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**COMPREHENSIVE TECHNICAL EXHIBIT
DISPLACEMENT APPLICATION FOR LPTV CONSTRUCTION PERMIT**

**Application to displace to channel 21, Hemet, CA
KDUG-LP, FCC ID 128855 (formerly K51IW)
FCC File Number BNPTTL-20000831BJZ
Louis Martinez Family Group, LLC**

Displacement application. This application seeks displacement relief because of proximity to co-channel full power station KXLA-DT, operating on Channel 51 at Ranchos Palos Verdes, CA.. KXLA-DT filed an objection to the initial application for construction permit for KDUG-LP, claiming that KDUG-LP would interfere with over-the-air reception of KXLA-DT by cable system headends. In a settlement agreement that was filed with the Commission, Louis Martinez Family Group, LLC, agreed to seek displacement relief.

KDUG-LP is presumptively entitled to displacement relief under Section 73.3572(a)(4)(iv)(A)(I) of the Rules, because the KDUG-LP and KXLA-DT transmitter sites are only 112 km apart, far less than the 265 km. specified in the rule.

Displacement relief is sought to allow KDUG-LP to change its output channel to 21. A change of antenna to a Scala array is requested. No increase in effective radiated power or change of location is requested.

Interference analysis. The following is submitted as an OET 69 Longley-Rice study exhibit for the above-captioned application.

a. The stations which exhibit contour overlap and thus must be studied are:

FCC FILE NUMBER	CALLSIGN AND LOCATION
BPCDT-20000427ABZ	KPMR-DT CP, Santa Barbara, CA
BLTT-20050516AUD	K21GI, Morongo Valley, CA
BLCT-19940317KM	KWHY-TV, Los Angeles, CA

b. All listed stations receive interference from the within proposal of less than 0.5%.

c. Accordingly, waiver of §§74.705, 74.706, and 74.707 as appropriate is requested.

Mexican border area statement. The within proposal is located within 320 km of the Mexican Border. UHFTV LPTV proposals in this region require coordination with the Mexican government if their effective radiated power is 10 kW or above. The ERP of the within proposal is 5 kW, so coordination is not required.

J. R. McDonald
12/27/2005