

Engineering Statement and Interference Analysis

This minor modification application is submitted for the licensed facility of KZNO-LP, Facility ID 63149, to specify the correct antenna location data as updated by American Tower who owns both the tower specified herein and the tower specified in the underlying CP (FCC File Number 0000004347) and its subsequent license (FCC File Number 0000004449).

The Applicant was provided an incorrect ASRN and as a result, the wrong coordinates and heights were populated by LMS. The correct antenna location for KZNO-LP is at a smaller unregistered tower that is 177 feet distance from the licensed antenna location. The AMSL is 3 feet lower than that of the licensed tower. There is no increase in coverage and further Mexican coordination is not required.

The proposed facility 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 process this application using the following Longley-Rice analysis settings:

- Cell Size for Service Analysis of 1.0 km per side
- Distance Increments for Longley-Rice Analysis of 1.0 km

Coordination with Mexico Not Required

The proposed facility is only 177 feet distance from the existing licensed facility and does not increase coverage. It continues to be in accordance with the *Agreement for the Assignment of VHF Television Channels along United States-Mexican Border effected by exchange of Notes of April 1962, as amended* and Mexican concurrence is not required.

The proposed facility is 205.9 km from the Mexican border, has an antenna height above average terrain at 871 meters and has an ERP that is not in excess of 0.5 kW. Therefore, it is in accordance with the *Agreement for the Assignment of VHF Television Channels along United States-Mexican Border effected by exchange of Notes of April 1962, as amended* and Mexican concurrence is not required.

Digital TV Station Protection

The proposed facility causes less than 0.5% interference to surrounding digital authorized facilities (i.e., “*de minimis*”).

Class A, Low Power TV and TV Translator Station Protection

The proposed facility is predicted to cause additional interference of 94.4914%, Scenario 1, to BPTVA-20090630AFD for KSFV-CD, licensed to Venture Technologies Group, LLC. However, the Applicant has received an interference acceptance letter, see Attachment A. Except for the station referenced above, the proposed facility of K06MU causes less than 0.5% new interference to surrounding Class A authorized facilities and less than 2.0% new interference to low power television authorized facilities (i.e., “*de minimis*”).



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July 31, 2015

Bear Valley Broadcasting, LLC
Attn: B. Holton
PMB 410
P.O. Box 6848
Big Bear Lake, CA 92315

RE: Interference Acceptance

Dear Mr. Holton,

We understand your proposed minor modification of K06MU, Facility ID 63149 in Big Bear Lake, CA is predicted to cause interference to the following facilities licensed to Venture Technologies Group, LLC.

- 94.4914%, Scenario 1 interference to BPTVA-20090630AFD, KSFV-CD

The interference noted above is only caused to KSFV's analog operations. These operations must cease by September 1, 2015. Therefore, by this letter, we hereby agree to accept the above-referenced interference from the proposed facility of K06MU.

Venture Technologies Group, LLC

A handwritten signature in dark ink, appearing to read "Lawrence Rogow".

Lawrence Rogow
Chairman