

Engineering Statement and Interference Analysis

This technical statement supports this digital flash cut application for KBKF-LP, Channel 6, San Jose, CA, Facility ID 127882.

The proposed digital flash cut facility is utilizing the same antenna at the same site on the same channel as the existing licensed facility. The proposed facility was studied using the Techware's tv_process_2010 software on a Sun Blade 1500 using the post transition database and the 2010 US Census. The default analysis settings have been changed to provide greater specificity in the analysis. The Applicant requests that the Commission process this application using the following Longley-Rice analysis settings:

Cell Size for Service Analysis of 0.5 km per side
Distance Increments for Longley-Rice Analysis of 0.5 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), 74.794(b), 73.1030 and other applicable parts of the Rules and Regulations of the FCC. 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 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.

Class A, Low Power TV and TV Translator Station Protection

The proposed operation causes less than 0.5% 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.