

Engineering Statement and Interference Analysis

This technical statement supports this amendment application to modify BDISDTL-20110620AAH for KEDD-LD, Channel 46, Los Angeles, CA, Facility ID 56793, licensed to Venture Technologies Group, LLC, the Applicant herein (“VTG”).

The proposed facility was studied using the Techware’s tv_process_2010 software on a Sun Blade 1500 using the post transition database and the 2000 US Census. In this amendment, VTG proposes to raise the ERP, the transmitter output power and requests that the Commission processes this application using the followings:

- Full Power DTV Emission Mask¹
- Cell Size for Service Analysis of 1.0 km per side
- Distance Increments for Longley-Rice Analysis of 1.0 km

This application for a minor change complies with the current rules as well as the new rules pursuant to the *Second Report and Order In the Matter of Amendment of Parts 73 and 74 of the Commission’s Rules to Establish Rules for Digital Low Power Television, Television Translator, and Television Booster Stations and to Amend Rules for Digital Class A Television Stations*, MB Docket No. 03-185, released and adopted on July 15, 2011, which becomes effective August 26, 2011. Therefore, this application is instantly grantable.

Digital TV Station Protection

The proposed facility causes less than 0.5% interference to surrounding digital assignments and allotments and facilities (i.e., “*de minimis*”). It is believed that the proposed facility is in compliance with the spirit and intent of the FCC’s interference standards.

Class A, Low Power TV and TV Translator Station Protection

The proposed facility causes interference to the following facilities of KTAV-LP, Channel 6, Altadena, CA, Facility ID 6791.

- BDISDTL-20090609ACK at 94.9349% (Scenario 1). This analog to digital displacement of KTAV-LP. The proposed facility of KEDD-LD is a digital to digital displacement and therefore it takes precedence over the analog to digital displacement.
- BSTA-20090722ABT at 94.7222% (Scenario 2). This is a STA facility and therefore VTG is not required to protect.

Except for as referenced above, the proposed facility causes less than 0.5% interference to surrounding low power assignments and allotments (i.e., “*de minimis*”). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards.

¹ *Heading J (Use of Full Power DTV Emission Mask), Paragraph 68 of the Second Report and Order In the Matter of Amendment of Parts 73 and 74 of the Commission’s Rules to Establish Rules for Digital Low Power Television, Television Translator, and Television Booster Stations and to Amend Rules for Digital Class A Television Stations*, MB Docket No. 03-185. Released and adopted on July 15, 2011. Effective on August 26, 2011.