

INTRODUCTION

This application is being filed on behalf of Sangre De Cristo Communications, Inc., licensee of Low Power Television (“LPTV”) station K30AA, Colorado Springs, Colorado in support of a modification to its Construction Permit (“CP”) with FCC File No. BPTT-20010814AAW. This application proposes an increase in Effective Radiated Power (“ERP”) 132.8 kilowatts.

ALLOCATION AND INTERFERENCE ANALYSIS

An allocation and interference analysis was performed for the proposed operation of K30AA. Although each of the stations listed in below in Table 1 are predicted to receive prohibited contour overlap, the interference has been evaluated using OET Bulletin No. 69 Longley-Rice methodology as permitted by §74.705(e) for TV Stations, §74.706 for DTV stations, and §74.707(e) for LPTV stations.

TABLE 1: LIST OF STATIONS RECEIVING PROHIBITED CONTOUR OVERLAP BY PROPOSAL

| <u>CALLSIGN</u> | <u>FILE NO.</u> | <u>CITY, STATE</u> | <u>CHANNEL</u> | <u>NEW IX</u> |
|-----------------|-------------------|-----------------------------|----------------|---------------|
| NEW | BNPTT-20000821ACC | YUMA, CO | 30 | 0.00% |
| K30FO | BLTT-20010914AAP | PEETZ & N. LOGAN CTY, CO | 30 | 0.00% |
| KGWN-DT | ALLOTMENT | CHEYENNE, WY | 30 | 0.06% |
| KGWN-DT | BPCDT-19991029ACA | CHEYENNE, WY | 30 | 0.00% |
| KDVR-TV | BLCT-19830818KM | DENVER, CO | 31 | 0.28% |

As detailed in Table 1 above, the proposal creates no new interference to each of the impacted stations when rounded to the nearest whole percent and is thus compliant with the Commission’s current policy. Therefore, Sangre De Cristo Communications, Inc. formally requests a waiver of the applicable interference protection rules by use of Longley-Rice methodology to all facilities included in Table 1. A map of the protected coverage area of the proposed facility has been included as Figure A-4 of this

engineering text.

The proposal is also located 0.07 kilometers away from the proposed site of the Ch-32 Hispanic Broadcasters, Ltd. ("HBC") application for Channel 32, Pueblo, Colorado with FCC File No. BPCT-19960102KE. According to §74.705(b)(5) of the Commission's Rules, any UHF LPTV or TV Translator application will not be accepted if it proposes to operate at 50 kilowatts or greater and within 32 kilometers of the transmitter site of a UHF TV broadcast station operating on a channel which is the second, third, or fourth adjacent channel. However, the applicant contends this rule is not applicable to the proposal and the HBC application since the HBC application is still pending and has not yet been authorized by the Commission.