

B. W. St. Clair

Exhibit 6
Engineering Statement
in support of a Minor Change
to CP BMPTT-200041223ACG
K35HG – Brian Head/Cedar City, UT

BACKGROUND

Applicant has a construction permit for Ch 35, K35HG. This application requests a change in the model of the antenna and a decrease in ERP. This request is submitted as a minor change application based on contour overlap in accordance with the definition in §73.3572:

(a)(2) “ . . . a major change is any change in:

(a)(2)(ii) Transmitting antenna location where the protected contour resulting from the change is not predicted to overlap any portion of the protected contour based on the station’s authorized facilities. [would be a major change]

(a)(3) “Other changes will be considered minor”

The construction permit BMPTT-20041223ACG appears to be an authorization within the meaning of this section of the rules

There is contour overlap between the facilities authorized in the construction permit and those proposed in this application.

In conclusion, it appears that this application fully meets the definition of a minor change. Further, the interference analysis run with the Techware software on a Sun computer indicates there is no outgoing interference. With these two requirements fully met, it appears this application should be grantable.

ADDITIONAL INTERFERENCE CONSIDERATIONS

Interference to the following station was studied using “Population Loss Studies” based on the “Longley-Rice Terrain Algorithm” in accordance with OET Bul 69.¹

BLTT-20000707AEL, K35FS, Ch 35, Santa Clara, UT

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20 January 2005

¹ The analysis was performed on a Sun “Blade” computer using the exact replica of the FCC program. Population losses of less than 5% are not reported in detail. Only an indication of no interference is shown.