

D'Amico Brothers Broadcasting, Corp.  
FRN 0007283575  
KVSD-LD, Facility ID 14910  
San Diego, CA

### SPECIAL TEMPORARY AUTHORITY JUSTIFICATION

This Engineering STA seeks to reinstate the engineering STA authorized in File LMS 0000125741 (the "Engineering STA") which inadvertently lapsed on June 1, 2021. Upon realizing the lapse, the licensee is immediately filing to reinstate and extend the Engineering STA to allow KVSD-LD to continue to operate while it completes the installation of its displacement facility.

KVSD-LD is licensed on Channel 26 but was displaced as a result of the repack. The station has been granted a construction permit to move to Channel 35. While awaiting repack funds to allow for construction of the new channel facilities, KVSD-LD was off the air for a time. The Engineering STA was granted in December 2020 to allow the station to resume operations prior to its one year off air date. The licensee is still awaiting repack funds to be able to complete purchase of the transmitter and construct the new Channel 35 facilities. KVSD-LD was unable to resume operation on Channel 26, because that channel is now occupied by KSWB-DT, Facility ID 58827. Thus, special temporary authority was needed to permit KVSD-LD to return to operations using alternate facilities.

KVSD-LD was in a similar position in 2019, and the Commission granted STA to allow resumption of operations on Channel 15, which KVSD-LD has authority to use as its studio-transmitter link. See LMS File No. 0000074685, granted 06/26/2019.

This application seeks an STA using the exact same facilities and parameters as the 2019 STA to again operate on Channel 15 to preserve the station license pending completion of construction on Channel 35.

An updated analysis based on TV Study concludes that this STA proposal meets all FCC interference protection requirements with respect to all Part 73 and Part 74 television broadcast facilities.

Section 74.709(b) governs protection of land mobile facilities operating within the TV Channel 15 band in Los Angeles. Section 74.709(b)(1) requires a TV facility to be located at least 130 km from reference coordinates for Los Angeles. Section 74.709(b)(2) allows a Part 74 TV facility specifically on Channel 15 to be located within 145 km of reference coordinates for San Diego. Attached are maps showing that the proposed KVSD-LD STA transmitter site complies with both requirements.

It should be noted that the requested STA facility has been licensed and in operation as a secondary studio-transmitter link for many years, with no interference complaints.