

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

This technical statement supports this application to amend BMPDVL-20110729AFW for KRVD-LD, a digital construction permit on Channel 5 in Banning, CA (Facility ID 128327).

This amendment is submitted pursuant to the FCC letter dated May 2, 2013 that states Mexico has objected to the proposal because of possible interference to XHAQ-TV, see Exhibit 2 attachment. Because of this request for an amendment to protect XHAQ-TV, the Applicant contacted the International Bureau to determine to what degree it needs to limit the proposed contour toward Mexico so that further coordination is not required. The Applicant received instruction to amend application “so that the F(50,90) 43 dBu contour does not extend between 112 degrees and 175 degrees, which is the entire arc from our transmitter site to the entire Mexican border within 400 km of our transmitter site.” Therefore, the Applicant proposes to modify the antenna make, model and orientation to limit its coverage toward Mexico in every direction which makes the proposed facility immediately grantable, see Attachment A.

The proposed channel 5 facility was studied using the Techware’s tv\_process\_2010 software on a Sun Blade 1500 using the 2000 US Census. The Cell Size for Service Analysis used in this application is 1.0 km per side and the Distance Increments for Longley-Rice Analysis used in this application is 1.0 km.

In this instant application, the Applicant proposes to move the transmitter site 27.3 miles which is less than 30 miles from the existing facility. This application for a minor change complies with the current rules as well as the new rules pursuant to the Second Report and Order In the Matter of 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 No. 03-185, released and adopted on July 15, 2011, which becomes effective August 26, 2011. Therefore, this application is instantly grantable.

It is believed that the proposed facility complies with the requirements Sections 74.709, 74.793(e)-(h), 74.794(b), 73.1030 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.

#### **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.

#### **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.

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.