



(REFERENCE COPY - Not for submission)

License To Cover for DTV Application

File Number: **0000118933** | Submit Date: **07/29/2020** | Call Sign: **KTLN-TV** | Facility ID: **49153** | FRN: **0028887529** | State: **California** | City: **PALO ALTO**
 Service: **DTV** | Purpose: **License To Cover 0000034197** | Status: **Granted** | Status Date: **07/29/2020** | Expiration Date: **12/01/2022** | Filing Status: **Active**

General Information

Section	Question	Response
Attachments	Are attachments (other than associated schedules) being filed with this application?	Yes

Fees, Waivers, and Exemptions

Section	Question	Response
Fees	Is the applicant exempt from FCC application Fees?	No
	Indicate reason for fee exemption:	
	Is the applicant exempt from FCC regulatory Fees?	No
Waivers	Does this filing request a waiver of the Commission's rule(s)?	No
	Total number of rule sections involved in this waiver request:	
	Are the frequencies or parameters requested in this filing covered by grandfathered privileges, previously approved by waiver, or functionally integrated with an existing station?	No

**Applicant
Information**

Applicant Name, Type, and Contact Information

Applicant	Address	Phone	Email	Applicant Type
OTA BROADCASTING (SFO), LLC Doing Business As: OTA BROADCASTING (SFO), LLC	William Tolpegin 11710 PLAZA AMERICA DRIVE SUITE 2000 RESTON, VA 20190 United States	+1 (703) 865-4442	tolpegin@otabroadcasting. com	Limited Liability Company

Authorization Holder Name

Check box if the Authorization Holder name is being updated because of the sale (or transfer of control) of the Authorization(s) to another party and for which proper Commission approval has not been received or proper notification provided.

**Contact
Representatives
(1)**

Contact Name	Address	Phone	Email	Contact Type
Ari Meltzer Wiley Rein LLP	1776 K Street NW Washington, DC 20006 United States	+1 (202) 719-7467	ameltzer@wileyrein.com	Legal Representative

Alien Ownership

Question	Response
1) Is the applicant a foreign government or the representative of any foreign government as specified in Section 310(a) of the Communications Act?	
2) Is the applicant an alien or the representative of an alien? (Section 310(b)(1))	
3) Is the applicant a corporation, or non-corporate entity, that is organized under the laws of any foreign government? (Section 310(b)(2))	
4) Is the applicant an entity of which more than one-fifth of the capital stock, or other equity or voting interest, is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any entity organized under the laws of a foreign country? (Section 310(b)(3))	
5) Is the applicant directly or indirectly controlled by any other entity of which more than one-fourth of the capital stock, or other equity or voting interest, is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof, or by any entity organized under the laws of a foreign country? (Section 310(b)(4))	
6) Has the applicant received a declaratory ruling(s) under Section 310(b)(4) of the Communications Act?	
6a) Enter the citation of the applicable declaratory ruling by DA/FCC number, FCC Record citation, release date, or any other identifying information.	
7) Has there been any change in the applicant's foreign ownership since issuance of the declaratory ruling(s) cited in response to Question 6?	
7a) Enter the File or Docket Number of the Petition for Declaratory Ruling that the applicant has filed for its foreign ownership in connection with this application pursuant to Section 310(b)(4) of the Communications Act. It is not necessary to file a request for a foreign ownership declaratory ruling if the applicant attaches a showing that the requested authorization(s) is exempt from the provisions of Section 310(b)(4).	
8) Does the applicant certify that it is in compliance with the terms and conditions of the foreign ownership declaratory ruling(s) cited in response to Question 6?	
9) In connection with this application, is the applicant filing a foreign ownership Petition for Declaratory Ruling pursuant to Section 310(b)(4) of the Communications Act?	

Basic Qualifying Questions

Section	Question	Response
Revoked Application	Has the Applicant or any party to this application had any FCC station Authorization revoked or had any application for an initial, modification or renewal of FCC station Authorization denied by the Commission?	
State or Federal Convictions	Has the Applicant or any party to this application, or any party directly or indirectly controlling the Applicant, ever been convicted of a felony by any state or federal court?	

Channel Sharing

Section	Question	Response													
Channel Sharing	Is this filing to dissolve a Channel Sharing Arrangement?														
Enter the Facility ID of the station to be shared:	<table border="1"> <thead> <tr> <th data-bbox="871 302 1005 412">Facility ID</th> <th data-bbox="1012 302 1541 412">Call Sign</th> <th data-bbox="1547 302 1669 412">Service</th> <th data-bbox="1675 302 1850 412">City</th> <th data-bbox="1856 302 1957 412">State</th> </tr> </thead> <tbody> <tr> <td data-bbox="871 421 1005 565">37689</td> <td data-bbox="1012 421 1541 565">KAXT-CD</td> <td data-bbox="1547 421 1669 565">DCA</td> <td data-bbox="1675 421 1850 565">SAN FRANCISCO, SAN JO</td> <td data-bbox="1856 421 1957 565">CA</td> </tr> </tbody> </table>					Facility ID	Call Sign	Service	City	State	37689	KAXT-CD	DCA	SAN FRANCISCO, SAN JO	CA
	Facility ID	Call Sign	Service	City	State										
37689	KAXT-CD	DCA	SAN FRANCISCO, SAN JO	CA											
Input the Facility ID of station(s) listed in the CSA:	<table border="1"> <thead> <tr> <th data-bbox="871 643 1005 723">Facility ID</th> <th data-bbox="1012 643 1614 723">Call Sign</th> <th data-bbox="1621 643 1740 723">Service</th> <th data-bbox="1747 643 1850 723">City</th> <th data-bbox="1856 643 1957 723">State</th> </tr> </thead> <tbody> <tr> <td data-bbox="871 732 1005 830">49153</td> <td data-bbox="1012 732 1614 830">KTLN-TV</td> <td data-bbox="1621 732 1740 830">DTV</td> <td data-bbox="1747 732 1850 830">PALO ALTO</td> <td data-bbox="1856 732 1957 830">CA</td> </tr> </tbody> </table>					Facility ID	Call Sign	Service	City	State	49153	KTLN-TV	DTV	PALO ALTO	CA
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49153	KTLN-TV	DTV	PALO ALTO	CA											

Channel and Facility Information

Section	Question	Response
Proposed Community of License	Facility ID	49153
	State	California
	City	PALO ALTO
	DTV Channel	22
	Designated Market Area	San Francisco-Oak-San Jose
Facility Type	Facility Type	Commercial
	Station Type	Main
Zone	Zone	2

Antenna Location Data

Section	Question	Response
Antenna Structure Registration	Do you have an FCC Antenna Structure Registration (ASR) Number?	Yes
	ASR Number	1044718
Coordinates (NAD83)	Latitude	37° 29' 57.0" N+
	Longitude	121° 52' 20.0" W-
	Structure Type	TOWER-A free standing or guyed struct
	Overall Structure Height	135.0 meters
	Support Structure Height	119.5 meters
	Ground Elevation (AMSL)	794.3 meters
Antenna Data	Height of Radiation Center Above Ground Level	115.2 meters
	Height of Radiation Center Above Average Terrain	
	Height of Radiation Center Above Mean Sea Level	909.5 meters

**Antenna
Technical Data**

Section	Question	Response
Antenna Type	Antenna Type	Directional Custom
	Do you have an Antenna ID?	No
	Antenna ID	1007035
Antenna Manufacturer and Model	Manufacturer:	DIE
	Model	TUM-C2-2/4M-1 SM
	Rotation	359 degrees
	Electrical Beam Tilt	4
	Mechanical Beam Tilt	0.6
	toward azimuth	300
	Polarization	Elliptical
DTV and DTS: Elevation Pattern	Does the proposed antenna propose elevation radiation patterns that vary with azimuth for reasons other than the use of mechanical beam tilt?	Yes
	Uploaded file for elevation antenna (or radiation) pattern data	kaxt_cd_22_elevation.xml

Directional Antenna Relative Field Values (Pre-rotated Pattern)

Degree	Value	Degree	Value	Degree	Value	Degree	Value
0	0.031	90	.031	180	.953	270	.955
10	.032	100	.032	190	.995	280	.999
20	.026	110	.031	200	.954	290	.982
30	.019	120	.104	210	.799	300	.884
40	.019	130	.216	220	.769	310	.732
50	.019	140	.37	230	.878	320	.551
60	.019	150	.544	240	.849	330	.373
70	.019	160	.716	250	.727	340	.218
80	.023	170	.857	260	.784	350	.105

Additional Azimuths

Degree	V _A
284	1.0

**Operating
Constants**

Section	Question	Response
Transmitter and Transmission Line	Transmitter Power Output (TPO): <i>(average power at input to transmission line, after any filter attached to the transmitter, if used)</i>	0.41 dBk 1.1 kW
	Transmission Line Loss (LL):	
	Antenna Input Power (AIP):	
	Max. Antenna Power Gain (AG)	
	Effective Radiated Power (ERP) <i>(Average Power)</i>	11.76 dBk 15 kW

**Parties to the
Application (0)**

Information not provided.

Attributable Interest

Facility ID: 37689

Section	Question	Response
Equity and Financial Interests	Applicant certifies that equity and financial interests not set forth by the applicant parties are non-attributable.	
Other Authorizations	Does the applicant or any party to the application have an attributable interest in any other broadcast station(s).	

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License Certifications

Facility ID: 37689

Section	Question	Response
Main Studio Location	The main studio location complies with 47 C.F.R. Section 73.1125.	
	Country	
	PO Box	
	Address Line 1	
	Address Line 2	
	City	
	Province/Region	
	Postal Code	
	Phone	
Constructed Facility	The facility constructed as authorized in the underlying construction permit.	
Special Operating Conditions	The facility was constructed in compliance with all special operating conditions, terms, and obligations described in the construction permit. An exhibit may be required. Review the underlying construction permit.	

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Transmitter	The transmitter complies with 47 C.F.R. Section 73.1660.	
Changing Transmitter Power Output	Is this application being filed to authorize a change in transmitter power output caused by the replacement of an omnidirectional antenna with another omnidirectional antenna or an alteration of the transmission line system? See 47 C.F.R. Sections 73.1690(c)(1) and (c)(10).	
Replacing a Directional Antenna	Is this application being filed pursuant to 47 C.F.R. Section 73.1690(c)(3) to replace a directional antenna with another directional antenna?	
	The proposed theoretical antenna pattern complies with 47 C.F.R. Section 73.1690(c)(3).	
Use a formerly licensed main facility as an auxiliary facility	Is this application being filed pursuant to 47 C.F.R. Section 73.1675(c)(1) to request authorization to use a formerly licensed main facility as an auxiliary facility and/or change the ERP of the proposed auxiliary facility?	
	The proposed auxiliary facility complies with 47 C.F.R. Section 73.1675(a).	
	Would a Commission grant of Authorization for this location be an action which may have a significant environmental effect? (See 47 C.F.R. Section 1.1306)	

**Legal
Certifications**

Facility ID: 37689

Section	Question	Response
<p>Obligations</p>	<p>Licensee/Permittee certifies that all terms, conditions, and obligations set forth in the underlying construction permit have been fully met.</p>	
	<p>Licensee/Permittee certifies that, apart from changes already reported, no cause or circumstance has arisen since the grant of the underlying construction permit which would result in any statement or representation contained in the construction permit application to be now incorrect.</p>	
<p>Character Issues</p>	<p>Applicant certifies that neither applicant nor any party to the application has or had any interest in, or connection with:</p> <ul style="list-style-type: none"> (a) any broadcast application in any proceeding where character issues were left in unresolved or were resolved adversely against the applicant or party to the application; or (b) any pending broadcast application in which character issues have been raised. 	
<p>Adverse Findings</p>	<p>Has the Applicant or any party to this application had an adverse finding or an adverse final action taken by any court or administrative body in a civil or criminal proceeding brought under any law related to the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination?</p>	
<p>Statement of Eligibility</p>	<p>Licensee certifies that it has filed a statement of eligibility on or before January 28, 2000, which has been found to be acceptable by the Commission.</p>	
<p>Continued Eligibility</p>	<p>License certifies that its station does, and will continue to, broadcast: (a) a minimum of 18 hours per day; and (b) an average of at least 3 hours per week of programming each quarter produced within the market area served by the station, or the market area served by a group of commonly controlled low-power or Class A stations that carry common local programming produced within the market area served by such groups.</p>	
<p>Main Studio</p>	<p>Licensee certifies that it has constructed and maintains a main studio at a location in compliance with the requirements of 47 C.F.R. Section 3.1125.</p>	
<p>Public Inspection File</p>	<p>Licensee certifies that it maintains for its station a public inspection file that includes the documentation required by 47 C.F.R. Section 73.3526.</p>	

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Adverse Findings	Has the Applicant or any party to this application had an adverse finding or an adverse final action taken by any court or administrative body in a civil or criminal proceeding brought under any law related to the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination?	

Certification

Section	Question	Response
<p>General Certification Statements</p>	<p>The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by authorization or otherwise, and requests an Authorization in accordance with this application (See Section 304 of the Communications Act of 1934, as amended.).</p>	
	<p>The Applicant certifies that neither the Applicant nor any other party to the application is subject to a denial of Federal benefits pursuant to §5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862, because of a conviction for possession or distribution of a controlled substance. This certification does not apply to applications filed in services exempted under §1.2002(c) of the rules, 47 CFR . See §1.2002(b) of the rules, 47 CFR §1.2002(b), for the definition of "party to the application" as used in this certification §1.2002 (c). The Applicant certifies that all statements made in this application and in the exhibits, attachments, or documents incorporated by reference are material, are part of this application, and are true, complete, correct, and made in good faith.</p>	
<p>Authorized Party to Sign</p>	<p>FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID</p> <p>Upon grant of this application, the Authorization Holder may be subject to certain construction or coverage requirements. Failure to meet the construction or coverage requirements will result in automatic cancellation of the Authorization. Consult appropriate FCC regulations to determine the construction or coverage requirements that apply to the type of Authorization requested in this application.</p> <p>WILLFUL FALSE STATEMENTS MADE ON THIS FORM OR ANY ATTACHMENTS ARE PUNISHABLE BY FINE AND /OR IMPRISONMENT (U.S. Code, Title 18, §1001) AND/OR REVOCATION OF ANY STATION AUTHORIZATION (U.S. Code, Title 47, §312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, §503).</p>	
	<p>I certify that this application includes all required and relevant attachments.</p>	
	<p>I declare, under penalty of perjury, that I am an authorized representative of the above-named applicant for the Authorization(s) specified above.</p>	

Attachments

Information not provided.