

ENGINEERING STATEMENT

This amendment application modifies File No. 0000090051, a minor modification application for the construction permit of KRMV-LD, Facility ID 129618, Channel 32, Riverside, CA, FCC File No. 0000054815 (“CP”).

Amendment

This amendment application is filed in response to FCC letter dated November 20, 2019, see Attachment A, to correct a typographic error in the specified antenna structure height. The correct antenna structure height is 42.7 meters (140 feet) and not 140 meters. No tower registration with the FCC is required.

Proposed Facility

The proposed move is less than 30 miles distance from the existing licensed facility and the CP. 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 and of the CP. The proposed facility was studied using TVStudy v2.2.5 using the following parameters:

Study cell size: 2.00 km
Profile point spacing: 0.20 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 Not Required

From 110 degrees to 245 degrees, the proposed contours are inside those of the existing CP. The Mexican border is 119 degrees to 174 degrees. Therefore, Mexican concurrence is not required as we are shrinking our contour in every direction toward Mexico.

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 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.



Federal Communications Commission
Washington, D.C. 20554

November 20, 2019

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

1800E3-RLG

In re: Low Power Television Application of:
Call Sign: KRMV-LD
Facility Id No: 129618
Riverside, CA.
Channel: 32
File No.: 0000090051

Dear Applicant:

The tower determination study of the engineering specifications as entered in the above referenced proposal shows that the tower registration with the FAA is required. Determination study imported below for your review:

DETERMINATION Results

This structure requires registration. The antenna structure is taller than 60.96 meters (200 feet) and does not meet the criteria for the 6.10-meter (20-foot) Rule exception.

Your Specifications

NAD83 Coordinates

Latitude 33-57-36.5 north

Longitude 117-16-43.2 west

Measurements (Meters)

Overall Structure Height (AGL) 140

Support Structure Height (AGL) 140

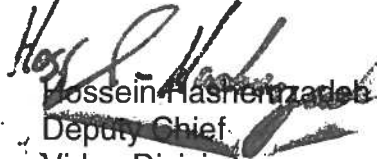
Site Elevation (AMSL) 931.5

Structure Type

GTOWER - Guyed Structure Used for Communication Purposes

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


Hossein Hashemi Zadeh
Deputy Chief
Video Division
Media Bureau

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