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EXHIBIT IN SUPPORT OF REQUEST FOR WAIVER

APPLICATION FOR MINOR CHANGE IN LICENSED FACILITY
KHFD-LD, FCC ID 127785
FCC FILE NUMBER BLDTL-20100603ACC
EICB-TV EAST, LLC

Minor change in licensed facility. The within application requests authority for a power upgrade to 15 kW, using a newly-permitted Full Service emission mask in accordance with FCC 11-110, released July 15, 2011. At section J, para 68, use of such a mask is permitted to LPTV applicants upon the effective date of the Rulemaking.

Use of full service emission mask. The application is filed using the full service mask in order to significantly reduce adjacent channel interference and thus allow a 4.8 dB power increase, thus enhancing its coverage and signal quality delivered to the public. Inasmuch as use of this mask reduces signal to adjacent channels by 17 dB (upper channel) and 14 dB (lower channel) and the application's effective radiated power is increased by 4.8 dB, the net signal reductions to the adjacent channels are 12.2 dB (upper channel) and 9.2 dB (lower channel). The lower channel attenuation increase thus reduces predicted interference by 9.2 dB to affected local adjacent channel 50 (KATA-CD, Facility ID 26950, Mesquite, TX) and the upper channel attenuation increase reduces predicted interference by 12.2 dB to all services in channels 52 and above. Study using official OET69 technique indicates the within application is in compliance with all applicable portions of §74.793.

Waiver of temporary freeze on channel 51 filings. As contemplated by the Public Notice DA 11-1428, the request for waiver is based on the need for KHFD-LD to increase its power to provide effective service to the public in an already crowded TV environment. When the added attenuation of the full service emission mask is taken together with the increased but still relatively low effective radiated power of the within digital LPTV facility, the net effect on communications users of channels 52 and above will be a reduction of potential interference by 12.2 dB below that in existence today if no changes were made in the KHFD-LD. Accordingly, it is respectfully requested that the within application be accepted for filing and processed in the normal way by the Commission.

James R. McDonald
August 25, 2011