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B. W. St. Clair, Inc.

Engineering Statement
in support of a
MINOR MODIFICATION TO A CONSTRUCTION PERMIT,
BDISDTT20090504ABS
Channel 38, Olivia, MN
Renville County TV Corporation

BACKGROUND

Renville County TV Corp. filed an application in May of 2009 to displace K55CK to channel 38 and flash cut channel 38 from analog to digital operation. The channel 55 analog translator is broadcasting from a tower that was registered with the FCC, 1209827.

During some studies that were made to flash cut other analog stations on this same tower, it was noted that the K55CK translator had its call letters changed to K38LC for digital operation and the longitudinal location error of one degree was noted. The other two displacements that were filed at the same time as the K55CK application did not contain the coordinate error. Those other analog translator stations are K53AO and K57AE.

MINOR MODIFICATION APPLICATION

Applicant is filing a minor mod application to correct the geographical coordinate error from 95 degrees west longitude to 94 degrees west longitude of the existing digital construction permit. This application is only correcting the typographical error that occurred in the filing of the original displacement and flash cut application and nothing else. Additionally, the FCC's FLR Interference Computer Program was run to assure the changed coordinate will not cause outgoing interference as determined with the criteria listed in the following section. This minor modification will co-locate the digital construction permit with the corresponding analog station license which has existed for many years.

INTERFERENCE CONSIDERATIONS

Interference to other TV stations was studied using "Population Loss Studies" based on the "Longley-Rice Terrain Dependent Algorithm" in accordance with OET Bulletin 69.¹ Population loss for each station is less than 0.5% for full-service and Class A TV stations and less than 2% for LPTV and translator stations. Cell size for service analysis is 1.0 km/side. The distance increments for Longley-Rice Analysis is 1.0 km.

Prepared By:
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¹ The analysis was performed on a Sun "Blade" Computer using the exact replica of the FCC program. Population losses of less than 0.5% are not reported in detail. Only an indication of no interference is shown.