

ENGINEERING STATEMENT

IN SUPPORT OF

MINOR MODIFICATION OF AN LPTV CONSTRUCTION PERMIT

K25QM-D

PALM SPRINGS, CA

Background

Major Market Broadcasting of California, Inc. (MMBC) is the licensee of digital television translator station K25QM-D which has a Construction Permit to operate on Ch. 25 near Palm Springs, CA (CDBS File No. BNPDTL-20090825ANX, Facility ID 181790). MMBC, in the instant application, is seeking to change the antenna, the antenna radiation center, and the ERP of the proposed facility.

Proposed Parameters

MMBC is proposing the following parameters for the K25QM-D digital operation on Ch. 25:

| | |
|--------------|---|
| Coordinates: | 33° 52' 02.9" N (NAD83) 116° 26' 01.1" W |
| ERP: | 0.8 kW |
| RCAMSL: | 490.0m |
| RCAGL: | 12.1m |
| Antenna: | Kathrein/Scala 1x2 750 10210 |
| Mask: | Full-Service |

Interference

An interference study was conducted of the proposed facility parameters using the FCC TVStudy software (Version 2.2.5) with the default parameters. The results of the study (copy attached hereto) show that potential interference from the proposed facility is not predicted to exceed 0.49% to any full-service DTV or Class A stations or 1.99% to any low power stations as required by the Commission's Rules.

The site of the proposed facility is within the coordination distance of the Mexican border; however, the change in parameters of the proposed facility does not result in a power increase in any azimuth toward the Mexican border when compared to that of the currently authorized facility (which has already been approved by Mexico). As such, coordination with the Mexican government is not necessary. Figure 1, attached hereto, is a map depicting the predicted F(50,90) 51 dBu protected service contour of the currently authorized facility and the facility proposed. As can be seen from the map, the predicted protected service contour of the proposed facility does not exceed that of the currently authorized facility in any azimuth toward the Mexican border.

Environmental/RFR

This report addresses only the conditions specified in 47CFR1.1307 that deal with Radio Frequency Radiation. Any other non-RFR conditions that might require the preparation of an EA are beyond the scope of this report; since the structure is existing and is registered, such conditions should not be an issue requiring further consideration.

The location of the proposed facility is a multi-user site and it is assumed to currently be "in compliance" with FCC guidelines for human exposure to RFR (as defined in OET-65). The worst-case ground level RFR contributed to the site by this proposal is calculated to be 0.016376 mW/cm² at 2m AGL. The calculated RFR is less than 5% of the maximum

permissible exposure (MPE) for public areas (0.359333 mW/cm²) at Ch. 25. Per Section 1.1307(b) of the FCC Rules, the proposed operation would be categorically excluded from taking corrective action in areas with levels above the MPE limit where the contribution to the RFR from the proposed facility is less than 5%.

MMCA agrees to comply with the Commission's requirements regarding power adjustments or cessation of operation as may be necessary to ensure a compliant environment for worker access.

Certification

I hereby certify that the foregoing report or statement was prepared by me but may include work performed by others under my supervision or direction. The statements of fact contained therein are believed to be true and correct based on personal knowledge, information and belief unless otherwise stated; with respect to facts not known of my own personal knowledge, I believe them to be true and correct based on their origin from sources known to me to be generally reliable and accurate. I have prepared this document with due care and in accordance with applicable standards of professional practice.



Benjamin Pidek, P.E.
August 16, 2023

Attached:

- TVStudy Interference Check Report
- Figure 1 – Map of Predicted Protected Service Contour of K25QM-D Authorized Facility vs. Proposed Facility

TVStudy TV Interference Check Report for K25QM-D on Ch. 25

Study created: 2023.08.16 21:00:00

Study build station data: LMS TV 2023-08-09

Proposal: K25QM-D D25 LD CP PALM SPRINGS, CA
File number: K25QM-ATCSite-K210r210-08k
Facility ID: 181790
Station data: User record
Record ID: 6
Country: U.S.

Build options:
Protect pre-transition records not on baseline channel

Stations potentially affected by proposal:

| IX | Call | Chan | Svc | Status | City, State | File Number | Distance |
|-----|---------|------|-----|--------|----------------------------|-------------------|----------|
| No | K17GJ-D | N17- | TX | LIC | TWENTYNINE PALMS, CA | BLTT20080902AED | 31.9 km |
| No | K21AC-D | N21 | TX | LIC | VICTORVILLE, ETC., CA | BLTT19820105IG | 113.9 |
| No | K24NG-D | D24 | LD | APP | LAKE HAVASU CITY, AZ | BLANK0000218886 | 206.4 |
| No | K24NI-D | D24 | LD | LIC | YUMA, AZ | BLANK0000064203 | 221.1 |
| No | K24LS-D | D24+ | LD | LIC | LUCERNE VALLEY, CA | BLANK0000115882 | 113.9 |
| No | KPXN-TV | D24 | DT | LIC | SAN BERNARDINO, CA | BLANK0000068510 | 155.7 |
| No | KBNT-CD | D24 | DC | LIC | SAN DIEGO, CA | BLANK0000068521 | 137.2 |
| No | KVVU-TV | D24 | DT | CP | HENDERSON, NV | BLANK0000185177 | 271.0 |
| No | K25PJ-D | D25 | LD | LIC | CHLORIDE, AZ | BLANK0000071721 | 267.7 |
| No | KDVD-LD | D25 | LD | CP | GLOBE, AZ | BLANK0000213831 | 408.6 |
| No | K25DH-D | D25 | LD | LIC | MEADVIEW, AZ | BLDTT20130308ABY | 307.6 |
| No | K25OM-D | D25 | LD | LIC | PRESCOTT, AZ | BLANK0000058628 | 364.8 |
| No | KJPO-LD | D25 | LD | LIC | TONOPAH, AZ | BLANK0000151024 | 309.7 |
| No | KGET-TV | D25 | DT | LIC | BAKERSFIELD, CA | BLANK0000007394 | 273.8 |
| No | KGET-TV | D25 | DT | CP | BAKERSFIELD, CA | BLANK0000127615 | 273.8 |
| Yes | KVEA | D25 | DT | LIC | CORONA, CA | BLANK0000136469 | 155.4 |
| No | K25QN-D | D25 | LD | CP | DESERT CENTER, CA | BNPDTL20100514ACT | 111.4 |
| No | DK25GK | N25+ | TX | APP | JOSHUA TREE, CA | BLTT20000605AOK | 49.8 |
| No | K25QB-D | D25+ | LD | LIC | LUCERNE VALLEY, CA | BLANK0000082018 | 77.9 |
| No | K25PL-D | D25 | LD | LIC | RIDGECREST, CA | BLANK0000068896 | 212.5 |
| No | KLFA-LD | D25 | LD | LIC | SANTA MARIA, CA | BLDTL20120411AAJ | 378.0 |
| No | K25AD-D | D25 | LD | LIC | VICTORVILLE, ETC., CA | BLANK0000137803 | 113.9 |
| No | K25AD-D | N25 | TX | LIC | VICTORVILLE, ETC., CA | BLTT19820105IE | 113.9 |
| No | KHAX-LD | D25 | LD | LIC | VISTA, CA | BLANK0000106760 | 100.8 |
| No | KPVM-LD | D25 | LD | LIC | LAS VEGAS, NV | BLANK0000112505 | 263.5 |
| No | K26OK-D | D26 | LD | APP | LAKE HAVASU CITY, AZ | BLANK0000218888 | 206.4 |
| No | KUVI-DT | D26 | DT | LIC | BAKERSFIELD, CA | BLANK0000081232 | 273.8 |
| No | K26MW-D | D26 | LD | LIC | LUCERNE VALLEY, CA | BLANK0000116236 | 113.9 |
| No | K26PR-D | D26 | LD | LIC | NEEDLES, CA | BLANK0000178666 | 198.4 |
| No | KMIR-TV | D26 | DT | LIC | PALM SPRINGS, CA | BLANK0000075143 | 0.1 |
| No | KMRZ-LD | D26 | LD | LIC | POMONA, CA | BLANK0000168080 | 122.0 |
| No | KSWB-TV | D26 | DT | LIC | SAN DIEGO, CA | BLANK0000068712 | 138.3 |
| No | KSKJ-CD | D26 | DC | LIC | VAN NUYS, CA | BLANK0000071612 | 154.8 |
| No | KTNV-TV | D26 | DT | APP | LAS VEGAS, NV | BLANK0000145120 | 263.5 |
| No | K27AE-D | N27 | TX | LIC | VICTORVILLE, ETC., CA | BLTT19820105IF | 113.9 |
| No | K29GK-D | N29- | TX | LIC | TWENTYNINE PALMS, ETC., CA | BLTT20060119ADC | 49.8 |
| No | KRVD-LD | N33+ | TX | LIC | BANNING, CA | BLTTL20070103ACI | 39.9 |

No non-directional AM stations found within 0.8 km

Directional AM stations within 3.2 km:
KPSF 1200 L DA2 D CATHEDRAL CITY, CA BMML20120312ADG
KPSF 1200 L DA2 N CATHEDRAL CITY, CA BMML20120312ADG
KXPS 1010 L DA2 D THOUSAND PALMS, CA BMML20130320AFG
KXPS 1010 L DA2 N THOUSAND PALMS, CA BMML20130320AFG

Record parameters as studied:

Channel: D25
Mask: Full Service
Latitude: 33 52 2.90 N (NAD83)
Longitude: 116 26 1.10 W
Height AMSL: 490.0 m
HAAT: 0.0 m
Peak ERP: 0.800 kW
Antenna: KAT 1x2 750 10210 0.0 deg
Elev Pattn: Generic

49.9 dBu contour:

| Azimuth | ERP | HAAT | Distance |
|---------|----------|---------|----------|
| 0.0 deg | 0.011 kW | -77.4 m | 5.9 km |
| 45.0 | 0.002 | -223.7 | 3.9 |
| 90.0 | 0.023 | 178.8 | 17.0 |
| 135.0 | 0.371 | 420.0 | 41.0 |
| 180.0 | 0.611 | 363.3 | 42.2 |
| 225.0 | 0.562 | 349.6 | 41.1 |
| 270.0 | 0.573 | 232.7 | 36.0 |
| 315.0 | 0.047 | 210.7 | 22.0 |

Database HAAT does not agree with computed HAAT
Database HAAT: 0 m Computed HAAT: 182 m

Distance to Canadian border: 1682.0 km

**Proposal is within coordination distance of Mexican border
Distance to Mexican border: 141.1 km

Conditions at FCC monitoring station: Livermore CA
Bearing: 313.3 degrees Distance: 643.2 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:
Bearing: 51.7 degrees Distance: 1210.0 km

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

Maximum new IX to full-service and Class A: 0.50%
Maximum new IX to LPTV: 2.00%

---- Below is IX received by proposal K25QM-ATCSite-K210r210 ----

Proposal receives 85.87% interference from scenario 1
No IX check failures found.

Ben Pidek Consulting, LLC

**FCC 51 dBu Protected Service of K25QM-D Construction Permit Facility (Black) vs.
Proposed Facility from ATC Tower ASR#1203976 with KAT 1x2 750 10210 Antenna (Red)**

K25QM-D (CP)

BNPDTL-20090825ANX
Latitude: 33-52-02.90 N
Longitude: 116-26-01.10 W
ERP: 1.00 kW
Channel: 25
Frequency: 539.0 MHz
AMSL Height: 496.9 m

K25QM-D (Prop)

Latitude: 33-52-02.90 N
Longitude: 116-26-01.10 W
ERP: 0.80 kW
Channel: 25
Frequency: 539.0 MHz
AMSL Height: 490.0 m

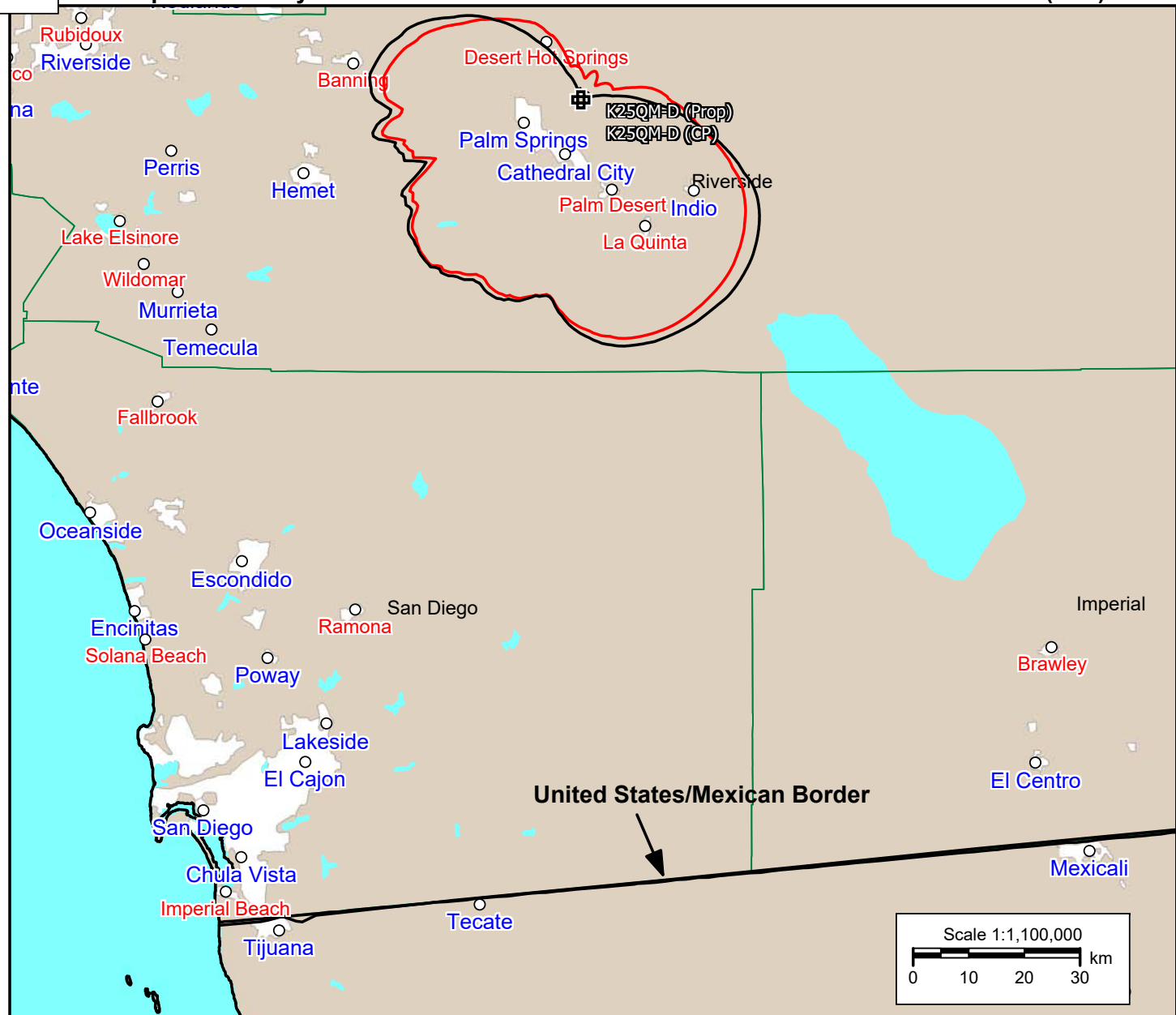


Figure 1