

WAIVER REQUEST

LOW POWER TELEVISION STATION KDTF-LD  
SAN DIEGO, CALIFORNIA  
CHANNEL 25 15 KW (DA)

1. A waiver of the contingent application rule, Section 73.3517 of the FCC Rules, is hereby respectfully requested.
2. Operation is proposed on channel 25 which is a pre-auction channel in the repacked television band (channel 2-36) that is currently precluded from use by KBNT-CD on channel 25 at San Diego, California (FCC File No. BLDTA-20121203AYP).<sup>1</sup> However, KBNT-CD will relocate to channel 24 as a result of the incentive auction and repacking process.
3. The waiver will allow the applicant to propose a channel that will become available following the Incentive Auction repack. This will allow KDTF-LD to continue to serve its current viewers without interruption and it will allow for more efficient use of the limited available frequency spectrum in the market.
4. The applicant agrees with the FCC condition that it not begin transmitting on the requested channel prior to the discontinuation of operation by the subject station currently licensed on the conflicting channel.

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<sup>1</sup> The proposed KDTF-LD operation on channel 25 is predicted to cause 31.58% new interference to KBNT-CD's pre-auction channel 25 operation per the attached *TVStudy* analysis.

tvstudy v2.2.5 (4uoc83)  
 Database: localhost, Study: KDTF-LD D25 Pre and Post T, Model: Longley-Rice  
 Start: 2018.04.17 15:51:17

Study created: 2018.04.17 15:51:17

Study build station data: LMS TV 2018-04-16 #132

Proposal: KDTF-LD D25 LD APP SAN DIEGO, CA  
 File number: KDTF-LD D25 Pre and Post T  
 Facility ID: 13022  
 Station data: User record  
 Record ID: 1763  
 Country: U.S.

Build options:  
 Protect pre-transition records not on baseline channel

Search options:  
 Non-U.S. records included

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
No	KDUG-LD	N21+	TX	LIC	HEMET, CA	BLTTL20080813ABI	103.3 km
No	NEW	D24	LD	APP	PALM SPRINGS, CA	BNPDTL20100202AAV	138.2
No	KPXN-TV	D24	DT	CP	SAN BERNARDINO, CA	BLANK0000034900	199.8
Yes	KBNT-CD	D24	DC	CP	SAN DIEGO, CA	BLANK0000034463	33.3
No	K25HD-D	D25	LD	LIC	BULLHEAD CITY, AZ	BLDTA20111128FZD	348.2
No	NEW	D25	LD	APP	KINGMAN, AZ	BMJADTL20100524AGW	384.0
No	K25AL	N25	TX	LIC	LAKE HAVASU CITY, AZ	BLTTL19850927IA	313.1
No	KJPO-LD	D25	LD	APP	PARKER, AZ	BLANK0000029870	368.2
No	KGET-TV	D25	DT	LIC	BAKERSFIELD, CA	BLANK0000007394	347.0
Yes	KVEA	D25	DT	CP	CORONA, CA	BLANK0000049167	199.6
No	NEW	D25	LD	APP	DESERT CENTER, CA	BNPDTL20100514ACT	191.5
No	K25GK	N25+	TX	LIC	JOSHUA TREE, CA	BLT20000605AOK	178.5
Yes	KBLM-LP	D25	LD	CP	RIVERSIDE AND PERRIS, CA	BLANK0000005087	137.9
Yes	KBLM-LP	N25+	TX	LIC	RIVERSIDE AND PERRIS, CA	BLTTL20081209ABP	144.3
Yes	KSDY-LD	D25	LD	APP	SAN DIEGO, CA	BLANK0000052238	0.0
Yes	KBNT-CD	D25	DC	LIC	SAN DIEGO, CA	BLDTA20121203AYP	33.3
No	KLFA-LD	D25	LD	LIC	SANTA MARIA, CA	BLDTL20120411AAJ	397.3
No	K25AD	N25	TX	LIC	VICTORVILLE, ETC., CA	BLTT19820105IE	215.2
No	K26KI-D	D26	LD	CP	BANNING, CA	BNPDTL20090825ACQ	127.8
No	KMIR-TV	D26	DT	CP	PALM SPRINGS, CA	BLANK0000034640	138.2
No	KCWQ-LD	D26	LD	LIC	PALM SPRINGS, CA	BLDTL20110819AAU	138.1
No	KVCR-DT	D26	DT	LIC	SAN BERNARDINO, CA	BLEDT20070904AIC	144.8
Yes	KVSD-LD	D26	LD	LIC	SAN DIEGO, CA	BLDTL20130828AFL	34.9
No	KSWB-TV	D26	DT	CP	SAN DIEGO, CA	BLANK0000025067	0.1
No	KSWB-TV	D26	DT	APP	SAN DIEGO, CA	BLANK0000048783	0.1
No	KSKJ-CD	D26	DC	CP	VAN NUYS, CA	BLANK0000034721	198.2
No	K32EM-D	N32	TX	LIC	MORONGO VALLEY, CA	BLTTL19970721JS	156.4
Yes	CADENATRES	D24	DT	LIC	ENSENADA, BN	BLANKBPFS20160524AAT	94.1
Yes	XHEXT	D25	DT	LIC	MEXICALI, BN	BLANKBPFS20050721BFG	135.9
No	CADENATRES	D25	DT	LIC	SAN QUINTIN SAN TELM, BN	BLANKBPFS20160524AAX	254.8
No	CADENATRES	D25	DT	LIC	PUERTO PENASCO, SO	BLANKBPFS20130710AAD	355.3
No	XHEBC	D26	DT	LIC	ENSENADA, BN	BLANKBPFS20160301ABP	96.0
No	XHSFB	D26	DT	LIC	SAN FELIPE, BN	BLANKBPFS20151106AAJ	271.8

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D25  
 Mask: Full Service  
 Latitude: 32 41 47.10 N (NAD83)  
 Longitude: 116 56 12.00 W  
 Height AMSL: 806.0 m  
 HAAT: 0.0 m  
 Peak ERP: 15.0 kW  
 Antenna: DIE-TLP-8B (ID 64167) 215.0 deg  
 Elev Pattn: Generic

49.9 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	5.34 kW	642.2 m	63.4 km
45.0	6.16	536.0	61.6
90.0	4.95	400.1	55.7

135.0	7.33	280.3	51.9
180.0	13.0	643.3	69.4
225.0	14.9	676.6	71.1
270.0	10.9	719.1	69.9
315.0	5.67	639.7	63.7

Database HAAT does not agree with computed HAAT  
 Database HAAT: 0 m    Computed HAAT: 567 m

Distance to Canadian border: 1811.3 km

\*\*Proposal is within coordination distance of Mexican border  
 Distance to Mexican border: 16.2 km

Conditions at FCC monitoring station: Douglas AZ  
 Bearing: 99.0 degrees    Distance: 698.3 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:  
 Bearing: 48.3 degrees    Distance: 1329.4 km

Study cell size: 1.00 km  
 Profile point spacing: 0.20 km

Maximum new IX to full-service and Class A: 0.50%  
 Maximum new IX to LPTV: 2.00%

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 Interference to BLDTA20121203AYP LIC scenario 1

**\*\*IX: 31.58% interference caused**

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	KBNT-CD	D25	DC	LIC	SAN DIEGO, CA	BLDTA20121203AYP	
Undesireds:	KDTF-LD	D25	LD	APP	SAN DIEGO, CA	KDTF-LD D25 Pre and Po	33.3 km
	Service area		Terrain-limited		IX-free, before	IX-free, after	Percent New IX
	4735.7    2,513,410	4424.2	2,243,871	4424.2	2,243,871	2058.2    1,535,292	53.48    31.58
	1019.5    1,091,142	1002.4	1,039,421	1002.4	1,039,421	231.7    546,671	76.89    47.41 (in Mexico)
Undesired			Total IX		Unique IX, before	Unique IX, after	
KDTF-LD D25 LD APP		2366.0	708,579		2366.0	708,579	
KDTF-LD D25 LD APP		770.7	492,750		770.7	492,750	(in Mexico)

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