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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

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**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

## Attachment 1

### 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.

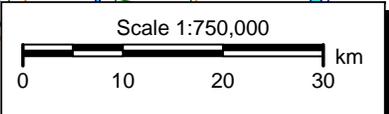
...END OF EXHIBIT

St. Clair  
BNPTTL20000831BIJ  
Latitude: 44-26-04 N  
Longitude: 068-35-25 W  
ERP: 10.00 kW  
Channel: 49Z  
Frequency: 683.0 MHz  
AMSL Height: 291.0 m  
Elevation: 229.0 m  
Horiz. Pattern: Directional  
Vert. Pattern: Yes  
Elec Tilt: 0.0  
Prop Model: Longley/Rice  
Climate: Cont temperate  
Conductivity: 0.0050  
Dielec Const: 15.0  
Refractivity: 311.0  
Receiver Ht AG: 10.0 m  
Receiver Gain: 0 dB  
Time Variability: 50.0%  
Sit. Variability: 50.0%  
ITM Mode: Broadcast

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

Three protected contours, 74 dBμ  
Mosely and Townsend have  
identical overlapping contours

Interference Contour  
46 dBμ, F50/10



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03/24/2005

