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ENGINEERING REPORT

KFLA-LD, Los Angeles, CA LPTV (Proposing Channel 19)

REGARDING LMRS ADJACENT CHANNEL 20

Section 74.709 protects co-channel and adjacent-channel Land Mobile Radio Service (“LMRS”) from LPTV interference at 13 large cities. Los Angeles channel 20 is one of the protected LMRS channels, as listed in Section 74.709(a). This LPTV channel 19 proposal is adjacent channel to the Los Angeles channel 20 LMRS.

As discussed below, because the FCC has since permitted LPTV stations to employ full-service emission masks (see Section 74.794 for a description of the full-service emission mask) and due to exceptions regarding adjacent-channel interference that the FCC has already allowed regarding cities listed in Section 74.709(a), it is respectfully requested that the FCC apply this same adjacent-channel exception to allow for the grant of this channel 19 channel displacement application.

The FCC contemplated allowing the use of the LMRS channels listed in Section 74.709(a) for LPTV in an effort to facilitate those LPTV stations in these larger cities that are impacted by the Incentive Auction re-pack. Regarding TVStudy (the software used by the FCC for determining protection by an LPTV station), Commission policy stated in Public Notice DA 18-124, released February 9, 2018, at Note 14 of its Appendix in reference to “protected due to land mobile or off shore radio”:

*Note that for purposes of generating the Channel Study, we continued to use the same distance-based protections that were used in the incentive auction. See Incentive Auction Task Force Releases Information Related to Incentive Auction Repacking, ET Docket No. 13-26, GN Docket No. 12-268, Public Notice, 28 FCC Rcd 10370, 10407-10 (2013) (Repacking Data PN). This **conservative** {emphases Ours} approach was adopted for ease of use, but displaced LPTV/translator stations can still make a technical showing to demonstrate that they can operate on these excluded channels and locations.*

As with many of the larger markets in the United States, Los Angeles has no open TV channels that can accommodate an LPTV displacement except for the channels associated with LMRS—channels 14 through 20. Therefore, this proposal for open channel 19 is requested.

A distance short-spacing to the Los Angeles channel 20 LMRS reference point of Section 74.709 is listed on the TVStudy result output (that is an attachment to this

application). With a full-service emission mask (as herein proposed), adjacent-channel interference the Los Angeles channel 20 LMRS is not expected to exist.

As mentioned above, the FCC has granted exceptions to Section 74.709 on at least two occasions. Channel 21 LPTV displacement applications in both Philadelphia, PA (WEFG-LD) and Los Angeles, CA (KTAV-LD) that are adjacent-channel to LMRS channel 20 in these two cities, as specified in Section 74.709(a), have been granted by the FCC. In neither case did such a grant rely on any additional showing of protection to the LMRS by the LPTV station, nor was a waiver of Section 74.709 requested. Instead, either the applicant for these two LPTV stations relied on the policy of PN DA 18-124 (cited above) or the FCC apparently relied on this policy on its own accord. (For WEFG-LD, there is no mention in its displacement application {LMS file 53972} of either the LMRS issue or the policy of PN DA 18-124, NOTE 14.) The adjacent-channel LMRS protection between this LPTV channel 19 proposal to the Los Angeles channel 20 LMRS is no different than the adjacent-channel protection that allowed the channel 21 LPTV use in either Philadelphia or Los Angeles.

Since a full-service emission mask is now permitted for increased adjacent-channel protection, the adjacent-channel protection of Section 74.709 appears to be obsolete. This rule section was formulated and is basically unchanged from the time of LPTV analog only service. It is noted that the actual adjacent-channel carrier-to-interference (C/I) ratio has decreased by 13 dB when a full-service emission mask is specified instead of the C/I ratio associated with an analog interferer.

Notwithstanding the foregoing, should a waiver of any other Commission policy or rule be required for this displacement proposal, such a waiver is hereby respectfully requested.