

2355 Ranch Drive
Westminster, CO 80234
Phone (303) 465-5742 Fax (303) 465-4067
e-mail: STCL@comcast.net

B. W. St. Clair

COMPREHENSIVE ENGINEERING EXHIBIT APPLICATION FOR LPTV CONSTRUCTION PERMIT

**MINOR CHANGE TO LICENSED FACILITY
K47HC, FCC ID 14152
FCC FILE NUMBER BLTTL-20040524AAM
BIRACH BROADCASTING CORPORATION**

1. **MINOR CHANGE TO LICENSED FACILITY.** The within application is filed as a minor change to licensed facility seeking a change of transmitter location to a new site within the same communication site and well within the 74 dBu contour of the underlying license. Additionally, it seeks a change of antenna and effective radiated power.

2. **INTERFERENCE STUDY.** The following is submitted as an OET 69 Longley-Rice study exhibit for the above-captioned application. The study was performed on a Sun Blade computer running the official FCC Longley-Rice program as provided by Techware, Inc.

a. The stations which exhibit contour overlap or short spacing and thus must be studied are:

FCC FILE NUMBER	CALLSIGN, LOCATION
BPFS	NEW, Mexicali, BN
BLTTL19970721JS	K32EM, Morongo Valley, CA
BLCDT20021007ABN	KMIR-DT, Palm Springs, CA
BPCDT19991029AFX	KFTR-DT CP, Ontario, CA
BPCDT20040528AVJ	KAZA-DT CP, Avalon, CA
BNPTTL20000831BVH	K47HZ CP, Banning, CA

b. Interference to all listed stations caused by the within application is less than 0.5%

c. Accordingly, waiver of §§74.706 and 74.707 as appropriate is requested.

3. **MEXICAN BORDER AREA STATEMENT.** The within proposal is not less than 140 km north of the nearest point of the U.S. border with Mexico. Pursuant to the U.S. - Mexico amended border area television broadcast agreement, it is exempt from the requirement for Mexican coordination for UHF LPTV stations by employing a power not in excess of 10 kW.

J. R. McDonald
12/06/2004