

Engineering Statement and Interference Analysis

This technical statement supports this application to make changes in K47IA on channel 47 in Bakersfield, CA. FCC File No. BMPTTL-20050502ACD, Facility ID 128230.

The Applicant was originally granted a construction permit for K47IA on 4/22/03 (FCC File No. BNPTTL-20000831ATV). A modification of that construction permit was granted on 4/23/04 to move it to Mt. Adalaide and raise the power (FCC File No. BMPTTL-20030609AFX). A further amendment was granted on 5/10/05, allowing a move to another tower on Mt. Adalaide and making changes in the maximum ERP of the station (FCC File No. BMPTTL-20050502ACD). The station as currently authorized is from a transmitter site that is within 121 km of the city of Visalia, CA.

The proposed channel 47 facilities were studied using the Techware Inc.'s tv_process_dlptv software for an NTSC LPTV station facility on a Sun Blade 1500. The study performed a Longley-Rice study in accordance with FCC rules 74.705, 74.706 and 74.707 and demonstrates that the proposed facility will not cause interference to any facility. Also included is Attachments A through D, which show contour overlaps between the proposed facility, the existing authorized CP of K47IA, and the original CP for K47IA, thereby demonstrating that this application is minor in nature.

In this application, the Applicant is proposing to modify the facility by moving it to a transmitter site to Mt. Breckenridge, which is farther away from the Visalia city reference point and lowering the ERP in the horizontal plane, this service area in this proposal is completely shadowed from the Visalia television stations.

Geographic Restriction Waiver Request

The existing authorized K47IA transmitter site is 110.7 km from the Visalia reference point. The proposed facility will move it further away from that reference point – to 115.8 km.

More importantly, from the proposed site, the K47IA service area will be completely shielded from the service area of the two Visalia television stations, KMPH and KNXT. By moving to Mt. Breckenridge, which is deeper into the Sierra Nevada mountain range the proposed service area is shadowed from the both TV stations and their respective Longley Rice coverage areas do not include the instantly proposed service area of K47IA.

This facility was originally was filed pursuant to the requirements set forth in the Notice and Filing Requirements Regarding July 31 through August 4, 2000, Limited Low Power Television/Television Translator/Class A Television Auction Filing Window, Public Notice, DA 00-1383 (June 23, 2000) (“*2000 Window Notice*”), which states that a waiver of the Commission’s 121 kilometer geographic restriction will be “granted where applicants demonstrate that their proposed facilities are completely shielded by terrain barriers from the applicable television market cities. . . .” To receive a waiver, requests “must be supported by an appropriate number of profiles showing the terrain between the proposed community of service and the applicable TV market cities, and indicating that the signals of full-service stations in these cities cannot be directly received in the proposed community.” *Id.* The proposed facility is within 121 km of Visalia, California, which is the city of license of KNXT and KMPH. As is demonstrated in Attachments A-D, which include shadow maps as well as Longley Rice coverage area maps for these stations as compared to the proposed facility, neither of these stations provides service to the service area proposed herein. A waiver of that application was not required because it was filed beyond the 121-kilometer geographic restriction. To the extent that it is deemed necessary, the Applicant hereby requests that the Commission grant its request for a waiver of the geographic restriction as the criteria for such a request have been met.

TV Broadcast Analog System Protection

The proposed operation causes less than 0.5% interference to surrounding analog assignments and allotments (i.e., “*de minimis*”). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards. If necessary, a waiver of the FCC rules is respectfully requested for this analog allocation study based on use of the OET-69 procedures.

Digital TV Station Protection

The proposed operation causes less than 0.5% interference to surrounding digital assignments and allotments and facilities (i.e., “*de minimis*”). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards. If necessary, a waiver of the FCC rules is respectfully requested for this digital allocation study based on use of the OET-69 procedures.

Low Power TV and TV Translator Station Protection

The proposed operation causes less than 0.5% interference to surrounding low power assignments and allotments (i.e., “*de minimis*”). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards. If necessary, a waiver of the FCC rules is respectfully requested for this low power allocation study based on use of the OET-69 procedures.

This application does not cause any predicted interference to any of the other proposals. To the degree it is deemed necessary, the applicant requests a waiver of Section 74.705, 74.706, and 74.707 and other applicable parts of the Rules and Regulations of the Federal Communications Commission in order to allow for the grant of this instant application.