

ENGINEERING STATEMENT

This application proposes a digital companion channel facility on channel 14 for KRPE-LP, Channel 6, Facility ID 129651, FCC File Number 0000063282 (“KRPE”), licensed to Venture Technologies Group, LLC (“VTG”).

Proposed Facility

VTG proposes a digital companion channel for KRPE to channel 14 at the existing licensed facility pursuant to the technical parameters specified herein. The proposed facility of KRPE was studied using TVStudy v2.2.5 using the following parameters and the results are as follow:

- Study cell size: 1.00 km
- Profile point spacing: 1.00 km
- Distance to Canadian border: 1811.2 km
- Distance to Mexican border: 16.2 km
- Conditions at FCC monitoring station: Douglas AZ
Bearing: 99.0 degrees Distance: 698.4 km
- Proposal is not within the West Virginia quiet zone area
- Conditions at Table Mountain receiving zone:
Bearing: 48.4 degrees Distance: 1329.4 km

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.

Proposed Facility Protects Channel 14 in San Diego

As illustrated in Attachment A, the proposed facility of KRPE on channel 14 protects the use of channel 14 as a land mobile channel in and around San Diego, CA. The F(50,10) 52 dBu contour of the proposed facility of KRPE on channel 14 is within 145 km of the corresponding coordinates from channel 14 in San Diego, CA, as listed in Section 74.709(b)(1), and is therefore within the channel 14 land mobile protection exclusionary area.

Digital TV and Class A Station Protection

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.

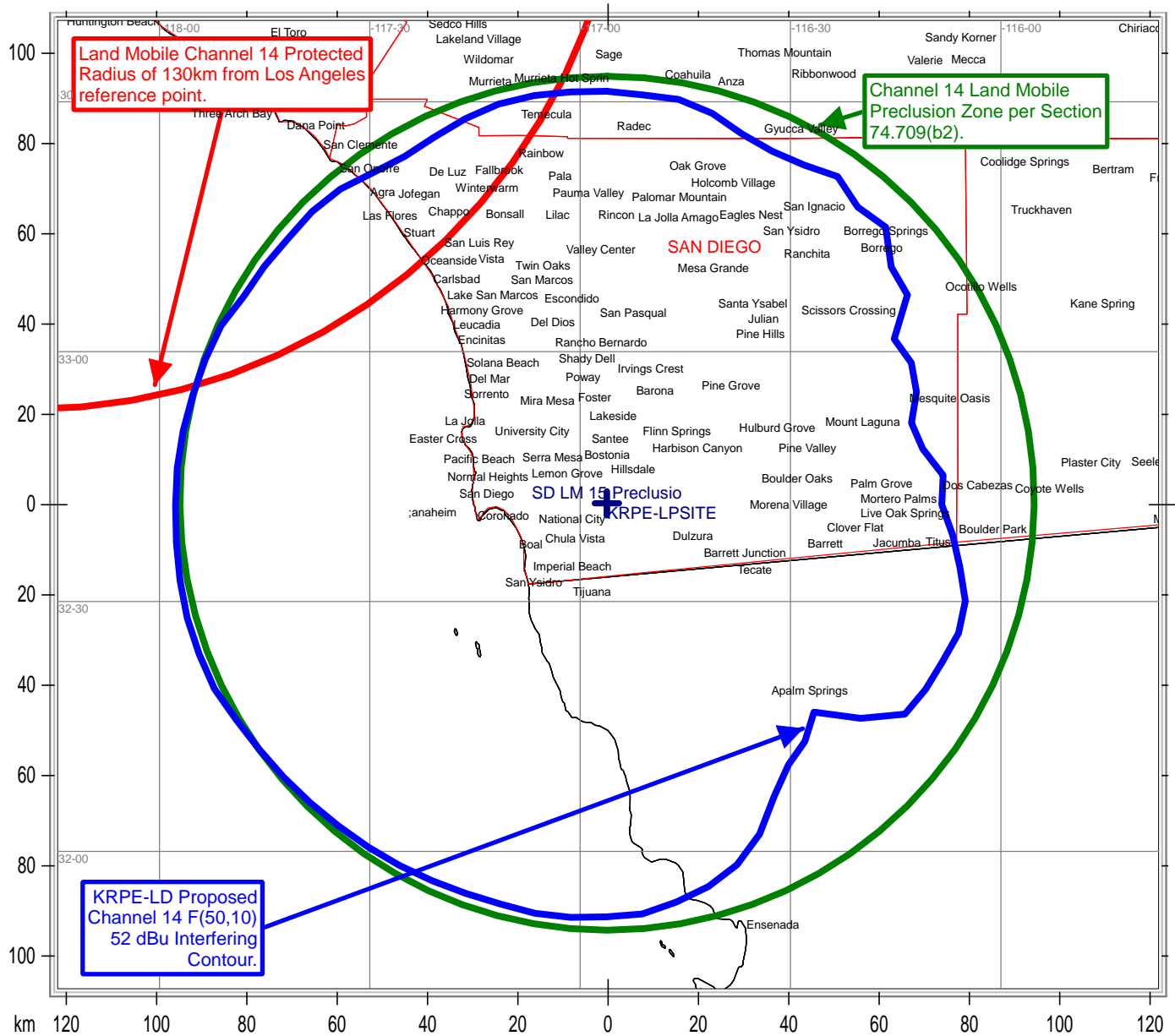
Low Power TV and TV Translator Station Protection

The proposed facility causes less than 2.0% interference to surrounding low power assignments and allotments (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.

CA SAN DIEGO KRPE-LD PROPOSED DISPLACEMENT TO CHANNEL 14



The 52 dBu contour does not intersect with the LM 14 protected contour outside the preclusion zone.

— National Borders — County Borders — State Borders — Lat/Lon Grid