

ENGINEERING STATEMENT

This engineering statement supports this application to modify FCC File No. 0000054820, a construction permit for KEDD-LD, Facility ID 56793, Channel 27, Los Angeles, CA, licensed to the Applicant herein.

The proposed facility is less than 30 miles distance from the existing licensed facility as well as less than 30 miles from the existing CP for KEDD-LD. 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 the CP. The proposed facility was studied using TVStudy v2.2.5 using the following parameters:

Study cell size: 1.00 km
Profile point spacing: 0.10 km

It is believed that the proposed facility complies with the requirements of Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h) and other applicable parts of the Rules and Regulations of the Federal Communications Commission.

Digital TV and Class A Station Protection

The authorized construction permit of KEDD-LD (FCC File No. 0000054820) was predicted to cause 0.70% new interference to the then-pending construction permit KPOM-CD (FCC File No. 0000059242).¹ KPOM-CD accepted that level of interference. See [Attachment A](#). That KPOM-CD construction permit was constructed and is now the licensed facility of KPOM-CD (FCC File No. 0000080302). The proposed KEDD-LD facility continues to cause exactly 0.70% new interference to the licensed facility of KPOM-CD, therefore it is eligible for a grant.

The currently authorized construction permit of KEDD-LD was authorized in June 2019. In November 2020, KPOM-CD applied for a minor modification of its license facility (FCC File No. 0000127698) that was subsequently been granted in December 2020. In that modification, KPOM-CD was predicted to receive 1.4% new interference from the KEDD-LD construction permit. By this proposed modification, the interference from KEDD-LD to KPOM-CD will be reduced to 0.92%. Therefore, this application is eligible to grant.

Except as referenced above, 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.

¹ KPOM-CD is now in a channel share with KSFV-CD. When referring to KPOM-CD in in this exhibit, it also therefore references KSFV-CD.

Environment Assessment Not Required

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. The applicant also certifies that it, in coordination with other users of each transmitter site, will reduce power or cease operation as necessary to protect persons having access to each site, transmitter or antenna from radio frequency electromagnetic exposure in excess of FCC guidelines.

ATTACHMENT A

Interference Acceptance Letter

1. Venture Technologies Group, LLC is the licensee of KEDD-LD, Channel 50, Los Angeles, CA, Facility ID 56793. KEDD-LD proposed a displacement application on channel 27 pursuant to the Special Displacement Window PN released on February 9, 2018 (DA 18-124).
2. Coachella Communications, LLC is the licensee of KPOM-CD, Channel 27, Ontario, CA, Facility ID 1018937 and has a pending application to modify its licensed facility on channel 27 (FCC File Number 0000034691).
3. The proposed facility of KEDD-LD on channel 27 is predicted to cause 3.35% interference to the pending application of KPOM-CD on channel 27 (FCC File Number 0000034691).
4. Coachella Communications, LLC hereby agrees to accept the above-referenced interference from the proposed facility of KEDD-LD on channel 27.

Accepted and Agreed,



Paul Koplin, Manager
Coachella Communications, LLC