

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of ROSEBURG BROADCASTING, INC., licensee of Low Power Television Station KAMK-LP Channel 53 in Eugene, Oregon, in support of this amendment to its pending minor change Application for Construction Permit BPTTL-20040122AAA. The purpose of this supplement is to provide additional data in response to the Commission's concern regarding impermissible interference to KLSR-TV, Channel 34 in Eugene, Oregon.

As mentioned in the above-referenced application, we conducted detailed interference studies using the Longley-Rice methodology contained in the Commission's *OET Bulletin No. 69* with respect to KLSR-TV. The software utilizes a 2-square kilometer cell size, calculates signal strength at 1.0 kilometer increments along each radial studied, and employs the 1990 U.S. Census to count population within cells. In addition, we reconfigured the program to utilize a 1-square kilometer cell size while calculating signal strength at 0.1 kilometer increments. In both cases the program did not take into account masking from any other station. The results of these studies are provided in Exhibit B. In both cases, they conclude that the facility proposed herein causes no significant new interference to KSLV-TV.

EXHIBIT A

As a result, a waiver of Section 74.705 of the Commission's Rules with respect to interference to KLSR-TV was requested and believed to be justified based on the additional Longley-Rice studies.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read 'J.S. Fisher', with a long horizontal flourish extending to the right.

JEFFREY S. FISHER

November 3, 2005

V-Soft Communications Population Report

KLSRTV (34Z) Eugene, OR - BLCT19910920KH
 Lat: 44-00-04 N Lng: 123-06-22 W ERP: 3090.0 kW AMSL: 457.0 m
 TV Incoming Interference Study
 Interference Considered Within: Noise Limited FCC Contour
 Signal Resolution: 2.0 km
 LR Profile Spacing Increment: 1.0 km
 Consider NTSC Taboo: Yes
 KWX error points are considered to
 be interference free coverage.
 # of radials computed for contours: 72
 Contours calculated using 8 radial HAAT.
 Using lptv/translators D/U rules.
 Threshold for reception: 63.6836
 Pop Centroid DB: 1990 US Census

Study Date: 11-1-2005
 TV Database Date: 11-01-05

Primary Terrain: V-Soft 3 Second US Terrain
 Secondary Terrain: V-Soft 3 Second US Terrain

Population Database: 1990 US Census

Percentages calculated using a baseline population of 380,072.

Stations which cause interference:

Call Letters	H Units	Population	%	Area (sq. km)
KAMK-L.A (49Z)	71	202	0.053	14.07

Totals for KLSRTV (34Z)

Calculation Area Population:	425,033	(11549.2 sq. km)
Not Affected by Terrain Loss:	380,072	(8669.0 sq. km)
Total NTSC Interference:	202	(14.1 sq. km)
DTV Only Interference:	0	(-0.0 sq. km)
Total DTV Interference:	0	(0.0 sq. km)
Interfered Population:	202	(14.1 sq. km)
Interference Free:	379,870	(8654.9 sq. km)
Percent Interference:	0.05		
Terrain Blocked Population:	44,961	(2880.3 sq. km)
Contour Area Population:	425,278		

KLSRTV (34Z) Eugene, OR - BLCT19910920KH
 Lat: 44-00-04 N Lng: 123-06-22 W ERP: 3090.0 kW AMSL: 457.0 m
 TV Incoming Interference Study
 Interference Considered Within: Noise Limited FCC Contour
 Signal Resolution: 1.0 km
 LR Profile Spacing Increment: 0.1 km
 Consider NTSC Taboo: Yes
 KWX error points are considered to
 be interference free coverage.
 # of radials computed for contours: 72
 Contours calculated using 8 radial HAAT.
 Using lptv/translators D/U rules.
 Threshold for reception: 63.6836
 Pop Centroid DB: 1990 US Census

Study Date: 11-1-2005
 TV Database Date: 11-01-05

Primary Terrain: V-Soft 3 Second US Terrain
 Secondary Terrain: V-Soft 3 Second US Terrain

Population Database: 1990 US Census

Percentages calculated using a baseline population of 382,604.

Stations which cause interference:

Call Letters	H Units	Population	%	Area (sq. km)
KAMK-L.A (49Z)	3	10	0.003	0.88

Stations considered which do not cause interference:

 Totals for KLSRTV (34Z)

Calculation Area Population:	425,187	(11572.2 sq. km)
Not Affected by Terrain Loss:	382,604	(9536.5 sq. km)
Total NTSC Interference:	10	(0.9 sq. km)
DTV Only Interference:	0	(0.0 sq. km)
Total DTV Interference:	0	(0.0 sq. km)
Interfered Population:	10	(0.9 sq. km)
Interference Free:	382,594	(9535.6 sq. km)
Percent Interference:	0.00		
Terrain Blocked Population:	42,583	(2035.7 sq. km)
Contour Area Population:	425,278		