

Interference

This technical statement supports this application for minor modification of construction permit to KNET-LP ("KNET"), a Class A television station (FCC Facility ID 3167) on channel 25 in Los Angeles, CA . This minor change application proposes to modify the transmitter site, antenna model, and ERP of the station. There is no change in output channel. The station will continue to serve the station's protected service area.

The proposed KNET channel 25 facilities were studied using the RadioSoft ComStudy program version 2.2 and the results are attached hereto. This is a contour study performed in accordance with FCC rules 73.6011, 73.6013, 73.6012 and 73.6014 and is summarized in Attachment A. The program lists in a column labeled "Clearance" the separation in kilometers between transmitter sites and the proposed interfering contour and the protected contours of pertinent stations. In cases where either the contour protection or distance separation requirements are not met, the "Clearance" is a negative number. Interference is shown even if one person is affected. In cases where the clearance is negative, as discussed in the following sections, a Longley-Rice interference study routine was run. The "Total Pop" reflects the pertinent station's coverage without any interference. The "Old Pop" reflects the pertinent station's coverage without interference from existing stations and without interference from the facility as proposed in this instant application. The "Old Pop%" reflects the percentage of population in the pertinent stations protected contour in which interference is currently received. The "New Pop" reflects the pertinent station's coverage after consideration of both interference from existing stations and interference from the facility as proposed in this instant application. The "New Pop %" reflects the total percentage population in the pertinent stations protected contour in which interference is currently received or would be received by the facility as proposed in this instant application. New interference caused by this instant applications is the difference between "Old Pop%" and "New Pop%". In all cases, it is less than 0.5% and is therefore *de minimis*.

In Attachment B, the coverage contours of applicable stations along with non-interfered coverage, as calculated by Longley-Rice are in green, and interfered coverage, as calculated by Longley-Rice are in red, and service area already receiving interference for existing stations in grey.

TV Broadcast Analog System Protection

The following is a summary of the calculated interference caused by the proposed KNET operation on channel 25 to pertinent surrounding analog television allotments, assignments, construction permits and licenses. Interference to these stations was studied by the Comstudy 2.2 program using a Longley-Rice routine. The factors applied follow OET 69 with a 1 km block size.

<u>Assignment</u>	<u>Facility ID</u>	<u>Location</u>	<u>Channel</u>	<u>Service Population</u>	<u>Interference Population</u>
KSCI (Lic)	35608	Long Beach, CA	18	11,197,971	0 (0.0%)
KVCR-TV (Lic)	58795	San Bernadino, CA	24	5,882,732	0 (0.0%)
KCET (Lic)	13058	Los Angeles, CA	28	11,241,082	0 (0.0%)
KWHY-TV	26231	Los Angeles, CA	22	10,613,819	0 (0.0%)

As demonstrated, 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 Section 73.6011 and any and all applicable FCC rules is respectfully requested for this analog allocation study based on use of the OET-69 procedures.

Digital TV Station Protection

The following is a summary of the calculated interference caused by the proposed KNET operation on channel 25 to pertinent surrounding digital (“DTV”) television applications, allotments, construction permits, licenses, and STA’s. Interference to these stations was studied by the Comstudy 2.2 program using a Longley-Rice routine. The factors applied follow OET 69 with a 1 km block size. In cases where the “Total Interference” is greater than 0.5%, a further study was done to separate “Existing Interference” to the pertinent station versus “New Interference.”

Assignment	Facility ID	Location	Channel	Service Population	Total Interference	Existing Interference	New Interference
KGTV-DT (CP)	40876	San Diego, CA	25	2,613,348	40,990 (1.6%)	30,317 (1.2%)	10,673 (0.4%)
KGTV (Allotment)	40876	San Diego, CA	25	2,572,972	10,987 (0.4%)	N/A	N/A
KGTV-DT (STA)	40876	San Diego, CA	25	2,505,658	6,584 (0.3%)	N/A	N/A
KGTV-DT (Lic)	40876	San Diego, CA	25	2,465,570	4,954 (0.2%)	N/A	N/A
KGET (Allotment)	34459	Bakersfield, CA	25	515,908	0 (0.0%)	N/A	N/A
KGET-DT (CP Mod)	34459	Bakersfield, CA	25	462,931	0 (0.0%)	N/A	N/A
KVCR-DT (CP)	58795	San Bernadino, CA	26	11,795,850	0 (0.0%)	N/A	N/A
KVCR-TV (Allotment)	58795	San Bernadino, CA	26	8,979,813	0 (0.0%)	N/A	N/A
KADY-DT (CP)	56384	Oxnard, CA	24	4,858,257	0 (0.0%)	N/A	N/A
KADY-TV (Allotment)	56384	Oxnard, CA	24	4,499,810	0 (0.0%)	N/A	N/A
New (Allotment)		Mexicali, Mexico	25	133,000	0 (0.0%)	N/A	N/A

As demonstrated, the proposed operation causes less than 0.5% new interference to surrounding DTV applications, allotments, construction permits, licenses, and STA's (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 Section 73.6013 and any and all applicable FCC rules is respectfully requested for this analog allocation study based on use of the OET-69 procedures.

Low Power TV, TV Translator, Class A and Digital Class A Station Protection

The following is a summary of the calculated interference caused by the KNET operation on channel 25 to pertinent surrounding low-power television ("LPTV") TV Translator, Class A and Digital Class A licenses, permits and applications. Interference to these stations was studied by the Comstudy 2.2 program using a Longley-Rice routine. The factors applied follow OET 69 with a 1 km block size. In cases where the "Total Interference" is greater than 0.5%, a further study was done to separate "Existing Interference" to the pertinent station versus "New Interference."

Assignment	Facility ID	Location	Ch.	Service Population	Total Interference	Existing Interference	New Interference
K25AD (Lic)	70076	Victorville, CA	25	92,535	0 (0.0%)	N/A	N/A
KBLM-LP (App)	38561	Riverside, CA	25	928,626	903,079 (97.2%)	901,251 (97.1%)	1,828 (0.2%)
KBLM-LP (CP Mod)	38561	Riverside, CA	25	774,702	749,155 (96.7%)	747,363 (96.5%)	1,792 (0.2%)
KBLM-LP (Lic)	38561	Riverside, CA	25	774,702	749,155 (96.7%)	747,363 (96.5%)	1,792 (0.2%)
KSFV-LP (Lic)	49704	San Fernando, CA	26 Z	680,580	0 (0.0%)	N/A	N/A

KWJD-LP (Lic)	22645	Van Nuys, CA	25	302,788	0 (0.0%)	N/A	N/A
K24DM (CP Mod)	36718	Oxnard, CA	25	347,258	40,966 (11.8%)	40,153 (11.6%)	813 (0.2%)

As demonstrated, the proposed operation causes less than 0.5% new interference to surrounding LPTV TV Translator, Class A and Digital Class A licenses, permits and applications (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 Section 73.6012 and any and all other applicable FCC rules is respectfully requested for this LPTV allocation study based on use of the OET-69 procedures.

Summary of Channel 25 Z:

Lat: 34-12-48.0 N

Lon: 118-03-41.0 W

ERP: 7.500 kW

ComStudy 2.2 RadioSoft

Callsign	Fac ID	ARN	City	Class	Type	ERP	Sep Type	Status	Bearing	Dist	Pri	Clearance	D/U	Fx/FB	Zone	Ch#	Adj	Matrix	Svc dbu	Int dbu	Old Pop%	New Pop%	Total Pop	Old Pop	New Pop
KGTV-DT	40876	BPCTD200SAN DIEGO.DTV		CP		1000.000	C/M	Interf	153.54	170.4	-	-159.4	2	14.0	2	25	Co	LR	40	19	1.2%	1.6%	2613348	2583031	2572358
KGTV*	40876	DTV ALLO SAN DIEGO.DTV		LIC		809.100	C/M	Interf	153.54	170.4	-	-150.3	2	14.0	2	25	Co	LR	40	19	0.0%	0.4%	2572972	2572972	2562671
KGTV-DT	40876	BDSIA200SAN DIEGO-STA		LIC		316.000	C/M	Interf	153.54	170.4	-	-149.7	2	14.0	0	25	Co	LR	40	19	0.0%	0.3%	2505652	2505652	2499068
KGTV-DT	40876	BLCTD199SAN DIEGO.DTV		LIC		316.000	C/M	Interf	153.54	170.4	-	-140.5	2	14.0	0	25	Co	LR	40	19	0.0%	0.2%	2465570	2465570	2460616
KSCI	33608	BLCTD2001LONG BEACH.TSC		LIC		2583.000	M	Clean	176.76	0.0	100	-	-33	0.0	2	18 -	T-7	LR	64	-	0.0%	0.0%	11191971	11191971	11191971
K25AD	70076	BLTT1982VICTORVILLE.PTV		LIC		1.280	C/M	Clean	57.90	83.7	-	-94.6	45	6.0	0	25	Co	LR	74	29	0.0%	0.0%	92535	92535	92535
KGET*	34459	DTV ALLO BAKERSFIELD.DTV		LIC		285.100	C/M	Clean	335.76	149.7	-	-90.3	2	14.0	2	25	Co	LR	40	19	0.0%	0.0%	515908	515908	515908
KGET-DT	34459	BMPCD12BAKERSF.DTV		CP MOD		135.000	C/M	Clean	335.75	149.6	-	-88.3	2	14.0	2	25	Co	LR	40	19	0.0%	0.0%	462931	462931	462931
KBLM-LP	38561	BPRTL200RIVERSIDE.PTV		APP		10.000	C/M	Interf	110.89	77.2	-	-71.5	28	6.0	0	25 +	Co	LR	74	46	97.1%	97.2%	928626	27375	25547
KBLM-LP	38561	BMPTTL200RIVERSIDE.PTV		CP MOD		6.000	C/M	Interf	110.89	77.2	-	-68.5	28	6.0	0	25 +	Co	LR	74	46	96.5%	96.7%	774702	27339	25547
KBLM-LP	38561	BLTTL200RIVERSIDE.PTV		LIC		6.000	C/M	Interf	110.89	77.2	-	-68.5	28	6.0	0	25 +	Co	LR	74	46	96.5%	96.7%	774702	27339	25547
KVCR-DT	56795	BPEDT200SAN BERN.DTV		CP		440.000	C/M	Clean	110.83	76.6	-	-58.8	48	14.0	2	26	A+1	LR	40	88	0.0%	0.0%	11795850	11795850	11795850
KSFV-LP	49704	BLTT1200SAN FERN.L.PTV		LIC		9.330	C/M	Clean	90.00	0.0	-	-51.7	-3	6.0	0	26 Z	A+1	LR	74	89	0.0%	0.0%	680580	680580	680580
KVCR-TV	56795	BLETT1983SAN BERN.TSC		LIC		1320.000	C/M	Clean	110.83	76.6	-	-48.1	-13	6.0	2	24 -	A-1	LR	64	79	0.0%	0.0%	5882732	5882732	5882732
KWJD-LP	22645	BLTT1200VAN NUYS.L.PTV		LIC		1.200	C/M	Clean	268.06	36.2	-	-42.8	28	6.0	0	25 -	Co	LR	74	46	0.0%	0.0%	302788	302788	302788
KVCR-TV*	56795	DTV ALLO SAN BERN.DTV		LIC		50.000	C/M	Clean	110.83	76.6	-	-38.0	48	14.0	2	26	A+1	LR	40	88	0.0%	0.0%	8979813	8979813	8979813
-	0	MEX-DTV-MEXICALI.DTV				500.000	C/M	Clean	126.07	297.4	-	-31.1	2	14.0	0	25	Co	LR	40	19	0.0%	0.0%	114534	114534	114534
KCET	13058	BLETT1982LOS ANGE.TSC		LIC		2450.000	D/M	Clean	356.46	1.2	32	-30.8	-33	6.0	2	28 Z	T-3	LR	64	-	0.0%	0.0%	11241082	11241082	11241082
KMHY-TV	26231	BLCT1994LOS ANGE.TSC		LIC		2630.000	D/M	Clean	342.77	1.6	32	-30.4	-34	6.0	2	22 Z	T-3	LR	64	-	0.0%	0.0%	10613819	10613819	10613819
KADY-DT	56394	BPCTD199OXNARD.DTV		CP		85.000	C/M	Clean	278.64	89.3	-	-10.4	49	14.0	2	24	A-1	LR	40	88	0.0%	0.0%	4499810	4499810	4499810
KADY-TV*	56394	DTV ALLO OXNARD.DTV		LIC		50.000	C/M	Clean	278.68	89.3	-	-4.2	49	14.0	2	24	A-1	LR	40	88	0.0%	0.0%	4499810	4499810	4499810
K3SEL	12688	BMPTTL199DNDIO.L.PTV		CP MOD		10.400	C/M	Clean	103.92	154.9	-	16.6	28	6.0	0	25 +	Co	LR	74	46	0.0%	0.0%	166171	166171	166171
K24DM	36718	BMPTTL199OXNARD.A		CP MOD		10.000	C/M	Interf	278.71	89.2	-	17.2	28	6.0	0	25 +	Co	LR	74	46	11.6%	11.8%	347258	307105	306292
K24FG	6791	BLTT12001LANCASTE.PTV		LIC		9.500	C/M	Clean	339.38	39.5	-	20.0	-13	6.0	0	24 +	A-1	LR	74	89	0.0%	0.0%	177720	177720	177720
K54DN	67901	BLTT12001LANCASTE.PTV		LIC		4.600	C/M	Clean	340.29	39.4	-	34.2	-3	6.0	0	26 -	A+1	LR	74	89	0.0%	0.0%	88414	88414	88414
K25DU	11371	BLTT199SAN DIEGO.PTV		LIC		19.500	C/M	Clean	152.63	184.9	-	63.2	28	6.0	0	25 -	Co	LR	74	46	99.5%	99.5%	352500	1926	1926
K256K	43612	BLTT12000JOSHUA TLE.PTV		LIC		0.629	C/M	Clean	93.93	194.4	-	77.7	28	6.0	0	25 +	Co	LR	74	46	N/C	N/C	N/C	N/C	N/C
K24DM	36718	BLTT199OXNARD.L.PTV		LIC		2.940	C/M	Clean	278.71	89.2	-	83.5	-13	6.0	0	24 +	A-1	LR	74	89	0.0%	0.0%	214643	214643	214643
K25FT	14303	BLTT199BAKERSF.L.PTV		LIC		21.500	C/M	Clean	326.45	154.6	-	89.1	28	6.0	0	25 -	Co	LR	74	46	0.0%	0.0%	300158	300158	300158
NEW	128872	BMPTTL120YUMA.L.PTV		APP		50.000	C/M	Clean	112.42	325.9	-	92.3	45	6.0	0	25 Z	Co	LR	74	29	0.0%	0.0%	888	888	888

KDIG-LP	14902	BFTTLJGDT	temecula	LPTV	CP	22,200	C/M	Clean	134.87	114.9	-	93.3	3	6.0	0	26 -	A+1	LR	74	89	0.0%	0.0%	58590	58590	58590
K25FV	13999	BLTTL199	SANTAMALL	PTV	LIC	16,200	C/M	Clean	288.67	223.5	-	103.3	45	6.0	0	25.2	Co	LR	74	29	0.0%	0.0%	109330	109330	109330

FCC Form 301-CA
Venture Technologies Group, LLC
KNET-LP
Facility ID 3167
Exhibit 4, 5, 6
Attachment A

[illegible]

FCC Form 301-CA
Venture Technologies Group, LLC
KNET-LP
Facility ID 3167
Exhibit 4, 5, 6
Attachment B

County Borders State Borders City Borders Lat/Lon Grid