

### **Engineering Statement and Interference Analysis**

This technical statement supports this application to modify low power television station KDBK-LP in Caliente, CA, FCC File No. BLTTL-20090306AAE, Facility ID 128238. The applicant is proposing to flash cut from its analog facility on channel 41 to a digital facility on channel 41.

The proposed channel 41 facilities were studied using the Techware's tv\_process\_dlptv software on a Sun Blade 1500. It is believed that the proposed facility complies with the rule sections of 74.709, 74.793(e)-(h), 74.794(b) and 73.1030 and other applicable parts of the Rules and Regulations of the FCC. This instant application is not subject to the June 10, 2009 Public Notice, DA 09-1299, titled COMMISSION SETS "CUT-OFF" DATE OF JUNE 30, 2009 FOR CLASS A, LOW POWER, AND TRANSLATOR APPLICATIONS THAT ARE FILED PRIOR TO THE FULL-SERVICE STATION DIGITAL TRANSITION, because it is grantable under the pre-transition databases.

If the instant flash cut application is granted, the Applicant will promptly surrender KDBK-LP's digital companion channel construction permit K35IW-D on channel 35, FCC File No. BDCCDTL-20061030AQU, Facility ID 167300, granted January 12, 2007.

#### **TV Broadcast Analog System Protection**

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

#### **Digital TV Station Protection**

The proposed operation 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. If necessary, a waiver of the FCC rules is respectfully requested for this digital allocation study based on use of the OET-69 procedures, and all possible variance from FCC rules.

#### **Class A, Low Power TV and TV Translator Station Protection**

The proposed operation 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 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, and all possible variance from FCC rules.