

MINOR CHANGE APPLICATION
K LICENSEE, INC.
W17CD LPTV STATION
CH 17- (488-494 MHZ) - 75.0 KW (DA)
STAMFORD, CONNECTICUT
October 2006

TECHNICAL STATEMENT

This Technical Statement and attached exhibits were prepared on behalf of K Licensee, Inc. ("KLI"), licensee of LPTV station W17CD, Channel 17-, Stamford, Connecticut. KLI seeks to make minor changes in the facilities of W17CD by relocating the station to a new site, reducing effective radiated power and increasing the height of the antenna above ground, mean sea level, and average terrain. It is noted that W17CD is presently dark and that this relocation is needed to restore the service of the station. As such, expedited processing of this application is respectfully requested.

The antenna system for the proposed W17CD facility will be located atop an existing building located in Stamford. The building at the site is less than 200 feet, with existing antenna systems (poles) that extend just above the structure to 220 feet above ground. Using the Commission's TOWAIR program, no antenna structure registration is required. As such, the Federal Aviation Administration has not been apprised of this proposal.

The proposed relocation of the W17CD facility complies with the Commissions interference rules, based on the use of the Longley-Rice OET-69 Bulletin.¹ It is noted that the

1) The Longley-Rice model was implemented on the Probe 3 computer model from V-Soft Communications. This model has been found to closely replicate the results provided by the Commission's computer model.

terrain was sampled at 0.1 kilometer and a signal cell size of 1.0 kilometer was used, with both 1990 and 2000 Census population reviews. A simple emission mask was used in the calculations. In neither case, does the proposed W17CD facility cause unique interference to the population of any existing, applied for, or proposed facility, based on a percentage of the impacted stations total population.² See Exhibit A for a tabulation of the outgoing interference analysis for analog operation on Channel 17-. Since the antenna is to be mounted atop of a building, attached as Exhibit B is a radio frequency radiation study that shows the proposed Channel 17- antenna system complies with the Commission's RF exposure guidelines.

2) If a waiver is necessary to use the Longley-Rice model in lieu of a contour overlap analysis, one is respectfully requested.