

DELAWDER COMMUNICATIONS, INC.

P.O. Box 1095

Ashburn, Virginia 20146-1095

(703) 299-9222

ENGINEERING REPORT

International Communications Network, Inc.

K61GH, National City, CA: STA Request for Analog Service on Channel 69(z)

EXHIBIT 22

LPTV STA SUPPORT WITH INTERFERENCE STUDIES

1. International Communications Network, Inc. ("Applicant") is the licensee of K61GH, National City, CA, analog channel 61. (National City is a community in the San Diego area.) This Engineering Exhibit supports a request for Special Temporary Authority ("STA") to temporarily operate the analog facility from a new transmitter site located at Mt. San Miguel on channel 69 analog, with zero frequency offset.

2. Since KSWB-TV has already ceased its licensed channel 69(z) analog service at San Diego (at the same transmitter location on Mt. San Miguel as herein proposed by Applicant), grant of this STA is possible without causing interference to any other primary or secondary TV facility. Also, since the proposed facility does not extend service beyond that of the previously licensed KSWB-TV channel 69 analog facility, coordination of the STA facility with Mexico is not deemed necessary.

3. 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.) As demonstrated by Figure 1, the proposed facility adequately protects all other required US broadcast stations as required by the FCC Rules. All studies are conducted in accordance with current FCC Rules and Regulations. (Note: Once the study results to KSWB-TV are removed, no stations are determined to require a detailed OET-69 showing; thus, no affected station studies are included in Figure 1.)

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.

FIGURE 1 – OET-69 SHOWING FOR K61GH, NATIONAL CITY, CA, CH 69z (ANALOG)

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 03-02-2009 Time: 16:08:31

Record Selected for Analysis

K61GH USERRECORD-01 NATIONAL CITY CA US
Channel 69 ERP 150. kW HAAT 723. m RCAMSL 00806 m
Latitude 032-41-47 Longitude 0116-56-09
Status APP Zone 2 Border Offset Z
Dir Antenna Make usr Model SBP_UPSL Beam tilt N Ref Azimuth 270.
Last update Cutoff date Docket
Comments
Applicant

Census data selected: 1990

Cell Size for Service Analysis 2.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Not full service station

Facility meets maximum power limit

Azimuth (Deg)	ERP (kW)	HAAT (m)	74.0 dBu F(50,50) (km)
0.0	0.000	638.6	1.0
45.0	0.000	533.7	1.0
90.0	0.000	395.8	1.0
135.0	0.000	280.8	1.0
180.0	0.000	646.1	1.0
225.0	34.560	680.5	43.7
270.0	150.000	722.7	55.4
315.0	34.921	646.0	43.1

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quiet zone

Proposed facility OK toward Table Mountain

Proposed facility is beyond the Canadian coordination distance

Proposed facility is within the Mexican coordination distance
Distance to border = 16.2km

Proposed station is OK toward AM broadcast stations

FIGURE 1 – OET-69 SHOWING FOR K61GH, NATIONAL CITY, CA, CH 69z (ANALOG)

Start of Interference Analysis

Channel	Proposed Station Call	City/State	ARN
69	K61GH	NATIONAL CITY CA	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
69	KSWB-TV	SAN DIEGO CA	0.1	LIC	BLCT	-19970929KI

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Analysis of Interference to Affected Station 1

NTSC Baseline Analysis

Channel	Call	City/State	Application	Ref. No.
69	KSWB	SAN DIEGO CA	DTVPLN	-NPLN2010

(NOTE: SINCE KSWB HAS CEASED TO OPERATE ON CHANNEL 69, PROTECTION TO THIS FACILITY IS NOT DEEMED NECESSARY BY THE PROPOSED STA FACILITY. THE STUDY TO THIS STATION HAS, THEREFORE, BEEN REMOVED.)

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