

ENGINEERING STATEMENT

Renard Communications Corp. (“Renard”) is the permittee of construction permit BDISDTL-20080701AEZ, which authorizes digital operation on channel 50 for displaced LPTV station WBQM-LP, Brooklyn, NY.

Renard is now proposing modification of the CP by requesting a power increase. Renard respectfully requests a waiver of Section 74.793(f) of the Commission’s rules. Specifically, with regard to full-power station WNJN, channel 50, Montclair, NJ, it is requested that predicted interference be disregarded. It is imminent that WNJN will cease analog broadcasting no later than 2/17/09 (or 3/19/09 if full-power stations are uniformly granted a 30-day extension to better inform the public of the digital transition).

This is a matter not unlike that of a group of FM stations that may seek a channel change and/or power upgrade. In these cases, the FCC may specify a special condition on the construction permit directing Station B that it may not implement its upgraded facilities until Station A files its license application certifying that it has completed the technical changes in its CP which were necessary (site relocation and/or channel change) for Station B to implement its new facilities.

Likewise, the Commission has allowed full-power television stations to specify post-transition facilities without regard for other full-power analog stations that are required to cease operation. Unlike the scenario for the FM stations where there is a degree of uncertainty when and whether a given FM station may complete its construction thereby paving the way for the second station to implement its newly authorized facilities, this situation is a certainty due to the fact that analog transmissions by full-power stations must cease.

There is a greater efficiency, and it is in the public interest, that LPTV stations not be delayed anymore than necessary to be able to implement facilities that they would be permitted to utilize after the analog transmissions of a full-power station have ceased.

Therefore, Renard requests grant of a CP with the facilities requested herein stating the condition that it may not commence operation prior to midnight of February 17, 2009, or by such other date as the Commission may establish in the future, without prior approval from the Commission.