

## **Unilateral Engineering Amendment**

This Unilateral Engineering Amendment application is submitted to resolve mutual exclusivity in MX Group 24 pursuant to *FCC Public Notice DA 18-1108* (October 30, 2018), where FCC File Number 0000054814, a displacement application submitted during the FCC Special Displacement Window for KEDD-LD, Los Angeles, CA, Facility ID 56793, was identified by the FCC as mutually exclusive and was assigned to MX Group 24.

KEDD-LD currently licensed on channel 50 is automatically displaced because it is operating in the new 600 MHz band for mobile broadband service (channels 38-51). The applicant proposed to move KEDD-LD to channel 27 during the Special Displacement Window.

The facility proposed in this amendment application will unilaterally resolve the mutual exclusivity with the other application in MX Group 24: FCC File Number 0000052714 for KTBV-LD, Channel 27, Los Angeles, CA, Facility ID 125499. Moreover, the proposed facility herein does not create new mutual exclusivities and is minor in nature.

### **Amendment**

In this amendment application, the applicant proposes the following changes:

- 1) Move the antenna location.
- 2) Modify the ERP from 0.600 kW to 15 kW.
- 3) Modify the antenna orientation from 204 degrees to 280 degrees.
- 4) The proposed facility was studied using TVStudy v2.2.5 using the following parameters:
  - Study cell size: 1.00 km
  - Profile point spacing: 0.10 km

The proposed facility is in less than 30 miles distance from the existing licensed facility. The F(50,90) 51 dBu contours of the proposed facility overlaps with the F(50,90) 51 dBu contours of the existing licensed facility. It is believed that the proposed facility complies with 47 C.F.R. Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h).

### **Mexican Coordination Required**

The proposed facility is within coordination distance of Mexican border.

### **Waiver Request**

The applicant hereby requests to waive the contingent application rule 47 C.F.R Section 73.3517 to allow the grant of this application which is necessary for the station to continue to serve its current viewers.

In addition, in order to comply with Section 73.3700(g)(2), the applicant agrees to a condition that the proposed facility will not commence operation until any other potentially

mutually interfering repacked full power or Class A stations have left their channels pursuant to the relevant phase assignment.

#### **Digital TV and Class A Station Protection**

The proposed facility of KEDD-LD is predicted to cause 0.7% interference to FCC File Number 0000059243 for KPOM-CD. The applicant has obtained an Interference Acceptance Letter, see [Attachment A](#).

Except as referenced above, the proposed facility causes less than 0.5% interference to surrounding digital and Class A television stations and allotments and facilities (i.e., “*de minimis*”) based on TVStudy v2.2.5. It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards.

#### **Low Power TV and TV Translator Station Protection**

The proposed facility causes less than 2.0% interference to surrounding low power licenses and construction permits (i.e., “*de minimis*”) based on TVStudy v2.2.5. It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards.

#### **Environment Effect**

The proposed facility is deemed individually and cumulatively to have no significant effect on the quality of the human environment and are categorically excluded from environmental processing as defined by 47 C.F.R. § 1.1306. Additionally, the applicant certifies that it will reduce power or cease operation as necessary to protect any persons from having RF exposure in excess of FCC guidelines.

**Interference Acceptance Letter**

1. Venture Technologies Group, LLC is the licensee of KEDD-LD, Channel 50, Los Angeles, CA, Facility ID 56793. KEDD-LD proposed a displacement application on channel 27 pursuant to the Special Displacement Window PN released on February 9, 2018 (DA 18-124).
2. Coachella Communications, LLC is the licensee of KPOM-CD, Channel 27, Ontario, CA, Facility ID 1018937 and has a construction permit on channel 27 (FCC File Number 0000059243).
3. The proposed facility of KEDD-LD on channel 27 as amended pursuant to *FCC Public Notice DA 18-1108* (“Unilateral Engineering Amendment”) is predicted to cause 0.7% interference to the construction permit of KPOM-CD on channel 27 (FCC File Number 0000059243).
4. Coachella Communications, LLC hereby agrees to accept the above-referenced interference from the proposed facility of KEDD-LD on channel 27.

Accepted and Agreed,



Paul Koplin, Manager  
Coachella Communications, LLC