

Engineering Statement and Interference Analysis

This technical statement supports this amendment to minor modification BMPTVL-20090611ACW for KBKF-LP on channel 6 in Glen Arbor, California, Facility ID 127882.

The Applicant is proposing to move the transmitter site and modify the antenna. The facility proposed in this instant application completely encompasses the protected contour of the original authorized facility and continues to serve Glen Arbor, California. It is believed that the proposed facility complies with rule sections 74.705, 74.706, 74.707, 74.708, 74.709 & 74.710.

TV Broadcast Analog System Protection

The proposed operation causes less than 0.5% interference to surrounding analog 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 analog allocation study based on use of the OET-69 procedures.

Digital TV Station Protection

The proposed operation causes less than 0.5% interference to surrounding digital assignments and allotments and facilities (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 digital allocation study based on use of the OET-69 procedures.

Low Power TV and TV Translator Station Protection

The proposed facility of KBKF-LP on channel 6 in Glen Arbor, CA (“Proposed Facility”) was studied using Techware’s tv_process_dlptv software on a Sun Blade 1500 using the post-transition data and the 2000 US Census (“Interference Study”), and it is predicted to cause interference to the following facilities:

1. KBKF-LD, Channel 5, Glen Arbor, CA, Facility ID 167280, FCC File No. 20090630ADE, a digital displacement application for the paired digital companion channel of the proposed facility of KBKF-LP. The Applicant hereby agrees to accept such interference.
2. KEFM-LP, Channel 6, Chico, CA, Facility 127996, FCC File No. BLTVL-20070326ACW, a low power television station licensed to the Applicant herein. The Interference Study predicted 2.6% interference from the instant proposal to the licensed facility of KEFM-LP. The Applicant hereby agrees to accept this interference to and from the instant proposed facility and the licensed facility of KEFM-LP.
3. K06DK, Channel 6, Potter Valley, CA, Facility 53128, FCC File No. BLTTV-19821019IA, licensed to Potter Valley Television Association.

The Interference Study predicted 2.3% interference from the instant proposal to the licensed facility of K06DK. However, K06DK is a non-offset station and pursuant to paragraph 117 of the *Report and Order In the Matter of Amendment of Parts 73 and 74 of the Commission's Rules to Establish Rules for Digital Low Power Television, Television Translator, and Television Booster Stations and to Amend Rules for Digital Class A Television Stations*, released on September 30, 2004 (MB Docket No. 03-185):

“Where analog LPTV and TV translator stations operating without a nominal frequency offset prevent the proposed service of a new or modified LPTV, TV translator or Class A station, we agree that the time has come to require that station to maintain a designated offset. Where non-offset stations are so remotely located that no additional service proposals would be obstructed, we also agree that the expense of installing “offset” equipment would be unnecessary. We address only the situation where protection of an existing analog LPTV or translator station without a frequency offset (*i.e.*, plus 10 KHz, minus 10 kHz or zero) would render an application proposal specifying an offset unacceptable for filing. In this situation, the proposed facilities will be analyzed with respect to co-channel “non offset” stations based on both the 45 dB D/U ratio applicable for non offset operations and the 28 dB D/U ratio that applies in the analysis of stations specifying different offsets. In such cases, the application proposal will be considered acceptable if it provides adequate protection based on the 28 dB “offset” D/U ratio. The existing non-offset station will then be required to install at its expense offset equipment and notify us that it has done so or, alternatively, that it has reached an interference agreement with the new station. In the event the existing station does not cooperate in this regard, we will direct it to operate with a frequency offset different than that specified in the application proposal.”

Therefore, the licensee of K06DK is required to operate its station at either zero or plus offset or accept interference from the instant proposed facility.

Other than the above, the proposed operation causes less than 0.5% interference to surrounding low power 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 low power allocation study based on use of the OET-69 procedures.