

DELAWARE COMMUNICATIONS, INC.

5568 General Washington Drive, Suite A-218

Alexandria, Virginia 22312

(703) 658-5390

ENGINEERING REPORT

International Communications Network, Inc.
National City, CA (Channel 38- Minor Modification)

EXHIBIT 8

LPTV MINOR MODIFICATION – INTERFERENCE STUDIES

I. Introduction

1. International Communications Network, Inc. (ICN) is the licensee of K61GH, National City, CA, Channel 61 (FCC File Number BPTTL-19990909AAM). By this application, ICN is seeking "DTV displacement relief" by proposing to migrate its LPTV operation from Channel 61 to Channel 38(-), and to operate with analog (NTSC) service. This application also specifies various technical changes necessary to facilitate use of Channel 38(-), including a site move of 12.2 kilometers east to San Miguel Mountain (at N 32° 41' 47"; W 116° 56' 09"; NAD 27).

2. Pursuant to 47 C.F.R. Section 73.3572(a)(2)(ii), because it is licensed above channel 51, K61GH qualifies for displacement relief and, therefore, is not a major change modification. Because the site move is less than 16 kilometers, no additional channel preclusion study of the currently licensed site is deemed necessary in order to make this site/channel change. The proposed 74 dBu service contour will overlap the licensed 74 dBu service contour.

3. The use of frequency offset is made in order to add protection to any nearby analog co-channel station. The applicant will maintain the requested offset per 47 C.F.R. Section 74.761 by use of a precision oscillator supplied by the transmitter manufacturer.

II. Interference Studies to US Facilities

4. Attached as Figure 1 are the OET-69 study results for the proposed facility (as the referenced station) as determined by V-Soft Communications' SunDTVTM software program. (According to V-Soft Communications, the SunDTVTM Program identically duplicates the FCC's OET processing program.) As demonstrated by Figure 1, the proposed facility adequately protects all required US broadcast stations as required by the FCC Rules. All studies are conducted in accordance with current FCC Rules and Regulations.

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5. The proposed facility is nearly collocated with KNSD, the first adjacent-channel analog TV station on channel 39. As demonstrated by Figure 1, KNSD is fully protected by the proposed facility. If deemed necessary and requested by the FCC, this application can be amended to include a rule waiver of 47 CFR Section 74.705(b)(1).

III. Interference Studies to Mexican Facilities and Mexican Notification Request

6. The proposed site is located 16.2 kilometers from the US-Mexican Border; therefore, Mexican Coordination is required by this application. ICN respectfully request that this proposal be coordinated with Mexico.

7. Attached as Appendix A is a Mexican Allocation study that demonstrates non-interference to all Mexican NTSC and DTV stations and allotments.

OET-69 TV & DTV INTERFERENCE and SPACING ANALYSIS PROGRAM

1990 Census Data Selected

Record Selected for Analysis

K61GH38 USERRECORD-01 SAN DIEGO CA US
 Channel 38 ERP 125.9 kW HAAT m RCAMSL 00806 m
 Latitude 032-41-47 Longitude 0116-56-09
 Status APP Zone 1 Border Offset -
 Dir Antenna Make SBP Model UPSL Beam tilt N Ref Azimuth 240.
 Last update Cutoff date Docket
 Comments
 Applicant

Cell Size for Service Analysis 1.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Not full service station

Facility meets maximum power limit

Azimuth (Deg)	ERP (kW)	HAAT (m)	74.0 dBu F(50,50) (km)
0.0	0.000	638.6	1.5
45.0	0.000	533.7	1.5
90.0	0.000	395.8	1.5
135.0	0.000	280.8	1.5
180.0	6.711	646.1	31.7
225.0	89.385	680.5	50.6
270.0	52.141	722.7	47.5
315.0	0.022	646.0	5.5

Contour Overlap Evaluation from LPTV Station to Full Service TV & DTV

Station inside contour of station

KNSD 39 SAN DIEGO CA BLCT 19921230KF

Contour Overlap Evaluation from LPTV to Full Service TV & DTV Complete

Contour Overlap Evaluation from LPTV Station to LPTV Stations

[illegible]

Analysis of Interference to Affected Station 1

DTV Baseline Analysis

Channel	Call	City/State	Application	Ref. No.
38	KZKI-DT	SAN BERNARDINO CA	DTVPLN	-DTVP1040

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
38	KNSO-DT	MERCED CA	426.8	PLN	DTVPLN	-DTVP1039
38	NEW	SANTA BARBARA CA	210.6	PLN	DTVPLN	-NPLN1537
39	NEW	BAKERSFIELD CA	168.0	PLN	DTVPLN	-NPLN1558
39	KVEA-DT	CORONA CA	33.6	PLN	DTVPLN	-DTVP1079
39	KNSD	SAN DIEGO CA	180.2	PLN	DTVPLN	-NPLN1559

Results for: 38A CA SAN BERNARDINO DTVPLN DTVP1040 PLN
 HAAT 715.0 m, ATV ERP 210.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	13518178	24722.3
not affected by terrain losses	11872073	17819.9
lost to NTSC IX	259996	452.6
lost to additional IX by ATV	303612	240.6
lost to ATV IX only	503877	391.5
lost to all IX	563608	693.2

NTSC Baseline Analysis

Channel	Call	City/State	Application	Ref. No.
30	KZKI	SAN BERNARDINO CA	DTVPLN	-NPLN1376

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
22	KWHYTV	LOS ANGELES CA	34.0	PLN	DTVPLN	-NPLN1134
23	KEROTV	BAKERSFIELD CA	162.7	PLN	DTVPLN	-NPLN1166
23	KTBN-DT	SANTA ANA CA	33.6	PLN	DTVPLN	-DTVP0513
23	KVMD-DT	TWENTYNINE PALMS CA	138.2	PLN	DTVPLN	-DTVP0514
26	KVCR-DT	SAN BERNARDINO CA	45.4	PLN	DTVPLN	-DTVP0630
28	KCET	LOS ANGELES CA	33.6	PLN	DTVPLN	-NPLN1326
29	KBAKTV	BAKERSFIELD CA	162.5	PLN	DTVPLN	-NPLN1350
30	KFSNTV	FRESNO CA	357.3	PLN	DTVPLN	-NPLN1374
30	KPBS-DT	SAN DIEGO CA	180.3	PLN	DTVPLN	-DTVP0777
31	KTLA-DT	LOS ANGELES CA	33.9	PLN	DTVPLN	-DTVP0813
31	KVMD	TWENTYNINE PALMS CA	138.2	PLN	DTVPLN	-NPLN1401
32	KDOC-DT	ANAHEIM CA	0.1	PLN	DTVPLN	-DTVP0854
34	KMEXTV	LOS ANGELES CA	33.9	PLN	DTVPLN	-NPLN1469
38	KZKI-DT	SAN BERNARDINO CA	0.0	PLN	DTVPLN	-DTVP1040
44	KHIZ-DT	BARSTOW CA	60.3	PLN	DTVPLN	-DTVP1254
44	KRPA	RANCHO PALOS VERDES CA	110.9	PLN	DTVPLN	-NPLN1653
45	KUZZTV	BAKERSFIELD CA	168.4	PLN	DTVPLN	-NPLN1678

Figure 1 (Page 4 of 8)

Results for: 30N CA SAN BERNARDINO	DTVPLN	NPLN1376	PLN
	POPULATION	AREA (sq km)	
within Noise Limited Contour	13518022	24719.3	
not affected by terrain losses	11582375	17311.1	
lost to NTSC IX	250548	259.3	
lost to additional IX by ATV	499800	2019.4	
lost to all IX	750348	2278.8	

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
38	KPXN	SAN BERNARDINO CA	BLCDDT	-20050623AAG

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
38	KSEE	FRESNO CA	341.0	LIC	BLCDDT	-20050914AAZ
38	KSEE-DR	FRESNO CA	341.0	LIC	BPRM	-20040503AHI
38	KNSO-DT	MERCED CA	409.3	PLN	DTVPLN	-DTVP1039
38	KPMR	SANTA BARBARA CA	177.6	LIC	BLCT	-20010209ABS
39	960328KH	BAKERSFIELD CA	149.6	APP	BPET	-19960328KH
39	KVEA	CORONA CA	0.1	LIC	BLCDDT	-20030507AAW
39	KVEA-DT	CORONA CA	1.3	PLN	DTVPLN	-DTVP1079
39	KNSD	SAN DIEGO CA	198.3	LIC	BLCT	-19921230KF
38	K61GH38		198.2	APP	USERRECORD-01	

Total scenarios = 4

Result key: 1
 Scenario 1 Affected station 1
 Before Analysis

Results for: 38A CA SAN BERNARDINO	BLCDDT	20050623AAG	LIC
HAAT 909.0 m, ATV ERP 1000.0 kW			
	POPULATION	AREA (sq km)	
within Noise Limited Contour	13947608	33879.6	
not affected by terrain losses	12940152	23648.9	
lost to NTSC IX	168072	1792.8	
lost to additional IX by ATV	197	3.0	
lost to ATV IX only	197	5.9	
lost to all IX	168269	1795.7	

Potential Interfering Stations Included in above Scenario 1

38N CA SANTA BARBARA	BLCT	20010209ABS	LIC
39A CA CORONA	BLCDDT	20030507AAW	LIC

After Analysis

Results for: 38A CA SAN BERNARDINO BLCDT 20050623AAG LIC
 HAAT 909.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	13947608	33879.6
not affected by terrain losses	12940152	23648.9
lost to NTSC IX	168846	1853.9
lost to additional IX by ATV	197	3.0
lost to ATV IX only	197	5.9
lost to all IX	169043	1856.8

Potential Interfering Stations Included in above Scenario 1

38N CA SANTA BARBARA	BLCT	20010209ABS	LIC	
39A CA CORONA	BLCDT	20030507AAW	LIC	
38N	USERRECORD01		APP	
*Percent Service lost without proposal:	-12.7	to BLCDT		20050623AAG
*Percent Service lost with proposal:	-12.7	to BLCDT		20050623AAG

Result key: 2
 Scenario 2 Affected station 1
 Before Analysis

Results for: 38A CA SAN BERNARDINO BLCDT 20050623AAG LIC
 HAAT 909.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	13947608	33879.6
not affected by terrain losses	12940152	23648.9
lost to NTSC IX	168072	1792.8
lost to additional IX by ATV	72946	64.0
lost to ATV IX only	89594	116.2
lost to all IX	241018	1856.8

Potential Interfering Stations Included in above Scenario 2

38N CA SANTA BARBARA	BLCT	20010209ABS	LIC
39A CA CORONA	DTVPLN	DTVP1079	PLN

After Analysis

Results for: 38A CA SAN BERNARDINO BLCDT 20050623AAG LIC
 HAAT 909.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	13947608	33879.6
not affected by terrain losses	12940152	23648.9
lost to NTSC IX	168846	1853.9
lost to additional IX by ATV	72946	64.0
lost to ATV IX only	89594	116.2
lost to all IX	241792	1917.9

Potential Interfering Stations Included in above Scenario 2

38N CA SANTA BARBARA	BLCT	20010209ABS	LIC	
39A CA CORONA	DTVPLN	DTVP1079	PLN	
38N	USERRECORD01		APP	
*Percent Service lost without proposal:	-12.1	to BLCDT		20050623AAG
*Percent Service lost with proposal:	-12.1	to BLCDT		20050623AAG

Result key: 3
 Scenario 3 Affected station 1
 Before Analysis

Results for: 38A CA SAN BERNARDINO BLCDT 20050623AAG LIC
 HAAT 909.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	13947608	33879.6
not affected by terrain losses	12940152	23648.9
lost to NTSC IX	168072	1792.8
lost to additional IX by ATV	197	3.0
lost to ATV IX only	197	5.9
lost to all IX	168269	1795.7

Potential Interfering Stations Included in above Scenario 3

38N CA SANTA BARBARA	BLCT	20010209ABS	LIC
39A CA CORONA	BLCDT	20030507AAW	LIC

After Analysis

Results for: 38A CA SAN BERNARDINO BLCDT 20050623AAG LIC
 HAAT 909.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	13947608	33879.6
not affected by terrain losses	12940152	23648.9
lost to NTSC IX	168846	1853.9
lost to additional IX by ATV	197	3.0
lost to ATV IX only	197	5.9
lost to all IX	169043	1856.8

Potential Interfering Stations Included in above Scenario 3

38N CA SANTA BARBARA	BLCT	20010209ABS	LIC	
39A CA CORONA	BLCDT	20030507AAW	LIC	
38N	USERRECORD01		APP	
*Percent Service lost without proposal:	-12.7	to BLCDT		20050623AAG
*Percent Service lost with proposal:	-12.7	to BLCDT		20050623AAG

Result key: 4
 Scenario 4 Affected station 1
 Before Analysis

Results for: 38A CA SAN BERNARDINO BLC DT 20050623AAG LIC
 HAAT 909.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	13947608	33879.6
not affected by terrain losses	12940152	23648.9
lost to NTSC IX	168072	1792.8
lost to additional IX by ATV	72946	64.0
lost to ATV IX only	89594	116.2
lost to all IX	241018	1856.8

Potential Interfering Stations Included in above Scenario 4

38N CA SANTA BARBARA	BLCT	20010209ABS	LIC
39A CA CORONA	DTVPLN	DTVP1079	PLN

After Analysis

Results for: 38A CA SAN BERNARDINO BLC DT 20050623AAG LIC
 HAAT 909.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	13947608	33879.6
not affected by terrain losses	12940152	23648.9
lost to NTSC IX	168846	1853.9
lost to additional IX by ATV	72946	64.0
lost to ATV IX only	89594	116.2
lost to all IX	241792	1917.9

Potential Interfering Stations Included in above Scenario 4

38N CA SANTA BARBARA	BLCT	20010209ABS	LIC
39A CA CORONA	DTVPLN	DTVP1079	PLN
38N	USERRECORD01		APP
*Percent Service lost without proposal:	-12.1	to BLC DT	20050623AAG
*Percent Service lost with proposal:	-12.1	to BLC DT	20050623AAG

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Analysis of Interference to Affected Station 2

NTSC Baseline Analysis

Channel	Call	City/State	Application Ref. No.
39	KNSD	SAN DIEGO CA	DTVPLN -NPLN1559

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
36	KMIRTV	PALM SPRINGS CA	138.2	PLN	DTVPLN	-NPLN1513
38	KZKI-DT	SAN BERNARDINO CA	180.2	PLN	DTVPLN	-DTVP1040
39	NEW	BAKERSFIELD CA	346.6	PLN	DTVPLN	-NPLN1558
39	KVEA-DT	CORONA CA	199.4	PLN	DTVPLN	-DTVP1079
40	KNSD-DT	SAN DIEGO CA	0.0	PLN	DTVPLN	-DTVP1115
40	KTBNV	SANTA ANA CA	199.4	PLN	DTVPLN	-NPLN1579
42	KESQTV	PALM SPRINGS CA	111.4	PLN	DTVPLN	-NPLN1618
46	KHSCTV	ONTARIO CA	199.8	PLN	DTVPLN	-NPLN1696
46	KMIR-DT	PALM SPRINGS CA	138.2	PLN	DTVPLN	-DTVP1318
54	NEW	AVALON CA	150.7	PLN	DTVPLN	-NPLN1834
54	KAJB	CALIPATRIA CA	200.7	PLN	DTVPLN	-NPLN1835

Results for: 39N CA SAN DIEGO	DTVPLN	NPLN1559	PLN
	POPULATION	AREA (sq km)	
within Noise Limited Contour	2535344	24595.9	
not affected by terrain losses	2429506	20535.9	
lost to NTSC IX	104364	209.7	
lost to additional IX by ATV	5228	2396.2	
lost to all IX	109592	2605.9	

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
39	KNSD	SAN DIEGO CA	BLCT	-19921230KF

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
36	KMIR-TV	PALM SPRINGS CA	138.2	LIC	BLCT	-19901207KE
38	KPXN	SAN BERNARDINO CA	200.0	APP	BMPCDT	-20040727AGB
38	KZKI-DT	SAN BERNARDINO CA	180.2	PLN	DTVPLN	-DTVP1040
38	KPXN	SAN BERNARDINO CA	198.3	LIC	BLC DT	-20050623AAG
39	960328KH	BAKERSFIELD CA	347.0	APP	BPET	-19960328KH
39	KVEA	CORONA CA	198.3	LIC	BLC DT	-20030507AAW
39	KVEA-DT	CORONA CA	199.4	PLN	DTVPLN	-DTVP1079
40	KNSD	SAN DIEGO CA	0.0	LIC	BLC DT	-20040805AAL
40	KNSD-DT	SAN DIEGO CA	0.0	PLN	DTVPLN	-DTVP1115
40	KNSD	SAN DIEGO CA	0.0	CP MOD	BMPCDT	-20041029AHV
40	KTBN-TV	SANTA ANA CA	199.4	LIC	BLCT	-19830418KH
42	KESQ-TV	PALM SPRINGS CA	138.1	LIC	BLCT	-20050727AHL
43	NEW	BRAWLEY CA	137.7	ADD	BPRM	-20000717ACQ
46	KFTR-TV	ONTARIO CA	199.8	LIC	BLCT	-20050217AAG
46	KMIR-DT	PALM SPRINGS CA	138.2	PLN	DTVPLN	-DTVP1318
53	KVMD	TWENTYNINE PALMS CA	175.9	ADD	BPRM	-20000717AFU
54	KAZA-TV	AVALON CA	199.8	LIC	BLCT	-20010712AGN
54	KAJB	CALIPATRIA CA	200.7	LIC	BLCT	-20001221ABL
38	K61GH38		0.1	APP	USERRECORD-01	

Proposal causes no interference

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