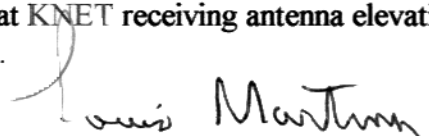


ENGINEERING STATEMENT AND WAIVER REQUEST

1. KBLM-LP Licensee Louis Martinez, an engineer, has prepared and herein files this statement in support of his position that KBLM can, without causing interference, increase its ERP to horizon from 6 Kw to 26.6 Kw, providing the Commission grant his herein requested waiver permitting use of terrain shielding and/or UHF receiving antenna gain pattern variation with angle to evaluate interfering signal effects. That antenna pattern front/back (F/B) ratio, at UHF reaches a maximum of -14 dB as recognized in Appendix A TECHNICAL DATA, FCC 6th DTV Report and Order, and declines with off-axis angle.
2. KBLM is licensed to operate on Channel 25 (plus offset) with 6 Kw ERP to horizon, in the Riverside-Perris area, 90 Km east of Los Angeles. The power increase herein sought will use the presently installed dual Bogner B8UB composite antenna with slightly altered antenna pattern and reduced down tilt. No other changes are proposed.
3. Co-channel stations evaluated in the past by KBLM include: KGTV-DTV in San Diego, K53EL Indio, K25GK Joshua Tree, K24DM Oxnard, K25AD Victorville. All these stations lie beyond intervening high mountains and thus are terrain shielded and, in addition, receiving antenna 14 dB F/B adds additional protection since in all cases KBLM's signal arrives in a direction opposite the desired signal. The 6.5 dB power increase requested herein by KBLM-LP does alter the prior argued conclusion that no interference to aforesaid station will occur, as demonstrated in prior filings herein made a part hereof by this reference.
4. Interference to adjacent channel KVCR-DTV is not a problem because KBLM is effectively collocated with KVCR-DTV and operates at substantially lower power.
5. KBLM-LP has taken special care to protect existing co-channel stations KNET-LP (zero offset) 14.8 Km northwest of Los Angeles and KWJD-LP (minus offset), 25.4 Km Northwest of Los Angeles. Because those two station operate in the Los Angeles city area, all TV receiving antennas in their grade A contour are oriented toward Mt. Wilson, therefore the incoming radiation from KBLM-LP falls in off-axis angles exceeding 33 degrees, at which point the "F/B" ratio attenuation exceeds -7.5 dB. Because of channel offset, the normally required 28 dB protection requiring interfering signals be 46 dBu or less now changes to 53.5 dBu, or less. The attached figure 1 plots KBLM-LP proposed 53.5 dBu (F 50,10) contour and demonstrates it is outside KNET and KWJD grade A contours, thus will not interfere. Secondly, and just as important, figure 2 is a typical profile of terrain between KBLM and KNET (and KWJD) and it shows intervening mountains and hills that block KBLM radiation at KNET receiving antenna elevations, further eliminating the possibility of interference.

Prepared and submitted by:
May 29, 2002,


Louis Martinez/ Engineer and Licensee, KBLM-LP

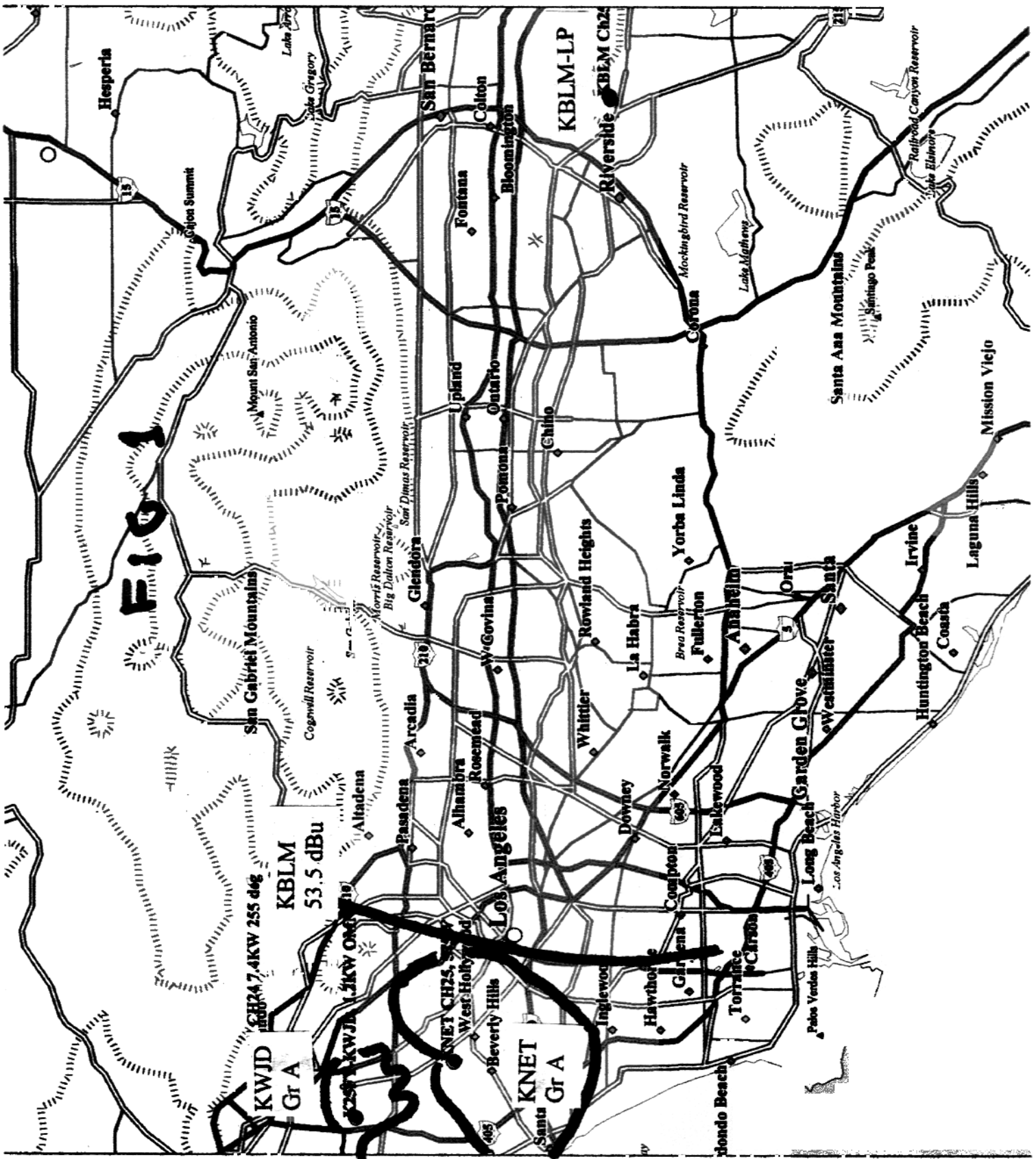
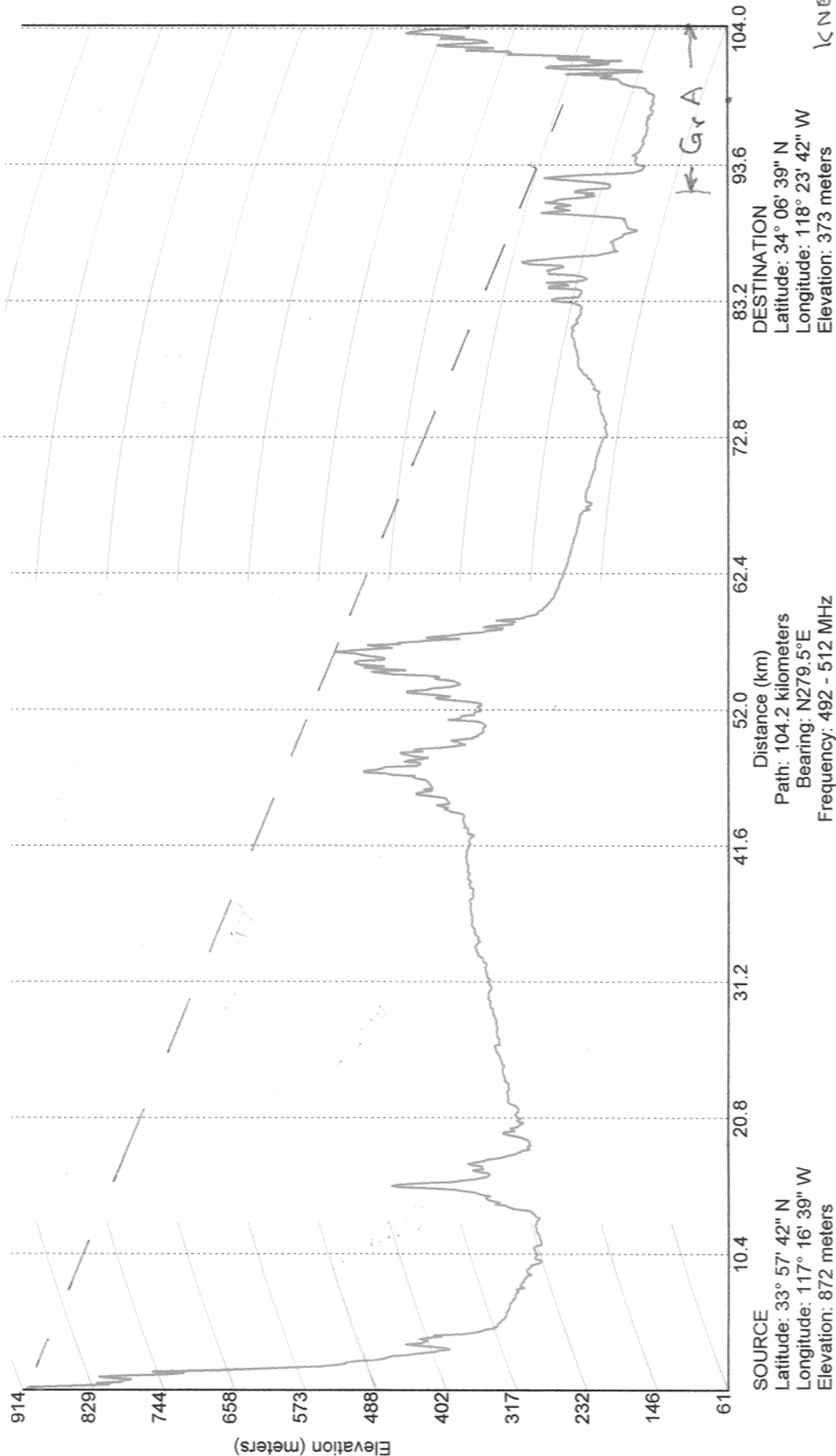


FIG 2

+

+



KNET
441 m
RCAMSL

KBLM
917 m
RCAMSL