

Engineering Statement and Interference Analysis

This technical statement supports this application to modify KRPE-LP on channel 6 in Banning, CA. FCC File No. BLTVL-.20090819AHG Facility ID 129651.

The proposed facility was studied using the Techware's tv_process_2010 software on a Sun Blade 1500 using the post transition data and the 2010 US Census. This application does not cause any predicted interference to any of the other proposals. The Applicant requests that the Commission process this application using the following Longley-Rice analysis settings:

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

Mexican Concurrence Not Required

Mexican coordination not is not required for the proposed facility because there is no change in channel number and the proposed facility is just 12.2 miles from the licensed facility and the proposed F(50,50) 62 dBu contour is completely within the F(50,50) 62 dBu contour of the licensed facility. See Attachment A.

The proposed facility does not increase the coverage area in any direction. The ERP of the proposed facility is not in excess of 1.0 kw, the antenna height above average terrain is not in excess of 200 meters (it is 33 meters), and it is located in excess of 90 km from the Mexican border (127.1 km). Therefore, no Mexican approval is required for this proposed facility and this application is immediately grantable.

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

The proposed facility causes less than 0.5% interference to surrounding Class A and low power 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.

It is believed that the proposed facility complies with the requirements of 47.C.F.R Sections 74.705, 74.706, 74.707, 74.708, 74.709, 74.710 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.