

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

MINOR MODIFICATION: DIRECTIONAL ANTENNA AT 345 DEGREES TRUE

Channel	Proposed Station Call	City/State	ARN
61	NATCITY6		USERRECORD01

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
61	KSCI	LONG BEACH CA	193.1	LIC	BMLCDT	-20040930BWO
61	K61GH	NATIONAL CITY CA	0.0	APP	BLTTL	-19990909AAM

Analysis of Interference to Affected Station 1

Channel	Call	City/State	Application Ref. No.
61	KSCI-DT	LONG BEACH CA	DTVPLN -DTVP1665

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
60	KCBS-DT	LOS ANGELES CA	34.7	PLN	DTVPLN	-DTPV1664
61	KKAG	PORTERVILLE CA	255.3	PLN	DTVPLN	-NPLN1921
62	KRCA	RIVERSIDE CA	0.0	PLN	DTVPLN	-NPLN1932

	POPULATION	AREA (sq km)
within Noise Limited Contour	14304839	37638.0
not affected by terrain losses	12307592	26226.3
lost to NTSC IX	1428	13.8
lost to additional IX by ATV	762816	912.7
lost to ATV IX only	764244	923.5
lost to all IX	764244	926.5

Channel	Call	City/State	Application Ref. No.
18	KSCI	LONG BEACH CA	DTVPLN -NPLN1010

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
17	KGET	BAKERSFIELD CA	168.5	PLN	DTVPLN	-NPLN0980
18	KVPT	FRESNO CA	318.4	PLN	DTVPLN	-NPLN1009
18	KUSI-DT	SAN DIEGO CA	180.1	PLN	DTVPLN	-DTVP0296
19	KSWB-DT	SAN DIEGO CA	180.2	PLN	DTVPLN	-DTVP0339
22	KWHYTV	LOS ANGELES CA	34.1	PLN	DTVPLN	-NPLN1134
26	KVCR-DT	SAN BERNARDINO CA	45.4	PLN	DTVPLN	-DTVP0630
32	KDOC-DT	ANAHEIM CA	0.2	PLN	DTVPLN	-DTVP0854

FIGURE 1 – OET-69 SHOWING FOR K61GH, NATIONAL CITY, CA, CHAN 61(-)**MINOR MODIFICATION: DIRECTIONAL ANTENNA AT 345 DEGREES TRUE**

Results for: 18N CA LONG BEACH DTVPLN NPLN1010 PLN
 POPULATION AREA (sq km)
 within Noise Limited Contour 13971262 30789.8
 not affected by terrain losses 12074164 23822.0
 lost to NTSC IX 217157 112.6
 lost to additional IX by ATV 208802 3655.3
 lost to all IX 425959 3768.0

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
61	KSCI	LONG BEACH CA	BMLCDT	-20040930BWO

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
60	KCBS-DT	LOS ANGELES CA	2.3	PLN	DTVPLN	-DTVP1664
61	KTFF-TV	PORTERVILLE CA	241.0	LIC	BLCT	-20020625AAF
62	KRCA	RIVERSIDE CA	0.1	LIC	BLCT	-20020308ABC
61	NATCITY6		193.1	APP	USERRECORD-01	

Total scenarios = 2

Result key: 1
 Scenario 1 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 1

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

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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