

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.