

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

This technical statement supports this amendment to modify BDISDTL-20090821ADM, a digital displacement application on channel 27 for low-power television station KHTV-LP in Los Angeles, CA, Facility ID 60026.

This amendment is filed to cure the interference KVCR-DT, BLEDT-20070904AAIC, Channel 26, San Bernardino, CA. The ERP has been significantly lowered to break mutual exclusivity with all other facilities. The proposed facility on channel 27 was studied using the Techware's tv\_process\_dlptv\_pt software on a Sun Blade 1500 using the post transition data and the 2000 US Census. It is believed that the proposed facility complies with the rule sections of 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 FCC. 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 Displacement Relief**

KHTV-LP has been serving southern California viewers for more than a decade. The station originally went on the air in April 1999 on channel 38, see FCC File No. BLTTL-19990404DJ. In May 2001, KHTV-LP was displaced by KPXN-DT in San Bernardino, CA, Facility ID 58978, and moved to channel 48, see FCC File No. BLTTL-20010507AAM. In May 2003, KHTV-LP was displaced off of channel 48 by the operation of full power digital television station KOCE-DT in Huntington Beach, CA, Facility ID 4328. In October 2004, KHTV-LP began operation on channel 67 pursuant to special temporary authority (see FCC File No. BSTA-20040914AGD).

In 2004, KHTV-LP applied for a digital companion channel on channel 46 in Los Angeles, CA, see FCC File No. BDCCDTL-20061030ARX. That application was dismissed pursuant to FCC letter dated November 11, 2007 (1800E1-MFC). A Petition for Reconsideration was filed on January 7, 2008 and subsequently denied pursuant to FCC letter dated June 4, 2008.

On May 28, 2008, KHTV-LP filed a digital displacement application to move from analog channel 48 to digital channel 5, see FCC File No. BDISDVL-20080528AFZ. In light of the fact that XHAQ-TV is operating as a full power analog television station on channel 5 in Mexicali, Baja California, Mexico, it is unlikely that the Mexican authorities will not object to the grant of BDISDVL-20080528AFZ. Therefore, on October 14, 2008, KHTV-LP proposed another digital displacement application to move from analog channel 48 to digital channel 44, see FCC File No. BDISDTL-20081014AFC, as amended on January 16, 2009. Consequently, BDISDVL-20080528AFZ on channel 5 was dismissed pursuant to FCC letter dated July 23, 2009 (1800E1-MTU) and BDISDTL-20081014AFC on channel 44 was dismissed on April 22, 2010. To expedite the construction of KHTV-LP's digital facilities, the Applicant proposes to operate KHTV-LP on digital channel 27 pursuant to the technical parameters specified in this 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. 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.