

## **ENGINEERING STATEMENT**

This displacement application is submitted pursuant to the Special Displacement Window PN released on February 9, 2018 (DA 18-124), to modify the licensed facility of KEDD-LD, Channel 50, Los Angeles, CA, Facility ID 56793, FCC File Number BLDTL-20101018AAZ, licensed to the Applicant herein.

### **Nature of Displacement**

KEDD-LD is automatically displaced because it is operating in the new 600 MHz band for mobile broadband service (channels 38-51).

### **Proposed Facility**

The Applicant proposes to move KEDD-LD to channel 27. The proposed facility is less than 30 miles distance from the existing licensed facility. The F(50,90) 51 dBu contours of the proposed facility overlaps with the F(50,90) 51 dBu contours of the existing licensed facility. The proposed facility was studied using TVStudy v2.2.5 using the following parameters and the results are as follow:

- Study cell size: 1.00 km
- Profile point spacing: 0.20 km
- Distance to Canadian border: 1617.2 km
- Distance to Mexican border: 195.7 km
- Conditions at FCC monitoring station: Livermore CA  
Bearing: 322.3 degrees Distance: 500.1 km
- Proposal is not within the West Virginia quiet zone area
- Conditions at Table Mountain receiving zone:  
Bearing: 56.5 degrees Distance: 1325.0 km

The proposed facility does not cause interference to the predicted service of: (1) all other primary users in the repacked TV Band or in adjacent bands including land mobile operations, (2) licenses and valid construction permits for LPTV/translator stations; (3) licenses and valid construction permits for full power and Class A stations that were not reassigned; (4) the post-auction channels of reassigned full power and Class A stations as reflected in the Closing and Reassignment Public Notice, and (5) the alternative channels and expanded facilities proposed during the two filing windows by reassigned full power and Class A stations.

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).

### **Mexican Coordination Required**

The proposed facility is within coordination distance of Mexican border.

### **Waiver Request**

The Applicant hereby requests to waive the contingent application rule 47 C.F.R Section 73.3517 to allow the grant of this application which is necessary for the station to continue to serve its current viewers.

In addition, in order to comply with Section 73.3700(g)(2), the Applicant agrees to a condition that the proposed facility will not commence operation until any other potentially mutually interfering repacked full power or Class A stations have left their channels pursuant to the relevant phase assignment.

#### **Digital TV and Class A Station Protection**

The proposed facility of KEDD-LD is predicted to cause 3.35% interference to FCC File Number 0000034691 for KPOM-CD. The Applicant has obtained an Interference Acceptance Letter, see [Attachment A](#).

Except as referenced above, the proposed facility causes less than 0.5% interference to surrounding digital and Class A television stations and allotments and facilities (i.e., “*de minimis*”) based on TVStudy v2.2.5. 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 facility causes less than 2.0% interference to surrounding low power licenses and construction permits (i.e., “*de minimis*”) based on TVStudy v2.2.5. It is believed that the proposed operation is in compliance with the spirit and intent of the FCC’s interference standards.

#### **Environment Effect**

The proposed facility is deemed individually and cumulatively to have no significant effect on the quality of the human environment and are categorically excluded from environmental processing as defined by 47 C.F.R. § 1.1306. Additionally, the Applicant certifies that it will reduce power or cease operation as necessary to protect any persons from having RF exposure in excess of FCC guidelines.

## ATTACHMENT A

### **Interference Acceptance Letter**

1. Venture Technologies Group, LLC is the licensee of KEDD-LD, Channel 50, Los Angeles, CA, Facility ID 56793. KEDD-LD proposed a displacement application on channel 27 pursuant to the Special Displacement Window PN released on February 9, 2018 (DA 18-124).
2. Coachella Communications, LLC is the licensee of KPOM-CD, Channel 27, Ontario, CA, Facility ID 1018937 and has a pending application to modify its licensed facility on channel 27 (FCC File Number 0000034691).
3. The proposed facility of KEDD-LD on channel 27 is predicted to cause 3.35% interference to the pending application of KPOM-CD on channel 27 (FCC File Number 0000034691).
4. Coachella Communications, LLC hereby agrees to accept the above-referenced interference from the proposed facility of KEDD-LD on channel 27.

Accepted and Agreed,



Paul Koplin, Manager  
Coachella Communications, LLC