

Engineering Statement and Interference Analysis

This technical statement supports this application to modify digital low-power television station KSCZ-LD, Channel 20, Greenfield, CA, FCC File No. BPDTL-20120213AAB, Facility ID 167279.

Application Process

The Applicant has filed a license to cover application on March 23, 2012, see FCC File No. BLDLTL-20120323AAC, for the underlying construction permit specified herein. Pursuant to information provided by the head of the LPTV Branch in May 2009, this instant minor modification will be considered a modification of the pending license since it is being filed while the license application is pending.

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. The Applicant requests that the Commission process this application using the following Longley-Rice analysis settings:

- Cell Size for Service Analysis of 1.0 km per side
- Distance Increments for Longley-Rice Analysis of 0.20 km

It is believed that the proposed facility complies with the requirements Sections 74.709, 74.793(e)-(h), 74.794(B), 73.1030 and other applicable parts of the Rules and Regulations of the Federal Communications Commission. However, to the degree that it is deemed necessary, the Applicant requests a waiver of these other applicable Commission rules in order to allow for the grant of this instant application.

Digital TV Station Protection

The proposed facility interferes with an already expired facility of KMAX-TV, FCC File No. BPCDT-20080620ABK, Channel 21, Facility ID 51499, licensed to Sacramento Television Stations Inc. The construction permit of BPCDT-20080620ABK expired September 2, 2011.

Except referenced above, the proposed operation causes less than 0.5% interference to surrounding digital assignments and allotments and facilities (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.

Class A, Low Power TV and TV Translator Station Protection

The proposed operation 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.