

Engineering Statement and Interference Analysis

This application proposes a digital companion channel facility to be associated with Class A television station KSFV-CA, Facility ID 49704, licensed to the Applicant herein.

The proposed channel 22 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. The Applicant requests that the Commission processes this application using the following Longley-Rice analysis settings:

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

It is believed that the proposed facility complies with 47.C.F.R Sections 73.6016, 73.6017, 73.6018, 73.6019, 73.6020, 73.6027, 74.794(b) 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

Mexican concurrence was granted on April 7, 2011 and approved by the International Bureau on April 18, 2011 for a proposal on the same channel at the same transmitter site with facilities that predicted greater coverage (BDISDTL-20090602ACM for KMRZ-LD). The proposed facility does not increase ERP and signal contour in any direction toward Mexico beyond what was already approved, therefore no further Mexican concurrence is required.

Digital TV Station Protection

The proposed facility 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.

Class A, Low Power TV and TV Translator Station Protection

The proposed facility is predicted to cause interference to construction permit BDISDTL-20120611ABA for KMRZ-LD which is licensed to the Applicant herein. The Applicant hereby accepts such interference.

Except for as referenced above, the proposed facility 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.