

**Amendment to K28GY-D, Santa Barbara, CA, Facility ID 13469, Request to Extend a Suspension
of Operations and Silent Authority**

June 2022

At the request of FCC staff, this amendment supplies a detailed accounting of what construction remains and a timeline plan of how and when the station expects to complete construction and begin operations. That timeline is attached.

The process of ordering or altering remaining equipment has been on hold until the FCC grants the construction permit in LMS File No. 0000190777, which was filed on May 18, 2022. The construction permit was just granted on June 23, 2022, the date of this amendment.

The licensee also supplies the requested backup documentation recounted in the pending request to extend its silent authority that shows its efforts since the last extension in January 2022 and the circumstances outside the station's control that prevented the resumption of service for the displaced translator.

K28GY-D as Channel 33 Construction Timeline

Establishing Lead Time

- 6/13-6/16 Contact Tee Thomas at Anywave Re: confirmation of existing filter (8 Pole) as full service certified and replacement lead time. Options – Send in ch 19 filter for retune, have 19 filter tuned in field, or wait for new filter from new supplier (at least one month lead time)
- 6/13-6/15 Contact Dan Barton at Alive Telecom to confirm lead time on antenna. Minimum lead time ARO is ***eight weeks***.

Construction

- 6/20-6/24 Travel to Site – confirm condition of transmitter, filter, and site in general from idle state post K19MO-D. Assuming all is in good order:
 - Determine direction for filter (tune/replace).
 - Place antenna order.
 - Contact tower crew(s) to determine approximate availability for antenna swap (Late August timeframe based on antenna) and bid job.
- 6/27-7/30 Monitor status of filter retune/replace scenario with Anywave and Antenna build and testing at Alive Telecom. – Confirm and schedule tower crew. – miscellaneous site prep as needed.
- 7/30-8/15 Filter is tuned or replaced and put in-line for testing
 - Confirm delivery date for antenna.
 - Confirm Tower crew schedule and adjust as needed based on antenna arrival.
- 8/22-10/1 Given equipment lead time, crew availability, and weather conditions this window should allow for delivery delays, tower crew scheduling and testing post construction.

*** All dates furnished are based on the most recent lead times from manufacturers and assuming little to no delays in delivery and scheduling.**

From: [Jeremy Howard](#)
To: [Melodie Virtue](#); [June M. Baldwin](#); [Dawn Ariza](#)
Subject: FW: Fine Satellites 1 of 2
Date: Tuesday, June 14, 2022 11:47:42 AM

Correspondence with Howard Fine after enlisting his assistance to identify potential old CPs 1 of 2.

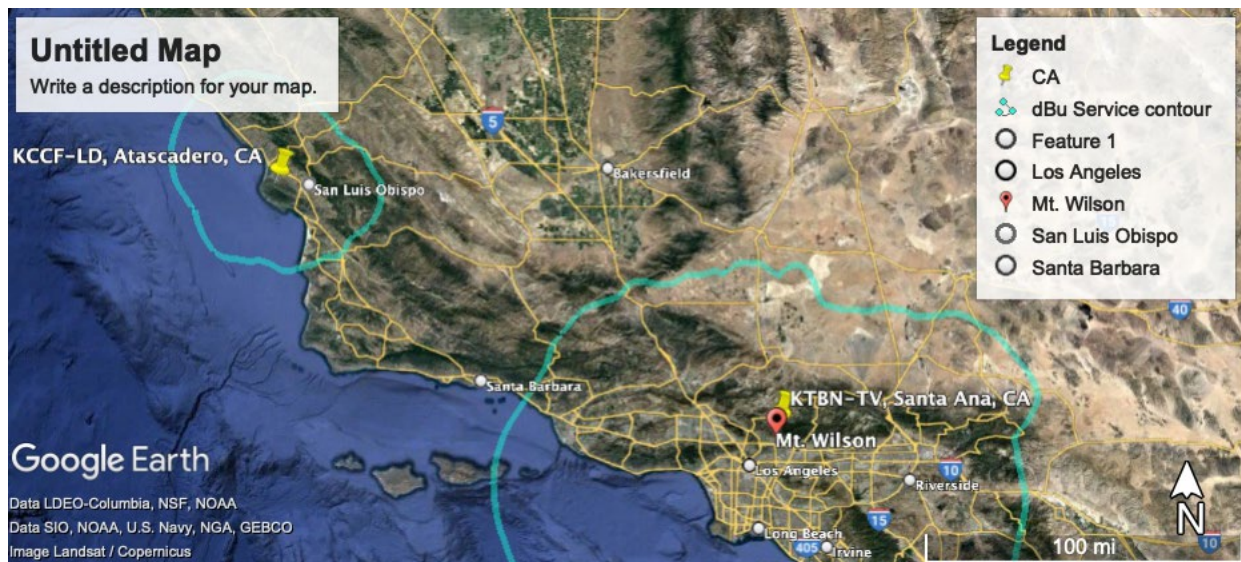
Jeremy Howard

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Public Media Group of Southern California

From: Howard Fine <howard.fine@finesatellites.com>
Sent: Tuesday, February 1, 2022 12:08 PM
To: Jeremy Howard <jhoward@pmgsocal.org>
Subject: Channel 33

Look at this jpeg.



Howard Fine
Fine Satellites and Fiber, LLC
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howard.fine@finesatellites.com

From: [Jeremy Howard](#)
To: [Melodie Virtue](#); [June M. Baldwin](#); [Dawn Ariza](#)
Subject: FW: Fine Satellites 2 of 2
Date: Tuesday, June 14, 2022 11:50:00 AM
Attachments: [KCET LPTV search SB - BKS.xlsx](#)

List of potential channels including 33 correspondence with Howard Fine 2 of 2.

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From: Howard Fine <howard.fine@finesatellites.com>
Sent: Wednesday, February 2, 2022 10:17 AM
To: Jeremy Howard <jhoward@pmgsocal.org>
Subject: Bakersfield and Santa Barbara UHF channels

See attache

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	14	K14TK-D	SANTA MARIA	34-54-53.8 N 120-27-23.2 W	1270 West Mccoy Lane, Santa Maria	CP	Tolling request pending	1/10/2022	Lowcountry 34 Media, LLC
6	15	KSBY	SAN LUIS OBISPO	35-21-37.0 N 120-39-22.0 W	Cuesta Peak			LICENSED	SCRIPPS BROADCASTING HOLDINGS LLC
16	16	K16FC-D	SAN LUIS OBISPO	35-21-36.9 N 120-39-23.6 W	Cuesta Peak			LICENSED	PUBLIC MEDIA GROUP OF SOUTHERN CALIFORNIA
17	17	KLDF-CD	LOMPOC	34-44-30.0 N 120-26-49.3 W	Harris Grade, Lompoc			LICENSED	HC2 STATION GROUP, INC.
17	17	KSBB-CD	SANTA BARBARA	34-24-35.9 N 119-42-28.4 W	KEYT Studios			LICENSED	SANTA BARBARA
28	19 → 18	K28GY-D	SANTA BARBARA	34-31-30.9 N 119-57-32.5 W					PUBLIC MEDIA GROUP OF SOUTHERN CALIFORNIA
12	19	KCOY-TV	SANTA MARIA	34-54-37.0 N 120-11-13.0 W	Tepesquet Peak			LICENSED	VISTAWEST CALIFORNIA, LLC
32	20	KWSM-LD	SANTA MARIA	34-54-36.9 N 120-11-11.5 W	Tepesquet Peak			LICENSED	COCOLA BROADCASTING COMPANIES, LLC
38	21	KPMR	SANTA BARBARA	34-31-35.7 N 119-58-19.8 W	Broadcast Peak			LICENSED	ENTRAVISION HOLDINGS, LLC
	22	K22QP-D	SANTA BARBARA	34-31-28.4 N 119-57-38.4 W	Broadcast Peak	CP		8/19/2023	POINT BROADCASTING COMPANY
57	23	KFUL-LD	SAN LUIS OBISPO	35-21-38.0 N 120-39-24.6 W	Cuesta Peak			LICENSED	KJLA, LLC
24	24	KKFX-CD	SAN LUIS OBISPO	35-21-37.9 N 120-39-24.6 W	Cuesta Peak			LICENSED	NPG OF CALIFORNIA, LLC
	24	K24NX-D	SANTA BARBARA	34-27-56.9 N 119-40-41.4 W	Gibraltar Peak	CP	Possible	1/10/2022	SPECTRUM EVOLUTION, INC.
25	25	KLFA-LD	SANTA MARIA	34-50-05.9 N 120-22-59.5 W	Mt. Solomon, Santa Maria			LICENSED	KJLA, LLC
	25	K25QG-D	SANTA BARBARA	34-27-56.9 N 119-40-41.4 W	Gibraltar Peak	CP	Possible	1/10/2022	SPECTRUM EVOLUTION, INC.
26	26	K26FT-D	SANTA BARBARA	34-27-55.9 N 119-40-43.4 W	Gibraltar Peak			LICENSED	PUBLIC MEDIA GROUP OF SOUTHERN CALIFORNIA
26	26	K26PP-D	Santa Maria-Lompoc	34-54-37.0 N 120-11-13.0 W	Tepesquet Peak			LICENSED	JOSE RIVERA MIRAMONTES
3	27	KEYT-TV	SANTA BARBARA	34-31-32.0 N 119-57-32.0 W	Broadcast Peak			LICENSED	NPG OF CALIFORNIA, LLC
41	28	KVMM-CD	SANTA BARBARA	34-27-56.9 N 119-40-41.4 W	Gibraltar Peak			LICENSED	HC2 STATION GROUP, INC.
29	29	KQMM-CD	SANTA MARIA	34-54-35.9 N 120-11-13.5 W	Tepesquet Peak			LICENSED	HC2 STATION GROUP, INC.
30	30	KDFS-CD	SANTA MARIA	34-53-52.2 N 120-35-26.4 W	Guadalupe Peak, West of Santa Maria			LICENSED	HC2 STATION GROUP, INC.
3	31	K31KE-D	San Luis Obispo, ETC	35-21-37.9 N 120-39-24.6 W	Cuesta Peak			LICENSED	NPG OF CALIFORNIA, LLC
50	31	KBAB-LD	SANTA BARBARA	34-31-28.4 N 119-57-38.4 W	Broadcast Peak			LICENSED	BILTMORE BROADCASTING SANTA BARBARA, INC.
28	32	K32LT-D	SAN LUIS OBISPO	35-21-36.9 N 120-39-21.6 W	Cuesta Peak			LICENSED	ENTRAVISION HOLDINGS, LLC
32	32	KSBT-LD	SANTA BARBARA	34-27-56.9 N 119-40-41.4 W	Gibraltar Peak			?	R&C MEDIA GROUP, INC. D/B/A WCETV
46	33	KCCF-LD	ATASCADERO	35-16-55.7 N 120-48-45.3 W	South of Los Osos			LICENSED	CKSG9, INC.
	33	K33MO-D	SANTA BARBARA	34-27-56.9 N 119-40-41.4 W	Gibraltar Peak	CP	Possible	1/10/2022	SPECTRUM EVOLUTION, INC.
33	34	KTAS	SAN LUIS OBISPO	35-21-37.9 N 120-39-24.6 W	Cuesta Peak			LICENSED	RAUL PALAZUELOS
35	35	KTSB-CD	SANTA MARIA	34-54-37.0 N 120-11-13.0 W	Tepesquet Peak			LICENSED	ENTRAVISION HOLDINGS, LLC
	35	K35PJ-D	SANTA BARBARA	34-28-14.0 N 119-40-34.0 W	Gibraltar Peak	CP		8/13/2023	DTV AMERICA 1, LLC
42	36	KSBO-CD	SAN LUIS OBISPO	35-21-39.4 N 120-39-25.0 W	Cuesta Peak			LICENSED	HC2 STATION GROUP, INC.
36	36	K36QH-D	SANTA BARBARA	34-27-56.9 N 119-40-40.4 W	Gibraltar Peak	CP		8/13/2023	MAJOR MARKET BROADCASTING OF CALIFORNIA, INC.

From: [Jeremy Howard](#)
To: [Melodie Virtue](#); [June M. Baldwin](#); [Dawn Ariza](#)
Subject: FW: Emails - Raj Mathur to Dane K33MO-D Study
Date: Tuesday, June 14, 2022 11:58:56 AM

Melodie,

This email thread is from where I started working with Raj to the point where Dane took over.

Jeremy Howard

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From: Jeremy Howard <jhoward@pmgsocal.org>
Sent: Monday, March 28, 2022 11:47 AM
To: Rajat Mathur <rmathur@h-e.com>
Cc: Dane Ericksen <dericksen@h-e.com>
Subject: Re: K28GY-D / K19MO-D

Hi Dane,

Do you have any updates for us? I don't want to miss this opportunity.

Thank you,

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From: Jeremy Howard <jhoward@pmgsocal.org>
Sent: Friday, March 11, 2022 3:04:20 PM
To: Rajat Mathur <rmathur@h-e.com>
Cc: Dane Ericksen <dericksen@h-e.com>
Subject: Re: K28GY-D / K19MO-D

Hi Raj,

Sounds good - have a wonderful trip, and hello Dane. Looking forward to working with you again sir.

Just got back (literally just landed) to town from a NextGenTV seminar so we can certainly catch up next week

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From: Rajat Mathur <rmathur@h-e.com>
Sent: Friday, March 11, 2022 11:26:01 AM
To: Jeremy Howard <jhoward@pmgsocal.org>
Cc: Dane Ericksen <dericksen@h-e.com>
Subject: Re: K28GY-D / K19MO-D

Thanks, Jeremy. Yes, I am certainly looking forward to seeing family after almost 4 years.

I chatted with Dane this morning (he is copied to this email) and he is up to speed on this project. I also called and emailed PSI to let them know that there is some urgency here and that we are looking to file with the FCC soon. They may suggest a different antenna for us as the one proposed by K33MO-D (which I used for our immediate purposes) is apparently large and may be impractical.

Thanks,
Raj

Rajat Mathur, P.E.
Hammett & Edison, Inc.
rmathur@h-e.com
707/996-5200

On Mar 10, 2022, at 12:16 PM, Jeremy Howard <jhoward@pmgsocal.org> wrote:

Hi Raj,

That sounds wonderful. To be able to join your family is something to jump at while the pandemic has calmed down somewhat. I'll get things going with June and Melodie.

I also really appreciate your enlisting Dane to assist while you're gone and look forward to chatting with him again after all these years.

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From: Rajat Mathur <rmathur@h-e.com>
Sent: Thursday, March 10, 2022 2:30:44 PM
To: Jeremy Howard <jhoward@pmgsocal.org>
Subject: Re: K28GY-D / K19MO-D

Hi Jeremy,

Thanks for your e-mail. I've contacted PSI to get specifications for the antenna; once those are received we can complete the engineering and start working on the technical portions of the application.

I think Melodie and I can work in parallel, so you could engage her now. She can start the application and work on the exhibit explaining why K33MO-D should be ignored / removed from the database, while we complete the engineering.

Also, I'd want to let you know that I'll be on a 3+ week vacation to India (sister's wedding) starting on Monday, March 14. I've managed to entice Dane out of semi-retirement to work on this project in my absence. He's already familiar with the site and I'm getting him up to speed on this project tomorrow.

Thanks,
Raj

Rajat Mathur, P.E.
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707/996-5200

On Mar 10, 2022, at 8:26 AM, Jeremy Howard <jhoward@pmgsocal.org> wrote:

Hi Raj,

I've gotten approval to have you go ahead and use the antenna/orientation you have based this scenario on so we can get an application in as soon as possible. I agree that wasting time comparing and asking manufacturers about custom patterns won't buy us anything in the short term that we can modify later.

When you are getting close with your study let me know and we'll engage with Melodie to operate from the legal side.

Thank you,

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From: Rajat Mathur <rmathur@h-e.com>

Sent: Wednesday, March 9, 2022 7:41 PM

To: Jeremy Howard

Subject: Re: K28GY-D / K19MO-D

Hi Jeremy,

Thanks for your e-mail. As you requested, attached is a Google Maps KMZ file showing the predicted TIREM coverage from a potential K28GY-D facility on Channel 33, at 11.1 kW ERP, using a PSI narrow cardioid with reduced rear pattern, oriented towards 310 degrees true, after ignoring the 11-year-old K33MO-D CP. The KMZ file should let you zoom into areas of interest to see coverage details. Let me know if you have trouble opening the file and I can send you a traditional pdf version of the coverage map.

I used TIREM rather than Longley-Rice with FCC methodology, as I find that TIREM generally gives better results. It predicts interference free coverage (shown in green) to about 207,000 persons, with good coverage

predicted to Santa Ynez, Solvang, and Vandenberg AFB, partial coverage to Lompoc (due to terrain shielding), and partial coverage to Santa Maria (due to interference). TIREM predicts interference (shown in red) to about 30,000 persons, primarily from co-channel Station KCCF-LD, Atascadero, and first-adjacent Station K32LT-D, Channel 32, San Luis Obispo.

If this works for you, then the next step would generally be to reach out to antenna manufacturers for antenna proposals. However, that can take some time, and if you would like to get an application in soon, then we can file with the PSI antenna, and if needed, modify the application later. Let me know how you would like to proceed.

Thanks,
Raj

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rmathur@h-e.com
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On Mar 9, 2022, at 8:54 AM, Jeremy Howard
<jhoward@pmgsocal.org> wrote:

Hi Raj,

Appreciate your efforts to work this out. It seems logical to focus our efforts on option 2 here. We have very good coverage from K26FT-D on Gibraltar as far north as Goleta and we really want to regain the service area afforded by the old K28GY-D which provided coverage into the Vandenburg AFB, Lompoc, Solvang, Santa Ynez area. Can you send a coverage map of your proposed installation and show where the interference with KCCF-LD is predicted? I think we are on the right track here and would like to be able to file for 33 ASAP. I am sure you've seen this list <https://www.fcc.gov/document/update-t-band-tv-protection-list>.

Thank you very much,

Jeremy Howard
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From: Rajat Mathur <rmathur@h-e.com>
Sent: Tuesday, March 8, 2022 5:20 PM
To: Jeremy Howard <jhoward@pmgsocal.org>
Subject: Re: K28GY-D / K19MO-D

Hi Jeremy,

Thanks for your e-mail. I've done some further work on switching K28GY-D / K19MO-D, Channel 19, Santa Barbara, etc., to Channel 33, and have some options for you to ponder:

Option 1

From the existing site, orient a narrow beam antenna (I used the Scala 4DR "2HN" pattern; see page 3 of attached) towards Santa Barbara / Goleta at 140°T. As I noted in my e-mail below, this means that the antenna would be oriented partly towards co-channel TV Station KTVB-TV, Santa Ana, CA, and the ERP would need to be reduced to just 16 watts ERP to not cause impermissible interference to that station. At such a low ERP the received interference is significant (about 38%), and so I would not recommend this option, except as a possible placeholder for Channel 33.

Option 2

As you suggest in your e-mail below, from the existing site, orient the antenna towards the Vandenberg AFB / Lompoc / Santa Maria area, at approximately 310°T. Using a PSI narrow cardioid antenna with reduced rear (the same one as proposed by K33MO-D), K28GY-D on Channel 33, could operate at an ERP of about 11 kW. The limiting station is co-channel KCCF-LD, Atascadero, CA; KTVB-TV is not a concern here as the PSI antenna has excellent back lobe suppression and is oriented away from that station. K28GY-D is predicted to receive about 11% interference, primarily from KCCF-LD.

Does KCET translator K16FC-D, Channel 16, San Luis Obispo,

CA, located at Cuesta Peak, presently provide coverage to the Vandenberg AFB / Lompoc / Santa Maria area, or would this be new coverage for KCET?

Option 3

Move from the existing site to the Gibraltar Road site, where K33MO-D is proposed to be located, with the antenna oriented toward Santa Barbara / Goleta (about 235°T). I haven't studied this site in detail, but K33MO-D apparently works from here at a reasonable power, so K28GY-D on Channel 33 would, too. Also, this appears to be the location of the other KCET translator in Santa Barbara, K26FT-D, Channel 26, so perhaps you have an existing relationship with a tower owner at the site. Let me know if you want me to study this option further.

Please let me know if you have any questions.

Thanks,
Raj

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On Mar 4, 2022, at 6:34 PM, Jeremy Howard
<jhoward@pmgsocal.org> wrote:

Hi Raj,

Thanks for the update. Any chance swinging the main beam away from Santa Barbara proper to the north, or northwest towards Goleta or Vandenberg might help us out?

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From: Rajat Mathur <rmathur@h-e.com>

Sent: Friday, March 4, 2022 5:23:32 PM

To: Jeremy Howard <jhoward@pmgsocal.org>

Subject: K28GY-D / K19MO-D

Hi Jeremy,

Following up on our conversation from last week, I wanted to give you an update on switching K28GY-D / K19MO-D, Channel 19, Santa Barbara, etc., CA, to Channel 33. During our discussion, you noted that the FCC was now open to dismissing the old LPTV/translator construction permits that have clogged up the available spectrum, including the existing 11-year-old construction permit for K33MO-D, Channel 33, Santa Barbara, CA. So, we have ignored that station for the purposes of our analysis.

I'm still working on the engineering, but the situation is complicated by co-channel Station KTVB-TV, Santa Ana, CA, located at Mount Wilson. The problem is that the K28GY-D site is located northwest of Santa Barbara, with the antenna oriented southeast, towards KTVB-TV, causing impermissible interference to that station. Presumably, K33MO-D did not have this same issue because its site is located north-northeast of Santa Barbara (at Gibraltar Peak), with the antenna oriented away from Mount Wilson.

I'm looking at reducing the beamwidth of the antenna azimuth pattern, reducing the power, and other engineering solutions to help minimize the predicted interference to KTVB-TV. I should have more information for you on that early next week.

Have a great weekend!

Thanks,
Raj

Rajat Mathur, P.E.
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From: [Jeremy Howard](#)
To: [Melodie Virtue](#); [June M. Baldwin](#); [Dawn Ariza](#)
Subject: FW: Ch 33 Attempts To Contact PSI Emails from H&E K33MO-D Study
Date: Tuesday, June 14, 2022 12:02:11 PM

Melodie,

These are the emails forwarded by Dane in both Raj's and his own attempts to get answers from PSI.

Jeremy Howard

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From: Jeremy Howard <jhoward@pmgsocal.org>
Sent: Friday, April 1, 2022 10:19 AM
To: Dane <dericksen@h-e.com>
Subject: Re: Channel 33 antenna

Thanks for the update Dane.

Thoughts on going ahead with what Raj started working on using the pattern for the previous 33 CP and modifying later in the event they don't reply?

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From: Dane <dericksen@h-e.com>
Sent: Friday, April 1, 2022 9:25:51 AM
To: Doug Ross <doug@psibroadcast.com>
Cc: sales@psibroadcast.com <sales@psibroadcast.com>; Jeremy Howard <jhoward@pmgsocal.org>; Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>
Subject: Fwd: Channel 33 antenna

April 1, 2022

Doug:

Can you please send information regarding the PSI Model PSIUCB4NCR antenna?

Thanks,

Dane E. Ericksen, P.E.

Consultant to

Hammett & Edison, Inc. • Consulting Engineers

Broadcast & Wireless 707/996-5200 office

cc: Jeremy Howard, Rajat Mathur, P.E., Bill Hammett, P.E.

Begin forwarded message:

From: Rajat Mathur <rmathur@h-e.com>

Subject: Re: Channel 33 antenna

Date: March 11, 2022 at 11:15:12 AM PST

To: Doug Ross <doug@psibroadcast.com>

Cc: sales@psibroadcast.com, Dane Ericksen <dericksen@h-e.com>

Hi Doug,

I wanted to follow up on my e-mail from yesterday to let you know that Dane Ericksen from our office will be working on this project (copied to this email); please include both of us on any correspondence.

I don't have any information on this antenna, so if you feel that it would be impractical for our purposes, then please feel free to suggest other antennas, with similar azimuth patterns and back lobe suppression, that may work better. There is some urgency to get this application filed, so your quick response is greatly appreciated.

Thanks,

Raj

Rajat Mathur, P.E.

Hammett & Edison, Inc.

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On Mar 10, 2022, at 10:10 AM, Rajat Mathur <rmathur@h-e.com> wrote:

Hi Doug,

Hope you have been well. I'm working on a displacement application for a translator and the azimuth pattern of the PSIUCB4NCR antenna, which I found in the FCC database, appears to work well for our purposes; see attached. We are now completing the FCC application and I need some further information on this antenna to confirm that it will meet our needs. Below is what we are looking for:

Channel: 33

ERP: 11.1 kW

Vertical beamwidth: about 6 degrees

Downtilt: 1.5 degrees electrical, no mechanical

Can you please provide specifications for this antenna (gain, elevation pattern, brochure) so that I can confirm that it will work for us?

Thanks,

Raj

Rajat Mathur, P.E.

Hammett & Edison, Inc.

rmathur@h-e.com

707/996-5200

<PSIUCB4NCR.csv>

From: [Jeremy Howard](#)
To: [Melodie Virtue](#); [June M. Baldwin](#); [Dawn Ariza](#)
Subject: FW: Looking for options other than PSI K33MO-D Study
Date: Tuesday, June 14, 2022 12:05:26 PM

Melodie,

This is where we started to pivot away from relying on PSI to respond and the beginning of looking for options at other manufacturers.

Jeremy Howard

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From: Jeremy Howard <jhoward@pmgsocal.org>
Sent: Tuesday, April 5, 2022 12:12 PM
To: Dane <dericksen@h-e.com>
Cc: Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>
Subject: Re: Is Broadcast Peak controlled access or public?

Hi Dane,

That is unfortunate, but that's what we are facing. The site is completely fenced including the tower so I believe that conforms to the FCC standard for controlled. There is also an access gate to the Broadcast Peak site from the USFS road.

Hope this helps and please let me know if you need anything else.

Jeremy Howard
Director of Engineering
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jhoward@pmgsocal.org
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Public Media Group of Southern California

From: Dane <dericksen@h-e.com>
Sent: Tuesday, April 5, 2022 11:25:55 AM
To: Jeremy Howard <jhoward@pmgsocal.org>
Cc: Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>

Subject: Is Broadcast Peak controlled access or public?

April 5, 2022

Jeremy:

Looks like Propagation Systems, Inc. (PSI) isn't going to respond with technical details for the PSIUCB4NCR antenna specified by Spectrum Evolution, Inc. (SEI) for their never-built K33MO-D; strange, and disappointing, since the PSI web site (<https://www.psibroadcast.com>) is devoid of any useful technical data.

I know that Raj found that an ERP of 11.1 kW would work using the PSIUCB4NCR narrow cardioid reduced-rear azimuth pattern at 310°T, if K33MO-D is treated as no longer existing, and I am looking into alternative antenna manufacturers with similar patterns.

We also need to check ground-level RF exposure for Channel 33 operation; I see that my 2008 application for K28GY-D treated the site as controlled access, whereas Raj's 2018 displacement application for Channel 19 used the five-times more stringent public exposure limit. However, we often conservatively use the lower public limit when the ground-level exposure allows. At 11.1 kW ERP and CPOL (thus 22.2 kW for RF exposure purposes), an 8-bay antenna with its C.O.R. at 17.0 m AGL calculates to 24% to 51% of the public limit, depending on which manufacturer's elevation pattern is used. This means that the 5% or less exemption from calculating or measuring (once constructed) the ground-level power densities of the K19MO-D as Channel 33 operation plus all other stations at the Broadcast Peak site (including cellular) can perhaps be shown as not required if the occupational rather than the public limit can be used. So please advise whether the K19MO-D/K28GY-D Broadcast Peak site can be treated as a controlled access site. That is, is public access restricted by an access road with a locked gate, and is the site fenced or otherwise not accessible to foot traffic?

If the occupational limit can be applied, it might be possible to keep the predicted ground-level power density at 5% or less of the occupational limit, even for 22.2 kW ERP CPOL.

Regards,

Dane E. Ericksen, P.E.

Consultant to

Hammett & Edison, Inc. • Consulting Engineers

Broadcast & Wireless 707/996-5200 office

From: [Jeremy Howard](#)
To: [Melodie Virtue](#); [June M. Baldwin](#); [Dawn Ariza](#)
Subject: FW: Channel 33 design Move to Alive K33MO-D Study
Date: Tuesday, June 14, 2022 12:10:16 PM

Melodie,

This is where Dane was able to identify the Alive antenna as a viable option and additional questions from myself to enhance the site design. Also where June and Dawn are looped into the process.

Jeremy Howard

Director of Engineering
Office - (747) 201-5315
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jhoward@pmgsocal.org
2900 W Alameda Ave. Suite 600 Burbank, CA 91505

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Public Media Group of Southern California

From: Jeremy Howard <jhoward@pmgsocal.org>
Sent: Tuesday, April 12, 2022 9:35 AM
To: Dane <dericksen@h-e.com>; June M. Baldwin <jmbaldwin@pmgsocal.org>; Dawn Ariza <DAriza@pmgsocal.org>
Cc: Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>
Subject: Re: K19MO-D as Channel 33 design

Hi Dane,

Glad we decided to take this tack as time is of the essence here. Now that we seem to have a solid leg to stand on with a good study, I agree that it's time to bring legal into the picture. We appreciate your efforts to come up with a reasonable - and most important - type accepted antenna design. While this orientation is somewhat unique for this site it should allow us to realize our goals to regain important viewers in the communities to the north of Santa Barbara. Also, with a brand new 1kw transmitter already on site with very few hours of run time as 19, the 5.7 Kw ERP is a VERY achievable goal. Is there any wiggle room to maximize this design down the road considering how much TPO we have available? Sure you've addressed this but the question must be asked.

I'm sure you remember working with June Baldwin along the way with KCET, and I know she was pleased that you were able to step into the breach for us on this one. I would audio like to introduce you to Dawn Ariza, our SVP of Finance and Administration. Dawn comes to the organization from KOCE as part of our merger and is our EMT lead for Engineering, IT, and Facilities in addition to her role with Financial oversight. Both are included here and are up to speed as to what our intentions are.

June and Dawn, I believe we are at the point where we should proceed with our plan to engage with Melodie and get an application started in the FCC LMS. As you can see Dane has compiled a

thorough study with enough data to begin the process. I believe his suggestions regarding what is currently residing in the LMS portal and next steps are quite logical and worth serious consideration based on our recent experience with the frailties of the system.

We are standing by in the interim.

Thank you,

Jeremy Howard
Director of Engineering
Office - (747) 201-5315
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jhoward@pmgsocal.org
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Public Media Group of Southern California

From: Dane <dericksen@h-e.com>
Sent: Monday, April 11, 2022, 2:27 PM
To: Jeremy Howard <jhoward@pmgsocal.org>
Cc: Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>
Subject: K19MO-D as Channel 33 design

April 11, 2022

Jeremy:

I believe that we finally have a useable design for K19MO-D as Channel 33. Given the non-response of PSI, we looked at Alive Telecom, Antenna Concepts, Dielectric, ERI, and Kathrine/Scala low power UHF TV antennas, and found the Alive Telecom 8-bay T pattern to be the best fit. The maximum ERP is 5.7 kW rather than the 11.1 kW ERP Raj found simply using the K33MO-D PSI Model PSIUCB4NCR pattern, but perhaps it was a blessing in disguise not to hear from PSI, because we don't find the 0.001 relative field values of record for the PSI pattern as credible. Since unlike primary Full Service and Class A TV stations, secondary stations such as LPTV and TV Translators are not "home free" if the FCC agrees with the OET69 interference study and grants a CP. Rather, once a secondary station is built and operating, if actual interference is nevertheless caused to a primary station, the interference must be eliminated (as you are undoubtedly well aware, since that is why K19MO-D had to go dark). So a more credible pattern such as the Alive Telecom "T" pattern, with back lobe relative field values of 0.03, is more likely to not cause actual interference once constructed and on the air.

The first attached PDF file shows the Alive Telecom T azimuth pattern (solid line) versus the PSI azimuth pattern (dashed line); these are normalized patterns, the main beam orientation for

K19MO-D as Channel 33 is 310°T.

Alive Telecom has a web tool that allows selecting the available patterns and other technical characteristics for our choice of the T pattern, 8-bay elevation pattern, side-mount, 1.5° electrical beam tilt, HPOL operation at 5.7 kW ERP in the main beam (we first tried selecting CPOL, but then the VPOL azimuth pattern does not have the necessary back lobe suppression). Assuming the same 30 meters of 7/8-inch foam dielectric coax is used, the required TPO will be around 0.163 kW. The Jampro documentation we have for the Channel 19 Jampro Model JA/SS-8/19 SCC 8-bay CPOL antenna is for some reason missing its mechanicals (marked “to be determined”), so we cannot finalize the somewhat longer transmission line that will be required for an end-fed 8-bay Channel 33 slot antenna versus the 8-bay Channel 19 Jampro antenna (keeping the C.O.R. unchanged at 17.0 m AGL/1,234.1 m AMSL/896.0 m HAAT).

So, we think that it is time to bring Melody Virtue into the loop, and have her delete the K19MO-D displacement application that she started on June 4, 2021, since you thought that started but never completed and filed application might be corrupted in the LMS, and start a new displacement application for Channel 33. We will then complete the technical portions and advise when that work has been completed, and the application is ready for filing as far as we are concerned.

We will need to state that all other Full Service, Class A, LPTV and TV Translator stations except the 11-year old, never-built Spectrum Evolution, Inc. (SEI) K33MO-D construction permit were studied, and that the proposed Channel 33 operation is predicted to cause 0.5% or less “de minimus” interference to all Full Service and Class A TV stations, and no more than 2% incremental interference to studied LPTV and TV Translator stations. We prefer to leave it to KCET and Melody to address why the still-in-the-database K33MO-D can be omitted, and whether there will be a requirement to serve SEI with a copy of the K19MO-D as Channel 33 displacement application.

The predicted interference-free population (2020 Census) within the F(50,90) 50.6 dBu dipole-adjusted protected contour is 122,067 persons, and 187,455 persons unrestricted (i.e., interference-free cells regardless of whether inside or outside the 50.6 dBu protected contour; of course, cells outside the protected contour are subject to possible new interference from other stations in the future). For comparison, the predicted interference-free coverage for the now dark K19MO-D, updated to 2020 Census, was 198,787 persons within the F(50,90) 49.3 dBu dipole-adjusted contour, and 455,843 persons unrestricted.

Regards,

Dane E. Ericksen, P.E.

Consultant to

Hammett & Edison, Inc. • Consulting Engineers

Broadcast & Wireless 707/996-5200 office

cc: Rajat Mathur, P.E., Bill Hammett, P.E.

From: [Jeremy Howard](#)
To: [Melodie Virtue](#); [June M. Baldwin](#); [Dawn Ariza](#)
Subject: FW: Confirmation of Alive Antenna Design K33MO-D Study
Date: Tuesday, June 14, 2022 12:18:28 PM

Melodie,

This thread is a continuation of the last where we confirm the Alive design is finalized with some V-Pol and right before we bring you into the loop.

Jeremy Howard

Director of Engineering
Office - (747) 201-5315
Mobile - (323) 855-0291
jhoward@pmgsocal.org
2900 W Alameda Ave. Suite 600 Burbank, CA 91505

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Public Media Group of Southern California

From: Jeremy Howard <jhoward@pmgsocal.org>
Sent: Tuesday, April 12, 2022 1:25 PM
To: Dane <dericksen@h-e.com>; June M. Baldwin <jmbaldwin@pmgsocal.org>
Cc: Dawn Ariza <DAriza@pmgsocal.org>; Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>; Hukue Cloud <hcloud@pmgsocal.org>
Subject: Re: K19MO-D as Channel 33 design

Hi Dane,

Just catching up on emails while on the road. We are using the same foam dielectric heliax that we built K28GY-D with. It should work just fine with an end fed antenna.

And speaking of antennas, I'm thrilled that you were able to confirm the additional VPol is applicable to the design! This makes much more sense in the long run for 3.0 capabilities.

However, I do want to make sure we don't lose any time as I just received some news that the FCC is looking to release the CPs that expired in January any day. K33MO-D is on that list and I would hate to lose it, so if we need to push forward and modify for the updated antenna design later that might be our best bet.

Thank you all for your efforts.

Jeremy Howard
Director of Engineering
Office - (747) 201-5315
Mobile - (323) 855-0291

jhoward@pmgsocal.org

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Public Media Group of Southern California

From: Dane <dericksen@h-e.com>

Sent: Tuesday, April 12, 2022 12:43:39 PM

To: June M. Baldwin <jmbaldwin@pmgsocal.org>

Cc: Dawn Ariza <DAriza@pmgsocal.org>; Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>; Hukue Cloud <hcloud@pmgsocal.org>; Jeremy Howard <jhoward@pmgsocal.org>

Subject: Re: K19MO-D as Channel 33 design

April 12, 2022

June:

Good to be working with you again. With regard to maximizing the K19MO-D as Channel 33 design, I am pleased to report that Dan Barton of Alive Telecom was able to customize the 8-bay, side-mounted coaxial slot antenna to add a vertically polarized (VPOL) component that is everywhere equal to or less than the horizontally polarized (HPOL) component, resulting in a 70% elliptically polarized (EPOL) signal; that is, HPOL = 5.70 kW ERP, VPOL = 3.97 kW ERP. This increases the required transmitter power output (TPO) from approximately 0.163 kW to 0.277 kW, but if KCET has a new 1 kW digital transmitter available, the increased TPO requirement should not be a problem, and further should easily provide the additional 2 dB of headroom needed for the peak TPO if K33??-D eventually converts (we presume) from ATSC1.0 to ATSC3.0.

We are still using the K19MO-19 transmission line length of 98 feet (30 meters) of Andrew Type LDF5-50 7/8-inch foam dielectric coax, although we realize that a somewhat longer length will be needed since the 8-bay Channel 33 antenna will be shorter than the 8-bay Channel 19 antenna. The Alive Telecom antenna length is 4.98 m (16.34 feet). We do not have information for the length of the 8-bay, Channel 19 Jampro JA/SS-8/19-SCC antenna. If Jeremy has this information, please provide, and we can then more accurately estimate that additional transmission line length and finalize the required TPO. If the as-built K19MO-D transmission line length was other than the 30 meters estimated in our May 18, 2018, Technical Summary, please advise.

Please let us know when a new, Channel 33, displacement application has been started in the Licensing & Management System (LMS). We will then log in and complete the engineering portions, and advise when that has been done.

The model number assigned by Alive Telecom for the customized EPOL signal is ATC-BCE68T-V6-33. Dan Barton's contact information at Alive Telecom is

Dan Barton

President & CEO
Alive Telecom
9850 West 190th Street, Unit F
Mokena, IL 60448
708-478-6886 (work)
708-478-6892 (cell)
dbaron@alivetele.com

We have advised Mr. Barton that he can expect to be contacted by our client for a quotation. Because of the sensitivity of the situation involving a dark K19MO-D requiring the disappearance of the 11-year old, never-built K33MO-D construction permit (CP) still on record for Spectrum Evolution, Inc. (SEI) in order to be grantable, we have thus far only identified the station as involving a TV Translator for a West Coast Full Service TV station.

Regards,

Dane E. Ericksen, P.E.
Consultant to
Hammett & Edison, Inc. • Consulting Engineers
Broadcast & Wireless 707/996-5200 office

cc1: Dawn Ariza, Hukue Cloud, Jeremy Howard
cc2: Rajat Mathur, P.E., Bill Hammett, P.E.

On Apr 12, 2022, at 10:23 AM, June M. Baldwin <jmbaldwin@pmgsocal.org> wrote:

Hi Jeremy,

I'll ask Hukue set up a call with Melodie, you and me to move this forward. Dawn, we'll ask your questions, but I'm pretty sure Melodie will address the history and context with the FCC contact and get instruction on how to best handle this without any jeopardy to our license.

Thanks.

June

June M. Baldwin
Senior Vice President, General Counsel
(747) 201-5295
jmbaldwin@pmgsocal.org
2900 W Alameda Ave. Suite 600 Burbank, CA 91505

pbssocal.org | kcet.org | linktv.org
Public Media Group of Southern California

From: Dawn Ariza

Sent: Tuesday, April 12, 2022 9:50 AM

To: Jeremy Howard <jhoward@pmgsocal.org>; Dane <dericksen@h-e.com>; June M. Baldwin <jmbaldwin@pmgsocal.org>
Cc: Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>
Subject: RE: K19MO-D as Channel 33 design

Jeremy,

I think this is a good idea. I have one concern and I am sure it is an easy answer. If we remove the CP for channel 19 and then apply for channel 33 does it appear that we are abandoning our license? Will the fact that we delete one without the other being applied for lose us the ability to broadcast if we are refused? I hope my question is making sense.

Thank you,

Dawn Ariza
SVP, Finance & Administration
p: 714.241.4104
f: 714.668.9173
DAriza@pmgsocal.org

PBS SoCal | KCET | Link TV
Public Media Group of Southern California

From: Jeremy Howard
Sent: Tuesday, April 12, 2022 9:35 AM
To: Dane <dericksen@h-e.com>; June M. Baldwin <jmbaldwin@pmgsocal.org>; Dawn Ariza <DAriza@pmgsocal.org>
Cc: Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>
Subject: Re: K19MO-D as Channel 33 design

Hi Dane,

Glad we decided to take this tack as time is of the essence here. Now that we seem to have a solid leg to stand on with a good study, I agree that it's time to bring legal into the picture. We appreciate your efforts to come up with a reasonable - and most important - type accepted antenna design. While this orientation is somewhat unique for this site it should allow us to realize our goals to regain important viewers in the communities to the north of Santa Barbara. Also, with a brand new 1kw transmitter already on site with very few hours of run time as 19, the 5.7 Kw ERP is a VERY achievable goal. Is there any wiggle room to maximize this design down the road considering how much TPO we have available? Sure you've addressed this but the question must be asked.

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know she was pleased that you were able to step into the breach for us on this one. I would audio like to introduce you to Dawn Ariza, our SVP of Finance and Administration. Dawn comes to the organization from KOCE as part of our merger and is our EMT lead for Engineering, IT, and Facilities in addition to her role with Financial oversight. Both are included here and are up to speed as to what our intentions are.

June and Dawn, I believe we are at the point where we should proceed with our plan to engage with Melodie and get an application started in the FCC LMS. As you can see Dane has compiled a thorough study with enough data to begin the process. I believe his suggestions regarding what is currently residing in the LMS portal and next steps are quite logical and worth serious consideration based on our recent experience with the frailties of the system.

We are standing by in the interim.

Thank you,

Jeremy Howard
Director of Engineering
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jhoward@pmgsocal.org
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Public Media Group of Southern California

From: Dane <dericksen@h-e.com>
Sent: Monday, April 11, 2022, 2:27 PM
To: Jeremy Howard <jhoward@pmgsocal.org>
Cc: Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>
Subject: K19MO-D as Channel 33 design

April 11, 2022

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values of record for the PSI pattern as credible. Since unlike primary Full Service and Class A TV stations, secondary stations such as LPTV and TV Translators are not “home free” if the FCC agrees with the OET69 interference study and grants a CP. Rather, once a secondary station is built and operating, if actual interference is nevertheless caused to a primary station, the interference must be eliminated (as you are undoubtedly well aware, since that is why K19MO-D had to go dark). So a more credible pattern such as the Alive Telecom “T” pattern, with back lobe relative field values of 0.03, is more likely to not cause actual interference once constructed and on the air.

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So, we think that it is time to bring Melody Virtue into the loop, and have her delete the K19MO-D displacement application that she started on June 4, 2021, since you thought that started but never completed and filed application might be corrupted in the LMS, and start a new displacement application for Channel 33. We will then complete the technical portions and advise when that work has been completed, and the application is ready for filing as far as we are concerned.

We will need to state that all other Full Service, Class A, LPTV and TV Translator stations except the 11-year old, never-built Spectrum Evolution, Inc. (SEI) K33MO-D construction permit were studied, and that the proposed Channel 33 operation is predicted to cause 0.5% or less “de minimus” interference to all Full Service and Class A TV stations, and no more than 2% incremental interference to studied LPTV and TV Translator stations. We prefer to leave it to KCET and Melody to address why the still-in-the-database K33MO-D can be omitted, and whether there will be a requirement to serve SEI with a copy of the K19MO-D as Channel 33 displacement application.

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50.6 dBu protected contour; of course, cells outside the protected contour are subject to possible new interference from other stations in the future). For comparison, the predicted interference-free coverage for the now dark K19MO-D, updated to 2020 Census, was 198,787 persons within the F(50,90) 49.3 dBu dipole-adjusted contour, and 455,843 persons unrestricted.

Regards,

Dane E. Ericksen, P.E.

Consultant to

Hammett & Edison, Inc. • Consulting Engineers

Broadcast & Wireless 707/996-5200 office

cc: Rajat Mathur, P.E., Bill Hammett, P.E.

From: [Jeremy Howard](#)
To: [Melodie Virtue](#); [June M. Baldwin](#); [Dawn Ariza](#)
Subject: FW: Waiting on word from the FCC K33MO-D Study
Date: Tuesday, June 14, 2022 12:22:31 PM

Melodie,

Continuation of previous where we are waiting to hear back from Kevin Harding at the FCC.

Jeremy Howard

Director of Engineering
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jhoward@pmgsocal.org
2900 W Alameda Ave. Suite 600 Burbank, CA 91505

pbssocal.org | kcet.org | linktv.org
Public Media Group of Southern California

From: Jeremy Howard <jhoward@pmgsocal.org>
Sent: Thursday, April 28, 2022 10:12 AM
To: Dane <dericksen@h-e.com>
Cc: June M. Baldwin <jmbaldwin@pmgsocal.org>; Dawn Ariza <DAriza@pmgsocal.org>; Hukue Cloud <hcloud@pmgsocal.org>; Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>; Melodie Virtue <melodie.virtue@foster.com>
Subject: Re: K19MO-D as Channel 33 design

Hi Dane,

We are waiting to hear from Melodie as to what answer, if any has been received from Kevin at the FCC in regard to the inquiry about how we should proceed with filling on the channel without the old CP being officially dismissed and purged from the DB. It's possible that commission staff also was in Las Vegas this week so that may be a factor.

Jeremy Howard
Director of Engineering
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Public Media Group of Southern California

From: Dane <dericksen@h-e.com>
Sent: Thursday, April 28, 2022 9:47:19 AM
To: Jeremy Howard <jhoward@pmgsocal.org>
Cc: June M. Baldwin <jmbaldwin@pmgsocal.org>; Dawn Ariza <DAriza@pmgsocal.org>; Hukue Cloud

<hcloud@pmgsocal.org>; Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>; Melodie Virtue <melodie.virtue@foster.com>

Subject: Re: K19MO-D as Channel 33 design

April 28, 2022

Jeremy:

Can you provide an update on the status of the K19MO-D, Santa Barbara, CA, as Channel 33 displacement application in the LMS?

Thanks,

Dane E. Ericksen, P.E.

Consultant to

Hammett & Edison, Inc. • Consulting Engineers

Broadcast & Wireless 707/996-5200 office

cc: June Baldwin, Dawn Ariza, Hukue Cloud, Melodie Virtue, Rajat Mathur, P.E., Bill Hammett, P.E.

On Apr 18, 2022, at 11:52 AM, Jeremy Howard <jhoward@pmgsocal.org> wrote:

Hi Dane,

We were able to connect with Melodie just now (she is included herein on this email thread for her reference) and she suggested that she might want to touch base with the commission (perhaps Kevin Harding) to confirm that the procedure we are proposing is Kosher before proceeding with filing. In regard to the application sitting in the LMS, it seems like the logical thing to do here is to start a fresh application and delete the other one as it is no longer a viable option.

Once Melodie is able to share her findings with the group we can proceed accordingly.

Thank you,

Jeremy Howard

Director of Engineering

Office - (747) 201-5315

Mobile - (323) 855-0291

jhoward@pmgsocal.org

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Public Media Group of Southern California

From: Dane <dericksen@h-e.com>
Sent: Friday, April 15, 2022 11:25 AM
To: Jeremy Howard <jhoward@pmgsocal.org>
Cc: June M. Baldwin <jmbaldwin@pmgsocal.org>; Dawn Ariza <DAriza@pmgsocal.org>;
Hukue Cloud <hcloud@pmgsocal.org>; Rajat Mathur <rmathur@h-e.com>; Bill
Hammett <bhammett@h-e.com>
Subject: Fwd: K19MO-D as Channel 33 design

April 15, 2022

Jeremy:

Has the K19MO-D displacement application been started in the LMS? Please advise.

Thanks,

Dane E. Ericksen, P.E.
Consultant to
Hammett & Edison, Inc. • Consulting Engineers
Broadcast & Wireless 707/996-5200 office

cc1: June Baldwin, Dawn Ariza, Huke Cloud
cc2: Rajat Mathur, P.E., Bill Hammett, P.E.

Begin forwarded message:

From: Dane Ericksen <dericksen@h-e.com>
Subject: Re: K19MO-D as Channel 33 design
Date: April 12, 2022 at 1:53:13 PM PDT
To: Jeremy Howard <jhoward@pmgsocal.org>
Cc: "June M. Baldwin" <jmbaldwin@pmgsocal.org>, Dawn Ariza
<DAriza@pmgsocal.org>, "Rajat Mathur, P.E." <rmathur@h-e.com>,
Bill Hammett <bhammett@h-e.com>, Hukue Cloud
<hcloud@pmgsocal.org>

April 12, 2022

Jeremy:

If the K19MO-D application is started in the LMS, I don't see any reason why we can't have our portion completed tomorrow.

Most impressed with Alive Telecom's Dan Barton's willingness to craft a

credible custom version of their 8-bay coaxial slot antenna with a VPOL pattern that is everywhere equal to or less than the HPOL pattern.

This e-mail being sent from home, where I have access to my H&E e-mail.
Can be back in the office tomorrow to finish up the K19MO-D as D33 application.

Regards,

Dane Ericksen, P.E.
dericksen@h-e.com
Consultant to Hammett & Edison, Inc.
707/996-5200

cc1: June Baldwin, Dawn Ariza, Hukue Cloud
cc2: Rajat Mathur, P.E., Bill Hammett, P.E.

On Apr 12, 2022, at 1:24 PM, Jeremy Howard
<jhoward@pmgsocal.org> wrote:

Hi Dane,

Just catching up on emails while on the road. We are using the same foam dielectric heliax that we built K28GY-D with. It should work just fine with an end fed antenna.

And speaking of antennas, I'm thrilled that you were able to confirm the additional VPol is applicable to the design! This makes much more sense in the long run for 3.0 capabilities.

However, I do want to make sure we don't lose any time as I just received some news that the FCC is looking to release the CPs that expired in January any day. K33MO-D is on that list and I would hate to lose it, so if we need to push forward and modify for the updated antenna design later that might be our best bet.

Thank you all for your efforts.

Jeremy Howard
Director of Engineering
Office - (747) 201-5315

Mobile - (323) 855-0291

jhoward@pmgsocal.org

2900 W Alameda Ave. Suite 600 Burbank, CA 91505

pbssocal.org | kcet.org | linktv.org

Public Media Group of Southern California

<snip>

From: [Jeremy Howard](#)
To: [Melodie Virtue](#); [June M. Baldwin](#); [Dawn Ariza](#)
Subject: FW: [EXTERNAL]: K28GY-D - File No 0000176877, Facility ID 13469, Santa Barbara, CA
Date: Tuesday, June 14, 2022 12:26:57 PM

Melodie,

This is group correspondence regarding getting the application going while you were out and trying to enjoy time off.

Jeremy Howard

Director of Engineering
Office - (747) 201-5315
Mobile - (323) 855-0291
jhoward@pmgsocal.org
2900 W Alameda Ave. Suite 600 Burbank, CA 91505

pbssocal.org | kcet.org | linktv.org
Public Media Group of Southern California

From: Jeremy Howard
Sent: Friday, May 13, 2022 2:48 PM
To: 'Melodie Virtue' <melodie.virtue@foster.com>; 'Dane' <dericksen@h-e.com>
Cc: June M. Baldwin <jmbaldwin@pmgsocal.org>; Dawn Ariza <DAriza@pmgsocal.org>; 'Rajat Mathur, P.E.' <rmathur@h-e.com>; 'Bill Hammett' <bhammett@h-e.com>; 'Cindy Lloyd' <Cindy.Lloyd@Foster.com>
Subject: RE: [EXTERNAL]: K28GY-D - File No 0000176877, Facility ID 13469, Santa Barbara, CA

OK, I am done...I'll try June once again so she can certify

Jeremy Howard

Director of Engineering
Office - (747) 201-5315
Mobile - (323) 855-0291
jhoward@pmgsocal.org
2900 W Alameda Ave. Suite 600 Burbank, CA 91505

pbssocal.org | kcet.org | linktv.org
Public Media Group of Southern California

From: Jeremy Howard
Sent: Friday, May 13, 2022 2:44 PM
To: 'Melodie Virtue' <melodie.virtue@foster.com>; Dane <dericksen@h-e.com>
Cc: June M. Baldwin <jmbaldwin@pmgsocal.org>; Dawn Ariza <DAriza@pmgsocal.org>; Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>; Cindy Lloyd <Cindy.Lloyd@Foster.com>
Subject: RE: [EXTERNAL]: K28GY-D - File No 0000176877, Facility ID 13469, Santa Barbara, CA

I will get in there and start plugging away. I also texted June so she can sign as needed.

Jeremy Howard

Director of Engineering

Office - (747) 201-5315

Mobile - (323) 855-0291

jhoward@pmgsocal.org

2900 W Alameda Ave. Suite 600 Burbank, CA 91505

pbssocal.org | kcet.org | linktv.org

Public Media Group of Southern California

From: Melodie Virtue <melodie.virtue@foster.com>

Sent: Friday, May 13, 2022 2:41 PM

To: Dane <dericksen@h-e.com>

Cc: Jeremy Howard <jhoward@pmgsocal.org>; June M. Baldwin <jmbaldwin@pmgsocal.org>; Dawn Ariza <DAriza@pmgsocal.org>; Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>; Cindy Lloyd <Cindy.Lloyd@Foster.com>

Subject: Re: [EXTERNAL]: K28GY-D - File No 0000176877, Facility ID 13469, Santa Barbara, CA

Hi. I agree this should be filed ASAP. Someone who has a computer can input the legal info by reviewing what was set up for the prior channel 18 application . I did see the deletion on the FCC public notices on ch 33 so we should act. Sorry I don't have the laptop with me.

Melodie

Sent from my iPad

Please excuse typos.

Melodie A. Virtue
Principal

Tel: [202.298.2527](tel:202.298.2527) ▪ *Fax:* [202.965.1729](tel:202.965.1729)
melodie.virtue@foster.com

Foster Garvey PC
[1000 Potomac St. NW, Suite 200](http://1000PotomacSt.NW.Suite200)
[Washington, D.C. 20007](http://Washington.DC.20007)
foster.com

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On May 13, 2022, at 2:34 PM, Dane <dericksen@h-e.com> wrote:

May 13, 2022

Jeremy:

We have started a K19MO-D (formerly K28GY-D), Santa Barbara, CA, displacement application for Channel 33 in the LMS. The engineering portion has been completed, along with the RF exposure environmental statement. However, there are still multiple legal sections that need completion. We think that it important that this application be filed today, or latest by this weekend, before other parties learn of the dismissal of the never built K33MO-D (now DK33MO-D) construction permit. We believe that filing for Channel 33 by other LPTV or TV Translator stations may be on a rolling one-day cutoff window, so that's we urge filing as quickly as possible. Melodie can confirm if this is the case.

Fortunately, we can find nothing on yesterday's or today's FCC Daily Digest about the deletion of the K33MO-D construction permit, so as best we can tell public disclosure of that action has not yet occurred.

A copy of the FCC Form 2100 application as it now exists in the LMS is attached; again, we note several flagged "errors" for various legal questions to be completed.

Also attached is a Technical Summary (TS) for the proposed new Channel 33 operation; this TS is for the station records and is NOT part of the FCC application.

We appreciate the opportunity to be of service and would welcome any questions on the enclosed material. Please let us know if we can be of further service.

Regards,

Dane E. Ericksen, P.E.
Consultant to
Hammett & Edison, Inc. • Consulting Engineers
Broadcast & Wireless 707/996-5200 office

cc: MelodieVirtue, June Baldwin, Dawn Ariza, Rajat Mathur, P.E., Bill Hammett, P.E.

On May 12, 2022, at 2:02 PM, Jeremy Howard <jhoward@pmgsocal.org> wrote:

Thank you so much Dane, we really appreciate it.

Jeremy Howard
Director of Engineering
Office - (747) 201-5315

Mobile - (323) 855-0291
jhoward@pmgsocal.org
2900 W Alameda Ave. Suite 600 Burbank, CA 91505
pbssocal.org | kcet.org | linktv.org
Public Media Group of Southern California

From: Dane Ericksen <dericksen@h-e.com>
Sent: Thursday, May 12, 2022 2:01:00 PM
To: Jeremy Howard <jhoward@pmgsocal.org>
Cc: Melodie Virtue <melodie.virtue@foster.com>; June M. Baldwin <jmbaldwin@pmgsocal.org>; Dawn Ariza <DAriza@pmgsocal.org>; Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>
Subject: Re: [EXTERNAL]: K28GY-D - File No 0000176877, Facility ID 13469, Santa Barbara, CA

May 12, 2022

Jeremy:

Yes, I should be able to start the application. Will advise when it's ready.

Dane

cc: Melodie Virtue, June Baldwin, Dawn Ariza, Rajat Mathur, P.E., Bill Hammett, P.E.

> On May 12, 2022, at 1:36 PM, Jeremy Howard
> <jhoward@pmgsocal.org> wrote:
>
> Hi Dane,
>
> Melodie is only available via phone this week and can't get into the
> system. Is there any way you can get it started?
>
> Jeremy Howard
> Director of Engineering
> Office - (747) 201-5315
> Mobile - (323) 855-0291
> jhoward@pmgsocal.org
> 2900 W Alameda Ave. Suite 600 Burbank, CA 91505
> pbssocal.org | kcet.org | linktv.org
> Public Media Group of Southern California
> From: Dane Ericksen <dericksen@h-e.com>
> Sent: Thursday, May 12, 2022 1:22:54 PM
> To: Melodie Virtue <melodie.virtue@foster.com>

> Cc: Jeremy Howard <jhoward@pmgsocal.org>; June M. Baldwin
<jmbaldwin@pmgsocal.org>; Dawn Ariza <DAriza@pmgsocal.org>; Rajat
Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>
> Subject: Re: [EXTERNAL]: K28GY-D - File No 0000176877, Facility ID
13469, Santa Barbara, CA

<snip>

<K19MO-D_K28GY-D Ch. 33 Displacement app.pdf>

<KCET615 Technical Summary 05132022.pdf>

From: [Jeremy Howard](#)
To: [Melodie Virtue](#); [June M. Baldwin](#); [Dawn Ariza](#)
Subject: FW: [EXTERNAL]: K28GY-D - File No 0000176877, Facility ID 13469, Santa Barbara, CA
Date: Tuesday, June 14, 2022 12:27:51 PM

Melodie,

Some follow up emails post filing the first time.

Jeremy Howard

Director of Engineering
Office - (747) 201-5315
Mobile - (323) 855-0291
jhoward@pmgsocal.org
2900 W Alameda Ave. Suite 600 Burbank, CA 91505

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Public Media Group of Southern California

From: Jeremy Howard <jhoward@pmgsocal.org>
Sent: Monday, May 16, 2022 12:22 PM
To: Dane Ericksen <dericksen@h-e.com>; Melodie Virtue <melodie.virtue@foster.com>
Cc: June M. Baldwin <jmbaldwin@pmgsocal.org>; Dawn Ariza <DAriza@pmgsocal.org>; Cindy Lloyd <Cindy.Lloyd@Foster.com>; Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>
Subject: Re: [EXTERNAL]: K28GY-D - File No 0000176877, Facility ID 13469, Santa Barbara, CA

I've always had great days on Friday the 13th!

Many thanks to the group for getting this pulled off. This was a huge win for us and allows us to potentially serve these communities for many years to come.

Jeremy Howard
Director of Engineering
Office - (747) 201-5315
Mobile - (323) 855-0291
jhoward@pmgsocal.org
2900 W Alameda Ave. Suite 600 Burbank, CA 91505
pbssocal.org | kcet.org | linktv.org
Public Media Group of Southern California

From: Dane Ericksen <dericksen@h-e.com>
Sent: Monday, May 16, 2022 12:15:24 PM
To: Melodie Virtue <melodie.virtue@foster.com>
Cc: Jeremy Howard <jhoward@pmgsocal.org>; June M. Baldwin <jmbaldwin@pmgsocal.org>; Dawn Ariza <DAriza@pmgsocal.org>; Cindy Lloyd <Cindy.Lloyd@Foster.com>; Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>

Subject: Fwd: [EXTERNAL]: K28GY-D - File No 0000176877, Facility ID 13469, Santa Barbara, CA

May 16, 2022

Dawn:

On today's FCC Daily Digest, a 25-page public notice with quite a few cancellations. K33MO-D got three mentions, at pages 5, 10 and 13. Glad that KCET got their K19MO-D/K28GY-D displacement application on file on Friday, May 13. Happy to see Media Bureau still using the old FCC seal.

Regards,

Dane Ericksen, P.E.

dericksen@h-e.com

Consultant to Hammett & Edison, Inc.

707/996-5200

Begin forwarded message:

From: Dane Ericksen <dericksen@h-e.com>

Subject: Re: [EXTERNAL]: K28GY-D - File No 0000176877, Facility ID 13469, Santa Barbara, CA

Date: May 14, 2022 at 5:34:57 PM PDT

To: Melodie Virtue <melodie.virtue@foster.com>

Cc: Jeremy Howard <jhoward@pmgsocal.org>, "June M. Baldwin" <jmbaldwin@pmgsocal.org>, Dawn Ariza <DAriza@pmgsocal.org>, "Rajat Mathur, P.E." <rmathur@h-e.com>, Bill Hammett <bhammett@h-e.com>, Cindy Lloyd <Cindy.Lloyd@Foster.com>

May 14, 2022

Melodie:

Okay, that matches my searches. I bet the K33MO-D deletion, and others, will show up on a Daily Digest in the next few days.

Dane

On May 14, 2022, at 4:57 PM, Melodie Virtue <melodie.virtue@foster.com> wrote:

Hi Dane.

I was looking at LMS and saw it was deleted. It wasn't on PN yet so far as I can tell using an iPhone search.

Melodie
Sent from my iPhone.
Please excuse typos.

Melodie A. Virtue
Principal
(she/her)

Tel: 202.298.2527 • Fax: 202.965.1729

melodie.virtue@foster.com

Foster Garvey PC

1000 Potomac St. NW, Suite 200

Washington, D.C. 20007

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.

On May 13, 2022, at 4:42 PM, Dane Ericksen <dericksen@h-e.com> wrote:

May 13, 2022

Melodie:

Where did you spot public notice of the K33MO-D deletion?
Can you provide a link?

Thanks,

Dane Ericksen, P.E.
dericksen@h-e.com

Consultant to Hammett & Edison, Inc.
707/996-5200

cc: Cindy Lloyd, Jeremy Howard, June Baldwin, Dawn Ariza,
Rajat Mathur, P.E., Bill Hammett, P.E.

On May 13, 2022, at 2:41 PM, Melodie Virtue
<melodie.virtue@foster.com> wrote:

Hi. I agree this should be filed ASAP. Someone
who has a computer can input the legal info by
reviewing what was set up for the prior channel
18 application . I did see the deletion on the
FCC public notices on ch 33 so we should act.
Sorry I don't have the laptop with me.

Melodie
Sent from my iPad
Please excuse typos.

Melodie A. Virtue
Principal

Tel: 202.298.2527 • Fax: 202.965.1729

melodie.virtue@foster.com

Foster Garvey PC

1000 Potomac St. NW, Suite 200

Washington, D.C. 20007

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someone other than the intended recipient is
prohibited.

On May 13, 2022, at 2:34 PM, Dane
<dericksen@h-e.com> wrote:

May 13, 2022

Jeremy:

We have started a K19MO-D (formerly K28GY-D), Santa Barbara, CA, displacement application for Channel 33 in the LMS. The engineering portion has been completed, along with the RF exposure environmental statement. However, there are still multiple legal sections that need completion. We think that it is important that this application be filed today, or latest by this weekend, before other parties learn of the dismissal of the never built K33MO-D (now DK33MO-D) construction permit. We believe that filing for Channel 33 by other LPTV or TV Translator stations may be on a rolling one-day cutoff window, so that's we urge filing as quickly as possible. Melodie can confirm if this is the case.

Fortunately, we can find nothing on yesterday's or today's FCC Daily Digest about the deletion of the K33MO-D construction permit, so as best we can tell public disclosure of that action has not yet occurred.

A copy of the FCC Form 2100 application as it now exists in the LMS is attached; again, we note several flagged "errors" for various legal questions to be completed.

Also attached is a Technical

Summary (TS) for the proposed new Channel 33 operation; this TS is for the station records and is NOT part of the FCC application.

We appreciate the opportunity to be of service and would welcome any questions on the enclosed material. Please let us know if we can be of further service.

Regards,

Dane E. Ericksen, P.E.
Consultant to
Hammett & Edison, Inc. •
Consulting Engineers
Broadcast & Wireless 707/996-
5200 office

<snip>

From: [Jeremy Howard](#)
To: [Melodie Virtue](#); [June M. Baldwin](#); [Dawn Ariza](#)
Subject: FW: 0000190777 - Interference
Date: Tuesday, June 14, 2022 12:29:21 PM

Melodie,

Email from Mark Colombo stating interference due to filter choice.

Jeremy Howard

Director of Engineering
Office - (747) 201-5315
Mobile - (323) 855-0291
jhoward@pmgsocal.org
2900 W Alameda Ave. Suite 600 Burbank, CA 91505

pbsocal.org | kcet.org | linktv.org
Public Media Group of Southern California

From: Jeremy Howard
Sent: Tuesday, May 17, 2022 11:18 AM
To: Mark Colombo <Mark.Colombo@fcc.gov>; June M. Baldwin <jmbaldwin@pmgsocal.org>; Dane Ericksen <dericksen@h-e.com>; Melodie Virtue <melodie.virtue@foster.com>
Subject: RE: 0000190777 - Interference

Hello Mr. Colombo,

Thank you for bringing this to our attention.

We will review the engineering accordingly to submit the necessary amendment.

Please feel free to contact us if needed for anything else.

Jeremy Howard

Director of Engineering
Office - (747) 201-5315
Mobile - (323) 855-0291
jhoward@pmgsocal.org
2900 W Alameda Ave. Suite 600 Burbank, CA 91505

pbsocal.org | kcet.org | linktv.org
Public Media Group of Southern California

From: Mark Colombo <Mark.Colombo@fcc.gov>
Sent: Tuesday, May 17, 2022 11:02 AM
To: June M. Baldwin <jmbaldwin@pmgsocal.org>; Dane Ericksen <dericksen@h-e.com>; Jeremy Howard <jhoward@pmgsocal.org>; Melodie Virtue <melodie.virtue@foster.com>
Subject: 0000190777 - Interference

Good afternoon,

I began to review 0000190777 (K28GY-D) and found that it fails TVStudy. Specifically, it causes 6.32% interference to KTAS.

You have 30 days to amend your application and resolve the issue or it will be dismissed.

Mark J. Colombo
Associate Chief, Video Division
Federal Communications Commission

From: [Jeremy Howard](#)
To: [Melodie Virtue](#); [June M. Baldwin](#); [Dawn Ariza](#)
Subject: FW: Amended K28GY-D to channel 33 - on file
Date: Tuesday, June 14, 2022 12:33:52 PM

Melodie,

This is the last of the forwarded group of emails to support our timeline up to the amended application being filed and accepted in the LMS.

I hope the grouping and explanations of these emails are helpful. If you have any questions please let me know.

As soon as I hear back from Alive and Anywave I will let you know.

Jeremy Howard

Director of Engineering
Office - (747) 201-5315
Mobile - (323) 855-0291
jhoward@pmgsocal.org
2900 W Alameda Ave. Suite 600 Burbank, CA 91505

pbssocal.org | kcet.org | linktv.org
Public Media Group of Southern California

From: Jeremy Howard <jhoward@pmgsocal.org>
Sent: Wednesday, May 18, 2022 9:25 AM
To: June M. Baldwin <jmbaldwin@pmgsocal.org>; Melodie Virtue <melodie.virtue@foster.com>; Dane <dericksen@h-e.com>
Cc: Dawn Ariza <DAriza@pmgsocal.org>; Cindy Lloyd <Cindy.Lloyd@Foster.com>; Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>; Yvette Graves <yvette.graves@foster.com>; Hukue Cloud <hcloud@pmgsocal.org>
Subject: Re: Amended K28GY-D to channel 33 - on file

Thank you Melodie. The amended application just showed up on the system.

Jeremy Howard
Director of Engineering
Office - (747) 201-5315
Mobile - (323) 855-0291
jhoward@pmgsocal.org
2900 W Alameda Ave. Suite 600 Burbank, CA 91505
pbssocal.org | kcet.org | linktv.org

Public Media Group of Southern California

From: June M. Baldwin <jmbaldwin@pmgsocal.org>
Sent: Wednesday, May 18, 2022 8:50:07 AM
To: Melodie Virtue <melodie.virtue@foster.com>; Dane <dericksen@h-e.com>
Cc: Dawn Ariza <DAriza@pmgsocal.org>; Cindy Lloyd <Cindy.Lloyd@Foster.com>; Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>; Jeremy Howard <jhoward@pmgsocal.org>; Yvette Graves <yvette.graves@foster.com>; Hukue Cloud <hcloud@pmgsocal.org>
Subject: RE: Amended K28GY-D to channel 33 - on file

Thanks Melodie!

June

June M. Baldwin

Senior Vice President, General Counsel

(747) 201-5295

jmbaldwin@pmgsocal.org

2900 W Alameda Ave. Suite 600 Burbank, CA 91505

pbssocal.org | kcet.org | linktv.org

Public Media Group of Southern California

From: Melodie Virtue <melodie.virtue@foster.com>

Sent: Wednesday, May 18, 2022 7:08 AM

To: June M. Baldwin <jmbaldwin@pmgsocal.org>; Dane <dericksen@h-e.com>

Cc: Dawn Ariza <DAriza@pmgsocal.org>; Cindy Lloyd <Cindy.Lloyd@Foster.com>; Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>; Jeremy Howard <jhoward@pmgsocal.org>; Yvette Graves <yvette.graves@foster.com>

Subject: Amended K28GY-D to channel 33 - on file

Hi June.

The displacement application has been amended. A copy as filed is attached for your records.

Melodie

Melodie A. Virtue

Principal

(she/her)

Foster Garvey PC

Tel: 202.298.2527

melodie.virtue@foster.com

From: Melodie Virtue

Sent: Wednesday, May 18, 2022 10:06 AM

To: June M. Baldwin <jmbaldwin@pmgsocal.org>; Dane <dericksen@h-e.com>

Cc: Dawn Ariza <DAriza@pmgsocal.org>; Cindy Lloyd <Cindy.Lloyd@Foster.com>; Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>; Jeremy Howard <jhoward@pmgsocal.org>; Yvette Graves <yvette.graves@foster.com>

Subject: RE: K28GY-D to channel 33

Melodie A. Virtue

Principal

(she/her)

Foster Garvey PC

Tel: 202.298.2527

melodie.virtue@foster.com

From: June M. Baldwin <jmbaldwin@pmgsocal.org>
Sent: Wednesday, May 18, 2022 12:56 AM
To: Melodie Virtue <melodie.virtue@foster.com>; Dane <dericksen@h-e.com>
Cc: Dawn Ariza <DAriza@pmgsocal.org>; Cindy Lloyd <Cindy.Lloyd@Foster.com>; Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>; Jeremy Howard <jhoward@pmgsocal.org>
Subject: RE: K28GY-D to channel 33

Hi Melodie,
Further to your email below, I approve the filing of the amended application.
Thanks.
June

June M. Baldwin
Senior Vice President, General Counsel
(747) 201-5295
jmbaldwin@pmgsocal.org
2900 W Alameda Ave. Suite 600 Burbank, CA 91505

pbssocal.org | kcet.org | linktv.org
Public Media Group of Southern California

From: Melodie Virtue <melodie.virtue@foster.com>
Sent: Tuesday, May 17, 2022 4:49 PM
To: Dane <dericksen@h-e.com>; June M. Baldwin <jmbaldwin@pmgsocal.org>
Cc: Dawn Ariza <DAriza@pmgsocal.org>; Cindy Lloyd <Cindy.Lloyd@Foster.com>; Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>; Jeremy Howard <jhoward@pmgsocal.org>
Subject: RE: K28GY-D to channel 33

Hi Dane.

I completed the legal sections and drafted and uploaded an exhibit explaining the Nature of the Amendment. Was I supposed to also upload the supplement engineering attachment you sent with your earlier email? I did not. If it is not required, then I would ask June to review the attached and approve the filing of the amended application.

If we need to add the Technical Summary to the application, let me know what "category" of attachment I should use in the LMS application to describe it (Technical Certification or Amendment?).

Melodie

Melodie A. Virtue
Principal
(she/her)
Foster Garvey PC
Tel: 202.298.2527
melodie.virtue@foster.com

From: Dane <dericksen@h-e.com>
Sent: Tuesday, May 17, 2022 4:40 PM
To: Jeremy Howard <jhoward@pmgsocal.org>

Cc: Melodie Virtue <melodie.virtue@foster.com>; June M. Baldwin <jmbaldwin@pmgsocal.org>; Dawn Ariza <DAriza@pmgsocal.org>; Cindy Lloyd <Cindy.Lloyd@Foster.com>; Rajat Mathur, P.E. <rmathur@h-e.com>; Bill Hammett <bhammett@h-e.com>

Subject: Re: K28GY-D to channel 33

May 17, 2022

Jeremy:

The K28GY-D as Channel 33 displacement was studied using the Full Service mask in order to protect KTAS(TV), V33/D34, San Luis Obispo. The displacement application should have therefore upgraded the mask filter from "Stringent" to "Full Service," but due to my oversight did not. An amending application has been created in the LMS, so upgrading the mask filter. This should take care of the KTAS interference.

A copy of the amended application as it now exists in the LMS is attached. You will need to review the legal portions of the amended application and probably will need to re-upload the legal exhibits, the LMS required me to re-upload the environmental exhibit. As soon as it is filed, the FCC should be able to grant the K28GY-D as D33 displacement application forthwith. An updated Technical Summary is also attached.

Regards,

Dane E. Ericksen, P.E.

Consultant to

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cc: Melodie Virtue, Cindy Lloyd, June Baldwin, Dawn Ariza, Rajat Mathur, P.E., Bill Hammett, P.E.

On May 17, 2022, at 11:33 AM, Jeremy Howard <jhoward@pmgsocal.org> wrote:

I suppose this has taken a back seat to the larger issue at hand...

Dane,

I am so sorry that this came back so quickly – I know you put quite a bit of effort in this.

Do you think you can make this work? I am surprised as I thought KTAS was on 34. At any rate please advise as the 30 day clock is ticking.

Thank you,

Jeremy Howard

Director of Engineering

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