

NTSC INTERFERENCE PROTECTION AND REQUEST FOR WAIVER:

As per 47 C.F.R. §73.6011 interference protection to TV broadcast stations are based upon 47 C.F.R. §74.705. The following stations were found to be in violation of the spacing and / or contour separation requirements:

- WBFS-TV 33 MIAMI, FL (BLCT-19850125KE)
- WTVX 34 FORT PIERCE, FL (BLCT-19800624KF)

As per §74.705(e)¹ in support of a request for waiver it is respectfully requested that the methodology provided in OET Bulletin No. 69 be admissible to determine interference to WBFS-TV, and WFGC. Figure 1 demonstrates that with the uses of this methodology, **interference is not predicted to be greater than a 0.5% population loss to the areas within the protected contour of the above reference stations**, and thus is in compliance with the interference criteria.

¹ “In support of a request for waiver of the interference protection rules, an applicant for a low power TV, TV translator or TV booster may make full use of terrain shielding and Longley-Rice terrain dependent propagation prediction methods to demonstrate that the proposed facility would not be likely to cause interference to TV broadcast stations. Guidance on using the Longley-Rice methodology is provided in *OET Bulletin No. 69*.”