

Engineering Statement and Interference Analysis

This application amends BDCCDTL-20141205CJW, a digital companion channel facility to be associated with low-power television station KRPE-LP, Facility ID 129651.

Amendment

This amendment application specifies the following:

- Correct Antenna Coordinates in NAD 83
- Correct Overall Structure Height
- Correct Support Structure Height
- Correct Ground Elevation (AMSL)
- Correct Height of Radiation Center Above Mean Sea Level
- Updated Environmental Effect Exhibit

The proposed channel 17 digital facility was studied using the Techware's tv_process_2010 software on a Sun Blade 1500. The Applicant requests that the Commission use the following Longley-Rice analysis settings to process this application:

- Cell Size for Service Analysis of 1.0 km per side
- Distance Increments for Longley-Rice Analysis of 1.0 km

The proposed facility is 29.2 miles from the licensed paired analog facility and the proposed facility's F(50,90) 51 dBu contour overlaps with the licensed paired analog facility's F(50,50) 62 dBu contour. Therefore, the application is immediately grantable.

It is believed that the proposed facility complies with the requirements 47.C.F.R Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h), 74.794(b), 73.1030 and other applicable parts of the Rules and Regulations of the Federal Communications Commission. However, to the degree that it is deemed necessary, the Applicant requests a waiver of these other applicable Commission rules in order to allow for the grant of this instant application.

Mexico Concurrence

Additional Mexico coordination is not required for this amendment as the proposed F(50,90) 51 dBu contour shrinks in every direction.

Land Mobile Protection

Pursuant to Section 74.709(a)-(b) of the Commission rules, adjacent channel 16 is used as Land Mobile frequencies in Los Angeles, CA. Pursuant to Section 74.709(b), an LPTV station cannot cause interference to any area within 130 km of the Los Angeles reference point. Adjacent channel interference is defined by the F(50,10) 76 dBu contour. The proposed facility does not overlap its F(50,10) 76 dBu contour with the 130 km radius of the Los Angeles Land Mobile protected contour, see Attachment A. Therefore, there is no predicted interference caused by instant application.

Digital TV Station Protection

This proposed facility is predicted to cause 80.5222% worst case Scenario 1 interferes to BPTTA-20080801APJ, KBNT-CD, Channel 17, San Diego, CA, Facility ID 4035, licensed to Entravision Holdings, LLC. However, it should have been deleted from the CDBS database because this application was dismissed by the FCC on December 3, 2012.

Except referenced above, the proposed operation causes less than 0.5% interference to surrounding digital assignments and allotments and facilities (i.e., “*de minimis*”). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards.

Class A, Low Power TV and TV Translator Station Protection

The proposed operation causes less than 2.0% interference to surrounding low power assignments and allotments (i.e., “*de minimis*”). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards.