

**Iron County
68 South 100 East
Parowan, UT 84761**

March 23, 2005

Secretary
Federal Communications Commission
Washington, DC 20554

RE: Petition to remove LPTV application BNPTT-20000831CNW from
Auction 81, Group MX232

Ladies and Gentlemen:

As explained in the attached "Engineering Statement" the subject application was amended during the August 2001 settlement window to clear the conflicts with the other applications in this group.

The supposed conflict in MX232 is with an application 15 channels below ours, at a location 252 km away. The interference contour extends only 5.3km, obviously there is a mistake here.

We believe it is not necessary for my application to be in the auction as there is neither an incoming or outgoing conflict.

Please reclassify my application as a "singleton".

Respectfully submitted

s/s David Yardley
County Clerk

**ENGINEERING STATEMENT IN SUPPORT OF THE
PETITION OF IRON COUNTY TO BE REMOVED
FROM AUCTION 81, GROUP MX232**

Introduction

Application BNPTTL-20000CNW has been included in MX232 in spite of the unilateral engineering changes filed in a settlement window to clear the conflicts with the other applications in this group.

Interference:

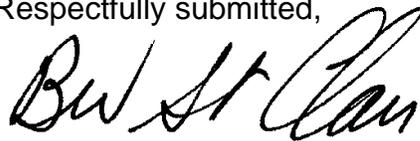
The supposed conflict in MX232 is with an application 15 channels below ours, at a location 252 km away. The interference contour extends only 5.3km, obviously there is a mistake here.

The application contains a statement added in the August 2001 settlement window to the effect that the applicant will accept interference from the other applicants in this group. This amendment was filed on 8/23/2001. See paragraph #4, Conclusion.

Discussion

The applicant by unilateral changes and additions to the application during a settlement window has cleared both outgoing and incoming conflicts. Thus it should not be in an auction with the other applicants in MX232.

Respectfully submitted,



B. W. St. Clair
Engineering Consultant
March 23, 2005

Name B. W. ST. CLAIR		Relationship to Applicant (e.g., Consulting Engineer) ENGINEERING CONSULTANT	
Signature		Date 8/23/2001	
Mailing Address 2355 RANCH DRIVE			
City WESTMINSTER		State or Country (if foreign address) CO	Zip Code 80234
Telephone Number (include area code) 3034655742		E-Mail Address (if available) STCL@AOL.COM	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibits

Exhibit 1

Description: SECTION III, EXHIBIT 6, M193

THIS APPLICATION MODIFICATION PROVIDES AN EXHIBIT CONTAINING ADDITIONAL INTERFERENCE STUDY INFORMATION RESPONSIVE TO QUESTION 13 IN THE TECH SECTION IN ORDER TO ALLOW IT TO BE REMOVED FROM THE AUCTION GROUP M193, AUCTION 81 AND TREATED AS A SINGLETON APPLICATION.

Exhibit 6

Description: ENGINEERING EXHIBIT - INTERFERENCE ANALYSIS

ENGINEERING EXHIBIT - INTERFERENCE ANALYSIS
 IN RE: APPLICATION FOR LOW POWER TELEVISION BROADCAST STATION LICENSE, AUGUST, 2000 WINDOW
 AUCTION NUMBER 81, ENGINEERING SOLUTION TO SEPARATE THIS APPLICATION FROM MUTUALLY EXCLUSIVE GROUP

1. INTRODUCTION

GROUP: M193

APPLICANT: M193 UT 41 BRIAN HEAD IRON COUNTY BNPTT20000831CNW

CONFLICTING APPLICATIONS HAVING ONE OR MORE OVERLAPPING PROTECTED/INTERFERING CONTOURS PER PUBLIC NOTICE DA-0129:

M193 UT 41 ST. GEORGE R & D MEDIA GROUP, INC./ BNPTTL20000831EED

2. DISCUSSION

ALTHOUGH THERE ARE ONE OR MORE OVERLAPPING PROTECTED V. INTERFERING CONTOURS BETWEEN THIS APPLICATION AND OTHER APPLICATIONS AS SHOWN ABOVE, THEY WERE SUBJECTED TO AN ANALYSIS OF POTENTIAL INTERFERENCE WHICH INCLUDES A LONGLEY-RICE STUDY IN ACCORDANCE WITH OET BULLETIN 69 OF THE ACTUAL PREDICTED INTERFERENCE, INCOMING AND OUTGOING, BETWEEN THIS APPLICATION AND THE IDENTIFIED CONFLICTING APPLICATIONS WITHIN THE SAME AUCTION GROUP. THE FINDINGS ARE SHOWN BELOW.

3. ANALYSIS

INTERFERENCE CAUSED BY THE APPLICANT'S PROPOSED FACILITY TO :

M193 UT 41 ST. GEORGE R & D MEDIA GROUP, INC./ BNPTTL20000831EED

...0.0

4. CONCLUSION

NO INTERFERENCE OR INTERFERENCE TO ZERO PERSONS PER OET BULLETIN 69 IS CAUSED TO THE APPLICANT'S PROPOSAL OR THE OTHER PROPOSALS SHOWN ABOVE WHEN THE LONGLEY-RICE STUDY IS USED AS PART OF THE APPLICATION. IN THE EVENT INTERFERENCE WERE TO BE SHOWN INCOMING TO THE APPLICANT, IT IS BELIEVED TO BE INSIGNIFICANT AND IS ACCEPTABLE TO THE APPLICANT. THUS, THIS APPLICATION IS NO LONGER MUTUALLY EXCLUSIVE WITH ANY OTHER IN ITS AUCTION GROUP. ACCORDINGLY, IT IS REQUESTED THAT IT BE REMOVED FROM THE GROUP AND ALLOWED TO PROCEED FORTHWITH TO THE PERMITTING PROCESS.

THERE HAS BEEN NO PAYMENT OR OTHER CONSIDERATION PROVIDED BY EITHER PARTY IN CONNECTION WITH THIS ENGINEERING SOLUTION AND/OR WITHDRAWL.

...END OF EXHIBIT
