

**DELAWDER COMMUNICATIONS, INC.**

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**ENGINEERING REPORT**

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CTVN Harrisburg, LLC

W35BT: Displacement Digital Minor Modification (Channel 7D)

**EXHIBIT 11**

**LPTV MINOR MODIFICATION – INTERFERENCE STUDIES**

1. CTVN Harrisburg, LLC (“Applicant”) is the licensee of W35BT, Harrisburg, PA, analog channel 35. By this digital displacement (with “flash cut” to digital) minor modification application, Applicant proposes a change to channel 7D with a 250 watt ERP omnidirectional facility that will operate from its licensed W35BT transmitter site. No other changes are proposed. Because W35BT is currently located only 150 kilometers from co-channel digital station WDCA-DT (Washington, DC, 35D), pursuant to 47 CFR Section 73.3572, the proposed displacement to channel 7D is a minor change. (W35BT is also located within the 265 kilometer displacement distance of this rule section to the planned post-transition use of channel 35D by WDCA-DT and by WYBE-DT (Philadelphia, PA).

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.) Except for those stations also licensed, authorized or proposed by the applicant, or those stations that have consented to predicted interference from this proposal, the proposed facility adequately protects all US broadcast stations as required by the FCC Rules. All studies are conducted in accordance with current FCC Rules and Regulations.

3. The Applicant accepts any existing and future interference that may result from any primary or secondary TV station that is otherwise deemed to have status priority to the herein-proposed facility.