby and Matt Tutor (Facility ID 130268) and Three Angels Broadcasting (Facility ID 129293), the applicant hereby accepts interference at the levels currently proposed by the other applicants within M130 in the event that they are granted stations pursuant to their proposals.

The applicant requests a waiver of Section 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.

Therefore, the applicant requests that the instant application be pulled from the mutual exclusive group M130 and be placed on a “singleton” grant list and that the construction permit for this station be granted with a condition of acceptance of interference as defined herein.