

## **Engineering Statement and Interference Analysis**

This technical statement supports this application to make changes in K55JW on channel 55 in Banning, CA. FCC File No. BNPTTL-20000831BVN, Facility ID 129651.

In this application, the Applicant is proposing to modify the ERP both in the horizontal and below the horizontal.

While the proposed facility is within the Mexican coordination distance, the closest distance to the border is 166.9km. Because the proposed facility is less than 10 kW ERP maximum, no coordination with Mexico is required.

The proposed channel 55 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 A.

### **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.