

DELAWDER COMMUNICATIONS, INC.

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ENGINEERING REPORT

K16GL, Jackson, MN: Digital Minor Modification Application

EXHIBIT 11

LPTV DISPLACEMENT TO DIGITAL – INTERFERENCE STUDIES

1. Blue Earth-Nicolet Faribault Cooperative Electric Association (“Applicant”) is the licensee of K16GL, Jackson, MN, analog channel 16. By this application, Applicant is proposing a displacement to digital channel 36D at its licensed transmitter site. This is a minor change application. This licensed site is located only 227 km from KDSM-DT, Des Moines, IA, 16D (Post-transition) and, therefore, qualifies for displacement relief pursuant to 47 CFR Section 73.3572(a)(4)(iv).

2. Attached as Figure 1 is the OET-69 study results for the proposed facility (as the referenced station) as determined on a Sun Computer using a Solaris (Unix-based) operating system and using the same OET-69 software as developed for use by the FCC. (According to the software developer, the program used herein provides identical results as the FCC’s OET-69 processing program.) All studies are conducted in accordance with current FCC Rules and Regulations. As demonstrated by Figure 1, the proposed facility adequately protects all required US broadcast stations as required by the FCC Rules with the exception of the following stations that have consented to any predicted interference that result from this proposal:

K57IX (channel 35; consent attached)

3. Also, this digital proposal is associated with various other licensed, authorized and proposed analog and digital LPTV stations at Jackson, St. James (Godahl) and Frost, Minnesota, that are licensed to either Cooperative Television Association of Southern Minnesota (“CTV”); Blue Earth-Nicollet Faribault Cooperative Electric Association (“BENCO”); Federated Rural Electric Association (“FREA”); or South Central Electric Association (“SCEA”). The Applicant accepts any existing and future interference that may result from any such associated analog or digital LPTV station. Therefore, this application should not be deemed directly mutually-exclusive to any such associated analog or digital LPTV station.

4. The applicant accepts any interference that is predicted to exist to the proposed facility by any licensed, authorized or previously proposed primary TV station. The applicant also accepts any interference that is predicted to exist to the proposed facility by any secondary TV facility that is given preferential status by the FCC over the Applicant’s herein proposed facility.