

CONTOUR OVERLAP AND
LONGLY-RICE INTERFERENCE STUDIES
PROPOSED CLASS-A STATION K03HK
CHANNEL 3 – FRESNO, CALIFORNIA
[AMENDMENT TO BPTVL-20040329AFS]

We conducted a computer analysis of the interference situation for the proposed facility, the results of which are shown in Exhibit D-2. The study is based on contour protection requirements of Sections 74.705, 74.706, and 74.707 of the FCC's Rules with respect to analog full-power, digital full-power, and low power television stations, respectively. It concludes that the facility proposed herein meets these requirements except for four stations: KEYT-TV, Channel 3, Santa Barbara, California; DDK03D, Channel 3, Yosemite Village, California; KMMD-CA, Channel 3, Salinas, California; and, KVHF-LP, Channel 4 in Fresno, California.

We then conducted detailed interference studies using the Longley-Rice methodology contained in the Commission's *OET Bulletin No. 69*, with respect to these facilities of concern. The software utilizes a 2-square kilometer cell size, calculates signal strength at 1.0 kilometer increments along each radial studied, and employs the 1990 U.S. Census to count population within cells. In addition, the program does not attribute interference to the proposed facility in cells within each station's protected contour where interference from another source (other than Three Angels' proposed K03HK) already is predicted to exist (also known as "masking"). The results of these

EXHIBIT C-1

studies are provided in Exhibit D-3. It concludes that the facility proposed herein causes no new interference to any of the above stations.

As a result, a waiver of Section 73.6011 of the Commission's Rules with respect to interference to KEYT-TV, and Section 73.6012 and 73.6014 with respect to interference to DDK03D, KMMD-CA and KVHF-LP are requested and believed to be justified based on the aforementioned Longley-Rice studies.