Engineering Statement and Interference Analysis

This technical statement supports this application to make changes to low power television station KRVD-LP, licensed to operate on channel 33 in Banning, California, Facility ID 128327.

Digital Displacement Relief

KRVD-LP is displaced off of channel 33 pursuant to MB Docket No. 04-225, RM-10695, released on June 18, 2004 where Trinity Christian Center of Santa Ana, Inc., licensee of KBTN-TV, applied to move from digital channel 23 to digital channel 33 and was granted a construction permit on digital channel 33.

On March 30, 2006, the Applicant applied for digital flash cut for KRVD-LP on channel 33 and that application was dismissed on December 4, 2007 (BDFCDTL-20060330AKG). On March 13, 2008, the Applicant applied for a digital displacement application to move KRVD-LP on channel 33 to digital channel 35 (BDISDTL-20080312ADG). However, further engineering studies revealed that it is unlikely that application will be grantable. Therefore, on June 11, 2009, the Applicant applied for another digital displacement application to move KRVD-LP on channel 33 to digital channel 4 (BDISDVL- 20090611ACZ) and requested that BDISDTL-20080312ADG be dismissed.

In order to expedite construction of KRVD-LP's digital facility, the Applicant hereby in this instant application proposes to move KRVD-LP from channel 33 to digital channel 5 instead of digital channel 35 and 4 and requests the Commission to dismiss the pending digital displacement application on channel 35 (BDFCDTL-20060330AKG) and channel 4 (BDISDVL-20090611ACZ).

The proposed channel 5 facilities were studied using the Techware's tv_process_dlptv_pt software on a Sun Blade 1500 using the post transition data and the 2000 US Census . It is believed that the proposed facility complies with the rule sections of 74.709, 74.793(e)-(h), 74.794(b) and 73.1030 and other applicable parts of the Rules and Regulations of the FCC.

TV Broadcast Analog System Protection

The proposed operation causes less than 0.5% interference to surrounding analog 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. If necessary, a waiver of the FCC rules is respectfully requested for this allocation study based on use of the OET-69 procedures.

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. If necessary, a waiver of the FCC rules is respectfully requested for this digital allocation study based on use of the OET-69 procedures.

Class A, Low Power TV and TV Translator Station Protection

The proposed operation 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. If necessary, a waiver of the FCC rules is respectfully requested for this low power allocation study based on use of the OET-69 procedures.