FCC Form 346
Venture Technologies Group, LLC
K47IA
Bakersfield, CA, Channel 47
Facility ID 128230
Exhibit 6

Interference

This technical statement supports this application to make changes in K47IA on channel 47 in Bakersfield, CA. FCC File No. BNPTTL – 20000831ATV, Facility ID 128230.

In this application, the Applicant is proposing to modify K47IA to change the antenna site location, maximum ERP, transmitting antenna, and antenna orientation.

The 74 dBu service contour of the construction permit of this facility and the 74 dBu service contour proposed herein overlap. See *Attachment A*. Therefore, this application is minor in nature.

The proposed channel 47 facilities were studied using the RadioSoft ComStudy program version 2.2 and the results are attached hereto. The program performed a contour study in accordance with FCC rules 74.705, 74.706 and 74.707 and is summarized in *Attachment B.* The study 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. In *Attachment C* , the coverage contours in red of applicable stations along with non-interfered coverage, as calculated by Longley-Rice are in green, and interfered coverage, as calculated by Longley-Rice are in red.

In addition, the proposed channel 47 facilities were studied using the Techware Inc.'s lptv_process software on a Sun Blade 1500 and the results are attached hereto as *Attachment D*.

TV Broadcast Analog System Protection

The following is a summary of the calculated interference caused by the proposed Bakersfield operation to pertinent surrounding analog television 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.

Assignment	Facility ID	Location	Channel	Service Population	Total Interference	Existing Interference	New Interference
KTBN-TV (LIC)	67884	SANTA ANA, CA	40	10,639,867	0 (0.00%)	NA	0 (0.00%)
KHSC-TV (LIC)	60549	ONTARIO, CA	46	10,601,398	0 (0.00%)	NA	0 (0.00%)
KFTR (APP)	60549	ONTARIO, CA	46	10,908,413	0 (0.00%)	NA	0 (0.00%)
960328KH (APP)	82375	BAKERSFIELD, CA	39	420,174	0 (0.00%)	NA	0 (0.00%)
KAZA-TV (LIC)	29234	AVALON, CA	54	10,942,300	0 (0.00%)	NA	0 (0.00%)

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

The following is a summary of the calculated interference caused by the proposed Bakersfield operation to pertinent surrounding digital television 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.

Assignment	Facility ID	Location	Channel	Service Population	Total Interference	Existing Interference	New Interference
KAZA-TV (APP)	137270	AVALON, CA	47	10,850,486	24,906 (0.23%)	NA	24,906 (0.23%)
KFTR (DTV ALLOT)	60549	ONTARIO, CA	47	11,385,816	18,347 (0.16%)	NA	18,347 (0.16%)
KHSC-DT (CP)	60549	ONTARIO, CA	47	11,161,790	12,462 (0.11%)	NA	12,462 (0.11%)
KHIZ-TV (APP)	137410	BARSTOW, CA	47	8,318,283	31,557 (0.39%)	NA	31,557 (0.39%)

KOCE-DT (CP)	4328	HUNTINGTON BEACH, CA	48	12,280,198	0 (0.00%)	NA	0 (0.00%)
KOCE-DT (LIC)	4328	HUNTINGTON BEACH, CA	48	12,067,556	0 (0.00%)	NA	0 (0.00%)

As demonstrated, the proposed operation causes less than 0.5% interference to surrounding digital 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 digital allocation study based on use of the OET-69 procedures.

Low Power TV and TV Translator Station Protection

The following is a summary of the calculated interference caused by the proposed Bakersfield operation to pertinent surrounding low power television 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.

Assignment	Facility ID	Location	Channel	Service Population	Total Interference	Existing Interference	New Interference
K47GD (LIC)	19780	SAN LUIS OBISPO, CA	47	22,564	0 (0.00%)	NA	0 (0.00%)
K47FL (LIC)	41601	FALLBROOK, CA	47	96,244	0 (0.00%)	NA	0 (0.00%)
K47CC (LIC)	13455	VICTORVILLE, CA	47	1053	0 (0.00%)	NA	0 (0.00%)
K47AE (LIC)	28571	INYOKERN, ETC., CA	47	NA	NA	NA	NA

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.