

Engineering Statement and Interference Analysis

This technical statement supports this application to make changes in KRPE-LP on channel 6 in Banning, CA, FCC File No. BLTVL-20090819AHG, Facility ID 129651 ("KRPE"), licensed to Venture Technologies Group, LLC ("VTG").

The proposed facility was studied using the Techware's tv_process_2010 software on a Sun Blade 1500 using the post transition database and the 2000 US Census. VTG requests that the Commission processes this instant application using the following Longley-Rice analysis settings:

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

It is believed that the proposed facility complies with the requirements of 47.C.F.R Sections 74.705, 74.706, 74.707, 74.708, 74.709, 74.710 and other applicable parts of the Rules and Regulations of the Federal Communications Commission. However, to the degree that it is deemed necessary, the Applicant requests a waiver of these other applicable Commission rules in order to allow for the grant of this instant application.

Mexican Concurrence Not Required

The proposed facility is within the Mexican coordination distance. The distance to the border is 159.2 km, however because the proposed facility is not more than 1 kW ERP and is less than 500 m HAAT (It is 495.8 m HAAT), Mexican concurrence is not required.

Digital TV Station Protection

The proposed facility causes less than 0.5% interference to surrounding digital authorized facilities (i.e., "*de minimis*"). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC's interference standards.

Class A, Low Power TV and TV Translator Station Protection

Except for those referenced below, the proposed facility causes less than 0.5% interference to surrounding Class A and low power authorized facilities (i.e., "*de minimis*"). It is believed that the proposed operation is in compliance with the spirit and intent of the FCC's interference standards.

The proposed facility of KRPE is predicted to receive more than de minimums interference from the followings:

1. BDFCDVL-20090608ABK, a digital flash cut application for KCIO-LP, Channel 6, Ontario, CA, Facility ID 11529, licensed to Obidia Porras. The worst case interference is 38.2732% in Scenario 1. However, this application was dismissed on August 4, 2010.
2. BLTVL-20041104AKL, the licensed facility of KSFV-CA, Channel 6, Los Angeles, Facility ID 49704, licensed to VTG. The worst case interference is 32.7177% in

Scenario 1. As the licensee of KSFV-CA, VTG consents to accept any predicted interference caused by the proposed facility of KPRE-LP.

3. BPTVA-20090630AFD, a minor change to the licensed facility of KSFV-CA, Channel 6, Los Angeles, CA, Facility ID 49704, licensed to VTG. The worst case interference is 7.9208% in Scenario 1. As the licensee of KSFV-CA, VTG consents to accept any predicted interference caused by the proposed facility of KPRE-LP.
4. BDCCDVL-20061030ASV, a digital companion channel application for KFSV-LD, Channel 6, Los Angeles, CA, Facility ID 167306, licensed to VTG. The worst case interference is 3.2267% in Scenario 7. As the Applicant of KSFV-LD and the licensee of KSFV-LD's paired analog facility KSFV-CA, VTG consents to accept any predicted interference caused by the proposed facility of KPRE-LP.