

Engineering Statement and Interference Analysis

This technical statement supports this application to modify FCC File No. 0000008080 for KRVD-LD, a digital license on Channel 5 in Banning, CA (Facility ID 128327).

The Applicant proposes to move the transmitter site less than 30 miles. The protected F(50,90) 43 dBu contour of the proposed facility will overlap with that of the authorized licensed facility. The proposed channel 5 facility was studied using the Techware's tv_process_2010 software on a Sun Blade 1500 using the 2010 US Census. The Cell Size for Service Analysis used in this application is 1.0 km per side and the Distance Increments for Longley-Rice Analysis used in this application is 1.0 km.

Coordination with Mexico Not Required

The proposed facility does not increase the station's service contours toward Mexico versus that of the licensed facility and the previously authorized facility.

The original construction permit application for KRVD-LD on channel 5 required Mexican concurrence and it was approved by Mexico prior to its grant in July 2011 (FCC File No. BDISDTL-20090824AKC). The Applicant applied to modify that facility later in the same month (FCC File No. BMPDVL-20110729AFW). On April 23, 2013, Mexican authorities notified the FCC that they objected to the proposed modification because it caused interference to their analog station XHAQ-TV Channel 5 in Mexicali, BC.

On May 21, 2013, the Applicant was informed by the International Bureau that if it kept its service contour entirely contained within the arc specified to the then approved facility (BDISDTL-20090824AKC), additional coordination with Mexico would not be required. See Attachment A. Specifically, the Applicant was instructed to amend the application so that the KRVD-LD proposed 43 dBu contour does not extend throughout the entire arc from its transmitter site to the entire Mexican border within 400 km of its site, which in that case was from 112 to 175 degrees from the proposed transmitter site. See Attachment B. On May 30, 2013, the application was amended to conform to these limits and it was granted a CP on July 2, 2013. The station was built in February 2016, and the license was granted on February 26, 2016 (FCC File No. 0000008080).

Like the previously granted construction permit, the proposed facility does not extend the 43 dBu contour beyond what has been previously authorized throughout the entire arc from the proposed transmitter site to the entire Mexican border within 400 km of the site, which in this case is from 119 to 164 degrees. Attachment C is a map illustrating this. In the map, the 43 dBu contour of the original KRVD-LD construction permit (BDISDTL-20090824AKC) is shown in black. The 43 dBu contour of the licensed facility, which was designed not to increase the signal toward Mexico, is shown in Blue. The 43 dBu contour of the proposed facility is shown in orange. Also shown on the map is the 400 km radius of the proposed facility and radials illustrating that the relevant contours of the proposed facility to Mexico are from 119

degrees to 164 degrees. Throughout this entire arc the proposed 43 dBu contours are further from Mexico than contours included in the originally granted CP and the licensed facility.

As seen on Attachment D, the contour of the proposed facility, shown in orange, between 119 degrees to 154 degrees is within the contour of BDISDVL-20090824AKC, which was coordinated with Mexico. (The 400 km radius from the proposed facility is on the 121 degree radial. But the border is not a straight line. Along the 119 degree radial, a tip of Mexico, west of Yuma, Arizona, and along the Colorado River, is within the 400 km radius. Therefore, the 119 degree radial was studied for this engineering exhibit.) The contour of the proposed facility between 154 degrees and 164 degrees is within the contour of the licensed facility (FCC File No. 0000008080). Because there is no increase in the 43 dBu contour toward Mexico versus what has been approved in the licensed facility of KRVD-LD and the authorized CP of KRVD-LD, no additional coordination with Mexico is required.

This current modification application continues not to extend the F(50,90) 43 dBu contour in any direction to Mexico beyond the contours of original CP nor the licensed facility. Therefore, this application is immediately grantable.

Digital TV Station Protection

The proposed operation causes less than 0.5% interference to surrounding digital assignments and allotments and facilities (i.e., “*de minimis*”). 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 Class A television facilities and less than 2.0% interference to surrounding low power and TV translator facilities (i.e., “*de minimis*”). The proposed operation is in compliance with the spirit and intent of the FCC’s interference standards.

Attachment A



Federal Communications Commission
Washington, D.C. 20554

MAY 02 2013

Venture Technologies Group, LLC
5670 Wilshire Blvd., Suite 1300
Los Angeles, CA. 90036-5622

1800E3-RLG

In re: Low Power Television Application of:
Venture Technologies Group, LLC
Channel 5, Banning, CA.
File no.: BMPDVL-20110729AFW
Facility Id No.: 128327

Dear Applicant:

Within 30 days from the date of this letter, file an amendment to resolve the deficiency that was discovered during the initial review of your application. Amendments must be filed electronically. Failure to amend your application will result in the dismissal of the application.

Specifically, On April 23, 2013, an objection reply was received from the Mexican Authorizes concerning your proposal to modify your digital station as proposed by the engineering specifications outlined in the above referenced modification construction permit. The reason for their objection is that your modified proposal will cause interference to their analog station XHAQ-TV Channel 5 in Mexicali, BC.

Sincerely,

A handwritten signature in black ink that reads "Hossein Hashemzadeh".

Hossein Hashemzadeh
Deputy Chief
Video Division
Media Bureau

C.C. Venture Technologies Group, LLC
C/O – Joan Stewart, Esq.
Wiley Rein LLP
1776 K Street, N.W.
Washington DC 20006

Attachment B

From: [James McLuckie](#)
To: [Lawrence Rogow](#)
Subject: RE: Coordination with Mexico for BMPDVL-2011-729AFW, Facility ID 128327, KRVD-LD 5
Date: Tuesday, May 21, 2013 11:14:36 AM
Attachments: [image003.png](#)

Mr. Rogow:

If you keep your service contour entirely contained within the arc specified to that of the currently approved facilities, we would not seek additional coordination with Mexico=> "Amend our application so that our F(50,90) 43 dBu contour does not extend between 112 degrees and 175 degrees, which is the entire arc from our transmitter site to the entire Mexican border within 400 km of our transmitter site"

Sincerely,
James McLuckie

From: Lawrence Rogow [mailto:lrogow@loop.com]
Sent: Friday, May 17, 2013 2:35 PM
To: James McLuckie
Subject: FW: Coordination with Mexico for BMPDVL-2011-729AFW, Facility ID 128327, KRVD-LD 5

Jim,

Please let me know to what degree I should limit our power to Mexico to not require additional coordination with Mexico. Thank you.

Lawrence Rogow
Chairman
5670 Wilshire Boulevard, Suite 1300
Los Angeles, CA 90024
Voice: (323) 965.5411 fax
(323) 965.5410
lrogow@loop.com

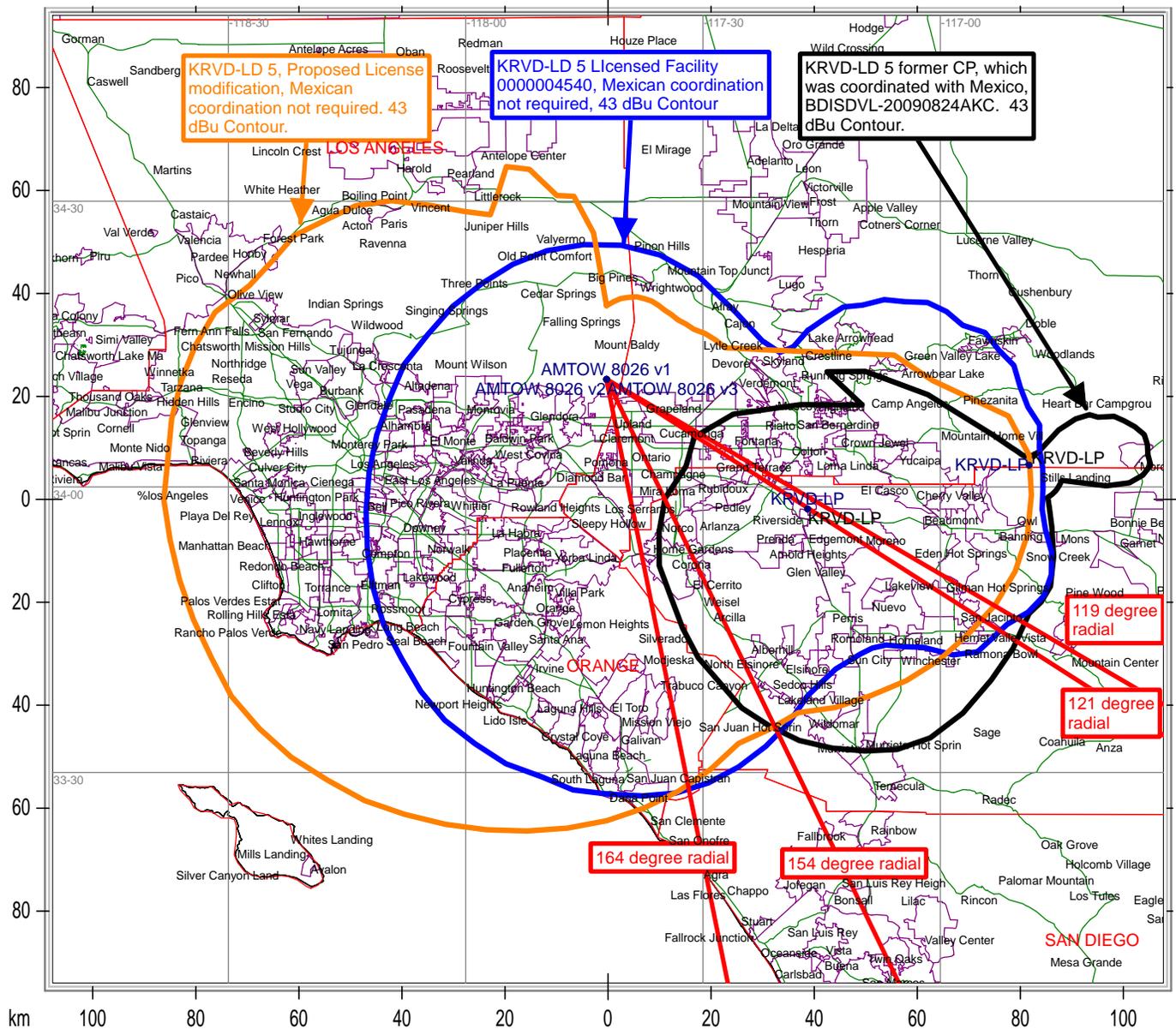
Venture Technologies
Group, LLC

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From: Lawrence Rogow
Sent: Wednesday, May 08, 2013 10:43 AM
To: James McLuckie (James.McLuckie@fcc.gov)
Cc: 'Stacey Ashton'; 'Hossein Hashemzadeh'
Subject: Coordination with Mexico for BMPDVL-2011-729AFW, Facility ID 128327, KRVD-LD 5

Jim,

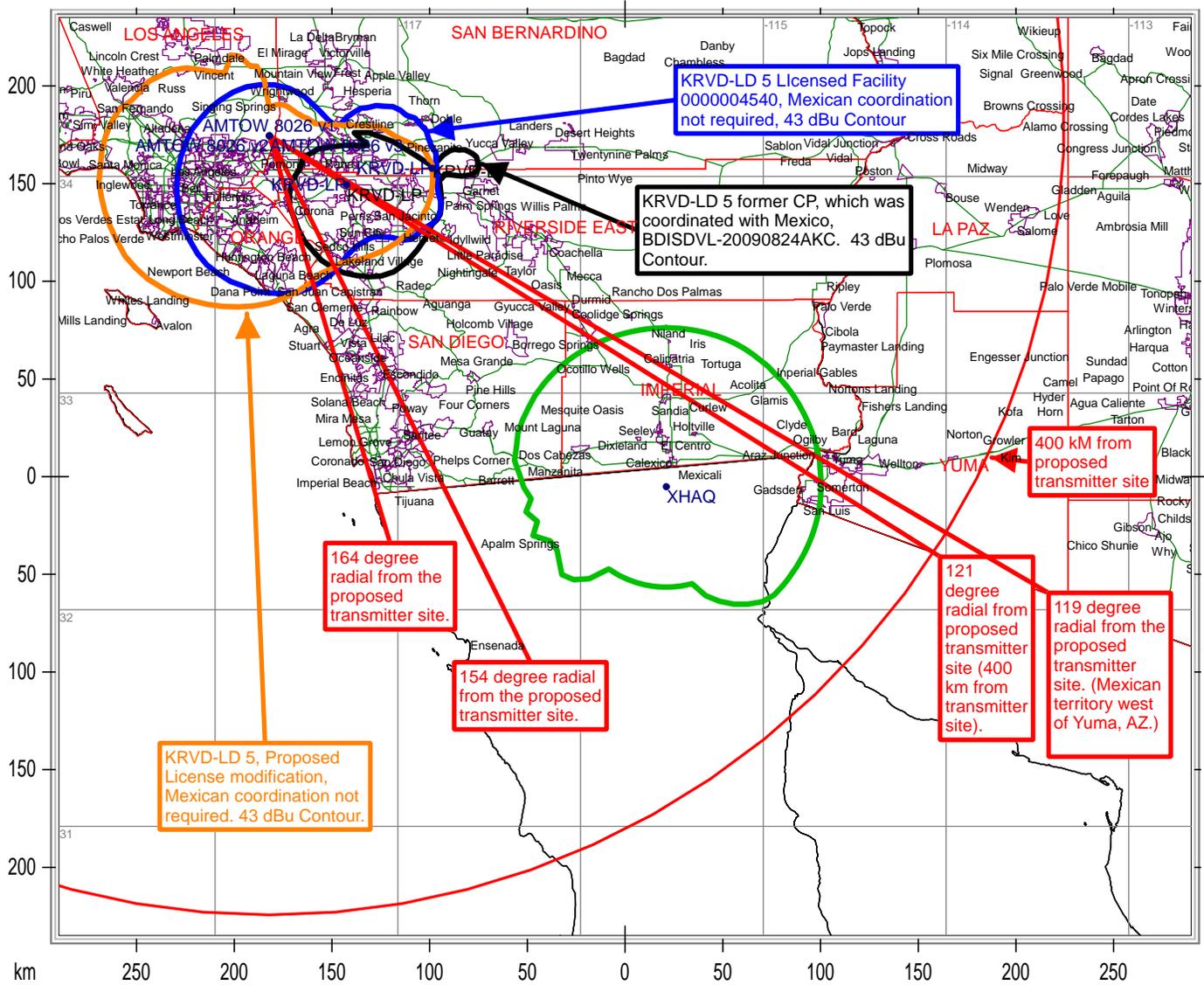
CA BANNING 5 KRVD-LD PROPOSED AMENDMENT TO MINOR MODIFICATION APPLICATION DOES NOT INCREASE SIGNAL



This modification limits coverage toward Mexico versus the original CP & the licensed facility.

- National Borders
- County Borders
- State Borders
- City Borders
- Highways
- Lat/Lon Grid

CA BANNING 5 KRVD-LD PROPOSED AMENDMENT TO MINOR MODIFICATION APPLICATION TO PROTECT XHAQ



This modification limits coverage toward Mexico versus the original CP & the licensed facility.

- National Borders
- County Borders
- State Borders
- City Borders
- Highways
- Lat/Lon Grid