

Engineering Statement and Interference Analysis

Venture Technologies Group, LLC (“VTG”) is the licensee of low power television station KRMV-LP on channel 45 in Walnut, California, Facility ID 129618, FCC File No. BLTTL-20070130AJO. VTG applied for displacement relief for KRMV-LP and was granted a construction permit on digital channel 40 pursuant to BDISDTL- 20080310AEA (“KRMV-LD”).

However, further engineering studies revealed that the authorized facility of KRMV-LD is within 143.9 km of the licensed facility of KNSD-TV on channel 40 in San Diego, CA, Facility ID 35277. KRMV-LD is therefore displaced and hereby requests to move to digital channel 45 in Walnut, California (“Proposed Facility”).

Amendment

This amendment is submitted to correct the interference caused to other authorized facilities. The Proposed Facility on channel 45 was studied using the Techware’s tv_process_2010 software on a Sun Blade 1500 using the post transition data and the 2000 US Census. It will use a Stringent Out-of-Channel Emission Mask. The Proposed Facility was studied with nonstandard parameters in order to provide greater specificity and accuracy of propagation. The Cell Size for Service Analysis is 0.5 km per side. The Distance Increments for Longley-Rice Analysis is 0.2 km.

To the degree it is deemed necessary, VTG requests a waiver of Section 74.705, 74.706, 74.707, 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h), 74.794(b), 73.1030 and other applicable parts of the Rules and Regulations of the Federal Communications Commission in order to allow for the grant of this instant application.

Digital TV Station Protection

Other than reference below, the Proposed facility causes less than 0.5% interference to surrounding digital authorized facilities (i.e., “*de minimis*”). It is believed that the Proposed Facility is in compliance with the spirit and intent of the FCC’s interference standards. In the event that any additional full service station facilities are authorized to which the Proposed Facility would cause more than 0.5% new interference, including BMPCDT-20090601AAG for KHIZ, Channel 44, Barstow, CA, Facility ID 63865, VTG will remedy the Proposed Facility.

Class A, Low Power TV and TV Translator Station Protection

Other than reference below, the Proposed Facility causes less than 0.5% interference to surrounding low power and Class A authorized facilities (i.e., “*de minimis*”). It is believed that the Proposed Facility is in compliance with the spirit and intent of the FCC’s interference standards.

1. The Proposed Facility is predicted to cause a worst case of 29.7% interference per Scenario 1 to VTG’s licensed facility of KRMV-LP on channel 45, FCC File No. BLTTL-20070130AJO. VTG hereby accepts the interference.

2. The Proposed Facility is predicted to cause a worst case of 92.8% interference per Scenario 1 to BDISDTL-20100929ADX, an analog to digital displacement application for KVTU-LP, Channel 45, Los Angeles, CA, Facility ID 130176. However, the Proposed Facility of VTG is a digital to digital displacement application and therefore takes precedence over this analog to digital application proposed by KVTU-LP. In addition, KVTU-LP filed a minor modification (BMPTVL-20101004AAM) five days after the filing of their analog to digital displacement application. The minor modification application filed subsequently takes precedence over the previously filed analog to digital displacement application.
3. The Proposed Facility is predicted to cause a worst case of 46.4% interference per Scenario 44 to KRMV-LP's digital flash cut application BDFCDTL-20060330ANP. However, this application was dismissed in December 2007.
4. The Proposed Facility is predicted to cause a worst case of 18.4% interference per Scenario 237 to BPTTL-20021016AAZ, a minor change application for KHTV-LP, Channel 45, Inland Empire, CA, Facility ID 60026. However, this application was dismissed in January, 2006.
5. The Proposed Facility is predicted to cause a worst case of 81.9% interference per Scenario 1 to BDISDTL-20090709AAW, a digital displacement application for KLAU-LD, Channel 45, Redlands, CA, Facility ID 21511. However, this application was dismissed in October, 2010.
6. The Proposed Facility is predicted to cause a worst case of 0.44% interference per Scenario 1 to BLDTA-20100309ACE, a license application for KSKJ-CD, Channel 45, Van Nuys, Facility ID 36717, which is "*de minimis*" and therefore is in compliance with the spirit and intent of the FCC's interference standards.