

DELAWDER COMMUNICATIONS, INC.

2121 Eisenhower Avenue, Suite 200

Alexandria, Virginia 22314

(703) 299-9222

ENGINEERING REPORT

International Communications Network, Inc.
National City, CA (K61GH, Channel 61- Minor Modification)

EXHIBIT 8—LPTV MINOR MODIFICATION – INTERFERENCE STUDIES

I. Introduction

1. International Communications Network, Inc. (“ICN”) is the licensee of K61GH, National City, CA, Channel 61(-). By this analog minor modification, ICN proposes to replace its omnidirectional transmit antenna with a directional transmit antenna aimed north-northwest: and to increase the maximum ERP to 50 kilowatts. No other changes are proposed.

2. The use of frequency offset is made in order to add protection to and from any nearby analog co-channel station. The applicant will maintain the requested offset per 47 C.F.R. Section 74.761 by use of a precision oscillator supplied by the transmitter manufacturer.

II. Mexican Coordination

3. The licensed K61GH omnidirectional facility has a maximum ERP of 1.83 kilowatts in all azimuths towards Mexico. This application proposes to replace the licensed omnidirectional transmit antenna with a Superior Broadcast Products (SBP) UPSL-2 directional transmit antenna with its main lobe oriented at 345 degrees True. This narrow-beam antenna has a beam-width of only 60 degrees, and has a deep pattern null of at least 60 dB on the back-side of the antenna.

4. The proposed directional antenna (with a maximum ERP of 50 kW) will produce less than 1.83 kilowatts ERP in all azimuths in an arc from 55 degrees True clockwise to 275 degrees True. This is true for all vertical angles along these azimuths. *Therefore, the herein proposed facility will radiate with less ERP in all directions towards Mexico than the currently licensed facility. This being the case, based on FCC Policy and Rules (and recently verified with FCC Staff), this minor modification does not require coordination with Mexico.*

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III. Interference Studies

5. Attached as Figure 1 are the OET-69 study results for the proposed facility (as the referenced station) as determined by V-Soft Communications' SunDTV™ software program. (According to V-Soft Communications, SunDTV™ identically duplicates the FCC's OET-69 processing program.) As demonstrated by Figure 1, this proposal adequately protects all US broadcast stations as required by the FCC Rules. All studies are conducted in accordance with current FCC Rules and Regulations.

6. The applicant accepts any interference that is predicted to exist to the proposed facility by any licensed, authorized or previously proposed primary TV stations. The applicant also accepts any interference that is predicted to exist to the proposed facility by any licensed or authorized secondary TV station, or by any previously-proposed *analog* secondary TV facilities.

FIGURE 1 – OET-69 SHOWING FOR K61GH, NATIONAL CITY, CA, CHAN 61(-)

MINOR MODIFICATION: DIRECTIONAL ANTENNA AT 345 DEGREES TRUE

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 06-22-2006 Time: 13:23:50

Record Selected for Analysis

NATCITY6 USERRECORD-01 US
Channel 61 ERP 50. kW HAAT RCAMSL 00137 m
Latitude 032-41-15 Longitude 0117-03-56
Status APP Zone 2 Border Offset -
Dir Antenna Make SBP Model UPSL Beam tilt N Ref Azimuth 345.
Last update Cutoff date Docket
Comments
Applicant

1990 Census data selected

Cell Size for Service Analysis 1.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Not full service station

Facility meets maximum power limit

Azimuth (Deg)	ERP (kW)	HAAT (m)	74.0 dBu F(50,50) (km)
0.0	40.365	33.0	11.6
45.0	3.920	33.0	6.6
90.0	0.000	33.0	0.5
135.0	0.000	33.0	0.5
180.0	0.000	103.3	0.5
225.0	0.000	133.1	0.5
270.0	0.000	133.1	0.5
315.0	25.205	73.5	15.6

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quite zone

Proposed facility OK toward Table Mountain

Proposed facility is beyond the Canadian coordination distance

Proposed facility is within the Mexican coordination distance
Distance to border = 16.4km

Proposed station is OK toward AM broadcast stations

FIGURE 1 – OET-69 SHOWING FOR K61GH, NATIONAL CITY, CA, CHAN 61(-)

MINOR MODIFICATION: DIRECTIONAL ANTENNA AT 345 DEGREES TRUE

Potential Interfering Stations Included in above Scenario 1

61N CA PORTERVILLE	BLCT	20020625AAF	LIC	
60A CA LOS ANGELES	DTVPLN	DTVP1664	PLN	
61N	USERRECORD01		APP	
*Percent Service lost without proposal:		-8.3	to BMLCDT	20040930BWO
*Percent Service lost with proposal:		-8.1	to BMLCDT	20040930BWO

Result key: 2
 Scenario 2 Affected station 1
 Before Analysis

Results for: 61A CA LONG BEACH BMLCDT 20040930BWO LIC
 HAAT 889.0 m, ATV ERP 256.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	14128840	32733.3
not affected by terrain losses	12956559	22934.2
lost to NTSC IX	3015	20.7
lost to additional IX by ATV	115716	426.7
lost to ATV IX only	115716	429.7
lost to all IX	118731	447.4

Potential Interfering Stations Included in above Scenario 2

61N CA PORTERVILLE	BLCT	20020625AAF	LIC
60A CA LOS ANGELES	DTVPLN	DTVP1664	PLN

After Analysis

Results for: 61A CA LONG BEACH BMLCDT 20040930BWO LIC
 HAAT 889.0 m, ATV ERP 256.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	14128840	32733.3
not affected by terrain losses	12956559	22934.2
lost to NTSC IX	19355	74.9
lost to additional IX by ATV	115716	418.8
lost to ATV IX only	115716	429.7
lost to all IX	135071	493.7

Potential Interfering Stations Included in above Scenario 2

61N CA PORTERVILLE	BLCT	20020625AAF	LIC	
60A CA LOS ANGELES	DTVPLN	DTVP1664	PLN	
61N	USERRECORD01		APP	
*Percent Service lost without proposal:		-8.3	to BMLCDT	20040930BWO
*Percent Service lost with proposal:		-8.1	to BMLCDT	20040930BWO

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FIGURE 1 – OET-69 SHOWING FOR K61GH, NATIONAL CITY, CA, CHAN 61(-)

MINOR MODIFICATION: DIRECTIONAL ANTENNA AT 345 DEGREES TRUE

Analysis of Interference to Affected Station 2

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
61	K61GH	NATIONAL CITY CA	BLTTL	-19990909AAM

NOTE: STATION BEING MODIFIED—NO STUDY REQUIRED.

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