

Engineering Statement and Interference Analysis

This technical statement supports this application to make changes in K45IC on channel 45 in Banning, CA. FCC File No. BNPTTL-20000831BVF, Facility ID 129618.

In this application, the Applicant is proposing to modify the K45IC construction permit, the Applicant is proposing to change the transmitter location, the maximum ERP, and utilize a different antenna. There is no change in the facilities output channel, and because the protected 74 dBu contours of the construction permit of K49IB and that proposed herein with this existing application overlap, see Attachment A, this application is minor in nature.

Additionally, because the proposed application is 160.1 km distant from Mexico (the applicable limit is 100 km at his power level) and not in excess of 10 kW ERP, this application can be granted without notification and approval from Mexico.

The proposed channel 45 facilities were studied using the Techware Inc.'s lptv_process software on a Sun Blade 1500 and the results are attached hereto. The study performed a contour study in accordance with FCC rules 74.705, 74.706 and 74.707 and are included as Attachment B.

TV Broadcast Analog System Protection

As demonstrated, 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

As demonstrated, 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

As demonstrated, 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. 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.