

**Engineering Statement and Interference Analysis**

This technical statement supports this application to modify Class A television station KKKK-CA, Channel 6, Indio, CA, Facility ID 51654 ("Station"), licensed to Park Place Broadcasting Company.

On April 22, 2013, an Assignment of License application was filed with the FCC to transfer the Station from Park Place Broadcasting ("Assignor") to Loop Media, LLC ("Assignee"), see FCC File No. BALTV-20130422ACW.

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. In this instant application, the Applicant is requesting the Commission to process this instant application using the following Longley-Rice analysis settings:

- Cell Size for Service Analysis of 1.0 km per side
- Distance Increments for Longley-Rice Analysis of 1.00 km

**Request for Waiver for the Filing Limitation Imposed by DA 13-618, *Media Bureau Announces Limitations on the Filing and Processing of Full Power and Class A Television Station Modification Applications, Effective Immediately, and Reminds Stations of Spectrum Act Preservation Mandate*, released on April 5, 2013**

This minor change is proposed because the Assignee does not have the right to stay on the existing licensed transmitter site. The proposed transmitter site was chosen not only because American Tower Corporation has agreed to provide the Assignee a long-term lease but also because the antenna used by the existing licensed facility can be repurposed at the proposed transmitter site and still serves the majority of the market.

While the move is less than 30 miles and the proposed transmitter site is within the authorized protected contour of the existing licensed station, a tiny amount of signal is predicted to propagate outside of the existing licensed contour, see Attachment A. However, the small additional area served is completely unpopulated. In fact, there are 7% fewer persons within the proposed facility and the area within the proposed 62 dBu contour is 29% less than the area with the licensed 62 dBu contour. Additionally, the proposed maximum ERP is 0.2 kW less, and the proposed radiation center of the antenna is also lowered.

Therefore, to the degree that is required, the Applicant requests a waiver pursuant to DA 13-618, *Media Bureau Announces Limitations on the Filing and Processing of Full Power and Class A Television Station Modification Applications, Effective Immediately, and Reminds Stations of Spectrum Act Preservation Mandate*:

*The Bureau will consider, on a case-by-case basis, requests for waiver of the filing limitation imposed by this Public Notice when a modification application is necessary or otherwise in the public interest for technical or other reasons to maintain quality*

*service to the public, such as when zoning restrictions preclude tower construction at a particular site or when unforeseen events, such as extreme weather events or other extraordinary circumstances, require relocation to a new tower site.*

### **Mexico**

In this instant application, the distance from the proposed transmitter site to Mexico is 149.2 km at its closest point. However, the entire arc from the proposed transmitter site to Mexico is between 101 degrees to the southeast and 197 degrees to the southwest. Over the entire 96 degree arc, the 62 dBu (F50,50) contour of the proposed transmitter site is within the 62 dBu (F50,50) contour of the licensed facility (see Attachment A). The proposed 62 dBu contour shrinks in every direction to Mexico. Therefore, further concurrence from Mexico is not required to grant this minor modification and this application can be granted immediately.

### **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 47.C.F.R Sections 73.6016, 73.6017, 73.6018, 73.6019, 73.6020, 73.6027, 74.794(b) 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.