

**DELAWDER COMMUNICATIONS, INC.**

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**ENGINEERING REPORT**

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Roger Mills

K66GD, Vidor (to Beaumont), TX: Amendment to Digital Minor Displacement Application

**EXHIBIT 11**

**LPTV DISPLACEMENT AS DIGITAL (AMENDMENT) – INTERFERENCE STUDIES**

1. Roger Mills ("Applicant") is the licensee of K66GD, Vidor, TX, analog channel 66, with a pending displacement application that specifies channel 6 digital (FCC File No. BDISDVL-20090630ADL). By this application, Applicant is proposing to amend BDISDVL-20090630ADL in order to specify an omni-directional antenna. No other changes are proposed to BDISDVL-20090630ADL. As an out-of-core station, this application qualifies for displacement relief as a minor change pursuant to 47 CFR Section 73.3572(a)(4)(ii).

2. Attached as Figure 1 are the OET-69 study results for the proposed facility (as the referenced station) as determined on a Sun Computer using a Solaris (Unix-based) operating system and using the same OET-69 software as developed for use by the FCC. (According to the software developer, the program used herein provides identical results as the FCC's OET-69 processing program.) All studies are conducted in accordance with current FCC Rules and Regulations. As demonstrated by Figure 1, the proposed facility adequately protects all required US broadcast stations as required by the FCC Rules.

3. BDISDVL-20090630ADL (as initially filed and as herein amended) does not protect BDISDVL-20090401AWB, which was amended on June 30, 2009 with facilities that no longer protect the pre-transition TV environment. Therefore, BDISDVL-20090630ADL and BDISDVL-20090401AWB both have a June 30, 2009 cutoff date and are currently mutually-exclusive with each other. Furthermore, on August 8, 2009, the FCC informed the applicant of BDISDVL-20090401AWB (Foster Charitable Foundation, Inc.) by FCC letter that its application is defective for not providing a valid reason for displacement and subject to dismissal within 30 days.

4. The applicant accepts any interference that is predicted to exist to the proposed facility by any licensed, authorized or previously-proposed primary TV station. The applicant also accepts any interference that is predicted to exist to the proposed facility by any secondary TV facility that is given preferential status by the FCC over the Applicant's herein proposed facility.