March 23, 2005

Secretary
Federal Communications Commission
Washington, DC 20554

RE: Petition to remove LPTV application BNPTTL-20000831BIJ from Auction 81, Group MX059

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.

I 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 Julie L. St. Clair
Applicant
ENGINEERING STATEMENT IN SUPPORT OF THE
PETITION OF JULIE L. ST. CLAIR TO BE REMOVED
FROM AUCTION 81, GROUP MX059

Introduction

Application BNPTTL-20000831BIJ has been included in MX059 in spite of the unilateral engineering changes filed in a settlement window to clear the conflicts with the other applications in this group.

Outgoing Interference:
The antenna pattern was changed in the settlement window to eliminate the interference to the other three applications as shown in the attached plot of protected and interference contours. The protected contours are 74 dB: . The other applications all have different offsets than this application so the interference contour is 46 dB: , F50/10. The plot shows that the interference contour does not overlap any of the protected contours of the other applications and there is no outgoing conflict.

 Incoming Interference:
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 statement appears when this application is viewed on CDBS. A copy of the page with this statement as it appears in CDBS is attached. See paragraph #3, 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 MX059

Respectfully submitted,

B. W. St. Clair
Engineering Consultant
March 23, 2005
Exhibit 6
Description: ENGINEERING EXHIBIT - INTERFERENCE ANALYSIS

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

1. INTRODUCTION
GROUP: M232
APPLICANT:
M232 ME 49 BLUE HILL ST. CLAIR, JULIE L. BNPTTL20000831BIJ

CONFLICTING APPLICATIONS HAVING ONE OR MORE OVERLAPPING PROTECTED/INTERFERING CONTOURS PER PUBLIC NOTICE DA-0129:
M232 ME 49 BANGOR CHARLES C. TOWNSEND, III BNPTTL20000828AWN
M232 ME 49 BANGOR DEAN M. MOSELY BNPTTL20000828AOQ
M232 ME 49 BANGOR LANGER BROADCASTING/ GRO BNPTTL20000824AEF

2. DISCUSSION
ALTHOUGH THERE ARE ONE OR MORE OVERLAPPING PROTECTED V. INTERFERING CONTOURS BETWEEN THIS APPLICATION AND OTHER APPLICATIONS AS SHOWN ABOVE, THE APPLICANT HAS AMENDED THE APPLICATION (BNPTTL20000831BIJ) TO REFLECT USE OF A NEW ANTENNA PATTERN, WHICH ELIMINATES OVERLAP BETWEEN THE APPLICANT'S INTERFERING CONTOURS AND PROTECTED CONTOURS OF THE OTHER APPLICATIONS (BNPTTL20000828AWN, BNPTTL20000828AOQ AND BNPTTL20000824AEF).

3. CONCLUSION
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.

...END OF EXHIBIT
Three protected contours, 74 dBµ
Mosely and Townsend have identical overlapping contours

Interference Contour, 46 dBµ, F50/10
BNPTTL-20000831BIJ, Julie L. St. Clair
vs
Other Three Applications in M059

B. W. St. Clair Engineering Consultant
2355 Ranch Drive, Westminster, CO 80234
303-465-5742 FAX-4067 stcl@comcast.net

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