

Engineering Statement and Interference Analysis

This technical statement amends the application to make changes in WXOX-LP on channel 65 in Cleveland, OH. FCC File No. BMPTTL-JG0601JF, Facility ID 6699.

In this application, the Applicant is proposing to amend a pending application to modify WXOX-LP from channel 65, from which it is displaced to channel 44 (FCC File No. BPTTL-20050927ALC). Because there is no change in the transmitter site location, this application remains minor in nature. In this amendment, the applicant is preparing to change antenna pattern, offset and maximum ERP. See Attachment A.

The proposed channel 44 facilities were studied using the Techware Inc.'s lptv_process software on a Sun Blade 1500 and the results are attached hereto. The study performed a Longley-Rice study in accordance with FCC rules 74.705, 74.706 and 74.707.

Canadian Coordination

The proposed facility will require Canadian Coordination. After discussing why a previous application (FCC File No. BPTTL-20050328ATZ) to modify this facility to channel 44 was rejected by Canadian authorities, the application contacted Industry Canada directly. On September 28, 2005, Martin Dumas, head of TV Broadcast Engineer of Industry Canada told me that the previously filed application was dismissed because it interfered with CBLN-TV-6, an NTSC station on channel 44 at Normandie, Ontario, Canada, which is not in the FCC database. Mr. Dumas provided us with the technical parameters of the station – 5.83 kw ERP, 296.5m RC-AMSL, along with the antenna pattern (See Attachment D). I used these parameters to make sure that CBLN-TV-6 is protected. See Attachment B and C. Attachment C is a blowup of the clearance between the 36 dBu interfering contour of the proposal and the protected 64 dBu contour of CBLN-TV-6.

TV Broadcast Analog System Protection

As demonstrated, the proposed operation causes less than 0.5% interference to surrounding analog assignments and allotments (i.e., “*de minimis*”). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards. If necessary, a waiver of the FCC rules is respectfully requested for this analog allocation study based on use of the OET-69 procedures.

Digital TV Station Protection

As demonstrated, the proposed operation causes less than 0.5% interference to surrounding digital assignments and allotments and facilities (i.e., “*de minimis*”). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards. If necessary, a waiver of the FCC rules is respectfully requested for this digital allocation study based on use of the OET-69 procedures.

Low Power TV and TV Translator Station Protection

As demonstrated, the proposed operation causes less than 0.5% interference to surrounding low power assignments and allotments (i.e., “*de minimis*”). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards. If necessary, a waiver of the FCC rules is respectfully requested for this low power allocation study based on use of the OET-69 procedures.

This application does not cause any predicted interference to any of the other proposals. To the degree it is deemed necessary, the applicant requests a waiver of Section 74.705, 74.706, and 74.707 and other applicable parts of the Rules and Regulations of the Federal Communications Commission in order to allow for the grant of this instant application.