

**Robert Raynolds**  
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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-20000831BHB from  
Auction 81, Group MX046

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 Robert Raynolds  
Applicant

g  
g  
g

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**ENGINEERING STATEMENT IN SUPPORT OF THE  
PETITION OF ROBERT RAYNOLDS TO BE REMOVED  
FROM AUCTION 81, GROUP MX046**

Introduction

Application BNPTTL-20000831BHB has been included in MX046 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 offset was changed in the August 2001 settlement window to eliminate the interference to the other applications. This change of offset is reflected when viewed in the CDBS.

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 #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 MX046.

Respectfully submitted,



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

(Extracted from the CDBS – BNPTTL-20000831BHB)

**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: M233

APPLICANT:

M233 ME 52 DEXTER                      ROBERT RAYNOLDS                      BNPTTL20000831BHB

CONFLICTING APPLICATIONS HAVING ONE OR MORE OVERLAPPING  
PROTECTED/INTERFERING CONTOURS PER PUBLIC NOTICE DA-0129:  
M233 ME 52 BANGOR                      TIGER EYE LICENSING, LLC BNPTTL20000818ACF

2. DISCUSSION

THERE ARE ONE OR MORE OVERLAPPING PROTECTED V. INTERFERING CONTOURS  
BETWEEN THIS APPLICATION AND OTHER APPLICATIONS AS SHOWN BELOW. BECAUSE  
THE INTERFERENCE REVEALED BY LONGLEY-RICE WAS IN EXCESS OF THE LIMIT IN  
OET69, THE OFFSET OF THE DEXTER APPLICATION WAS CHANGED FROM NO OFFSET TO  
MINUS OFFSET. SUBSEQUENTLY, BOTH APPLICATIONS 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 APPLICATION WITHIN THE SAME AUCTION GROUP. THE FINDINGS ARE  
SHOWN BELOW.

3. ANALYSIS

INTERFERENCE CAUSED BY THE APPLICANT'S PROPOSED FACILITY AS AMENDED TO  
M233 ME 52 BANGOR                      TIGER EYE LICENSING, LLC BNPTTL20000818ACF  
...0.00

INTERFERENCE CAUSED BY THE FOLLOWING APPLICATIONS TO THE APPLICANT'S  
PROPOSED FACILITY AS AMENDED IS SHOWN FOLLOWING:  
M233 ME 52 BANGOR                      TIGER EYE LICENSING, LLC BNPTTL20000818ACF  
...NONE.

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

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.

5. ATTACHMENT - PRINTOUT OF APPLICABLE LONGLEY-RICE STUDY

V-SOFT COMMUNICATIONS POPULATION REPORT  
INCOMING TO BNPTTL20000818ACF FROM BNPTTL20000831BHB, AMENDED  
NEW.A (52Z) BANGOR, ME BNPTTL20000818ACF