

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

The application amends the following sections:

- City of license
- Antenna Location Data
- Antenna Technical Data

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

This Station is Immediately Grantable As It Has Already Cleared a Proposed Grant List

The proposed facility is 20.8 miles from the 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. See Attachment A.

The F(50,90) dBu contour of the facility proposed in this amendment are completely enclosed within the F(50,90) dBu contour of the existing facility as applied for in FCC File No. BLTVL-20141113AGL. See Attachment B. Because the existing application was put on Proposed Grant List (Report No.: PGL15-7, Released November 25, 2015), this application, as amended, remains 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.

The Proposed Site Has Been Carefully Coordinated with the California Institute of Technology to Prevent Any Interference to the Mt. Palomar Observatory

After the originally filed BDCCDTL-20141205CJW was put on Proposed Grant List PGL15-7, an Informal Opposition was received by the FCC from the California Institute of Technology ("Caltech"). Caltech claimed that our proposed facility would interfere with their operations at the Mt. Palomar Observatory. The originally proposed transmitter site of this facility was just 5.4 km distant from the Mt. Palomar Observatory. In coordination with officials

at Caltech, we are proposing to move to a site that is 30.6 km from Mt. Palomar. See Attachment C. This Amendment was prepared in consultation with Caltech engineers, and we were informed that Caltech intends to withdraw its objection to our original proposal once this amendment is filed.¹

Further Mexican Concurrence Is Not Required

BDCCDTL-20141205CJW was approved by Mexico on September 24, 2015. The proposed facility is 96.3 kilometers to Mexico. Additional Mexico coordination is not required for this amendment as the proposed facility shrinks contour in every direction, see Attachment B.

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, except as referenced in Section 74.709(b)(2). Section 74.709(b)(2) states that if a Land Mobile channel (in this case, channel 16 in Los Angeles) is one channel above or below channel 15 in San Diego, then the Land Mobile protected contour excludes the area within 95 kilometers of the corresponding coordinates from the list below. As channel 16 in Los Angeles is one channel above channel 15 in San Diego, the adjacent-channel interference on channel 17 to channel 16 is carved of the 130 km radius 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 except within the area that is within 95 km of the San Diego channel 15 reference point. See Attachment D. Therefore, there is no predicted interference caused by instant application.

Digital TV Station Protection

The proposed operation causes less than 0.5% interference to surrounding digital assignments and allotments and facilities (i.e., “*de minimis*”). The only facility it causes any interference to is KUSI-TV, to which it causes a worst case in Scenario 1 of 0.332% new interference. It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards.

Class A Television Station Protection

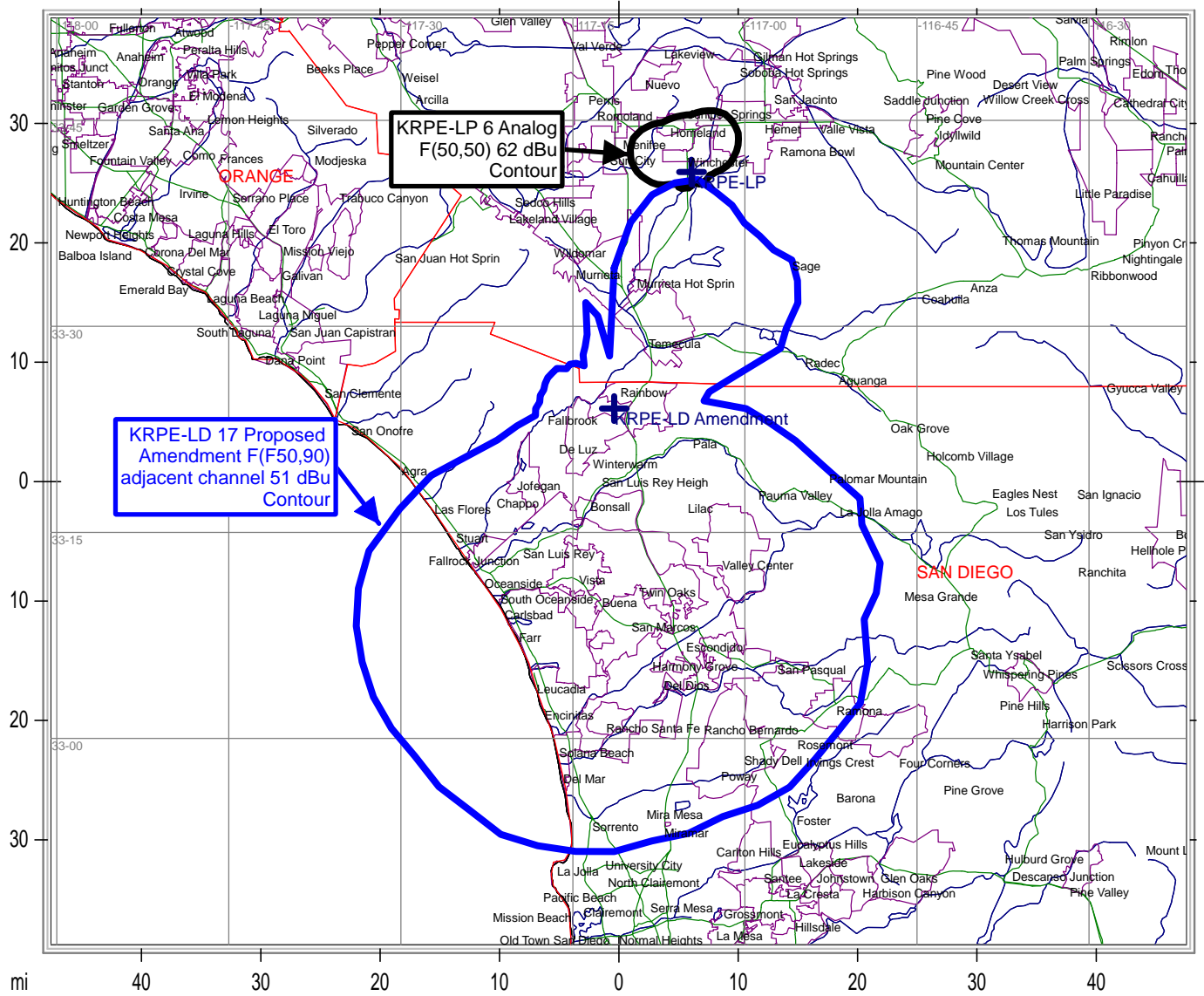
¹ An Informal Objection was also filed by Channel 51 of San Diego, Inc. on January 16, 2015. In that objection they claimed that our proposed facility was not fenced at the time of the application and that our application should be dismissed. The site is owned by American Tower. Although we would have worked with American Tower to fence the site in accordance with Commission rules, because we are moving to another American Tower site, that issue is moot.

The proposed operation causes less than 0.5% interference to surrounding Class A stations (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.

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.

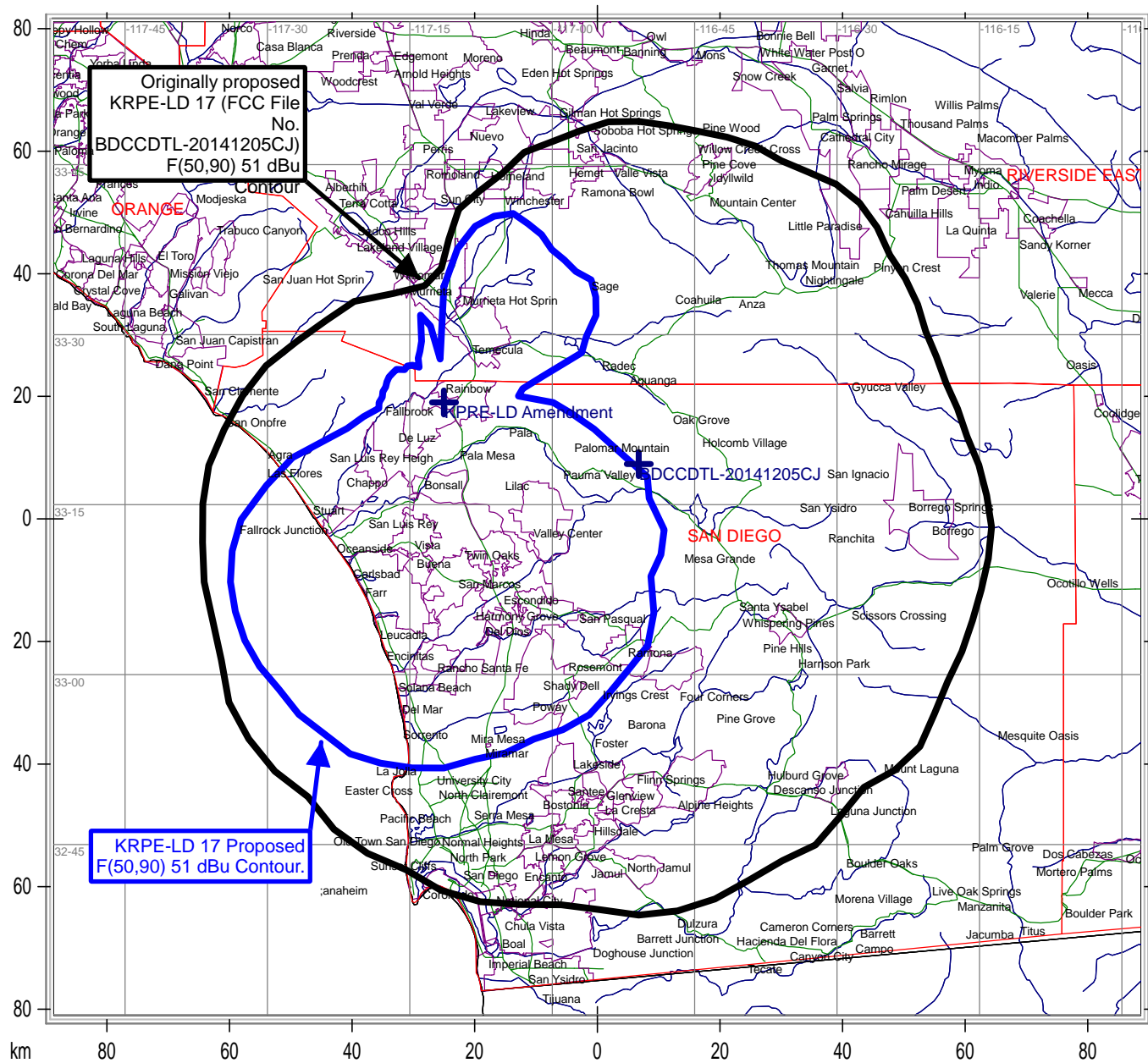
CA SAN DIEGO 17 AMENDMENT OVERLAP OF CONTOURS WITH KRPE-LP



The proposed transmitter is within 30 miles of that of KRPE-LP.

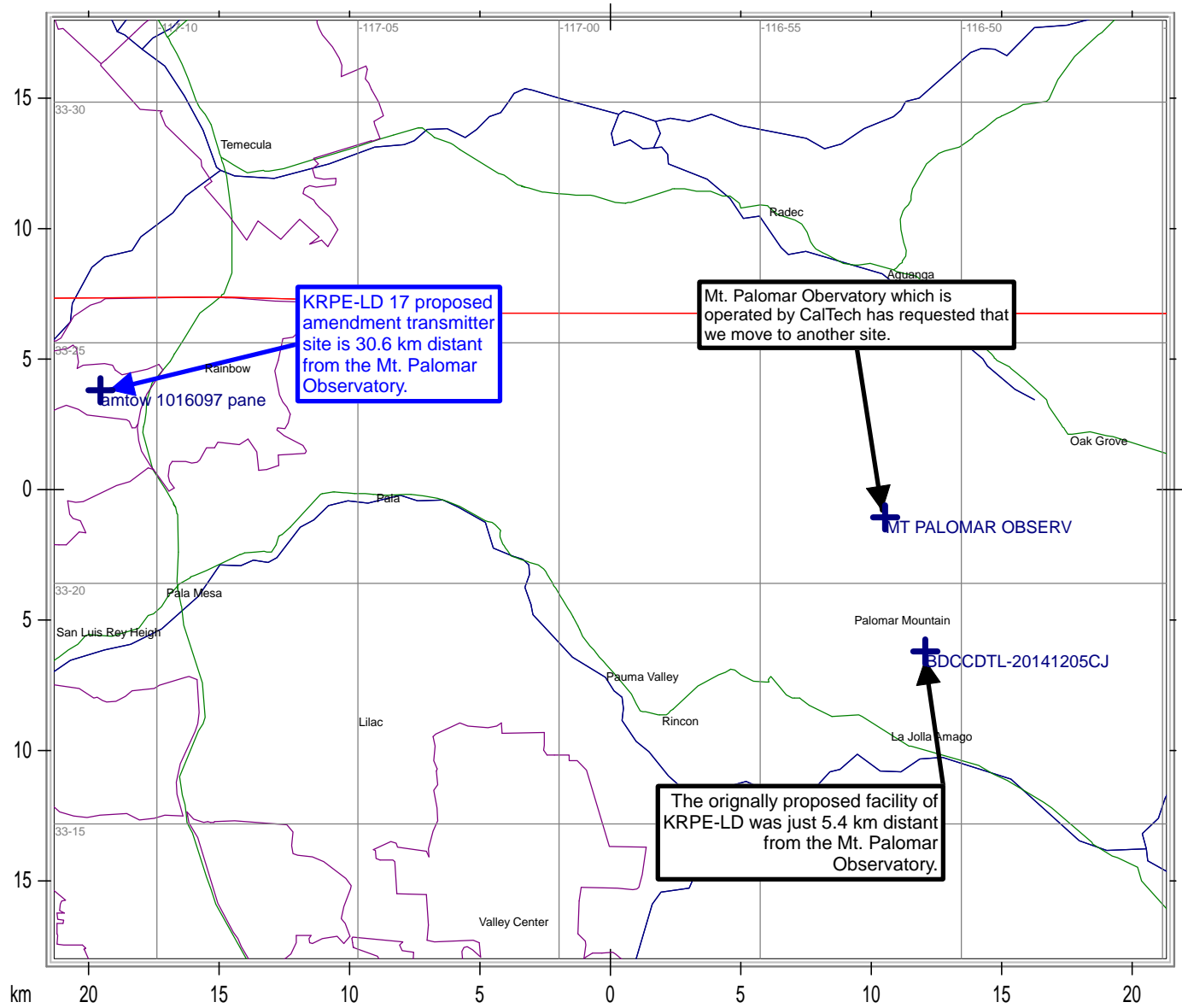
National Borders County Borders State Borders City Borders Highways
 Water Features Lat/Lon Grid

CA SAN DIEGO 17 KRPE-LD PROPOSED CONTOUR IS WITHIN THE CONTOUR OF THE CURRENTLY PROPOSED FACILITY



No new coordination nor calculations are required because the contour shrinks in every direction.

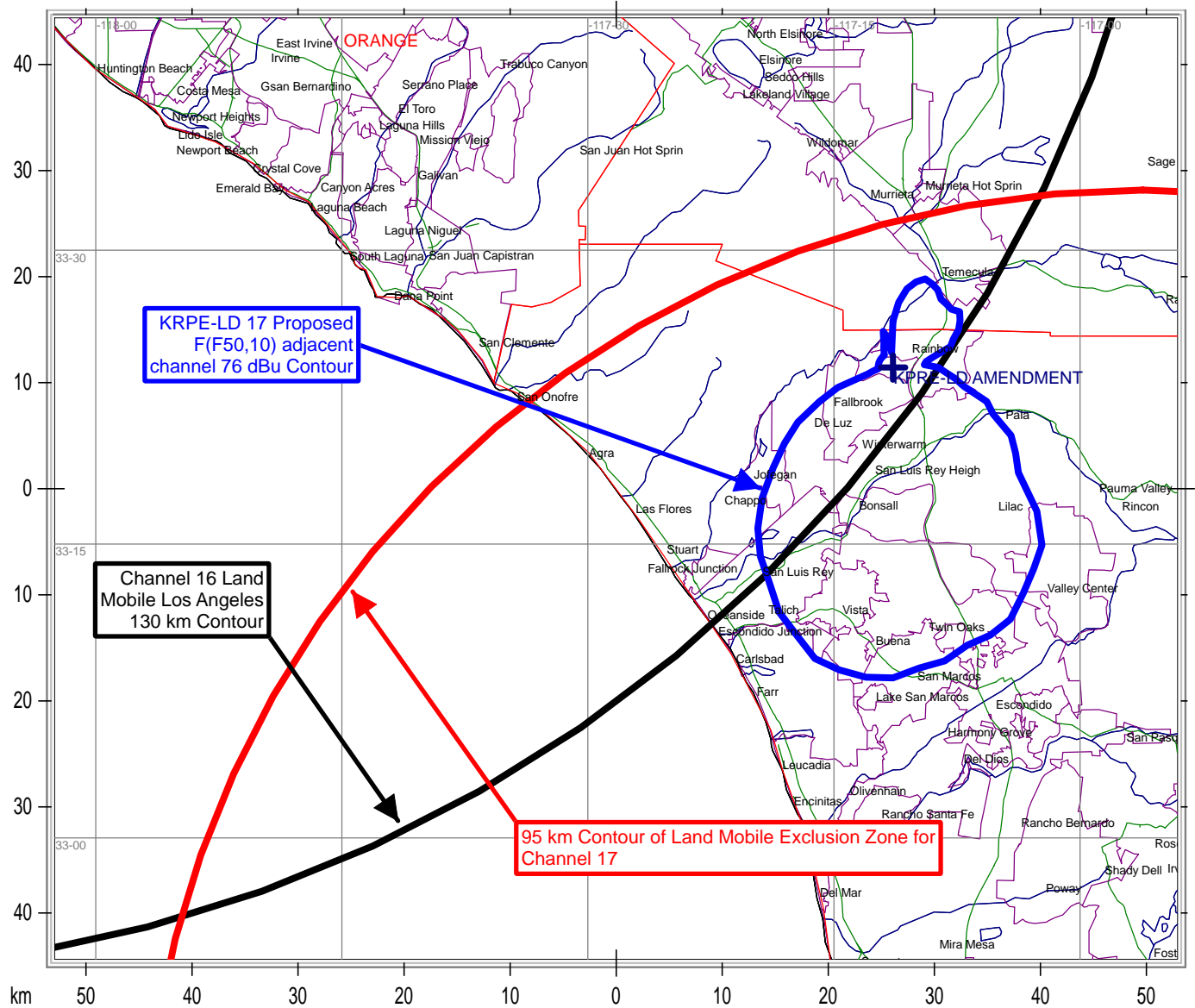
CA SAN DIEGO 17 KRPE-LD AMENDMENT TO MOVE FURTHER FROM MT. PALOMAR OBSERVATORY



This proposed move has been carefully coordinated with CalTech.

National Borders County Borders State Borders City Borders Highways
 Water Features Lat/Lon Grid

CA SAN DIEGO 17 KRPE-LD AMENDMENT PROTECTS LAND MOBILE 16 IN LOS ANGELES



The proposed 76 dBu contour is within the 95 km exclusion zone for channel 17 in San Diego.

National Borders County Borders State Borders City Borders Highways
 Water Features Lat/Lon Grid