

## **ENGINEERING EXHIBIT**

### **Application for Class A License Conversion of Digital Companion Facility**

prepared for

#### **Caballero Acquisition Inc.**

KMMD-LD Salinas, CA

Facility ID 167838

Ch. 39 (digital) 15 kW

*Caballero Acquisition Inc. ("CAI")* is the licensee of Class A Television station KMMD-CA, analog Channel 3, Salinas, CA, Facility ID 18733 (BLTVA-20060524AGK) and of the digital companion facility KMMD-LD, digital Channel 39, Facility ID 167838 (BLDTL-20100108ACI). Pursuant to the procedures adopted in FCC 11-110,<sup>1</sup> *CAI* herein proposes to transfer the Class A primary status from the analog channel to the licensed digital companion channel. This statement supports the associated FCC Form 302-CA License Application.

FCC 11-110 requires that licensees seeking to transfer Class A primary status certify that the subject digital companion channel facility meets all Class A interference protection requirements. In support, a detailed interference study per OET Bulletin 69<sup>2</sup> shows that the proposal complies with the Commission's interference protection requirements toward all DTV, television translator, LPTV, and Class A stations. The results are summarized in Table 1 and show that any interference attributable to KMMD-LD does not exceed the Commission's interference limits (0.5 percent to full power and Class A stations, and 2.0 percent to secondary stations).

---

<sup>1</sup>"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 03-185, Second Report and Order, FCC 11-110, released July 15, 2011.

<sup>2</sup>FCC Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 ("OET-69"). The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A cell size of 1 km was employed. Comparisons of various results of this computer program (run on a Sun Sparc processor) to the Commission's implementation of OET-69 show excellent correlation.

The undersigned hereby certifies that the foregoing statement and associated attachments were prepared by him or under his direction, and that they are true and correct to the best of his knowledge and belief.



Joseph M. Davis, P.E.  
August 18, 2011

**Chesapeake RF Consultants, LLC**  
207 Old Dominion Road  
Yorktown, VA 23692  
703-650-9600

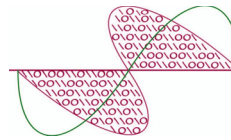
List of Attachments

Table 1      Interference Analysis Results Summary

Table 1

**Interference Analysis Results Summary**

prepared for

**Caballero Acquisition Inc.****KMMD-LD Salinas, CA****Chesapeake RF Consultants, LLC**Radiofrequency Consulting Engineers  
Digital Television and Radio

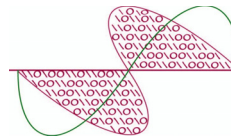
KMMD-LD	BLDTL	-20100108ACI	SALINAS	CA US
Channel 39	ERP 15.	kW	HAAT 977 m	RCAMSL 01035 m
STRINGENT MASK				
Latitude 036-32- 5 Longitude 0121-37- 9				
Dir Antenna Make CDB Model 00000000020469 Beam tilt Y Ref Azimuth 340.0				

Ch.	Call	City/State	Dist (km)	Status	Application Ref. No.	---Population (2000 Census)----	
						Baseline	New Interference
36	KJCN-LP	PASO ROBLES CA	85.3	CP	BPTTL-20070918ACL	---	none
38	KSEE	FRESNO CA	203.7	LIC	BMLCDT-20080324AIQ	---	none
38	K38KQ-D	PASO ROBLES CA	145.7	CP	BDCCDTT-20070418ABA	---	none
38	K38JP-D	SALINAS CA	0.7	LIC	BLDTL-20101005ABV	651,442	6,572 (1.01%)
38	KRON-TV	SAN FRANCISCO CA	154.4	LIC	BLCDDT-20091110AAH	6,507,664	3,969 (0.06%)
39	KASC-LD	ATASCADERO CA	145.7	CP	BDCCDTL-20070418ACU	118,450	23 (0.02%)
39	KABE-LD	BAKERSFIELD CA	297.4	LIC	BLDTL-20100922ABW	---	none
39	KABE-LD	BAKERSFIELD CA	297.4	STA	BSTA-20041105BDJ	---	none
39	K39KE-D	CHALFANT VALLEY CA	314.0	LIC	BLDTT-20110620AHJ	---	none
39	K39KE-D	CHALFANT VALLEY CA	314.0	CP	BDISTT-20090225AAU	---	none
39	KVEA	CORONA CA	368.0	APP	BPCDT-20101203AAU +	---	none
39	KMSG-LP	FRESNO CA	209.7	CP	BDFCDTL-20090220ADY	---	none
39	KMSG-LP	FRESNO CA	209.7	LIC	BLTTL-20060518ABZ	---	none
39	NEW	GUSTINE CA	87.9	APP	BNPDTL-20100513ADP	---	none
39	K39HT-D	RIDGECREST CA	372.9	LIC	BLDTT-20080401AVF	---	none
39	K39JM-D	SACRAMENTO CA	297.4	CP	BDCCDTL-20061030AQX	---	none
39	NEW	SACRAMENTO CA	297.4	APP	BDCCDTL-20110630AFV	---	none
39	KCNS	SAN FRANCISCO CA	154.4	LIC	BLCDDT-20060221AES	6,200,302	22,577 (0.36%)
39	KCNS	SAN FRANCISCO CA	154.4	CP MOD	BMPCDT-20100712AFR	6,290,844	18,613 (0.30%)
39	K39LG-D	SAN LUIS OBISPO CA	187.3	CP	BNPDTL-20100423AAI	---	none
39	KWHY-LP	SANTA BARBARA CA	289.4	CP	BDCCDTL-20061026ACD	---	none
39	NEW	SANTA MARIA CA	208.4	APP	BNPDTL-20100420AHU	---	none
39	K39AG	UKIAH CA	314.9	LIC	BLTT-19830125IN	---	none
39	NEW	CARSON CITY NV	334.0	APP	BNPDTL-20090825BNF	---	none
39	K39EZ-D	MINA / LUNING NV	376.6	LIC	BLDTT-20110311ACB	---	none
39	K39FF	RENO NV	374.5	LIC	BLTT-20010612ACH	---	none
39	K39KZ-D	SHURZ NV	361.4	LIC	BLDTT-20110609AAQ	---	none
40	KSCZ-LP	GREENFIELD CA	89.2	APP	BDISTTL-20051028ACT	---	none
40	NEW	MONTEREY CA	0.2	APP	BNPDTL-20090825ATZ	295,082	0 (0.00%)
40	KTXL	SACRAMENTO CA	193.3	CP MOD	BMPCDT-20080620ADJ	---	none

**Table 1**

**Interference Analysis Results Summary**

(page 2 of 2)



**Chesapeake RF Consultants, LLC**

Radiofrequency Consulting Engineers  
Digital Television and Radio

<u>Ch.</u>	<u>Call</u>	<u>City/State</u>	<u>Dist</u> <u>(km)</u>	<u>Status</u>	<u>Application Ref. No.</u>	---Population (2000 Census)---	
						<u>Baseline</u>	<u>New Interference</u>
40	KTXL	SACRAMENTO CA	193.3	LIC	BLCDT-20090918ABS	---	none
40	NEW	SALINAS CA	0.7	APP	BNPDTL-20090825BPJ	644,320	0 (0.00%)
40	NEW	SALINAS CA	0.0	APP	BNPDTL-20090825AFN	145,298	0 (0.00%)
40	KMMC-LP	SAN FRANCISCO CA	147.0	CP	BDFCDTL-20080801AOG	---	none
40	KMMC-LP	SAN FRANCISCO CA	147.0	LIC	BLTTL-20040812ABR	---	none
42	KSCZ-LP	COALINGA CA	111.8	LIC	BLTT-19950912IC	---	none
42	KSCZ-LP	GREENFIELD CA	89.2	APP	BSTA-20100111AIC	---	none
42	KAXT-CD	SANTA CLARA - SAN JO CA	109.5	APP	BDISTTA-20090629ADB	---	none
43	KMCE-LP	MONTEREY CA	26.7	LIC	BLTTL-20030711ABL	---	none
43	KMCE-LP	SAN MARTIN, ETC. CA	26.7	STA	BSTA-20030714AGM	---	none