

B. W. St. Clair

COMPREHENSIVE TECHNICAL EXHIBIT APPLICATION FOR LPTV CONSTRUCTION PERMIT

**MINOR CHANGE IN LICENSED FACILITY
W65AP, FCC ID 6042
FCC FILE NUMBER BLTTL-20010725ADQ
WDLP LICENSED SUBSIDIARY, LLC**

Minor change in licensed facility. The within application is filed as a minor change in licensed facility seeking a change of antenna height on an adjacent tower in the same antenna complex. The proposed 74 dBu F50,50 contour is wholly encompassed by the licensed contour.

Retention of Displacement Construction Permit outstanding. The above-captioned facility has construction permit BPTT-20041215ACN to displace to channel 21 and serve a larger area. This application is not intended to replace that permit, which will be constructed in due course, but rather to place the existing licensed facility on a tower with improved accessibility until such time as BPTT-20041215ACN can be constructed.

Unregistered tower. The within application is to be placed on an unregistered tower of 51.2 meters in height. This tower is one of several constituting an established communication site. The tower has been subjected to the FCC TOWAIR analysis and the determination is that it need not be registered.

Interference study. The following is submitted as an OET 69 Longley-Rice study exhibit for the above-captioned application. The study was performed on a Sun Blade computer running the official FCC Longley-Rice program as provided by Techware, Inc.

a. The stations which exhibit contour overlap or short spacing and thus must be studied are:

FCC FILE NUMBER	CALLSIGN, LOCATION
BNPTTL-20000829AWI	NEW, MARATHON, FL
BNPTTL-20000829AQB	W64CX CP, MARATHON, FL

b. Interference to all listed stations caused by the within application is less than 0.5%

c. Accordingly, waiver of §74.707 as appropriate is requested.

J. R. McDonald
December 9, 2005