

Interference Analysis
DISPLACEMENT APPLICATION FOR LPTV KNAV-LP
FCC File No. BLTTL-19900416IE

This Technical Exhibit is attached to FCC Form 346 in support of the Applicant's request for displacement relief and the grant of a construction permit for KNAV-LP. KNAV-LP is presently licensed to operate on NTSC Channel 30. However, Channel 30 has been allocated for use by DTV facility KMPX-DT, Decatur, Texas (facility ID. 73701). KMPX is predicted to cause 99.1% interference to the protected coverage area for KNAV. Accordingly, KNAV-LP files this application seeking displacement relief to channel 22. KNAV-LP proposes to continue operations from its presently licensed broadcast site.

Interference Analysis

A study has been conducted using the provisions of sections 74.703 74.705, 74.706, 74.707, 74.708 and 74.709 which indicates that the proposal will not create prohibited interference with other existing NTSC full power, DTV, LPTV, or Land Mobile facilities other than three Full-Power NTSC and three DTV facilities all listed in the tables below. As shown in the following tables, based upon the provisions of OET 69, this proposed facility's operation complies with the FCC's interference criteria towards these six facilities. Below is a complete analysis and tabulation of the predicted interference that would be caused by this proposal pursuant to the provisions of OET 69. This analysis indicates that no prohibited interference will be caused by the operation of the proposed facility to any Full Power NTSC or DTV facilities. **Accordingly, applicant requests a waiver of Section 74.705 and Section 74.706, based upon the results of the OET 69 analysis with regard to the facilities listed below.**

In addition, one LPTV application is predicted to suffer interference from this proposal. However, this LPTV applicant has provided a written waiver of interference, a copy of which is attached to this application.

LPTV and Class A Protections

The proposed facility complies with all LPTV and Class A facility protections as contained in section 74.707 and 74.708 without reliance upon OET 69 standards other than with regard to the pending application of K61CV-LP (facility Id No. 52928).

K61CV has executed a waiver of interference agreeing to accept any interference that may be caused by this application. The executed copy of this waiver is attached to this application.

Full Service NTSC Facilities

An interference analysis was conducted using 74.705 criteria and OET 69 Bulletin standards with regard to the effect of the proposed station on the NTSC full power station listed below. Below is a tabulation of the results from the Bulletin OET 69 study.

NTSC Full-Power	FCC Service Population	Proposed Interference Population
KMPX, CH 29Z Decatur, TX FILE NO. BMLCT-20030623ADR License	3,719,291	0 (0.0%)
KMPX, CH 29Z Decatur, TX FILE NO. BMPCT-20031121AOP CP Mod	4,053,158	0 (0.0%)
KTXA, CH 21- Fort Worth, TX FILE NO. BLCT-19801231KF License	4,054,197	439 (0.0%)
KUVN, CH 23Z Garland, TX FILE NO. BLCT-20030602BGW License	4,053,348	3,152 (0.08%)

As shown by the table above, the facility proposed by this application will cause virtually zero interference to any NTSC Full-Power facilities.

Full Service DTV Facilities

An interference analysis was conducted using 74.706 criteria and OET 69 Bulletin standards with regard to the effect of the proposed station on the DTV full power stations listed below. Below is a tabulation of the results from the Bulletin OET 69 study

DTV Full-Power	FCC Service Population	Proposed Interference Population
KETK-DT, CH 22 Jacksonville, TX DTV Allotment	542,094	349 (0.06%)
KETK-DT, CH 22 Jacksonville, TX File No. BPCDT-19991014ACD CP	802,728	704 (0.09%)
KETK-DT, CH 22 Jacksonville, TX File No. BDSTA-20030210AFB STA	231,309	794 (0.34%)
KAUZ, CH22 Wichita Falls, TX DTV Allotment	375,970	55 (.01%)
KAUZ, CH22 Wichita Falls, TX File No. BPCDT-19991028ADQ CP	312,166	317 (0.1%)

KLRU, CH 22 Austin, TX File No. BMPEDT-20000501AIT CP Mod	1,309,533	0 (0.0%)
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The table above indicates that this proposed facility will cause almost no interference to existing or permitted DTV facilities, and what interference is predicted is far below the “rounding” tolerance allowed for such calculations.

Land Mobile

There are no co-channel or first adjacent land mobile facilities within 145 kilometers of this proposal. Accordingly, this proposal meets all Land Mobile protections as contained in Section 74.709.