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B. W. St. Clair

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Exhibit

Engineering Statement
in support of a Minor Change
to CP BPTTA-20020925AAN
K47GR – Redding, CA

BACKGROUND & FILING FREEZE WAIVER

Applicant has a construction permit for Ch 47, K47GR - a Class A, LPTV station. This application requests a CP modification to make an ERP increase and a slight reduction in RCAGL. The ERP increase is obtained with 1.8˚ of mechanical downtilt so that the ERP on the horizon remains the same.

The slight radiation center reduction coupled with the use of mechanical downtilt will keep the CP mod's 74 dBμ contour fully contained within the 74 dBμ contour allowed by the current construction permit. Thus, the applicant believes the sum total of the requested changes is de minimis and therefore requests a waiver of the Filing Freeze for DTV and Class A LPTV Changes per FCC Public Notice DA 04-2446 that was released August 3, 2004.

CUSTOM ANTENNA

The antenna consists of five Scala PR-TV Paraflector antennas. A stack of four antennas are aimed at 308˚ true and those antennas receive 90% of the RF power. The fifth antenna is aimed at 268˚ true and receives 10% of the RF power.

INTERFERENCE ANALYSIS

Interference to the following 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 these stations is less than 0.5%. ***Cell size for service analysis is 1.0 km/side and the distance increments for Longley-Rice Analysis are 0.1 km.***

LPTV STATIONS		
BLTT19961223JA	K47EH, Ch. 47 LIC	Eureka, CA
BPTT20010122AHB	K47EH, Ch. 47 CP	Eureka, CA

Prepared By:
Gordon H. Allison, Jr.
12 May 2005

[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.