



(REFERENCE COPY - Not for submission)

## Modification of a License for Digital Class A TV Station Application

File Number: **0000055154** | Submit Date: **06/12/2018** | Call Sign: **KAXT-CD** | Facility ID: **37689** | FRN: **0019682483**  
 State: **California** | City: **SAN FRANCISCO, SAN JO**  
 Service: **DCA** | Purpose: **Modification to License (Sharing) BLDTA-20141107ACO** | Status: **Granted** | Status Date:  
**07/17/2018** | Expiration Date: **05/01/2020** | Filing Status: **Active**

### General Information

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

### Fees, Waivers, and Exemptions

Section	Question	Response
<b>Fees</b>	Is the applicant exempt from FCC application Fees?	No
	Indicate reason for fee exemption:	
	Is the applicant exempt from FCC regulatory Fees?	No
<b>Waivers</b>	Does this filing request a waiver of the Commission's rule(s)?	No
	Total number of rule sections involved in this waiver request:	

Application Type	Fee Code	Fee Amount
Modification to License (Sharing)	MJT	\$325.00
	<b>Total</b>	<b>\$325.00</b>

**Applicant  
Information**

**Applicant Name, Type, and Contact Information**

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

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**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  
(2)**

Contact Name	Address	Phone	Email	Contact Type
<b>Ari Meltzer</b> Wiley Rein LLP	1776 K Street NW Washington, DC 20006 United States	+1 (202) 719- 7467	ameltzer@wileyrein.com	Legal Representative
<b>David Sanderford</b> Marsand, Inc.	1957 Reynolds Drive Azle, VA 76020 United States	+1 (817) 783- 5566	david@marsand.com	Technical 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?	No
2) Is the applicant an alien or the representative of an alien? (Section 310(b)(1))	No
3) Is the applicant a corporation, or non-corporate entity, that is organized under the laws of any foreign government? (Section 310(b)(2))	No
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))	No
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))	No
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
<b>Revoked Application</b>	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?	No
<b>State or Federal Convictions</b>	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?	No

**Channel Sharing**

Section	Question	Response												
<p><b>Channel Sharing</b></p>	<p>Is this filing to implement a Channel Sharing Agreement?</p>	<p>Yes</p>												
	<p>Is the channel sharing agreement consistent with all Commission rules and policies including those set forth in 47 C.F.R. § 73.3700?</p>	<p>Yes</p>												
<p><b>Enter the Facility ID of the station to be shared:</b></p>	<table border="1"> <thead> <tr> <th data-bbox="871 449 1005 565">Facility ID</th> <th data-bbox="1012 449 1539 565">Call Sign</th> <th data-bbox="1545 449 1667 565">Service</th> <th data-bbox="1673 449 1850 565">City</th> <th data-bbox="1856 449 1957 565">State</th> </tr> </thead> <tbody> <tr> <td data-bbox="871 573 1005 723">37689</td> <td data-bbox="1012 573 1539 723">KAXT-CD</td> <td data-bbox="1545 573 1667 723">DCA</td> <td data-bbox="1673 573 1850 723">SAN FRANCISCO, SAN JO</td> <td data-bbox="1856 573 1957 723">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										
<p><b>Input the Facility ID of station(s) listed in the CSA:</b></p>	<table border="1"> <thead> <tr> <th data-bbox="871 795 1005 868">Facility ID</th> <th data-bbox="1012 795 1539 868">Call Sign</th> <th data-bbox="1545 795 1667 868">Service</th> <th data-bbox="1673 795 1850 868">City</th> <th data-bbox="1856 795 1957 868">State</th> </tr> </thead> <tbody> <tr> <td data-bbox="871 876 1005 983">49153</td> <td data-bbox="1012 876 1539 983">KTLN-TV</td> <td data-bbox="1545 876 1667 983">DTV</td> <td data-bbox="1673 876 1850 983">PALO ALTO</td> <td data-bbox="1856 876 1957 983">CA</td> </tr> </tbody> </table>				Facility ID	Call Sign	Service	City	State	49153	KTLN-TV	DTV	PALO ALTO	CA
Facility ID	Call Sign	Service	City	State										
49153	KTLN-TV	DTV	PALO ALTO	CA										

**Channel and Facility Information**

Section	Question	Response
<b>Proposed Community of License</b>	Facility ID	37689
	State	California
	City	SAN FRANCISCO, SAN JO
	DCA Channel	42
	Designated Market Area	San Francisco-Oak-San Jose

**Antenna Location Data**

Section	Question	Response
<b>Antenna Structure Registration</b>	Do you have an FCC Antenna Structure Registration (ASR) Number?	No
	ASR Number	
<b>Coordinates (NAD83)</b>	Latitude	37° 29' 57.0" N+
	Longitude	121° 52' 16.0" W-
	Structure Type	NNTANN-Antenna tower
	Overall Structure Height	43 meters
	Support Structure Height	43 meters
	Ground Elevation (AMSL)	785 meters
<b>Antenna Data</b>	Height of Radiation Center Above Ground Level	39 meters
	Height of Radiation Center Above Mean Sea Level	824 meters
	Effective Radiated Power	15 kW

**Antenna  
Technical Data**

Section	Question	Response
<b>Antenna Type</b>	Antenna Type	Directional Custom
	Do you have an Antenna ID?	Yes
	Antenna ID	106534
<b>Antenna Manufacturer and Model</b>	Manufacturer:	ALI
	Model	ATC SERIES CUSTOM SLOT ANTENNA
	Rotation	190 degrees
	Electrical Beam Tilt	2
	Mechanical Beam Tilt	Not Applicable
	toward azimuth	
	Polarization	Horizontal
<b>Elevation Radiation Pattern</b>	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	
	Out-of-Channel Emission Mask:	Full Service

**Directional Antenna Relative Field Values (Pre-rotated Pattern)**

Degree	V <sub>A</sub> (Authorized Value)	Degree	V <sub>A</sub> (Authorized Value)	Degree	V <sub>A</sub> (Authorized Value)	Degree	V <sub>A</sub> (Authorized Value)
0	1	90	1	180	0.01	270	0.01
10	0.947	100	0.967	190	0.01	280	0.021
20	0.793	110	0.872	200	0.01	290	0.094
30	0.756	120	0.729	210	0.01	300	0.218
40	0.902	130	0.556	220	0.01	310	0.378
50	0.902	140	0.378	230	0.01	320	0.556
60	0.756	150	0.218	240	0.01	330	0.729
70	0.793	160	0.094	250	0.01	340	0.872
80	0.947	170	0.021	260	0.01	350	0.967

**Additional Azimuths**

Degree	V <sub>A</sub>
65	0.74
25	0.74

**Parties to the  
Application (0)**

Information not provided.



**Attributable Interest**

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

**License  
Certifications**

Section	Question	Response
Constructed Facility	The facility constructed as authorized in the underlying construction permit.	Yes
Special Operating Conditions	The facility was constructed in compliance with all special operating conditions, terms, and obligations described in the construction permit. <b>An exhibit may be required.</b> Review the underlying construction permit.	Yes

**Legal  
Certifications**

Section	Question	Response
<b>Obligations</b>	Licensee/Permittee certifies that all terms, conditions, and obligations set forth in the underlying construction permit have been fully met.	Yes
	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.	Yes
<b>Character Issues</b>	<p>Applicant certifies that neither applicant nor any party to the application has or had any interest in, or connection with:</p> <p>(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</p> <p>(b) any pending broadcast application in which character issues have been raised.</p>	No
<b>Adverse Findings</b>	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?	No
<b>Statement of Eligibility</b>	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.	Yes
<b>Continued Eligibility</b>	Licensee 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.	Yes
<b>Main Studio</b>	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.	Yes
<b>Public Inspection File</b>	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.	Yes

**Certification**

Section	Question	Response
<p><b>General Certification Statements</b></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><b>Authorized Party to Sign</b></p>	<p><b>FAILURE TO SIGN THIS APPLICATION MAY RESULT IN DISMISSAL OF THE APPLICATION AND FORFEITURE OF ANY FEES PAID</b></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>Yes</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>	<p><b>William Tolpegin</b> <i>CEO</i></p> <p>06/12/2018</p>

## Attachments

File Name	Uploaded By	Attachment Type	Description
<a href="#"><u>Character_Issues_Exhibit.pdf</u></a>	Applicant	Legal Certifications	Character Issues
<a href="#"><u>OTA - KAXT Coordinate Correction Exhibit for License Mod. pdf</u></a>	Applicant	Antenna Technical Data	Coordinate Correction
<a href="#"><u>OTA - KAXT Statement of Common Ownership.pdf</u></a>	Applicant	Channel Sharing	Statement of Common Ownership