

Engineering Statement and Interference Analysis

Venture Technologies is the licensee (“VTG” or “Applicant”) of digital low power television station KEDD-LD, Channel 50, Los Angeles, California, Facility ID 56793. This technical statement supports this application to modify KEDD-LD, FCC File No. BLDL-20101018AAZ.

Digital Displacement Relief

In this application, VTG seeks displacement relief and proposes to move KEDD-LD from channel 50 to channel 45. KEDD-LD is displaced by KNLA-CD, which is on the same channel and on the same transmitter farm as KEDD-LD. The two stations are incompatible.

The proposed facility on channel 46 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. VTG requests that the Commission processes this application using:

- Cell Size for Service Analysis of 1.0 km per side
- Distance Increments for Longley-Rice Analysis of 1.00 km

To the degree it is deemed necessary, a waiver is hereby requested of Section 74.705, 74.706, 74.707, 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h), 74.794(b), 73.1030 and other applicable parts of the Rules and Regulations of the Federal Communications Commission in order to allow for the grant of this instant application.

Digital TV Station Protection

The proposed facility 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.

Class A, Low Power TV and TV Translator Station Protection

Except for those referenced below, 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.

The proposed facility of KEDD-LD on channel 45 is predicted to cause interference to the followings. However, three of the applications were dismissed and the remaining two are licensed to the Applicant herein and waivers to accept interference are given to the proposed facility of KEDD-LD.

1. BDFCDL-20060330ANP, a digital flash cut application for KRMV-LP, Channel 45, Banning, CA, Facility ID 129618, licensed to VTG. The worst case interference is 51.3282% in Scenario 2. However, this application was dismissed on December 4, 2007.
2. BDISDTL-20100929ADX, an analog to digital displacement application for KVTU-LP, Channel 45, Los Angeles, CA, Facility ID 130176, licensed to Mark C. Allen. The worst case interference is 93.9951% in Scenario 1. However, this application was dismissed on November 29, 2010.

3. BLTTL-20070130AJO, the licensed facility for KRMV-LP, Channel 45, Moreno Valley, CA, Facility ID 129618, licensed to VTG. The worst case interference is 37.6906% in Scenario 1. However, VTG consents to accept any predicted interference to and from the licensed facility of KRMV-LP and the proposed facility of KEDD-LD.
4. BDISDTL-20090709AAW, an analog to digital displacement application for KLAU-LD, Channel 45, Redlands, CA, Facility ID 21511, licensed to Gerald Benavides. The worst case interference is 68.0621% in Scenario 1. However, this application was dismissed on October 6, 2010.
5. BDISDTL-20101014ACN, a digital to digital displacement application for KRMV-LP, Channel 45, Walnut, CA, Facility ID 129618, licensed to VTG. The worst case interference is 82.0197% in Scenario 30. However, VTG consents to accept any predicted interference to and from this application and the facility proposed herein.