Engineering Statement and Interference Analysis

This technical statement supports this application to modify digital flash cut facility K60GV-D, Maltby, Washington, Facility ID 128217, FCC File No. BDFCDTL-20090630ACR.

Digital Displacement Relief

In this application, the Applicant seeks displacement relief and proposes to move K60GV-D from channel 60 to channel 45. K60GV-D has been asked to cease operations pursuant to the letter from AT&T Mobility, see *Attachment A*.

The proposed facility on channel 45 was studied using the Techware's tv_process_2010 software on a Sun Blade 1500 using the post transition data and the 2000 US Census. The proposed digital facility pursuant to Section 74.787 is 35.3 km (21.9 miles) at 343 degrees from the reference coordinates of the station's community of license. The community of license remains within the 51 dBu contour of the authorized facility as well as the proposed facility. Because of limited channel availability, the only available channel for use that the Applicant was able to identify is channel 45 which has to be co-sited with KUSE-LD on channel 46.

To the degree it is deemed necessary, the applicant requests a waiver of Section 74.705, 74.706, ,74.707, 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h), 74.794(b), 73.1030 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.

TV Broadcast Analog System Protection

The proposed operation causes less than 0.5% interference to surrounding analog authorized 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.

Digital TV Station Protection

The proposed operation causes less than 0.5% interference to surrounding digital authorized 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.

Class A, Low Power TV and TV Translator Station Protection

The proposed operation causes less than 0.5% interference to surrounding low power and class A authorized 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.