

## **ENGINEERING EXHIBIT**

### **Application for Class A License Conversion of Digital Companion Facility**

prepared for

#### **Caballero Acquisition Inc.**

KQMM-LD Santa Maria, CA

Facility ID 167844

Ch. 29 (digital) 15 kW

*Caballero Acquisition Inc. ("CAI")* is the licensee of Class A Television station KQMM-CA, analog Channel 14, Santa Maria, CA, Facility ID 18748 (BLTTA-20040728AIN) and of the digital companion facility KQMM-LD, digital Channel 29, Facility ID 167844 (BLDTL-20080423AEG). Pursuant to the procedures adopted in FCC 11-110,<sup>1</sup> *CAI* herein proposes to transfer the Class A primary status from the analog channel to the licensed digital companion channel. This statement supports the associated FCC Form 302-CA License Application.

FCC 11-110 requires that licensees seeking to transfer Class A primary status certify that the subject digital companion channel facility meets all Class A interference protection requirements. In support, a detailed interference study per OET Bulletin 69<sup>2</sup> shows that the proposal complies with the Commission's interference protection requirements toward all DTV, television translator, LPTV, and Class A stations. The results are summarized in Table 1 and show that any interference attributable to KQMM-LD does not exceed the Commission's interference limits (0.5 percent to full power and Class A stations, and 2.0 percent to secondary stations).

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<sup>1</sup>"Amendment of Parts 73 and 74 of the Commission's Rules to Establish Rules for Digital Low Power Television, Television Translator, and Television Booster Stations and to Amend Rules for Digital Class A Television Stations" MB Docket 03-185, Second Report and Order, FCC 11-110, released July 15, 2011.

<sup>2</sup>FCC Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004 ("OET-69"). The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A cell size of 1 km was employed. Comparisons of various results of this computer program (run on a Sun Sparc processor) to the Commission's implementation of OET-69 show excellent correlation.

The undersigned hereby certifies that the foregoing statement and associated attachments were prepared by him or under his direction, and that they are true and correct to the best of his knowledge and belief.



Joseph M. Davis, P.E.  
August 18, 2011

**Chesapeake RF Consultants, LLC**  
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Yorktown, VA 23692  
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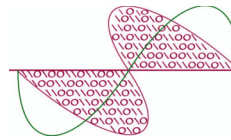
List of Attachments

Table 1      Interference Analysis Results Summary

Table 1

**Interference Analysis Results Summary**

prepared for

**Caballero Acquisition Inc.****KQMM-LD Santa Maria, CA****Chesapeake RF Consultants, LLC**Radiofrequency Consulting Engineers  
Digital Television and Radio

KQMM-LD BLDTL -20080423AEG SANTA MARIA CA US  
 Channel 29 ERP 15. kW HAAT 752 m RCAMSL 01003 m STRINGENT MASK  
 Latitude 034-54-36 Longitude 0120-11-10  
 Dir Antenna Make CDB Model 00000000020484 Beam tilt Y Ref Azimuth 270.0

Ch.	Call	City/State	Dist	Status	Application Ref. No.	---Population (2000 Census)----	
			(km)			Baseline	New Interference
14	KQMM-CA	SANTA MARIA CA	0.0	LIC	BLTTA-20040728AIN	---	none
15	K15DB	SANTA BARBARA CA	67.8	LIC	BLTT-19990223JA	---	none
22	KPAO-CA	PASO ROBLES CA	95.9	LIC	BLTTA-20060414ABG	---	none
25	KSKP-CA	OXNARD CA	124.4	LIC	BLTTA-20030507ACF	---	none
25	KLFA-LP	SANTA MARIA CA	19.7	LIC	BLTTL-19980714JB	---	none
28	K28FK	SAN LUIS OBISPO CA	65.8	LIC	BLTTL-19980902JB	---	none
28	K28GY-D	SANTA BARBARA, ETC. CA	47.6	LIC	BLDTT-20100429AAB	201,638	0 (0.00%)
28	NEW	SANTA MARIA CA	24.6	APP	BNPDTL-20100420AHT	102,064	158 (0.15%)
29	KBFX-CA	BAKERSFIELD CA	157.0	CP	BDISDTA-20090318ADO	---	none
29	KNLZ-LP	FOREST FALLS CA	323.9	CP MOD	BMP TTL-20060720ABQ	---	none
29	K29AB	MONTEREY, ETC. CA	237.0	CP	BDFCDTT-20090604AAD	---	none
29	K29AB	MONTEREY, ETC. CA	237.0	CP	BDFCDTT-20060829BHB	696,858	220 (0.03%)
29	K29AB	MONTEREY, ETC. CA	237.0	LIC	BLTT-19811124IC	---	none
29	KFTR-DT	ONTARIO CA	208.3	LIC	BLCDDT-20100401AFY	---	none
29	KFTR-DT	ONTARIO CA	208.3	APP	BPCDDT-20100426ACW	---	none
29	NEW	PALM SPRINGS CA	363.2	APP	BNPDTL-20090825BGG	---	none
29	K29HT-D	RIDGECREST, ETC. CA	236.1	CP	BDCCDDT-20061016AAQ	---	none
29	KSDX-LP	SAN DIEGO CA	388.1	LIC	BLTTL-20030404AAF	---	none
29	KPIX-TV	SAN FRANCISCO CA	375.7	LIC	BLCDDT-20091112AIZ	---	none
29	K29GK	TWENTYNINE PALMS, ETC CA	398.5	LIC	BLTT-20060119ADC	---	none
29	KVKV-LP	VICTORVILLE CA	266.4	LIC	BLTTL-20080725ACX	---	none
29	KVKV-LP	VICTORVILLE CA	266.4	CP	BPTTL-20090227ABH	---	none
30	NEW	BAKERSFIELD CA	98.8	APP	BNPDTL-20100514ABT	---	none
30	KPAO-LD	PASO ROBLES CA	95.9	CP	BDCCDDL-20070521AED	---	none
30	NEW	SANTA BARBARA CA	47.6	APP	BNPDTL-20100727ACY	---	none
30	KDFS-CA	SANTA MARIA CA	36.9	LIC	BLTTL-19980618JH	195,983	124 (0.06%)
36	KJCN-LP	PASO ROBLES CA	137.3	CP	BPTTL-20070918ACL	---	none
36	KJCN-LP	PASO ROBLES CA	65.8	LIC	BLTTL-19870602IA	---	none