

## **ENGINEERING STATEMENT**

This Engineering Statement supports this application to modify the licensed facility of KPOM-CD, Facility ID 191793, and its channel station KSFV-CD, Facility ID, 191101.

### **Proposed Facility**

This minor modification proposes to move less than 30 miles distance from the existing authorized 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:

- Study cell size: 0.5 km
- Profile point spacing: 0.05 km
- Distance to Canadian border: 1622.0 km
- Proposal is within coordination distance of Mexican border
- Distance to Mexican border: 188.8 km
- Conditions at FCC monitoring station: Livermore CA  
Bearing: 320.7 degrees Distance: 512.4 km
- Proposal is not within the West Virginia quiet zone area
- Conditions at Table Mountain receiving zone:  
Bearing: 56.2 degrees Distance: 1308.8 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).

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

The proposed facility interferes with KSKJ-CD upwards to 4.82%, while this is more than 0.5%, it is less than is currently accepted by KSKJ-CD from the existing licensed facility of KPOM-CD and KSFV-CD, and therefore this application is grantable.

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 interferes with KEDD-LD upwards of 3.16% and with KPCD-LD upwards of 11.76%, while this is more than 2.0%, it is less than is currently accepted by KEDD-LD and KPCD-LD from the existing licensed facility of KPOM-CD and KSFV-CD, and therefore this application is grantable.

Except as referenced above, the proposed facility causes less than 2.0% interference to surrounding low power assignments and allotments (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.