

## **Engineering Statement and Interference Analysis**

This application proposes a minor modification application for the licensed facility of KSCZ-LD, Facility ID 167279, FCC File No. BLDLTL-20120323AAC, licensed to the Applicant herein.

The proposed facility on channel 20 was studied using the Techware's tv\_process\_2010 software on a Sun Blade 1500 using the post transition data and the 2000 US Census. The proposed transmitter location is within 30 miles of the reference coordinates of the existing licensed facility. The Applicant requests that the Commission processes this instant application using the standard Longley-Rice analysis settings:

- Cell Size for Service Analysis is 0.5 km/side
- Distance Increments for Longley-Rice Analysis is 0.50 km

It is believed that the proposed facility complies with 47 C.F.R. 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. 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.

### **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*"). 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**

Except as referenced below, the proposed facility causes less than 2.0% interference to surrounding low power and Class A authorized 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.

The proposed facility of channel 20 will interfere with KEXT-CD, Facility ID 191793, licensed to Central Valley Television, LLC. The Applicant has entered into an Interference Acceptance Agreement with Central Valley Television, LLC, see Attachment A.

## INTERFERENCE ACCEPTANCE AGREEMENT

This Interference Acceptance Agreement is entered into as of September 19, 2016 by and between Central Valley Television, LLC (“Central”) and Venture Technologies Group, LLC. (“VTG”).

1. VTG is the licensee of digital low power television station KSCZ-LD, Channel 20, Greenfield, CA, Facility ID No. 167279.
2. Central is the licensee of Class A television station KEXT-CD, Channel 20, Ontario, CA, Facility ID 191793.
3. VTG desires to file a minor modification of license application with the Federal Communications Commission (“FCC”) for KSCZ-LD on channel 20 (the “KSCZ-LD MOD”). The proposed KSCZ-LD MOD application will cause an impermissible level interference to the KEXT-LD.
4. Central agrees to accept the interference described in paragraph 3 of this Agreement.
5. Central and VTG shall take all commercially reasonable steps to satisfy any questions or concerns raised by the FCC with respect to any filings implicated by this Agreement, notify the other of any such FCC inquiries, and furnish all information requested by the FCC with respect thereto. Except for the mutual consents and agreements set forth herein, no consideration is being paid or promised by either party in connection with this Agreement. Neither party shall take any action that is inconsistent with its obligations under this Agreement or that could hinder or delay the other party’s enjoyment of its rights and interests contemplated by this Agreement.
6. This Agreement may be executed in counterparts and by facsimile, each of which when so executed, will be deemed an original, and all of which together shall constitute one and the same instrument.

### VENTURE TECHNOLOGIES GROUP, LLC

By:   
Lawrence Rogow, Manager

### CENTRAL VALLEY TELEVISION, LLC

By:   
Paul Koplin, Manager