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June 6, 2012

Hossein Hashemzadeh  
Associate Chief, Video Division  
Federal Communications Commission  
Washington, D.C. 20554

Re: Response to FCC letter 1800E1-SSA  
Facility ID: 28566  
KFLA-LD, Los Angeles, CA  
BDISDTL-20090629ACM

cc: Lawrence Rogow, Venture Technology Group

Dear Hossein,

The above referenced FCC letter affords the applicant the opportunity to amend its above referenced application to cure two deficiencies. Based on its initial review staff has determined that the application proposes to relocate more than 30 miles from the licensed facility and that there is no contour overlap between the proposed facility and the licensed facility.

I appears that staff did not use the currently licensed facility for its initial review but instead used an old out of core analog facility that was replaced by a digital displacement facility in 2006.

For the record, the analog facility, listed in TV Query as BLTT-2035, was replaced by the an out of core to in core digital displacement facility, not a companion channel facility. Further, irrespective of any other action by the FCC, the analog facility licensed as BLTT-2035 ceased to exist by operation of law on December 1, 2006 when it expired. The license renewal of this facility was granted on 23 August, 2006 and was for the digital facility only.

The currently licensed facility is BLDVL-20071001AAC. The distance from this facility and the facilities sought in the instant application is less than ½ mile (2,601' based on the FCC distance calculation utility).

The contour of the of the proposed facility encompasses nearly all of the contour of the licensed facility. An overlap map showing the contours of the licensed and proposed facilities is attached as Exhibit #1.

In light of what is presented here I respectfully request that staff re-examine it's initial review. If , after it's review, staff still finds the application deficient I hereby request an additional 30 days to amend the existing application.

Finally, I would like to point out that the instant application is an element of a settlement agreement between the licensee and Venture Technology Group. The settlement agreement contemplates the dismissal of the instant application as a part of the settlement.

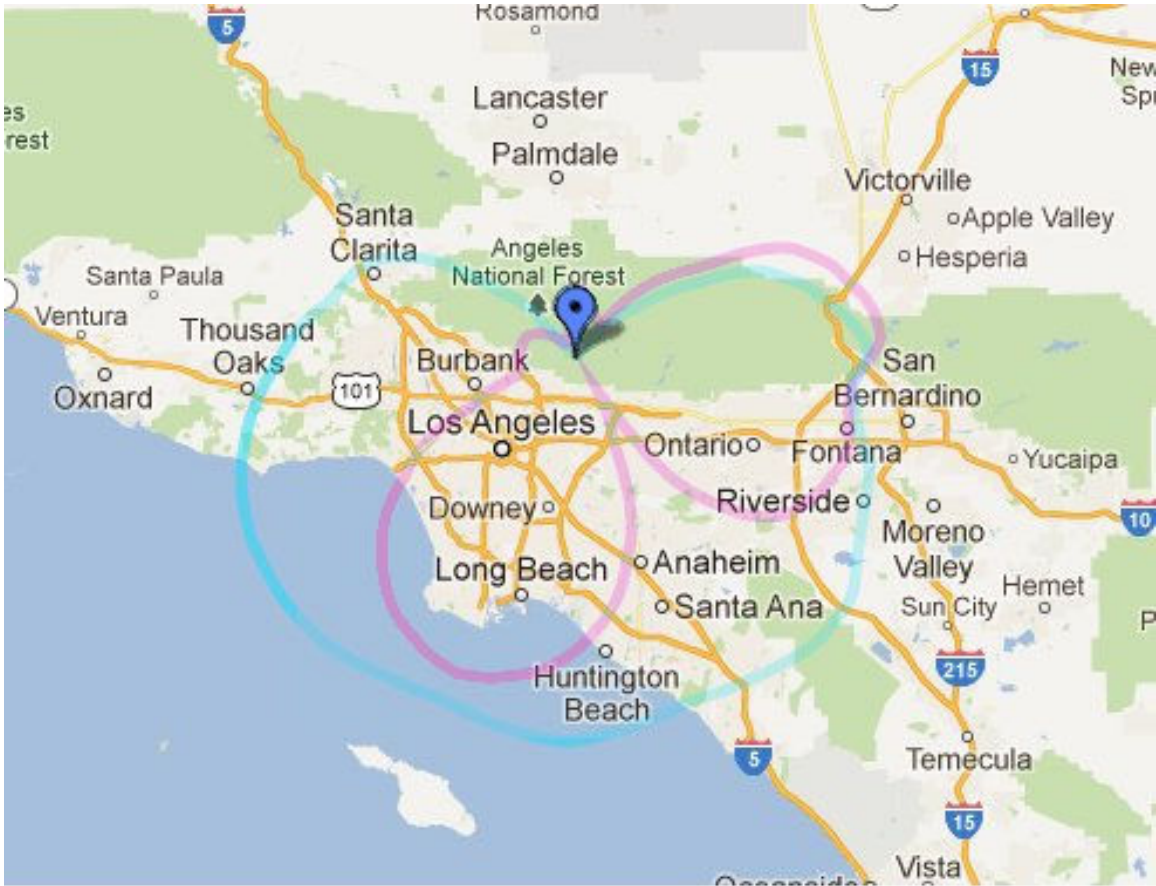
Accordingly, I hereby request that any final disposition of the instant application be stayed until such time as FCC staff can make a final determination of the settlement agreement and related applications currently pending before it.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Roy Mayhugh", written in a cursive style.

Roy William Mayhugh

**Exhibit # 1**  
**Contour Overlap Map**



**Proposed Contour**

**Licensed Contour**