

Engineering Statement and Interference Analysis

This technical statement supports this amendment to make changes in digital displacement application for KNET-CA on channel 22 in Los Angeles, CA, FCC File No. BDISDTA-20081222ACK, Facility ID 3167.

In this amendment, the Applicant is proposing to modify the ERP to 15 kW, the transmitter output power to 1.8 kW and the antenna orientation to 140 degrees. The proposed channel 22 facility was studied using the Techware's tv_process_dlptv software on a Sun Blade 1500 using the post transition data and the 2000 US Census.

Displacement

KNET-CA requests displacement relief pursuant to Section 73.3572(4)(iii) and 73.3572(4)(iv)(A)(1) of the Rules and Regulations of the Federal Communications Commission which provide for displacement relief to Class A stations within 265 km (162 miles) of co-channel DTV facilities. KNET-CA is displaced by the followings:

1. New interference from KVCR-DT on channel 26 in San Bernardino, CA, Facility ID 58795, FCC File No. BLEDT-20070904AIC, licensed to San Bernardino Community College District. This facility only began broadcasting at its fully authorized digital signal on adjacent channel 26 in 2007.
2. New interference from KBEH-DT, channel 24 in Oxnard, CA, Facility ID 56384, FCC File No. BLCDT 20061229AAK, licensed to Bela TV, LLC. This facility only began broadcasting at its fully authorized digital signal on adjacent channel 24 in December 2006 and it was recently authorized a modification which will cause more interference to KNET-CA.
3. The station is 148 km from KGET-DT, channel 25 in Bakersfield, CA.

Additionally, the Applicant requests a waiver of 47.C.F.R. Sections 73.6016, 73.6017, 73.6018, 73.6019, 73.6020, 73.6027 and 74.794(b) and other applicable parts of the Rules and Regulations of the Federal Communications Commission that is deemed necessary in order to allow for the grant of this instant application.

TV Broadcast Analog System Protection

The proposed operation causes less than 0.5% interference to surrounding analog assignments and allotments (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. If necessary, a waiver of the FCC rules is respectfully requested for this allocation study based on use of the OET-69 procedures.

Digital TV Station Protection

The proposed operation causes less than 0.5% interference to surrounding digital assignments and allotments and 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. If necessary, a waiver of the FCC rules is respectfully requested for this digital allocation study based on use of the OET-69 procedures.

Class A, Low Power TV and TV Translator Station Protection

The proposed operation causes less than 0.5% interference to surrounding low power assignments and allotments (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. If necessary, a waiver of the FCC rules is respectfully requested for this low power allocation study based on use of the OET-69 procedures.