

ENGINEERING STATEMENT

This application is submitted in response to FCC letter dated June 28, 2019 (1800E3-RLG), see Attachment A, to amend File No. 0000071994, a displacement application for K45NA-D (K35PB-D), Facility ID 128217, licensed to Venture Technologies Group, LLC (“VTG”).

Amendment

The Applicant requests the proposed facility be placed in Phase 7 of the transition schedule to eliminate interference to KVOS-TV. The Applicant will not commence operation of the proposed facility 35 until KVOS ceases operation on channel 35 in Phase 7.

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 to allow the station to continue to serve its current viewers.

Nature of Displacement

K45NA-D is displaced from channel 45 because it is out of core.

Proposed Facility

VTG proposes to move K45NA-D to channel 35 at a site that is less than 30 miles from its existing authorized facility. The proposed facility of K45NA-D was studied using TVStudy v2.2.5 using the following parameters:

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

And the results are as follow:

- Distance to Canadian border: 102.0 km
- Distance to Mexican border: 1719.3 km
- Conditions at FCC monitoring station: Ferndale WA
Bearing: 353.1 degrees Distance: 150.1 km
- Proposal is not within the West Virginia quiet zone area
- Conditions at Table Mountain receiving zone:
Bearing: 115.1 degrees Distance: 1593.2 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).

Canadian Coordination Required

The proposed facility is within coordination distance of Canadian border.

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.

Attachment A



Federal Communications Commission
Washington, D.C. 20554

June 28, 2019

Venture Technologies Group, LLC.
5670 Wilshire Blvd., Suite 1620
Los Angeles, CA. 90036

1800E3-RLG

In re: Low Power Television Application of:
Existing Call Sign: K45NA-D
Proposed Call Sign: K35PB-D
Facility Id No: 128217
Maltby, WA.
Channel: 35
File No.: 0000071994

Dear Applicant:

We are currently processing the above captioned application. Our preliminary analysis indicates the following:

The proposal is predicted to cause interference to the following facilities:

1. KVOS-TV – Bellingham, WA. – BLCDT-20070628ABX at 34.02%

If you do not amend your application electronically within 30 days from the date of this letter to resolve the above deficiency, we will dismiss your application.

Sincerely,
A handwritten signature in black ink, appearing to read "Hossein Hashemzadeh", is written over the word "Sincerely".

Hossein Hashemzadeh
Deputy Chief
Video Division
Media Bureau

C.C. Venture Technologies Group, LLC.
C/O Joan Stewart, Esq.
1776 K Street, NW.
Washington, DC 20006