

**Narrative Explanation for Special Temporary Authority Application
KUHD-LP, Camarillo, CA; Facility ID # 67963
September 1, 2015**

This Exhibit will explain the unique circumstances justifying the grant of this application for Special Temporary Authority to operate the above-referenced LPTV station KUHD-LP on Channel 30 at a temporary transmitter site 12.2 kilometers northeast of the current licensed site for KUHD-LP, pending resolution of an alleged interference problem on its incumbent channel 44. The circumstances are as follows:

KUHD-LP received a construction permit, BDISDTL-20101018ACP for operation on digital displacement channel 44. The licensee, Obidia Porras, constructed the facility in accordance with the construction permit, commenced program tests pursuant to automatic program test authority, and tendered to the Commission an application for license to cover that Construction Permit (See, File No. 0000004340). That application for license to cover was filed on July 30, 2015 and is presently pending.

The licensee has within the past few days received notice from counsel for KILM, a co-channel, full-power commercial television station licensed to Barstow, CA (which uses a distributed transmission system) that the as-constructed digital displacement facility for KUHD-LP is causing interference to viewers within the protected signal contour of KILM. This interference claim has not been evaluated by the licensee of KUHD-LP at the present time.¹ However, out of an abundance of caution, and pending resolution of the complaints relative to the operation of KUHD-LP on Channel 44, the station was taken off the air as of 5:00 PM PDT last evening, August 31, 2015.

It is unclear how long it will take to investigate and resolve the interference complaint lodged by KAZN-TV Licensee LLC relative to KILM, but it is not desirable for KUHD-LP to cease providing service to the community of Camarillo in the meantime. Accordingly, the licensee of KUHD-LP has asked its engineer to investigate alternative channels that might be available for a limited time to permit KUHD-LP to resume operation temporarily pending resolution of the Channel 44 interference concern. It has been determined that Channel 30 is available for a limited time for the operation of KUHD-LP, and therefore this application seeks authority to operate KUHD-LP on Channel 30 for up to six months pending resolution of the interference complaint of KILM.

Operation of KUHD-LP on Channel 30 meets all distance spacing requirements, save for two mutually exclusive facilities applications about which there is an ongoing dispute and pleadings pending since and prior to 2013. See, DK55KD, Facility ID No. 52216 (formerly licensed to Alma Vision Hispanic Network, Inc.) at Van Nuys, CA; and KSGA-LP, Facility ID No. 5342, San Bernardino, CA, licensed to KJLA, LLC.² It is anticipated that this matter will not be

¹ It is notable that the application for the Channel 44 construction permit filed by KUHD-LP and granted by the Commission fully met the Commission's *de minimis* standard for interference and no interference in excess of that level was anticipated to viewers of KILM.

² See, file numbers BDISTTL-20081209AEK; BSTA-20101202ABK; BDISTTL-20081105ADS; and BSTA-20130313ABZ and related pleadings between the two parties.

resolved finally in the next six months, but if it is, and if Channel 30 is finally assigned to one of the disputing parties prior to the time that KUHD-LP has resolved the Channel 44 interference complaint to the satisfaction of all concerned, then KUHD-LP will cease operation on Channel 30 at that time. It is not the intention of KUHD-LP to operate permanently on Channel 30, but only long enough to permit a satisfactory resolution of the Channel 44 interference complaint lodged by the licensee of KILM (or for such shorter period as it takes for the Commission to resolve the ongoing issues between Alma Vision Hispanic Network, Inc. and KJLA, LLC with respect to their entitlement to operate their respective facilities on Channel 30 in their communities of license).

Finally, because KUHD-LP is now off the air, it is respectfully requested that this be treated in the nature of an emergency STA and resolved quickly so as to permit KUHD-LP to recommence service to its community of license.