FCC Form 346
Venture Technologies Group, LLC
W42CX, Channel 42
Port Jervis, NY
Facility ID 127813
Exhibit 11

Engineering Statement and Interference Analysis

This technical statement supports this application to modify low power television station W42CX, which is licensed to operate on channel 42 in Port Jervis, New York, Facility ID 167323. In this application, the Applicant is proposing to modify its license from an NTSC analog facility on channel 42 to a DTV digital facility on channel 42. This is not a request for a paired facility but instead a digital flash cut application. The proposed channel 42 facilities were studied using the Techware's tv_process_dlptv software on a Sun Blade 1500. It is believed that the proposed facility complies with the rule sections of 74.709, 74.793(e)-(h), 74.794(b) and 73.1030 and other applicable parts of the Rules and Regulations of the FCC. However, to the degree that it is deemed necessary, the Applicant requests a waiver of these other applicable Commission rules in order to allow for the grant of this instant application.

Interference Acceptance

The Applicant of W42CX is also the permittee of digital low power television station W30CP-D, in Port Jervis, New York (Facility ID 167314), for which the Applicant has filed with the FCC an application for a digital displacement to operate on channel 41 in Port Jervis, NY (FCC File No. BDISDTL-20080117ACU), and the permittee of digital low power television station W43CN-D on channel 43 in Port Jervis, NY (FCC File No. BDCCDTL-20061030ASY, Facility ID 167318).

The Applicant hereby consents to accept any predicted interference from its digital displacement channel facility of W30CP-D on channel 41 in Port Jervis, NY as well as its digital companion channel facility of W43CN-D on channel 43 in Port Jervis, NY, to its proposed digital flash cut application of W42CX on channel 42 in Port Jervis, NY.

TV Broadcast Analog System Protection

The proposed operation causes less than 0.5% interference to surrounding analog authorized 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 analog allocation study based on use of the OET-69 procedures, and all possible variance from FCC rules.

Digital TV Station Protection

The proposed operation causes less than 0.5% interference to surrounding digital authorized 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, and all possible variance from FCC rules.

Class A, Low Power TV and TV Translator Station Protection

The proposed operation causes less than 0.5% interference to surrounding low power and Class A authorized 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 low power allocation study based on use of the OET-69 procedures, and all possible variance from FCC rules.