

Engineering Statement and Interference Analysis

This technical statement supports this application to make changes in W52DW, Channel 52, Port Jervis, NY, Facility ID 130475, licensed to Venture Technologies Group, LLC (“VTG”).

Analog Displacement

W52DW is displaced off of channel 52 due to spectrum reallocation. By this application, VTG seeks displacement relief and proposes to move W52DW from analog channel 52 to analog channel 24.

The proposed facilities were studied using the Techware’s tv_process_2010 software on a Sun Blade 1500 using the post transition data and the 2000 US Census. This application does not cause any predicted interference to any of the other proposals except for those referenced above.

To the degree it is deemed necessary, the applicant requests a waiver of Section 74.705, 74.706, 74.707, 74.708, 74.709 & 74.710 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. While analog-to-analog displacement applications are not subject to Section 74.787(c) of the Rules and Regulations of the Federal Communications Commission, which specifies a September 1, 2011 Out-of-Core Displacement Application Deadline¹, VTG requests a waiver of this rule if deemed necessary, to allow for the grant of this instant analog displacement application.

Digital TV Station Protection

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.

Low Power TV and TV Translator Station Protection

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.

¹ See 47 C.F.R. §74.787 (c) “Any digital displacement application submitted by a low power television station operating analog (NTSC) or digital facilities above Channel 51 that is submitted after 11:59 pm local time on September 1, 2011 will be dismissed.”