

Interference

This technical statement supports this application for a license to cover construction permit for a Class A facility for KNET-LP on channel 25 in Los Angeles, CA. FCC File No. BPTTL-JG0601JK, Facility ID 3167.

The proposed channel 25 facilities were studied using the RadioSoft ComStudy program version 2.2 and the results are attached hereto. The study performed a contour study in accordance with FCC rules 73.6011, 73.6012, 73.6013 and 73.6014 and is summarized in Attachment A. The program lists in a column labeled “Clearance” the separation in kilometers between the proposed interfering contour and the protected contours of pertinent stations. In cases where either the contour protection or distance separation requirements are not met, the “Clearance” is a negative number. The “Total Pop” and “Old Pop” reflect the existing station’s coverage without this proposed station. The “New Pop%” and “New Pop” show the effect of this proposal on the studied station. Interference is shown even if one person is affected. In Attachment B, the coverage contours are in red of applicable stations along with non-interfered coverage, as calculated by Longley-Rice are in green, and interfered coverage, as calculated by Longley-Rice are in red.

TV Broadcast Analog System Protection

The following is a summary of the calculated interference caused by the proposed KNET-LP operation to pertinent surrounding analog television allotments and assignments. Interference to these stations was studied by the Comstudy 2.2 program using a Longley-Rice routine. The factors applied follow OET 69 with a 1 km block size.

Assignment	Fac. ID	Location	Ch	Service Population	Total Interference	Existing Interference	New Interference
KVCR-TV (LIC)	58795	SAN BERNARDINO, CA	24	5,882,732	0 (0.0%)	0 (0.0%)	0 (0.0%)
KWHY-TV (LIC)	26231	LOS ANGELES, CA	22	10,613,819	0 (0.0%)	0 (0.0%)	0 (0.0%)
KCET (LIC)	13058	LOS ANGELES, CA	28	11,241,082	0 (0.0%)	0 (0.0%)	0 (0.0%)

As demonstrated, the proposed operation causes less than 0.5% interference to surrounding analog 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. If necessary, a waiver of the FCC rules is respectfully requested for this analog allocation study based on use of the OET-69 procedures.

Digital TV Station Protection

The following is a summary of the calculated interference caused by the proposed KNET-LP operation to pertinent surrounding digital television allotments and assignments. Interference to these stations was studied by the Comstudy 2.2 program using a Longley-Rice routine. The factors applied follow OET 69 with a 1 km block size.

Assignment	Fac. ID	Location	Ch.	Service Population	Total Interference	Existing Interference	New Interference
KGTV-DT (CP)	40876	SAN DIEGO, CA	25	2,612,647	399 (0.02%)	0 (0.0%)	399 (0.02%)
KADY-DT (CP)	56384	OXNARD, CA	24	4,858,255	0 (0.0%)	0 (0.0%)	0 (0.0%)
KGTV-DT (LIC)	40876	SAN DIEGO, CA	25	2,465,233	0 (0.0%)	0 (0.0%)	0 (0.0%)
KVCR-DT (CP)	58795	SAN BERNARDINO, CA	26	11,793,827	0 (0.0%)	0 (0.0%)	0 (0.0%)

As demonstrated, the proposed operation causes less than 0.5% interference to surrounding digital 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. If necessary, a waiver of the FCC rules is respectfully requested for this digital allocation study based on use of the OET-69 procedures.

Low Power TV and TV Translator Station Protection

The following is a summary of the calculated interference caused by the proposed KNET-LP operation to pertinent surrounding low power television allotments and assignments. Interference to these stations was studied by the Comstudy 2.2 program using a Longley-Rice routine. The factors applied follow OET 69 with a 1 km block size.

Assignment	Fac. ID	Location	Ch.	Service Pop.	Total Interference	Existing Interference	New Interference
KSFV-LP (LIC)	49704	SAN FERNANDO VALLEY, CA	26	152,242	1,017 (0.67%)	0 (0.0%)	1,107 (0.67%)
KWJD-LP	22645	VAN NUYS, CA	25	262,032	0 (0.0%)	0 (0.0%)	0 (0.0%)
K25AD (LIC)	70076	VICTORVILLE, ETC	25	74,635	0 (0.0%)	0 (0.0%)	0 (0.0%)
KBLM-LP (APP)	38561	RIVERSIDE AND PERRIS, CA	25	841,694	12 (0.0%)	0 (0.0%)	12 (0.0%)

As demonstrated, 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. If necessary, a waiver of the FCC rules is respectfully requested for this low power allocation study based on use of the OET-69 procedures.

KSFV-LP is co-owned by Venture Technologies Group, LLC with KNET-LP. The KNET-LP channel 25 service area is substantially within the KSFV-LP service on channel 26. Interference is predicted from KNET-LP to KSFV-LP on both contour overlap and Longley-Rice basis. KNET-LP was authorized on channel 25 in 2000. KSFV-LP requested a waiver of Rule 74.707 to accept interference from KNET-LP on channel 25 in its initial application for channel 26.

This application does not cause any predicted interference to any of the other proposals. The applicant requests a waiver of Section 74.705, 74.706, and 74.707 and other applicable parts of the Rules and Regulations of the Federal Communications Commission in order to allow for the grant of this instant application.