

Engineering Statement and Interference Analysis

This technical statement supports this application to modify BDISDVL-20090824AKC for digital low-power television station KRVD-LD, Channel 5, Banning, CA, Facility ID 128327.

In this instant application, the Applicant proposes to move the transmitter site 27.3 miles which is less than 30 miles from the existing facility. This application for a minor change complies with the current rules as well as the new rules pursuant to the *Second Report and Order In the Matter of Amendment of Parts 73 and 74 of the Commission's Rules to Establish Rules for Digital Low Power Television, Television Translator, and Television Booster Stations and to Amend Rules for Digital Class A Television Stations*, MB Docket No. 03-185, released and adopted on July 15, 2011, which becomes effective August 26, 2011. Therefore, this application is instantly grantable.

The proposed channel 5 facility was studied using the Techware's tv_process_2010 software on a Sun Blade 1500 using the 2000 US Census. The Applicant requests a waiver to the degree that it is deemed necessary to change the default analysis settings to provide greater accuracy and specificity than that of the standard distance increment of 2.0 km in the analysis. The Cell Size for Service Analysis used in this application is 1.0 km per side and the Distance Increments for Longley-Rice Analysis used in this application is 1.0 km.

It is believed that the proposed facility complies with the requirements Sections 74.709, 74.793(e)-(h), 74.794(B), 73.1030 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

The proposed facility is predicted to cause a 7.87% (Scenario 1) interference to BLTVL-20090819AHG for KRPE-LP, Channel 6, Banning, CA, Facility ID 129651, licensed to the Applicant herein. The Applicant hereby consents to accept such interference.

Except for as referenced above, the proposed facility causes less than 0.5% interference to surrounding low power assignments and allotments (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.