

Engineering Statement and Interference Analysis

This technical statement supports this application to modify digital low-power television station KNLA-LD on channel 50 in Los Angeles, CA, Facility ID 167309. The Applicant is applying to modify the construction permit, FCC File No. BDCCDTL-20061030ARW, as oppose to the license because the license have not been granted yet. A license to cover application for the underlying construction permit BDCCDTL-20061030ARW for KNLA-LD was filed on November 10, 2008 and amended on June 21, 2009, see FCC File No. BLDLTL - 20081110AAG. Pursuant to information provided by the head of the LPTV Branch, this minor modification will be considered a modification of the license since it is applied during the time that the license application is pending.

In this instant application, the Applicant is proposing to modify the ERP, the transmitter output power and the transmitting antenna model. The proposed channel 50 facility was studied using the Techware's tv_process_dlptv software on a Sun Blade 1500 using the post transition data and the 2000 US Census. The proposed channel 50 facility is predicted to cause interference to KEDD-LD; however, KEDD-LD applied for a contingent application in which it accepted interference from both the operating facility of KNLA-LD and the full power facility of KOCE-TV on channel 50. KEDD-LD was granted a CP under which it accepted interference to 100% of the population within its 51 dBu contour. Therefore, no new interference is caused to the KEDD-LD by this instant proposal.

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 facility causes less than 0.5% new interference to KOCE on channel 50 in Huntington Beach, CA, because KOCE has allegedly accepted interference from KEDD-LD to the majority of its coverage area. KOCE, KEDD-LP and the instant application of KNLA-LD are all co-located on the same tower. The protected contour of the entire proposed KNLA-LD facility is within the contour of KEDD-LP. Other than that which is *de minimis*, no new interference is caused by the instant application other than that which was already accepted by KEDD-LD from KOCE.

Other than referenced above, 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 facility causes less than 0.5% new interference to KEDD-LD on channel 50 in Lancaster, CA, because KEDD-LD has accepted interference from KOCE to its entire coverage area. KOCE, KEDD-LD and the instant application of KNLA-LD are all co-located on the same tower. The protected contour of the entire proposed KNLA-LD facility is within the contour of KEDD-LD. Other than that which is *de minimis*, no new interference is caused by the instant application other than that which is already caused by KOCE and accepted by KEDD-LD.

Other than referenced above, 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.

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.