

Interference

This technical statement supports this application for a new low-power television station on channel 52 in Port Jervis, New York. FCC File No. BNPTTL-20000831CEX.

The proposed channel 52 facilities were studied using the RadioSoft ComStudy program version 2.2 and the results are attached hereto. This is a contour study performed in accordance with FCC rules 74.705, 74.706 and 74.707. The program lists in a column labeled "Clearance" the separation in kilometers between the proposed interfering contour and the protected contours of pertinent stations. In cases where either the contour protection or distance separation requirements are not met, the "Clearance" is a negative number. The "Total Pop" and "Old Pop" reflect the existing station's coverage without this proposed station. The "New Pop%" and "New Pop" show the effect of this proposal on the studied station. Interference is shown even if one person is affected.

TV Broadcast Analog System Protection

The "Clearance" to all analog television stations are positive numbers. Accordingly, FCC rule 74.705 is fully met and no waivers are required.

Digital TV Station Protection

The following is a summary of the calculated interference caused by the proposed Port Jervis operation to pertinent surrounding digital television ("DTV") allotments and assignments. Interference to these stations was studied by the Comstudy 2.2 program using a Longley-Rice routine. The factors applied follow OET 69 with a 1 km block size.

<u>Assignment</u>	<u>Channel</u>	<u>Service Population</u>	<u>Interference Population</u>
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WNJN-DT, Montclair, NJ (APP)	51	16,146,029	0 (0.0%)
WEDW-DT, Bridgeport, CT (CP)	52	3,570,864	0 (0.0%)
WNJN-DT, Montclair, NJ (LIC)	51	16,033,842	0 (0.0%)
WEDW, Bridgeport, CT (LIC)	52	3,977,692	0 (0.0%)

As demonstrated, the proposed operation causes less than 0.5% interference to surrounding DTV 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.

Low Power TV and TV Translator Station Protection

The “Clearance” to all low-power TV and TV translator stations are positive numbers. Accordingly, FCC rule 74.707 is fully met and no waivers are required.