

**Meyer H. Feldman**  
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**Los Angeles, CA 90035**  
**310-552-7970**

March 23, 2005

Secretary  
Federal Communications Commission  
Washington, DC 20554

RE: Petition to remove LPTV application BNPTTL-  
20000831CBX from Auction 81, Group MX237

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 Meyer H. Feldman  
Applicant

*B. W. St. Clair*

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**ENGINEERING STATEMENT IN SUPPORT OF THE  
PETITION OF MEYER H. FELDMAN TO BE REMOVED  
FROM AUCTION 81, GROUP MX237**

Introduction

Application BNPTTL-20000831CBX has been included in MX237 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:

Outgoing interference was analyzed and was determined to be of no significance. The other application in this group filed an amendment to change its offset, thus clearing the interference contour overlap. A copy of the page with this statement as it appears in CDBS is attached See paragraph #2, Discussion.

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. 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 MX237.

Respectfully submitted,



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

**Exhibit 1****Description:** SECTION III, EXHIBIT 6, M573

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 AUCTION GROUP M573, AUCTION 81 AND TREATED AS A 'SINGLETON' APPLICATION.

**Attachment 1****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: M573

APPLICANT:

M573 TX 58 ORANGE GROVE      MEYER H. FELDMAN      BNPTTL20000831CBX

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

M573 TX 58 FREER      SHIGEO MURAKAMI      BNPTTL20000831AIM

M573 TX 58 ALICE      HAROLD W. AND/OR LUCILLE BNPTTL20000831AFU

## 2. DISCUSSION

THERE ARE ONE OR MORE OVERLAPPING PROTECTED V. INTERFERING CONTOURS BETWEEN THIS APPLICATION AND OTHER APPLICATIONS AS SHOWN BELOW. INTERFERENCE BETWEEN THIS PROPOSAL (BNPTTL20000831CBX) AND PROPOSAL BNPTTL20000831AFU HAS BEEN REDUCED BY THE FILING OF A CHANGE OF OFFSET BY THAT PROPONENT. THUS, ALL APPLICATIONS IN THE GROUP 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

M573 TX 58 FREER      SHIGEO MURAKAMI      BNPTTL20000831AIM

...NONE.

M573 TX 58 ALICE      HAROLD W. AND/OR LUCILLE BNPTTL20000831AFU

...40.673WHICH APPLICANT TEGTMEIER HAS PROPOSED AS ACCEPTABLE IN A SEPARATE APPLICATION AMENDMENT FOR BNPTTL20000831AFU.

INTERFERENCE CAUSED BY THE FOLLOWING APPLICATIONS TO THE APPLICANT'S  
PROPOSED FACILITY IS SHOWN FOLLOWING:

M573 TX 58 FREER      SHIGEO MURAKAMI      BNPTTL20000831AIM

...NONE.

M573 TX 58 ALICE                      HAROLD W. AND/OR LUCILLE BNPTTL20000831AFU  
...65,771 WHICH IS ACCEPTABLE TO THIS APPLICANT (BNPTTL20000831CBX).

IF APPLICABLE, THE LONGLEY-RICE STUDY PRINTOUT IS SHOWN IN ITEM #5 BELOW.

4. CONCLUSION

INTERFERENCE TO ALL PROPOSALS IN GROUP M573 IS SHOWN ABOVE AND IN THE LONGLEY-RICE STUDIES BELOW. IN THE EVENT INTERFERENCE WERE TO BE SHOWN INCOMING TO THE APPLICANT, IT 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.