

TECHNICAL EXHIBIT
DIGITAL FLASH CUT APPLICATION
STATION K35ER (FACILITY ID 31352)
SANTA MARIA, CALIFORNIA
CH 35 0.69 KW (MAX-DA)

Technical Narrative

This Technical Exhibit supports an amendment to the application to “flash-cut” to digital operation for Class A television station K35ER. Station K35ER is licensed to operate on analog channel 35 with a directional antenna maximum (visual) effective radiated power (ERP) of 20.8 kW and an antenna height above mean sea level (RCAMSL) of 500 meters (BLTTL-19980902JD). The pending application proposes to flash cut to digital using its licensed directional antenna (re-oriented) at a new transmitter site (BDFCDTA-20081230AAM).

This amendment is intended to address the FCC’s 30-day letter concerning excessive interference caused to station KTAS-DT. Specifically, a reduction is needed (and is proposed, herein) in the proposed K35ER ERP to comply with the “pre-transition” OET-69 interference provisions with respect to station KTAS-DT. K35ER remains compliant with the “post-transition” OET-69 provisions up to 1.75 kW ERP.

Proposed Facilities

This application proposes to flash-cut to digital mode on channel 35 from an existing transmitter site atop Tepusquet Peak (same transmitter site as in the pending STA and analog applications for K35ER.¹ The proposed site coordinates are (NAD27): 34-54-37 N, 120-11-09 W. A Bogner (BOG), model B8UB directional antenna, oriented at 270° True, with a maximum ERP of 0.69 kW and antenna RCAMSL of 1020 meters is proposed. The tower registration number is 1032645.

¹ See BSTA-20071221AAD & BPTTA-20090105AGI

Figure 1 is a map showing the licensed and proposed coverage contours. As is apparent on the map, the proposed 51 dBu digital contour will have some common contour overlap with the licensed 74 dBu contour.

Allocation Considerations – *pre-transition*

The proposed K35ER operation meets the FCC's pre-transition interference standards to pertinent LPTV, Class A and DTV facilities using the procedures outlined in the FCC's OET-69 Bulletin and a standard 1 kilometer cell size and 1 kilometer terrain distance increment.

The results of the interference analyses are summarized in Figure 2. For the studies, only the worst-case interference scenario was shown for each station. Detailed studies for any stations that were not predicted to receive any interference (i.e., no scenarios were generated) were not included.

Allocation Considerations – *post-transition*

The proposed K35ER operation meets the FCC's post-transition interference standards to pertinent LPTV, Class A and DTV facilities using the procedures outlined in the FCC's OET-69 Bulletin and a standard 1 kilometer cell size and 1 kilometer terrain distance increment.

The results of the interference analyses are summarized in Figure 3. For the studies, only the worst-case interference scenario was shown for each station. Detailed studies for any stations that were not predicted to receive any interference (i.e., no scenarios were generated) were not included.

The applicant understands that it must correct and/or eliminate prohibited interference that may result from its proposed operation. If necessary, a waiver of the FCC rules is respectfully requested based on use of the FCC's OET-69 Bulletin.

Radiofrequency Electromagnetic Field Exposure

The proposed K35ER facilities were evaluated in terms of potential radio frequency (RF) energy exposure at ground level to workers and the general public. The radiation center for the antenna is located 30 meters above ground level. The maximum proposed ERP is 0.69 kW. A conservative relative field value of 0.5 was assumed for the directional antenna's downward radiation (see Figure 4). The calculated power density at a point 2 meters (6.6 feet) above ground level is 0.0074 mW/cm^2 . This is less than 5% of the FCC's recommended limit of 0.4 mW/cm^2 for channel 35 for an "uncontrolled" environment.

Access to the transmitting site will be restricted and appropriately marked with warning signs. As this is a multi-user site, an agreement will control site access. In the event that workers or other authorized personnel enter restricted areas or climb the tower, appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by spreading out the work over a longer period of time, wearing "accepted" RFR protective clothing and/or RFR exposure monitors or scheduling work when the stations are at reduced power or shut down.

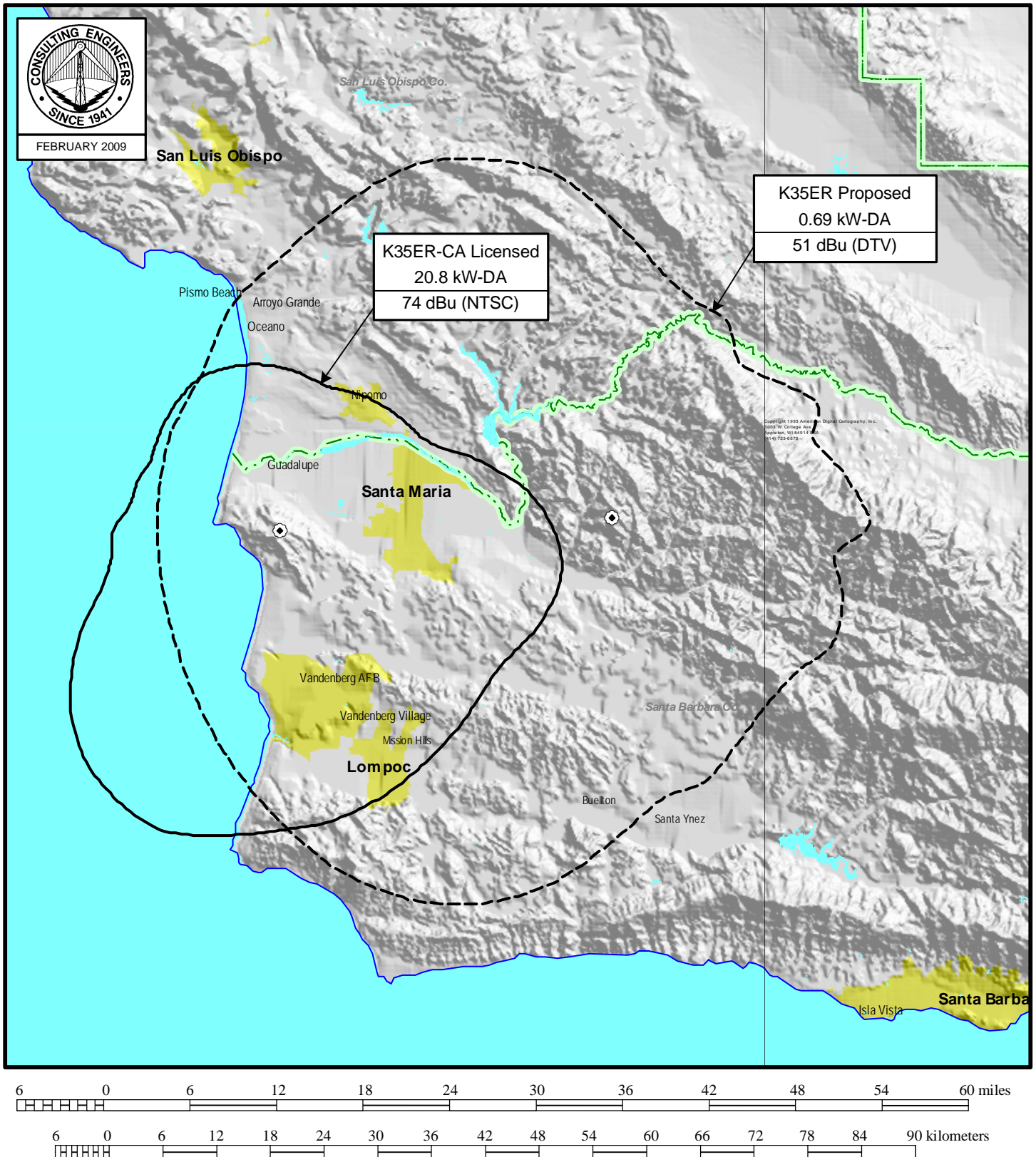
It is noted that this statement only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already have been provided to the FCC by the tower owner as part of the tower registration process.



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February 19, 2009

Figure 1



PREDICTED COVERAGE CONTOURS

STATION K35ER

SANTA MARIA, CALIFORNIA

du Treil, Lundin & Rackley, Inc Sarasota, Florida

Figure 2
Sheet 1 of 6

Census data selected: 1990

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 02-06-2009 Time: 14:01:35
Record Selected for Analysis

K35ER USERRECORD-01 SANTA MARIA CA US
Channel 35 ERP 0.69 kW HAAT 584. m RCAMSL 01020 m STRINGENT MASK
Latitude 034-54-37 Longitude 0120-11-09
Status APP Zone 2 Border
Dir Antenna Make CDB Model 00000000018180 Beam tilt N Ref Azimuth 270.
Last update Cutoff date Docket
Comments
Applicant

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

Not full service station
Facility meets maximum power limit

Azimuth (Deg)	ERP (kW)	HAAT (m)	51.0 dBu F(50,90) (km)
0.0	0.075	546.3	33.3
45.0	0.030	323.0	22.7
90.0	0.043	504.9	29.1
135.0	0.030	534.0	27.7
180.0	0.075	721.5	36.2
225.0	0.690	749.5	50.4
270.0	0.690	769.8	50.7
315.0	0.690	522.3	46.5

Contour Overlap to Proposed Station

Station			
KTAS	34 SAN LUIS OBISPO	CA BLCDDT20070222AAX	causes

Contour overlap to Digital LPTV station
K35ER 35 SANTA MARIA CA USERRECORD01

Station			
KMEX-TV	35 LOS ANGELES	CA BLCDDT20021118ACF	causes

Contour overlap to Digital LPTV station
K35ER 35 SANTA MARIA CA USERRECORD01

Station			
KCBA	35 SALINAS	CA BLCT19811022KE	causes

Contour overlap to Digital LPTV station
K35ER 35 SANTA MARIA CA USERRECORD01

Station			
K35ER	35 SANTA MARIA	CA BPTTA20090105AGI	

Station inside contour of Digital LPTV station
K35ER 35 SANTA MARIA CA USERRECORD01

Station			
K35ER	35 SANTA MARIA	CA BSTA20071221AAD	

Station inside contour of Digital LPTV station
K35ER 35 SANTA MARIA CA USERRECORD01

Station			
K35ER	35 SANTA MARIA	CA BLTTL19980902JD	

Figure 2
Sheet 2 of 6

Station inside contour of Digital LPTV station
K35ER 35 SANTA MARIA CA USERRECORD01

Station			
KMCF-LP	35 VISALIA	CA BLTTL20030303ACQ	causes

Contour overlap to Digital LPTV station
K35ER 35 SANTA MARIA CA USERRECORD01

Station			
K35ER	35 SANTA MARIA	CT BDFCDTA20081230AAM	

Station inside contour of Digital LPTV station
K35ER 35 SANTA MARIA CA USERRECORD01

Contour Overlap Evaluation to Proposed Station Complete

Proposed facility OK to FCC Monitoring Stations
Proposed facility OK toward West Virginia quiet zone
Proposed facility OK toward Table Mountain
Proposed facility is beyond the Canadian coordination distance
Proposed facility is beyond the Mexican coordination distance
Proposed station is OK toward AM broadcast stations

Start of Interference Analysis

Channel	Call	Proposed Station City/State	ARN
35	K35ER	SANTA MARIA CA	USERRECORD01

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
20	KSSY-LP	FORD CITY CA	71.3	LIC	BLTTL	-20081222ABD
21	DK50CL	BELRIDGE CA	118.2	APP	BMJPTTL	-20000829ASI
28	K28FK	SAN LUIS OBISPO CA	65.8	LIC	BLTTL	-19980902JB
28	K28GY	SANTA BARBARA, ETC. CA	47.6	LIC	BLTT	-20040412AAU
32	KSBT-LP	SANTA BARBARA CA	67.8	LIC	BLTTL	-19990922AAQ
33	KTAS	SAN LUIS OBISPO CA	65.8	LIC	BLCT	-19900416KF
34	KVPT-LP	BAKERSFIELD CA	143.8	LIC	BLTT	-20070223ABA
34	NEW	BAKERSFIELD CA	133.5	APP	BNPTTL	-20000831AWI
34	KTAS	SAN LUIS OBISPO CA	65.8	LIC	BLCDDT	-20070222AAX
34	KADE-DT	SAN LUIS OBISPO CA	65.8	PLN	DTVPLN	-DTVP0926
35	K35IW-D	BAKERSFIELD CA	156.8	CP	BDCCDTL	-20061030AQU
35	K35IW-D	BAKERSFIELD CA	156.8	APP	BMPDTL	-20070914ABF
35	KRMV-LP	BANNING CA	323.9	APP	BDISDTL	-20060901AAT
35	KRVD-LP	BANNING CA	323.9	APP	BDISDTL	-20080312ADG
35	K35BQ	DAGGETT, ETC. CA	299.9	LIC	BLTT	-19880307IA
35	K35DG	LA JOLLA CA	355.5	LIC	BLTTA	-20060621AAL
35	KMEX-TV	LOS ANGELES CA	208.3	LIC	BLCDDT	-20021118ACF
35	KMEX-DT	LOS ANGELES CA	208.4	PLN	DTVPLN	-DTVP0964
35	NEW	PALM SPRINGS CA	383.8	APP	BDCCDTL	-20070420ABK
35	NEW	PALM SPRINGS CA	363.2	APP	BSFDTL	-20060630ATQ
35	K35HO-D	RIDGECREST CA	236.1	LIC	BLDTT	-20080401AUL
35	K35HO-D	RIDGECREST, ETC. CA	236.0	CP	BPTT	-20041201BZX
35	KCRA-TV	SACRAMENTO CA	389.0	LIC	BLCDDT	-20040122ADR
35	KCRA-DT	SACRAMENTO CA	390.5	PLN	DTVPLN	-DTVP0965
35	KCBA	SALINAS CA	236.9	LIC	BLCT	-19811022KE
35	KMCF-LP	VISALIA CA	195.6	LIC	BLTTL	-20030303ACQ
36	KBFK-LP	BAKERSFIELD CA	143.8	LIC	BLTTL	-20040219ACE
36	KBFK-LP	BAKERSFIELD CA	143.8	CP	BDFCDTL	-20081215ABE
36	KJCN-LP	PASO ROBLES CA	137.3	CP	BPTTL	-20070918ACL
36	KJCN-LP	PASO ROBLES CA	65.8	LIC	BLTTL	-19870602IA
38	KPMR	SANTA BARBARA CA	47.6	LIC	BMLCT	-20051228ACS
42	KSBO-CA	SAN LUIS OBISPO CA	65.8	LIC	BLTTL	-19980902JA
43	KTSB-LP	SANTA BARBARA CA	67.9	LIC	BLTTL	-19970620JD

Figure 2
Sheet 3 of 6

Analysis of Interference to Affected Station 9

DTV Baseline Analysis

Channel	Call	City/State	Application Ref. No.
34	KADE-DT	SAN LUIS OBISPO CA	DTVPLN -DTVP0926

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
33	KBAK-DT	BAKERSFIELD CA	187.4	PLN	DTVPLN -DTVP0892
33	KADE	SAN LUIS OBISPO CA	0.0	PLN	DTVPLN -NPLN1443
34	KMEXTV	LOS ANGELES CA	267.9	PLN	DTVPLN -NPLN1469
34	KPST-DT	VALLEJO CA	310.7	PLN	DTVPLN -DTVP0927
35	KCBA	SALINAS CA	172.7	PLN	DTVPLN -NPLN1490

Results for: 34A CA SAN LUIS OBISPO DTVPLN DTVP0926 PLN
HAAT 440.0 m, ATV ERP 50.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	269470	7010.6
not affected by terrain losses	266897	6591.4
lost to NTSC IX	13	25.9
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	13	25.9

NTSC Baseline Analysis

Channel	Call	City/State	Application Ref. No.
33	KADE	SAN LUIS OBISPO CA	DTVPLN -NPLN1443

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
32	KION-DT	MONTEREY CA	156.7	PLN	DTVPLN -DTVP0855
33	KBAK-DT	BAKERSFIELD CA	187.4	PLN	DTVPLN -DTVP0892
33	KMTP-DT	SAN FRANCISCO CA	310.7	PLN	DTVPLN -DTVP0893
34	KADE-DT	SAN LUIS OBISPO CA	0.0	PLN	DTVPLN -DTVP0926

Results for: 33N CA SAN LUIS OBISPO DTVPLN NPLN1443 PLN

	POPULATION	AREA (sq km)
within Noise Limited Contour	269470	7010.6
not affected by terrain losses	249372	5623.4
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	3.0
lost to all IX	0	3.0

Analysis of current record

Channel	Call	City/State	Application Ref. No.
34	KTAS	SAN LUIS OBISPO CA	BLCDT -20070222AAX

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
33	KBAK-TV	BAKERSFIELD CA	187.4	LIC	BLCDT -20060628ABK
33	KBAK-DT	BAKERSFIELD CA	187.4	PLN	DTVPLN -DTVP0892
33	KTAS	SAN LUIS OBISPO CA	0.0	LIC	BLCT -19900416KF
34	KGPE	FRESNO CA	219.8	LIC	BLCDT -20030702ABJ
34	KJEO-TV	FRESNO CA	219.8	LIC	BPRM -20000803AAD
34	KMEX-TV	LOS ANGELES CA	267.8	LIC	BLCT -20030313AHD
34	KFSF-TV	VALLEJO CA	310.7	LIC	BLCDT -20030620ABV
34	KPST-DT	VALLEJO CA	310.7	PLN	DTVPLN -DTVP0927
35	KCBA	SALINAS CA	172.7	LIC	BLCT -19811022KE
35	K35ER	SANTA MARIA CA	65.8	APP	USERRECORD-01

Total scenarios = 4

Figure 2
Sheet 4 of 6

Result key: 1
Scenario 1 Affected station 9 KTAS
Before Analysis

Results for: 34A CA SAN LUIS OBISPO BLCDT 20070222AAX LIC
HAAT 453.0 m, ATV ERP 80.4 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	377607	21099.1
not affected by terrain losses	365772	18757.2
lost to NTSC IX	2012	111.6
lost to additional IX by ATV	15	303.8
lost to ATV IX only	15	345.7
lost to all IX	2027	415.4

Potential Interfering Stations Included in above Scenario 1

34N CA LOS ANGELES	BLCT	20030313AHD	LIC
34A CA FRESNO	BLCDT	20030702ABJ	LIC

After Analysis

Results for: 34A CA SAN LUIS OBISPO BLCDT 20070222AAX LIC
HAAT 453.0 m, ATV ERP 80.4 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	377607	21099.1
not affected by terrain losses	365772	18757.2
lost to NTSC IX	2012	111.6
lost to additional IX by ATV	805	451.2
lost to ATV IX only	805	505.0
lost to all IX	2817	562.8

Potential Interfering Stations Included in above Scenario 1

34N CA LOS ANGELES	BLCT	20030313AHD	LIC
34A CA FRESNO	BLCDT	20030702ABJ	LIC
35A CA SANTA MARIA	USERRECORD01		APP

Percent new IX = 0.2960%
Worst case new IX 0.2960% Scenario 1

Analysis of Interference to Affected Station 10

Analysis of current record

Channel	Call	City/State	Application Ref. No.
34	KADE-DT	SAN LUIS OBISPO CA	DTVPLN -DTVP0926

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
33	KBAK-TV	BAKERSFIELD CA	187.4	LIC	BLCDT -20060628ABK
33	KBAK-DT	BAKERSFIELD CA	187.4	PLN	DTVPLN -DTVP0892
33	KTAS	SAN LUIS OBISPO CA	0.0	LIC	BLCT -19900416KF
34	KGPE	FRESNO CA	219.8	LIC	BLCDT -20030702ABJ
34	KJEO-TV	FRESNO CA	219.8	LIC	BPRM -20000803AAD
34	KMEX-TV	LOS ANGELES CA	267.8	LIC	BLCT -20030313AHD
34	KFSF-TV	VALLEJO CA	310.7	LIC	BLCDT -20030620ABV
34	KPST-DT	VALLEJO CA	310.7	PLN	DTVPLN -DTVP0927
35	KCBA	SALINAS CA	172.7	LIC	BLCT -19811022KE
35	K35ER	SANTA MARIA CA	65.8	APP	USERRECORD-01

Total scenarios = 4

Result key: 5
Scenario 1 Affected station 10 KADE-DT
Before Analysis

Figure 2
Sheet 5 of 6

```
Results for: 34A CA SAN LUIS OBISPO      DTVPLN      DTVP0926      PLN
HAAT  440.0 m, ATV ERP    50.0 kW

      POPULATION      AREA (sq km)
within Noise Limited Contour      269470      7010.6
not affected by terrain losses      266897      6591.4
lost to NTSC IX                    13          25.9
lost to additional IX by ATV        64          31.9
lost to ATV IX only                 64          42.8
lost to all IX                      77          57.8
```

Potential Interfering Stations Included in above Scenario 1

```
34N CA LOS ANGELES      BLCT      20030313AHD      LIC
34A CA FRESNO           BLCDT      20030702ABJ      LIC
```

After Analysis

```
Results for: 34A CA SAN LUIS OBISPO      DTVPLN      DTVP0926      PLN
HAAT  440.0 m, ATV ERP    50.0 kW

      POPULATION      AREA (sq km)
within Noise Limited Contour      269470      7010.6
not affected by terrain losses      266897      6591.4
lost to NTSC IX                    13          25.9
lost to additional IX by ATV        1195         84.6
lost to ATV IX only                 1195        101.6
lost to all IX                      1208        110.5
```

Potential Interfering Stations Included in above Scenario 1

```
34N CA LOS ANGELES      BLCT      20030313AHD      LIC
34A CA FRESNO           BLCDT      20030702ABJ      LIC
35A CA SANTA MARIA      USERRECORD01      APP
```

```
Percent new IX =      0.4238%
Worst case new IX      0.4238% Scenario      1
```

#####

Analysis of Interference to Affected Station 34

Analysis of current record

```
Channel      Call      City/State      Application Ref. No.
35           K35ER      SANTA MARIA CA      USERRECORD-01
```

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
34	KTAS	SAN LUIS OBISPO CA	65.8	LIC	BLCDT -20070222AAX
34	KADE-DT	SAN LUIS OBISPO CA	65.8	PLN	DTVPLN -DTV0926
35	K35IW-D	BAKERSFIELD CA	156.8	CP	BDCCDTL -20061030AQU
35	K35IW-D	BAKERSFIELD CA	156.8	APP	BMPDTL -20070914ABF
35	KRMV-LP	BANNING CA	323.9	APP	BDISDTL -20060901AAT
35	KRVD-LP	BANNING CA	323.9	APP	BDISDTL -20080312ADG
35	KMEX-TV	LOS ANGELES CA	208.3	LIC	BLCDT -20021118ACF
35	KMEX-DT	LOS ANGELES CA	208.4	PLN	DTVPLN -DTV0964
35	NEW	PALM SPRINGS CA	383.8	APP	BDCCDTL -20070420ABK
35	NEW	PALM SPRINGS CA	363.2	APP	BSFDTL -20060630ATQ
35	K35HO-D	RIDGECREST CA	236.1	LIC	BLDTT -20080401AUL
35	KCRA-DT	SACRAMENTO CA	390.5	PLN	DTVPLN -DTV0965
35	KCBA	SALINAS CA	236.9	LIC	BLCT -19811022KE
35	KMCF-LP	VISALIA CA	195.6	LIC	BLTTL -20030303ACQ
36	KBFK-LP	BAKERSFIELD CA	143.8	CP	BDFCDTL -20081215ABE

Total scenarios = 2

```
Result key:      9
Scenario      1 Affected station      34 K35ER
Before Analysis
```

Figure 2
Sheet 6 of 6

```
Results for: 35A CA SANTA MARIA      USERRECORD01      APP
HAAT  584.0 m, ATV ERP    0.7 kW

      POPULATION      AREA (sq km)
within Noise Limited Contour      218101      4748.0
not affected by terrain losses      203364      4110.9
lost to NTSC IX                    2567         89.8
lost to additional IX by ATV        2613         26.3
lost to ATV IX only                 3739         44.9
lost to all IX                      5180        116.1
```

Potential Interfering Stations Included in above Scenario 1

```
35N CA SALINAS          BLCT      19811022KE      LIC
35N CA VISALIA          BLTTL      20030303ACQ      LIC
34A CA SAN LUIS OBISPO  BLCDT      20070222AAX      LIC
35A CA LOS ANGELES      BLCDT      20021118ACF      LIC
```

```
Result key:      10
Scenario      2 Affected station      34 K35ER
Before Analysis
```

```
Results for: 35A CA SANTA MARIA      USERRECORD01      APP
HAAT  584.0 m, ATV ERP    0.7 kW

      POPULATION      AREA (sq km)
within Noise Limited Contour      218101      4748.0
not affected by terrain losses      203364      4110.9
lost to NTSC IX                    2567         89.8
lost to additional IX by ATV        1059         21.5
lost to ATV IX only                 2185         40.0
lost to all IX                      3626        111.2
```

Potential Interfering Stations Included in above Scenario 2

```
35N CA SALINAS          BLCT      19811022KE      LIC
35N CA VISALIA          BLTTL      20030303ACQ      LIC
34A CA SAN LUIS OBISPO  DTVPLN      DTVP0926      PLN
35A CA LOS ANGELES      BLCDT      20021118ACF      LIC
```

#####

FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED

Figure 3
Sheet 1 of 6

Census data selected: 2000
Post DTV Transition Database Selected

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 12-15-2008 Time: 10:58:58
Record Selected for Analysis

K35ER USERRECORD-01 SANTA MARIA CA US
Channel 35 ERP 1.75 kW HAAT 584. m RCAMSL 01020 m STRINGENT MASK
Latitude 034-54-37 Longitude 0120-11-09
Status APP Zone 2 Border
Dir Antenna Make CDB Model 00000000018180 Beam tilt N Ref Azimuth 270.
Last update Cutoff date Docket
Comments
Applicant

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

Not full service station
Facility meets maximum power limit

Azimuth (Deg)	ERP (kW)	HAAT (m)	51.0 dBu F(50,90) (km)
0.0	0.191	546.3	39.0
45.0	0.075	323.0	27.4
90.0	0.109	504.9	34.5
135.0	0.075	534.0	33.0
180.0	0.191	721.5	41.8
225.0	1.750	749.5	56.4
270.0	1.750	769.8	56.8
315.0	1.750	522.3	52.1

Contour Overlap to Proposed Station

Station			
KTAS	34 SAN LUIS OBISPO	CA BLCDDT20070222AAX	causes

Contour overlap to Digital LPTV station
K35ER 35 SANTA MARIA CA USERRECORD01

Station			
KRCA	35 RIVERSIDE	CA BPCDDT20080620AIN	causes

Contour overlap to Digital LPTV station
K35ER 35 SANTA MARIA CA USERRECORD01

Station			
KRCA-DR	35 RIVERSIDE	CA BPRM20080204ADC	causes

Contour overlap to Digital LPTV station
K35ER 35 SANTA MARIA CA USERRECORD01

Station			
K35ER	35 SANTA MARIA	CA BSTA20071221AAD	

Station inside contour of Digital LPTV station
K35ER 35 SANTA MARIA CA USERRECORD01

Station			
K35ER	35 SANTA MARIA	CA BLTTL19980902JD	

Station inside contour of Digital LPTV station
K35ER 35 SANTA MARIA CA USERRECORD01

Figure 3
Sheet 2 of 6

Station			
KMCF-LP	35 VISALIA	CA BLTTL20030303ACQ	causes

Contour overlap to Digital LPTV station
K35ER 35 SANTA MARIA CA USERRECORD01

Contour Overlap Evaluation to Proposed Station Complete

Proposed facility OK to FCC Monitoring Stations
Proposed facility OK toward West Virginia quiet zone
Proposed facility OK toward Table Mountain
Proposed facility is beyond the Canadian coordination distance
Proposed facility is beyond the Mexican coordination distance
Proposed station is OK toward AM broadcast stations

Start of Interference Analysis

Channel	Call	Proposed Station City/State	ARN
35	K35ER	SANTA MARIA CA	USERRECORD01

Stations Potentially Affected by Proposed Station

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20	KSSY-LP	ARROYO GRANDE CA	0.0	LIC	BLTTL	-20080208AAB
34	NEW	BAKERSFIELD CA	133.5	APP	BNPTTL	-20000831AWI
34	KVPT-LP	BAKERSFIELD CA	143.8	LIC	BLTT	-20070223ABA
34	KTAS	SAN LUIS OBISPO CA	65.8	LIC	BLCDDT	-20070222AAX
34	KTAS	SAN LUIS OBISPO CA	65.8	PLN	DTVPLN	-DTVPL1241
35	K35IW-D	BAKERSFIELD CA	156.8	APP	BMPDDL	-20070914ABF
35	K35IW-D	BAKERSFIELD CA	156.8	CP	BDCCDDL	-20061030AQU
35	KRVD-LP	BANNING CA	323.9	APP	BDISDDL	-20080312ADG
35	KRMV-LP	BANNING CA	323.9	APP	BDISDDL	-20060901AAT
35	K35BQ	DAGGETT, ETC. CA	299.9	LIC	BLTT	-19880307IA
35	K35DG	LA JOLLA CA	355.5	APP	BDFCDTA	-20060802ASH
35	K35DG	LA JOLLA CA	355.5	APP	BSTA	-20060531AHV
35	K35DG	LA JOLLA CA	355.5	LIC	BLTTA	-20060621AAL
35	NEW	PALM SPRINGS CA	383.8	APP	BDCCDDL	-20070420ABK
35	NEW	PALM SPRINGS CA	363.2	APP	BSFDDL	-20060630ATQ
35	K35HO-D	RIDGECREST CA	236.1	LIC	BLDTT	-20080401AUL
35	K35HO-D	RIDGECREST, ETC. CA	236.0	CP	BPTT	-20041201BZX
35	KRCA	RIVERSIDE CA	209.3	APP	BPCDDT	-20080620AIN
35	KRCA-DR	RIVERSIDE CA	209.3	APP	BPRM	-20080204ADC
35	KCRA-TV	SACRAMENTO CA	390.6	CP	BPCDDT	-20080208AEM
35	KCRA-TV	SACRAMENTO CA	390.6	PLN	DTVPLN	-DTVPL1280
35	KCRA-TV	SACRAMENTO CA	389.0	LIC	BLCDDT	-20040122ADR
35	KMCF-LP	VISALIA CA	195.6	LIC	BLTTL	-20030303ACQ
36	KBFK-LP	BAKERSFIELD CA	143.8	LIC	BLTTL	-20040219ACE
36	KJCN-LP	PASO ROBLES CA	137.3	CP	BPTTL	-20070918ACL
36	KJCN-LP	PASO ROBLES CA	65.8	LIC	BLTTL	-19870602IA
36	KNXT-LP	BAKERSFIELD CA	143.8	LIC	BLTTL	-20070524ADC
38	KPAL-LP	PALMDALE CA	184.5	LIC	BLTTL	-19900723II
38	KPAL-LP	PALMDALE CA	184.4	STA	BSTA	-20060104ACS
38	KPAL-LP	PALMDALE CA	184.4	STA	BSTA	-20050922AFW
38	KSKJ-CA	VAN NUYS CA	171.6	LIC	BLTTA	-20040625AAS
39	KABE-LP	BAKERSFIELD CA	156.8	STA	BSTA	-20041105BDJ
39	KABE-LP	BAKERSFIELD CA	156.8	LIC	BLTTL	-20071231AFG
42	KZKC-LP	BAKERSFIELD CA	143.8	LIC	BLTTL	-20050428AAC
42	KSCZ-LP	COALINGA CA	156.3	LIC	BLTT	-19950912IC
42	KSBO-CA	SAN LUIS OBISPO CA	65.8	LIC	BLTTL	-19980902JA
43	KPMC-LP	BAKERSFIELD CA	143.8	LIC	BLTTL	-20080418AAF
43	KTSB-LP	SANTA BARBARA CA	67.9	LIC	BLTTL	-19970620JD

Figure 3
Sheet 3 of 6

DTV Baseline Analysis

Channel	Call	City/State	Application Ref. No.
34	KTAS	SAN LUIS OBISPO CA	DTVPLN -DTVPl241

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
33	KBAK-TV	BAKERSFIELD CA	187.4	PLN	DTVPLN -DTVPl208
34	KGPE	FRESNO CA	219.8	PLN	DTVPLN -DTVPl239
34	KMEX-TV	LOS ANGELES CA	267.8	PLN	DTVPLN -DTVPl240
34	KFSF-TV	VALLEJO CA	310.7	PLN	DTVPLN -DTVPl242

Results for: 34A CA SAN LUIS OBISPO DTVPLN DTVPl241 PLN

HAAT 441.0 m, ATV ERP 82.0 kW	
	POPULATION AREA (sq km)
within Noise Limited Contour	425142 21033.5
not affected by terrain losses	412797 18684.6
lost to NTSC IX	0 0.0
lost to additional IX by ATV	1140 363.6
lost to ATV IX only	1140 363.6
lost to all IX	1140 363.6

Analysis of current record

Channel	Call	City/State	Application Ref. No.
34	KTAS	SAN LUIS OBISPO CA	BLCDDT -20070222AAX

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
33	KBAK-TV	BAKERSFIELD CA	187.4	LIC	BLCDDT -20060628ABK
33	KBAK-TV	BAKERSFIELD CA	187.4	PLN	DTVPLN -DTVPl208
34	KGPE	FRESNO CA	219.8	LIC	BLCDDT -20030702ABJ
34	KGPE	FRESNO CA	219.8	PLN	DTVPLN -DTVPl239
34	KMEX-TV	LOS ANGELES CA	267.8	PLN	DTVPLN -DTVPl240
34	KMEX-TV	LOS ANGELES CA	267.8	APP	BMPCDDT -20080620AGO
34	KMEX-TV	LOS ANGELES CA	267.8	CP	BPCDDT -20080228ABI
34	KFSF-TV	VALLEJO CA	310.7	LIC	BLCDDT -20030620ABV
34	KFSF-TV	VALLEJO CA	310.7	PLN	DTVPLN -DTVPl242
34	KFSF-TV	VALLEJO CA	310.7	APP	BPCDDT -20081031AAE
35	K35ER	SANTA MARIA CA	65.8	APP	USERRECORD-01

Total scenarios = 10

Result key: 5
Scenario 5 Affected station 4 KTAS
Before Analysis

Results for: 34A CA SAN LUIS OBISPO BLCDDT 20070222AAX LIC

HAAT 453.0 m, ATV ERP 80.4 kW	
	POPULATION AREA (sq km)
within Noise Limited Contour	425149 21102.1
not affected by terrain losses	412196 18743.2
lost to NTSC IX	0 0.0
lost to additional IX by ATV	163 372.6
lost to ATV IX only	163 372.6
lost to all IX	163 372.6

Potential Interfering Stations Included in above Scenario 5

34A CA FRESNO	BLCDDT	20030702ABJ	LIC
34A CA LOS ANGELES	DTVPLN	DTVPl240	PLN
34A CA VALLEJO	BPCDDT	20081031AAE	APP

After Analysis

Results for: 34A CA SAN LUIS OBISPO BLCDDT 20070222AAX LIC

HAAT 453.0 m, ATV ERP 80.4 kW	
	POPULATION AREA (sq km)

Figure 3
Sheet 4 of 6

within Noise Limited Contour	425149	21102.1
not affected by terrain losses	412196	18743.2
lost to NTSC IX	0	0.0
lost to additional IX by ATV	2136	642.5
lost to ATV IX only	2136	642.5
lost to all IX	2136	642.5

Potential Interfering Stations Included in above Scenario 5

34A CA FRESNO	BLCDDT	20030702ABJ	LIC
34A CA LOS ANGELES	DTVPLN	DTVPl240	PLN
34A CA VALLEJO	BPCDDT	20081031AAE	APP
35A CA SANTA MARIA	USERRECORD01		APP

Percent new IX = 0.4793%
Worst case new IX 0.4793% Scenario 5

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Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application Ref. No.
34	KTAS	SAN LUIS OBISPO CA	DTVPLN -DTVPl241

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
33	KBAK-TV	BAKERSFIELD CA	187.4	LIC	BLCDDT -20060628ABK
33	KBAK-TV	BAKERSFIELD CA	187.4	PLN	DTVPLN -DTVPl208
34	KGPE	FRESNO CA	219.8	LIC	BLCDDT -20030702ABJ
34	KGPE	FRESNO CA	219.8	PLN	DTVPLN -DTVPl239
34	KMEX-TV	LOS ANGELES CA	267.8	PLN	DTVPLN -DTVPl240
34	KMEX-TV	LOS ANGELES CA	267.8	APP	BMPCDDT -20080620AGO
34	KMEX-TV	LOS ANGELES CA	267.8	CP	BPCDDT -20080228ABI
34	KFSF-TV	VALLEJO CA	310.7	LIC	BLCDDT -20030620ABV
34	KFSF-TV	VALLEJO CA	310.7	PLN	DTVPLN -DTVPl242
34	KFSF-TV	VALLEJO CA	310.7	APP	BPCDDT -20081031AAE
35	K35ER	SANTA MARIA CA	65.8	APP	USERRECORD-01

Total scenarios = 10

Result key: 15
Scenario 5 Affected station 5 KTAS
Before Analysis

Results for: 34A CA SAN LUIS OBISPO DTVPLN DTVPl241 PLN

HAAT 441.0 m, ATV ERP 82.0 kW	
	POPULATION AREA (sq km)
within Noise Limited Contour	425142 21033.5
not affected by terrain losses	412797 18684.6
lost to NTSC IX	0 0.0
lost to additional IX by ATV	1148 371.6
lost to ATV IX only	1148 371.6
lost to all IX	1148 371.6

Potential Interfering Stations Included in above Scenario 5

34A CA FRESNO	BLCDDT	20030702ABJ	LIC
34A CA LOS ANGELES	DTVPLN	DTVPl240	PLN
34A CA VALLEJO	BPCDDT	20081031AAE	APP

After Analysis

Results for: 34A CA SAN LUIS OBISPO DTVPLN DTVPl241 PLN

HAAT 441.0 m, ATV ERP 82.0 kW	
	POPULATION AREA (sq km)
within Noise Limited Contour	425142 21033.5

Figure 3
Sheet 5 of 6

not affected by terrain losses	412797	18684.6
lost to NTSC IX	0	0.0
lost to additional IX by ATV	3202	649.5
lost to ATV IX only	3202	649.5
lost to all IX	3202	649.5

Potential Interfering Stations Included in above Scenario 5

34A CA FRESNO	BLCDDT	20030702ABJ	LIC
34A CA LOS ANGELES	DTVPLN	DTVP1240	PLN
34A CA VALLEJO	BPCDDT	20081031AAE	APP
35A CA SANTA MARIA	USERRECORD01		APP

Percent new IX = 0.4990%
Worst case new IX 0.4990% Scenario 1

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Analysis of Interference to Affected Station 39

Analysis of current record			
Channel	Call	City/State	Application Ref. No.
35	K35ER	SANTA MARIA CA	USERRECORD-01

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
34	KTAS	SAN LUIS OBISPO CA	65.8	LIC	BLCDDT -20070222AAX
34	KTAS	SAN LUIS OBISPO CA	65.8	PLN	DTVPLN -DTVP1241
35	K35IW-D	BAKERSFIELD CA	156.8	APP	BMPDDL -20070914ABF
35	K35IW-D	BAKERSFIELD CA	156.8	CP	BDCCDDL -20061030AQU
35	KRVD-LP	BANNING CA	323.9	APP	BDISDDL -20080312ADG
35	KRMV-LP	BANNING CA	323.9	APP	BDISDDL -20060901AAT
35	K35DG	LA JOLLA CA	355.5	APP	BDFCDDL -20060802ASH
35	NEW	PALM SPRINGS CA	383.8	APP	BDCCDDL -20070420ABK
35	NEW	PALM SPRINGS CA	363.2	APP	BSFDDL -20060630ATQ
35	K35HO-D	RIDGECREST CA	236.1	LIC	BLDTT -20080401AUL
35	KRCA	RIVERSIDE CA	209.3	APP	BPCDDL -20080620AIN
35	KRCA-DR	RIVERSIDE CA	209.3	APP	BPRM -20080204ADC
35	KCRA-TV	SACRAMENTO CA	390.6	CP	BPCDDL -20080208AEM
35	KCRA-TV	SACRAMENTO CA	390.6	PLN	DTVPLN -DTVP1280
35	KCRA-TV	SACRAMENTO CA	389.0	LIC	BLCDDL -20040122ADR
35	KMCF-LP	VISALIA CA	195.6	LIC	BLTTL -20030303ACQ

Total scenarios = 14

Result key: 23
Scenario 3 Affected station 39 K35ER
Before Analysis

Results for: 35A CA SANTA MARIA	USERRECORD01	APP
HAAT 584.0 m, ATV ERP 1.8 kW		
	POPULATION	AREA (sq km)
within Noise Limited Contour	265596	6199.1
not affected by terrain losses	251987	5312.1
lost to NTSC IX	4984	42.9
lost to additional IX by ATV	2136	112.2
lost to ATV IX only	2739	138.6
lost to all IX	7120	155.1

Potential Interfering Stations Included in above Scenario 3

35N CA VISALIA	BLTTL	20030303ACQ	LIC
34A CA SAN LUIS OBISPO	BLCDDT	20070222AAX	LIC
35A CA BAKERSFIELD	BMPDDL	20070914ABF	APP
35A CA RIVERSIDE	BPCDDL	20080620AIN	APP

Result key: 26

Figure 3
Sheet 6 of 6

Scenario 6 Affected station 39 K35ER
Before Analysis

Results for: 35A CA SANTA MARIA	USERRECORD01	APP
HAAT 584.0 m, ATV ERP 1.8 kW		
	POPULATION	AREA (sq km)
within Noise Limited Contour	265596	6199.1
not affected by terrain losses	251987	5312.1
lost to NTSC IX	4984	42.9
lost to additional IX by ATV	2136	112.2
lost to ATV IX only	2739	138.6
lost to all IX	7120	155.1

Potential Interfering Stations Included in above Scenario 6

35N CA VISALIA	BLTTL	20030303ACQ	LIC
34A CA SAN LUIS OBISPO	BLCDDT	20070222AAX	LIC
35A CA BAKERSFIELD	BDCCDDL	20061030AQU	CP
35A CA RIVERSIDE	BPCDDL	20080620AIN	APP

Result key: 29
Scenario 9 Affected station 39 K35ER
Before Analysis

Results for: 35A CA SANTA MARIA	USERRECORD01	APP
HAAT 584.0 m, ATV ERP 1.8 kW		
	POPULATION	AREA (sq km)
within Noise Limited Contour	265596	6199.1
not affected by terrain losses	251987	5312.1
lost to NTSC IX	4984	42.9
lost to additional IX by ATV	2136	111.2
lost to ATV IX only	2739	137.6
lost to all IX	7120	154.2

Potential Interfering Stations Included in above Scenario 9

35N CA VISALIA	BLTTL	20030303ACQ	LIC
34A CA SAN LUIS OBISPO	DTVPLN	DTVP1241	PLN
35A CA BAKERSFIELD	BMPDDL	20070914ABF	APP
35A CA RIVERSIDE	BPCDDL	20080620AIN	APP

Result key: 32
Scenario 12 Affected station 39 K35ER
Before Analysis

Results for: 35A CA SANTA MARIA	USERRECORD01	APP
HAAT 584.0 m, ATV ERP 1.8 kW		
	POPULATION	AREA (sq km)
within Noise Limited Contour	265596	6199.1
not affected by terrain losses	251987	5312.1
lost to NTSC IX	4984	42.9
lost to additional IX by ATV	2136	111.2
lost to ATV IX only	2739	137.6
lost to all IX	7120	154.2

Potential Interfering Stations Included in above Scenario 12

35N CA VISALIA	BLTTL	20030303ACQ	LIC
34A CA SAN LUIS OBISPO	DTVPLN	DTVP1241	PLN
35A CA BAKERSFIELD	BDCCDDL	20061030AQU	CP
35A CA RIVERSIDE	BPCDDL	20080620AIN	APP

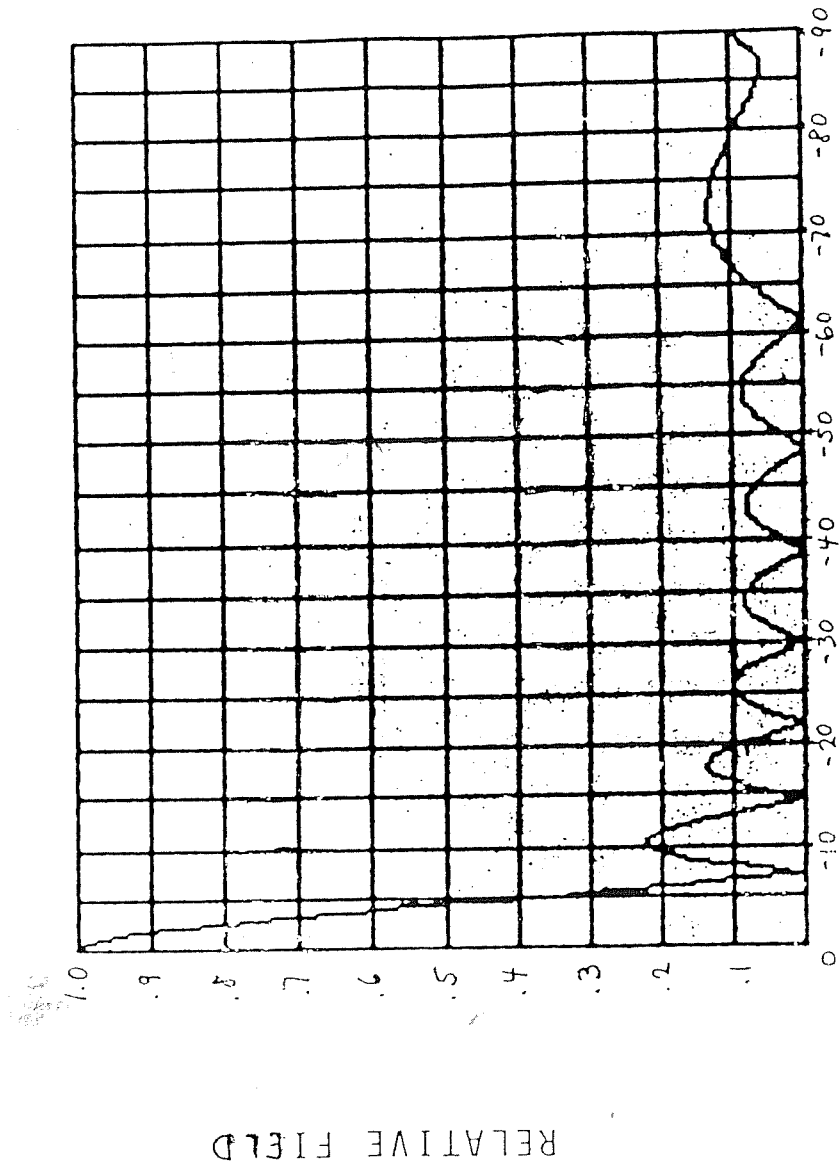
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BOGNER BROADCASTS EQUIPMENT CORP.

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WESTBURY, NEW YORK 11590

BOGNER VERTICAL PLANE RADIATION PATTERN B8U()
LOW & MEDIUM POWER



DEGREES BELOW HORIZONTAL

Figure 4