

Engineering Statement and Interference Analysis

This technical statement supports this amendment to modify digital low-power television station KSCZ-LD, Channel 20, Greenfield, CA, FCC File No. BMPDTL-20111118COD, Facility ID 167279.

In this amendment, the Applicant proposes to operate the station at the existing site as authorized in BMPDTL-20110826ABS, lower the antenna height, the ERP, the transmitter output power, modify the antenna, and the mask filter. The proposed facility will overlap with its paired analog facility of KSCZ-LP, Facility ID 68091. 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 2000 US Census.

Digital TV Station Protection

The proposed facility 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 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.

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.