Engineering Statement and Interference Analysis

This technical statement supports this amendment application to modify BDISDVL-20090630AHK, a digital displacement application on channel 8 for low power television station KILA-LP at Cherry Valley, CA, Facility ID 129642.

This amendment is filed in response to the FCC letter dated October 5, 2009 (1800E3-MTU) as attached in Exhibit 2 of this application. To resolve the predicted interference to the facilities specified in the letter, the Applicant proposes to modify the antenna orientation from 15 degrees to 75 degrees and the out-of-emission mask from a full service mask to a stringent mask.

The proposed facility of KILA-LP on channel 8 was studied using the Techware's tv_process_dlptv_pt software on a Sun Blade 1500 using the post transition data and the 2000 US Census. To the degree it is deemed necessary, the applicant requests a waiver of Section 74.705, 74.706, ,74.707, 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h), 74.794(b), 73.1030 and other applicable parts of the Rules and Regulations of the Federal Communications Commission in order to allow for the grant of this instant application.

Digital Displacement Relief

KILA-LP is displaced by KXLA-LD on channel 51 because the authorized facility of KILA-LP is located 117.4 km from the KXLA-DT facility and its coverage area is entirely within the protected 41 dBu contour of KXLA-DT. Therefore, the Applicant seeks displacement relief and proposes to move KILA-LP from analog channel 51 to digital channel 8.

TV Broadcast Analog System Protection

The proposed operation causes less than 0.5% interference to surrounding analog 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. If necessary, a waiver of the FCC rules is respectfully requested for this analog allocation study based on use of the OET-69 procedures and all possible variance from FCC rules.

Digital TV Station Protection

The proposed operation 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. If necessary, a waiver of the FCC rules is respectfully requested for this digital allocation study based on use of the OET-69 procedures and all possible variance from FCC rules.

Class A, Low Power TV and TV Translator Station Protection

The proposed operation causes less than 0.5% interference to surrounding low power and class A 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. 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 and all possible variance from FCC rules.