Kessler and Gehman Associates, Inc.

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SECTION 73.622(f)(5) - LARGEST STATION IN THE MARKET ANALYSIS

The instant application contains a TVStudy exhibit which indicate that the proposed 27.2kW ERP exceeds the 13.1kW maximum allowable ERP threshold. Section 73.622(f)(5) of the FCC rules indicate that licensees and permittees may request an increase in either ERP in some azimuthal direction or antenna HAAT, or both, up to that needed to provide the same geographic coverage area as the largest station within their market, whichever would allow the largest service area.

KVCR is associated with the Los Angeles, CA DMA. A noise limited contour analysis of all the stations associated with the Los Angeles DMA determined that the licensed KCOP station having FCC File No.: BLCDT-20100709AFG has the largest geographical coverage area in the DMA. KCOP and the herein proposed KVCR facility have a geographical coverage area of 57,202 km² and 56,928 km² respectively; thus the proposed facility is compliant with Section 73.622(f)(5) of the rules, and may exceed the otherwise applicable 13.1kW ERP threshold.