

Engineering Statement and Interference Analysis

This technical statement supports this application to amend BMPDTL-20090630AEN, which is a minor change of license for digital low-power television station KNLA-LD on channel 50 in Los Angeles, CA, Facility ID 167309.

The proposed facilities are identical to the authorized facilities of KEDD-LD on channel 50 in Los Angeles, CA, FCC File No. BLDTL-20101018AAZ. The proposed facilities were studied using the Techware's tv_process_2010 software on a Sun Blade 1500 using the post transition data and the 2000 US Census.

Waiver of Interference

The proposed channel 50 facilities are predicted to cause interference to KEDD-LD, currently licensed to Adelman Broadcasting, Inc. However, permission to accept interference has been granted pursuant to Section 1.9 of the Asset Purchase Agreement between Venture Technologies Group, LLC and Adelman Broadcasting, Inc. as follows:

"Seller shall consent to an amendment to the pending Minor Modification application for KNLA (FCC File No. BMPDTL-20090630AEN) and any impermissible interference that amendment may cause to KEDD-LP."

The Asset Purchase Agreement was granted by the FCC on May 31, 2011, see Exhibit 11 of FCC File No. BALTTL-20110328AAZ.

Mexican Concurrence

No new Mexican concurrence should not be required because the identical facilities have already been authorized pursuant to KEDD-LD's license. There's no increase of contour in any direction from the proposed facilities compared to the authorized facilities of KEDD-LD.

Digital TV Station Protection

The proposed facility 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

Except as referenced-above, 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. 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.