

Interference

This technical statement supports this application for a new low-power television station on channel 55 in Rochelle, IL. FCC File No. BNPTT-20000831AUQ.

This instant application was a part of mutual exclusive group M212, as included in Attachment A to FCC Public Notice Low Power Television Auction No. 81 Mutual Exclusive Proposals Subject to Auction (DA 01-1289). This application was part of this group only because it is 15 channels above one or more of the other proposed facilities within M212 and minimal interference to such other facilities is predicted utilizing standard methodologies.

The proposed channel 55 facilities were studied using the RadioSoft ComStudy program version 2.2 and the results are attached hereto. The study performed a contour study in accordance with FCC rules 74.705, 74.706 and 74.707 and is summarized in Attachment A. The program lists in a column labeled “Clearance” the separation in kilometers between the proposed interfering contour and the protected contours of pertinent stations. In cases where either the contour protection or distance separation requirements are not met, the “Clearance” is a negative number. The “Total Pop” and “Old Pop” reflect the existing station’s coverage without this proposed station. The “New Pop%” and “New Pop” show the effect of this proposal on the studied station. Interference is shown even if one person is affected. In Attachment B, the coverage contours of applicable stations along with non-interfered coverage, as calculated by Longley-Rice are in green, and interfered coverage, as calculated by Longley-Rice are in red.

TV Broadcast Analog System Protection

The “Clearance” to all analog television stations are positive numbers. Accordingly, FCC rule 74.705 is fully met and no waivers are required.

Digital TV Station Protection

The following is a summary of the calculated interference caused by the proposed Rochelle operation to pertinent surrounding digital television (“DTV”) allotments and assignments. Interference to these stations was studied by the Comstudy 2.2 program using a Longley-Rice routine. The factors applied follow OET 69 with a 1 km block size.

<u>Facility/ Call Sign</u>	<u>Location</u>	<u>Channel</u>	<u>Service Population</u>	<u>Interference Population</u>
WREX-TV (Allotment)	Rockford, IL	54	1,082,813	0 (0.0%)
WREX-DT (CP)	Rockford, IL	54	1,027,627	0 (0.0%)
WREX-DT (Lic)	Rockford, IL	54	668,127	0 (0.0%)
KWWL (Allotment)	Waterlo, IA	55	875,619	0 (0.0%)

As demonstrated, the proposed operation causes less than 0.5% interference to surrounding DTV assignments and allotments (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. If necessary, a waiver of the FCC rules is respectfully requested for this DTV allocation study based on use of the OET-69 procedures.

Low Power TV and TV Translator Station Protection

The following is a summary of the calculated interference caused by the proposed Rochelle operation to pertinent surrounding low-power television (“LPTV”) allotments and assignments. Interference to these stations was studied by the Comstudy 2.2 program using a Longley-Rice routine. The factors applied follow OET 69 with a 1 km block size.

<u>Facility/ Call Sign</u>	<u>Location</u>	<u>Channel</u>	<u>Service Population</u>	<u>Interference Population</u>
Venture Technologies Group, LLC File No. BNPTTL-20000831AWL Facility ID 128345	Rochelle	40	1,790	0 (0.0%)

Therefore, the proposed operation causes interference to above proposed LPTV applications (i.e., “*de minimis*”). Pursuant to a settlement agreement filed previously, that channel 40 facility has amended its application to accept interference from this proposal. It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards. If necessary, a waiver of the FCC rules is respectfully requested for the LPTV allocation study based on use of the OET-69 procedures.

This application does not cause any predicted interference to any of the other proposals included within M212.

Because the predicted level of interference caused by any of the other proposed facilities within M212 is *de minimus* in nature, the applicant hereby accepts interference at the levels currently proposed by the other applicants within M212.

The applicant requests a waiver of Section 74.706 and 74.707 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.

Therefore, the applicant requests that the construction permit for this station be granted with a condition of acceptance of interference as defined herein.