

D'Amico Brothers Broadcasting, Corp.  
FRN 0007283575  
KVSD-LD, Facility ID 14910  
San Diego, CA

### SPECIAL TEMPORARY AUTHORITY JUSTIFICATION

KVSD-LD is licensed on Channel 26 but has been displaced as a result of the repack. The station has been granted a construction permit to move to Channel 35. While awaiting repack funds to allow for construction of the new channel facilities, KVSD-LD has been off the air. It must resume operations prior to December 10, 2020. The licensee is still awaiting repack funds to be able to complete purchase of the transmitter and construct the new Channel 35 facilities. While the funds were reportedly approved this week by the FCC Reimbursement Fund team, there is insufficient time for order, delivery and installation of the transmitter before the one-year silence deadline. KVSD-LD cannot resume operation on Channel 26, because that channel is now occupied by KSWB-DT, Facility ID 58827. Thus, special temporary authority is needed to permit KVSD-LD to return to operations using alternate facilities.

KVSD-LD was in a similar position in 2019, and the Commission granted STA to allow resumption of operations on Channel 15, which KVSD-LD has authority to use as its studio-transmitter link. See LMS File No. 0000074685, granted 06/26/2019.

This application seeks an STA using the exact same facilities and parameters as the 2019 STA to again operate on Channel 15 to preserve the station license pending completion of construction on Channel 35.

An updated analysis based on TV Study concludes that this STA proposal meets all FCC interference protection requirements with respect to all Part 73 and Part 74 television broadcast facilities.

Section 74.709(b) governs protection of land mobile facilities operating within the TV Channel 15 band in Los Angeles. Section 74.709(b)(1) requires a TV facility to be located at least 130 km from reference coordinates for Los Angeles. Section 74.709(b)(2) allows a Part 74 TV facility specifically on Channel 15 to be located within 145 km of reference coordinates for San Diego. Attached are maps showing that the proposed KVSD-LD STA transmitter site complies with both requirements.

It should be noted that the requested STA facility has been licensed and in operation as a secondary studio-transmitter link for many years, with no interference complaints.