

### **Engineering Statement and Interference Analysis**

This technical statement supports this application to modify digital low-power television station KRMV-LD, Channel 40, Moreno Valley, CA, Facility ID 129618, FCC File No. BDISDTL-20080310AEA, licensed to Venture Technologies Group, LLC (“Applicant”).

The proposed facility on channel 40 was studied using the Techware’s tv\_process\_2010 software on a Sun Blade 1500 using the post transition data and the 2010 US Census. The Applicant requests that the Commission processes this instant application using the following standard Longley-Rice analysis settings:

- Cell Size for Service Analysis is 1.0 km/side
- Distance Increments for Longley-Rice Analysis is 1.00 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.

#### **No Mexican Coordination Required**

The area within the F(50, 90) 51 dBu contour of the proposed facility of KRMV-LD on channel 40 is identical to the area within the F(50, 90) 51 dBu contour of the construction permit of KRPE-LD, Channel 40, Banning, CA, Facility ID 189834, FCC File No. BDCCDTL-20110826ABK. Therefore, no additional coordination with Mexico is required, and 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 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 facility is predicted to cause a worst case interference of 91.1497% (Scenario 2) to construction permit BDCCDTL-20110826ABK, KRPE-LD, Channel 40, Banning, CA, Facility ID 189834, authorized to the Applicant herein. The Applicant hereby agrees to accept the predicated interference from the proposed facility of KRMV-LD to the authorized facility of KRPE-LD, see Attachment A.

Except for the 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.