

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

This application proposes a digital companion channel facility to be associated with Class A television station KPOM-CA in Indio, California, Facility ID 51654, licensed to the Loop Media, LLC (“Loop Media” or “Applicant”).

The proposed facility on channel 45 was studied using the Techware’s tv\_process\_2010 software on a Sun Blade 1500 using the post transition data and the 2000 US Census. The Applicant requests that the Commission processes this instant application using the standard Longley-Rice analysis settings:

- Cell Size for Service Analysis is 1.0 km/side
- Distance Increments for Longley-Rice Analysis is 1.00 km

The proposed facility is less than 30 miles from the licensed KPOM-CA transmitter site and the proposed F(50, 90) 51 dBu contour overlaps with the licensed F(50,50) 62 dBu contour.

#### **Further Mexican Concurrence and Coordination Not Required**

According to the International Branch of the FCC, channel 45 was covered under the vacated full-service operation of KRCA on channel 45, which is still registered with Mexico. The vacated full-service operation of KRCA on channel 45 had greater coverage toward all borders with Mexico than the proposed facility on channel 45. Therefore, coordination with Mexico is not necessary prior to the grant of 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.

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

In the tv\_process\_2010 study today’s data base, the proposed facility is predicted to cause interference to the following facilities:

1. BDFCDTL-20060330ANP (worst case new IX 75.6589%, Scenario 9), a digital flash cut application on channel 45 for KRMV-LP, Banning, CA Facility ID 129618, licensed to Venture Technologies Group, LLC. This application on channel 45 was dismissed on 12/4/2007 and is therefore irrelevant.
2. BDISDTL-20120618ABU (worst case new IX 3.6208%, Scenario 1), a digital displacement application for KEDD-LD, Los Angeles, CA, Facility ID 56793, licensed to Venture Technologies Group, LLC. The Applicant has obtained a waiver, see Attachment A.
3. BLTTTL-20070130AJO (worst case new IX 42.6803%, Scenario 1), the licensed facility of KRMV-LP, Moreno Valley, CA, Facility ID 129618, licensed to

Venture Technologies Group, LLC. The Applicant has obtained a waiver, see Attachment A.

4. BDISDTL-20090709AAW (worst case new IX 51.2393%, Scenario 12), a digital displacement application for DKLAU-LD, Redlands, CA, Facility ID 21511, licensed to Gerald Benavides. This application was dismissed on 10/6/2010 and the underlying license was cancelled on 1/9/2013, and is therefore irrelevant.
5. BDISDTL-20101014ACN (worst case new IX 15.6600%, Scenario 1), a digital displacement application for KRMV-LP, Walnut, CA, Facility ID 129618, licensed to Venture Technologies Group, LLC. The Applicant has obtained a waiver, see Attachment A.

Except as referenced above, the proposed facility 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.

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.