

Engineering Statement and Interference Analysis

This technical statement supports this application to modify Class A television station KENT-CA in Los Angeles, CA, Facility ID 3167. The Applicant is proposing to flash cut from its authorized analog facility on channel 25 to a digital facility on channel 25.

The proposed facility on channel 25 was 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. The facility as proposed will use a full service mask filter instead of a simple or stringent mask filter. The default analysis settings have been changed to provide greater specificity in the analysis. The cell size for Service Analysis is 0.5 km per side. The distance increments for Longley-Rice Analysis is 0.20 km.

It is believed that the proposed facility complies with the rule sections of 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 FCC. 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.

TV Broadcast Analog System Protection

The proposed operation causes less than 0.5% interference to surrounding analog authorized 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 analog allocation study based on use of the OET-69 procedures, and all possible variance from FCC rules.

Digital TV Station Protection

The proposed operation causes less than 0.5% interference to surrounding digital authorized 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, and all possible variance from FCC rules.

Class A, Low Power TV and TV Translator Station Protection

The proposed operation causes less than 0.5% interference to surrounding low power and Class A authorized 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 low power allocation study based on use of the OET-69 procedures, and all possible variance from FCC rules.