

Engineering Statement and Interference Analysis

This technical statement supports this application to make changes in KRVD-LP on channel 33 in Banning, California. FCC File No. BLTTL-20070103ACI, Facility ID 128327.

Digital Displacement

KRVD-LP is displaced off of channel 33 by KBTN-TV in Santa Ana, CA, Facility ID 67884. Pursuant to MB Docket No. 04255, RM-10695, KBTN-TV applied to move their DTV channel 23 to DTV channel 33 and was recently granted a construction permit for channel 33 digital. KBTN-TV will move to DTV channel 33 as its post-transition DTV channel as oppose to DTV channel 23. Additionally, KRVD-LP was denied a flash cut application on channel 33 and thus will not be able to remain on channel 33 after the digital transition. See FCC File No. BDFCDTL-20060330AKG dismissed on December 4, 2007. On March 13, 2008, KRVD-LP filed BDISDTL-20080312ADG to operate on channel 35 as a displacement relief; however, upon further engineering studies, the Applicant found that it is unlikely that application will be grantable. In order to expedite construction of KRVD-LP's digital facility, the Applicant proposes instead to operate KRVD-LP on digital channel 4 pursuant to the technical parameters specified in this instant application and simultaneously for the grant of this instant application requests the Commission to dismiss BDISDTL-20080312ADG.

The proposed channel 4 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.

TV Broadcast Analog System Protection

The proposed operation causes less than 0.5% interference to surrounding analog 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 allocation study based on use of the OET-69 procedures.

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.