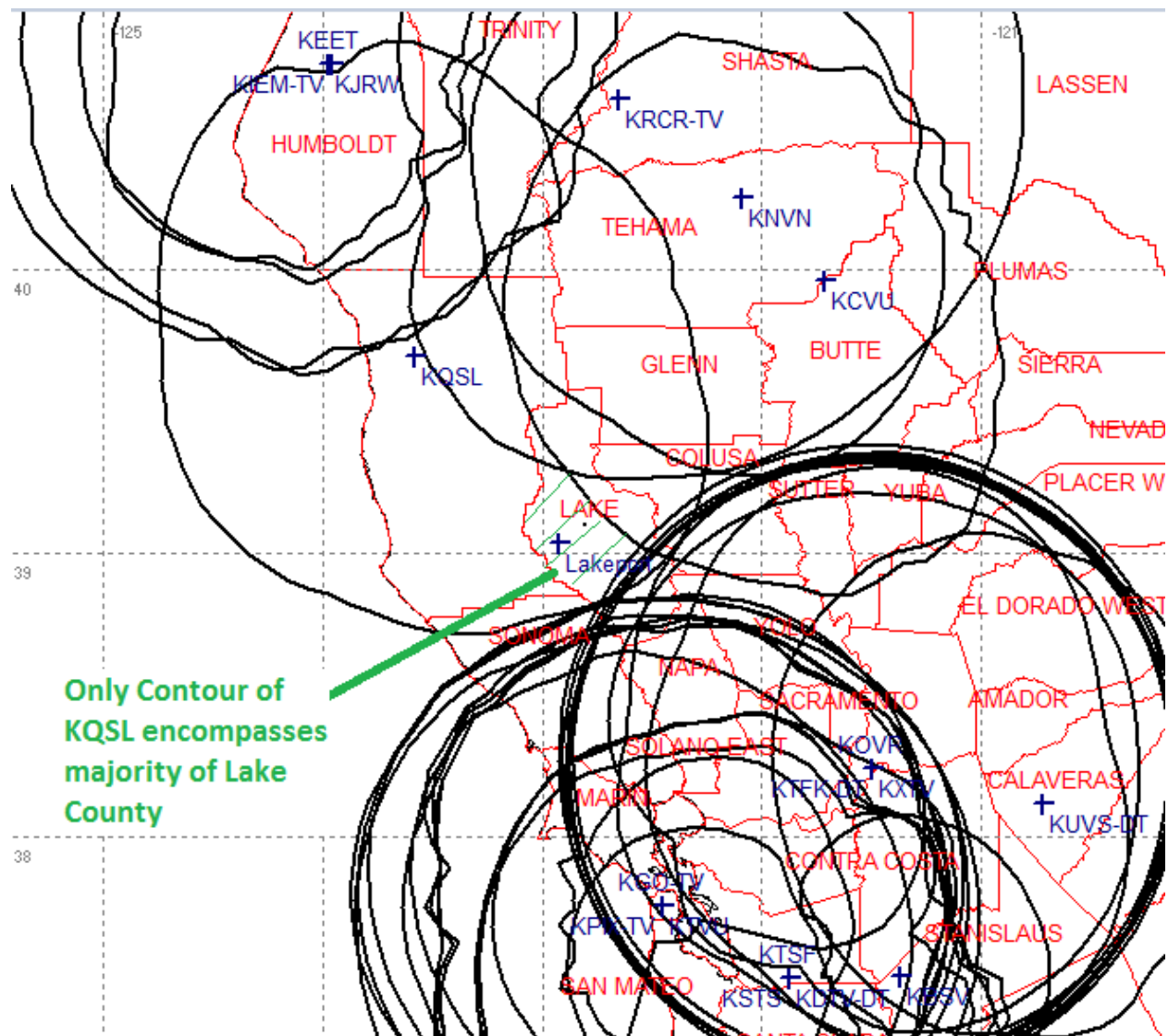


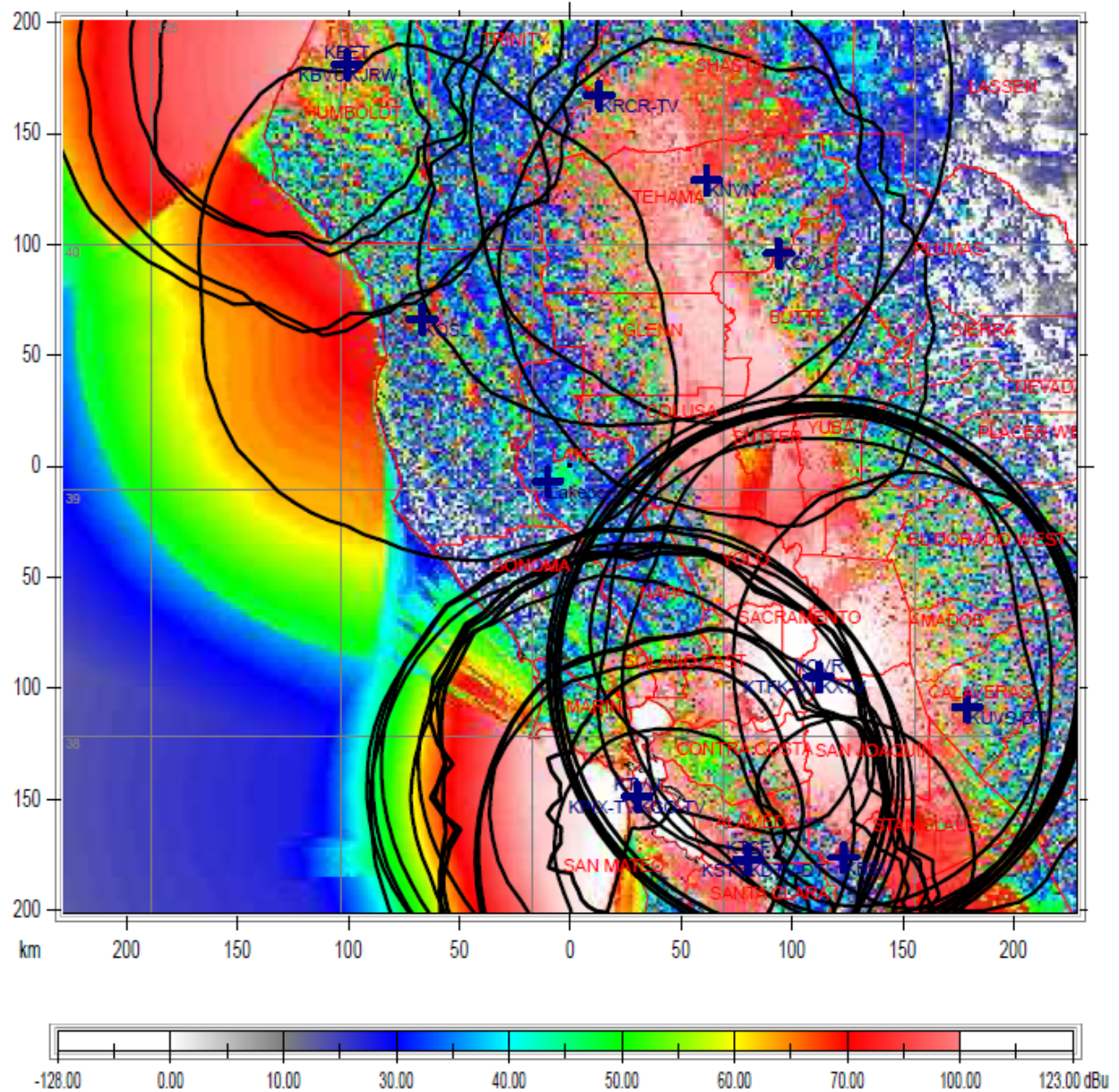
May 21, 2019

Lake County is only encompassed by the service contour of one full power TV station, KQSL. However, KQSL is terrain shielded to much of Lake County due to a mountain range dividing Lake and Mendocino Counties. Also, only a small portion of Lake County is within any other NCE TV station's contour; however, coverage over-the-air is practically non-existent.

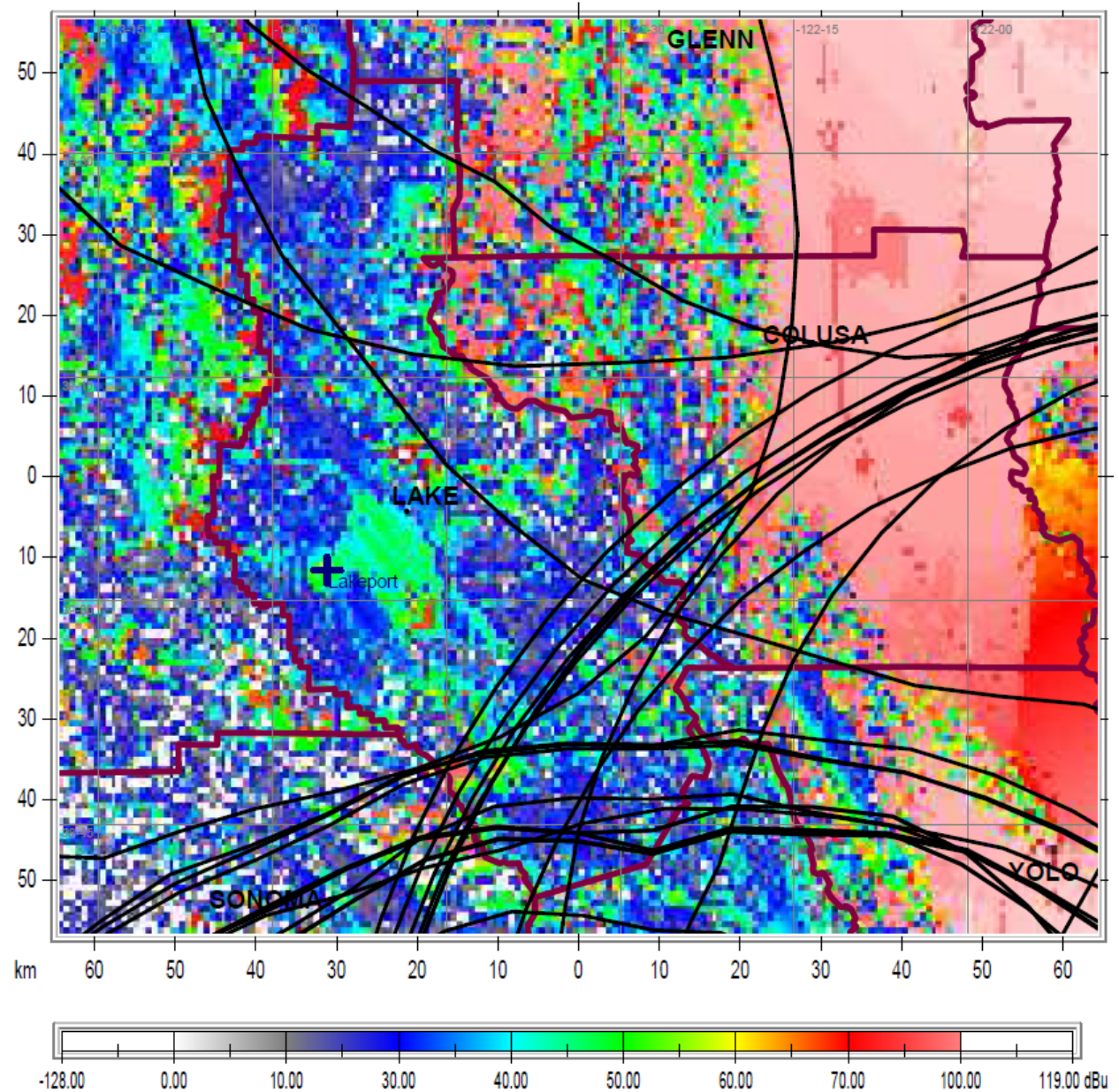
Below is a contour map showing gray area over Lake County. Other than KQSL's contour overlap of Lake County, approximately 75% of Lake County is covered by no other San Francisco market full power TV station.



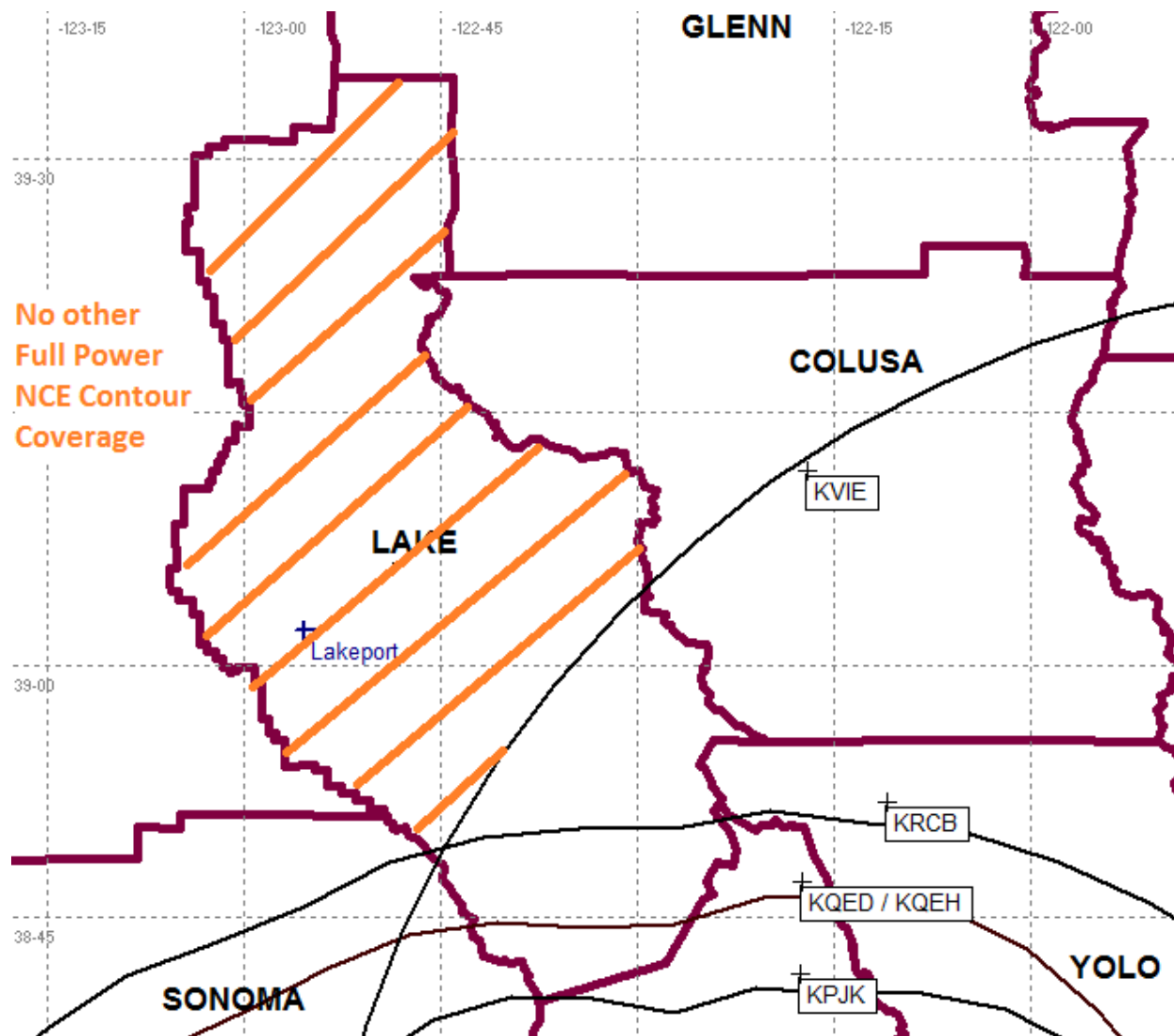
The below Longley-Rice Map of all full-power TV stations in the San Francisco, Sacramento, Redding-Chico, and Eureka markets show poor Longley-Rice signal strength over Lake County from any station. No full power TV station would have reliable indoor over-the-air coverage from any full power TV station. The city of Lakeport is marked by a "+" in the middle of the map:



Below is a map showing a zoomed in Longley-Rice coverage map all full power TV stations.
The center of Lakeport is marked by a "+" on the map:



Below is a map Showing Lack of Full Power NCE Contour Coverage of the vast majority of Lake County



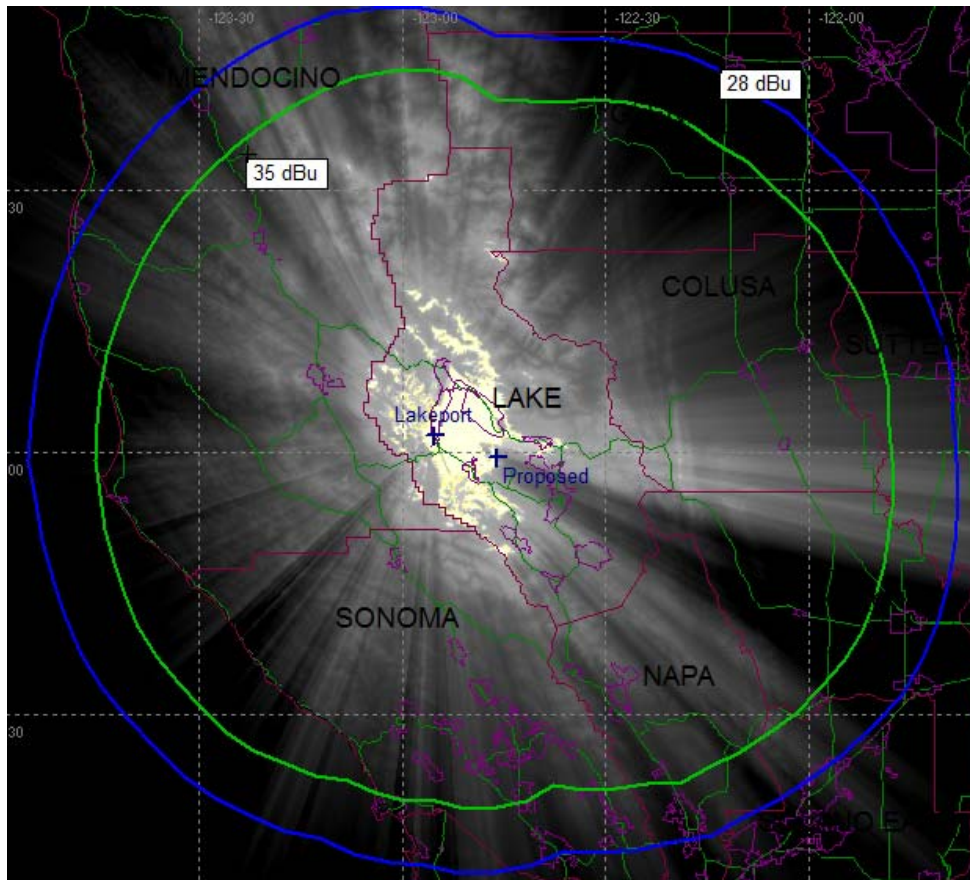
Section 2: Compliance with Geographic Spacing Specified in 73.623(d):

There are not any other full power channel 6 stations within 273.6 km.

There are not any full power TV station licenses or construction permits within 23 km and 110 km. KRCB was originally granted a displacement channel 73.2 km away on channel 5; however, due to there not being any tower or site availability that KRCB could locate on Sonoma Mountain, KRCB has instead applied for and been granted a construction permit to build on Sutro Tower in San Francisco 139.9 km away. One Ministries, Inc. requests that the Commission only consider the permitted facility for KRCB in determining compliance with the spacing rules and not consider the initial site that KRCB operated on channel 23 prior to the repacking of the TV band. Furthermore, when considering the base line facility for KRCB awarded in the auction, the proposed operation on channel 6 would cause only de-minimus interference due to terrain shielding according to the TV Study results (refer to section 9).

Section 3: Principle Community Coverage Specified in 73.625(a)

The proposed site is 15 km from Lakeport and is not terrain shielded to Lakeport. The 35 dBu and 28 dBu contours encompass Lakeport:



Section 4: Class A Protection

There are not any nearby Class A TV stations nearby affected by this proposal according to the TV Study results.

Section 5: Land Mobile protection requirements of section 73.623(e)

The applicant proposes to operate on the low VHF TV band, and therefore will not affect Land Mobile operation.

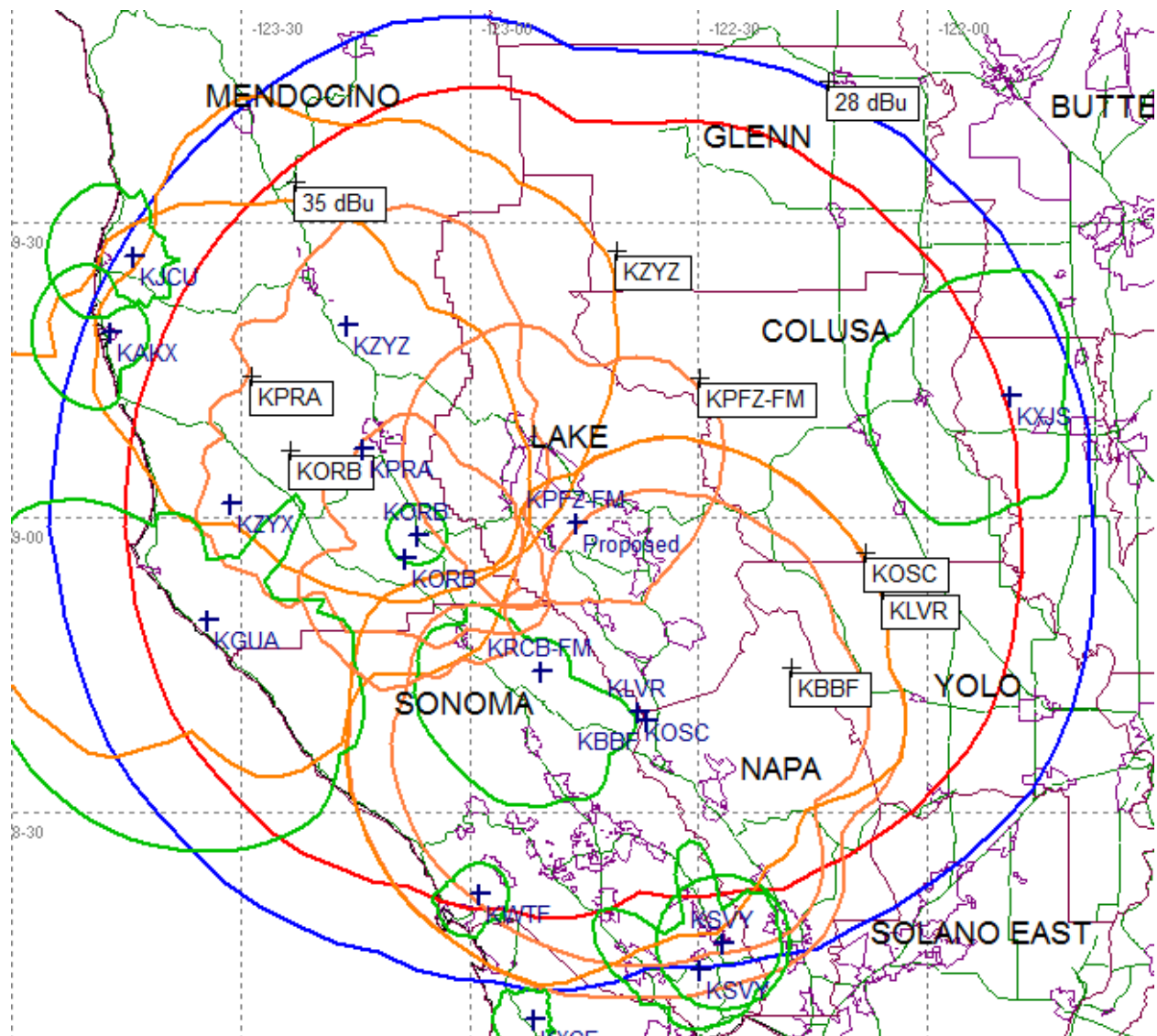
Section 6: FM Radio Protection Specified in 73.623(f)

In order to prevent any interference issues to NCE FM stations, the applicant proposes to co-locate with community radio station KPFZ-FM Channel 201. Furthermore, the applicant proposes to operate at a power level less than or equal to KPFZ's 300 watts ERP. Furthermore, the applicant proposes to only operate horizontally polarized. Furthermore, the applicant pledges to accept all interference from NCE FM stations and to rectify any interference complaint issues. When considering the power of the proposed channel 6 in the equivalent bandwidth of an FM channel, then the proposed channel 6 will be approximately 15 dB lower in power than KPFZ-FM. The formula to calculate this ratio in power is $10 \cdot \log(6 \text{ MHz} / 200 \text{ kHz}) = -14.8 \text{ dB}$. Typically, when considering interference to adjacent channel FM signals, the interference ratio is 6 dB. Therefore, by operating at no more than 300 watts, the power in the adjacent channel is down by an additional margin of 8.8 dB. This would therefore not cause any problems receiving KPFZ-FM. Furthermore, it is planned that Lakeport Channel 6 will most likely directly be constructed using the newer TV standard ATSC 3.0. With ATSC 3.0, the standard allows for the option to deploy fewer carriers to reduce the occupied bandwidth to 5.51 MHz. This will further protect KPFZ-FM by providing a 250 kHz buffer between the upper limit of the channel 6's occupied bandwidth and the transition point of 88 MHz between the TV and radio band.

Besides co-located KPFZ-FM, there are not any other NCE FM full power stations within Lake County. The following list below of NCE stations that transmit from adjacent counties are not expected to receive any interference. For the most part those stations in nearby counties are terrain shielded from covering most of Lake County where the proposed transmitter for channel 6 is located.

KBBF Calistoga 89.1 MHz (39.3 km away)
KLVR Middleton 91.9 MHz (37.5 km away)
KORB Hopland 88.7 MHz (33 km away)
KZYX Willits 91.5 MHz (57 km away)
KOSC Angwin 89.9 MHz (37.5 km away)
KPRA Ukiah 89.5 MHz (42.5 km away)
KZYX Philo 90.7 MHz (65.3 km away)
KZYX Willits 91.5 MHz (57.2 km away)

Map of Nearby NCE FM Stations:



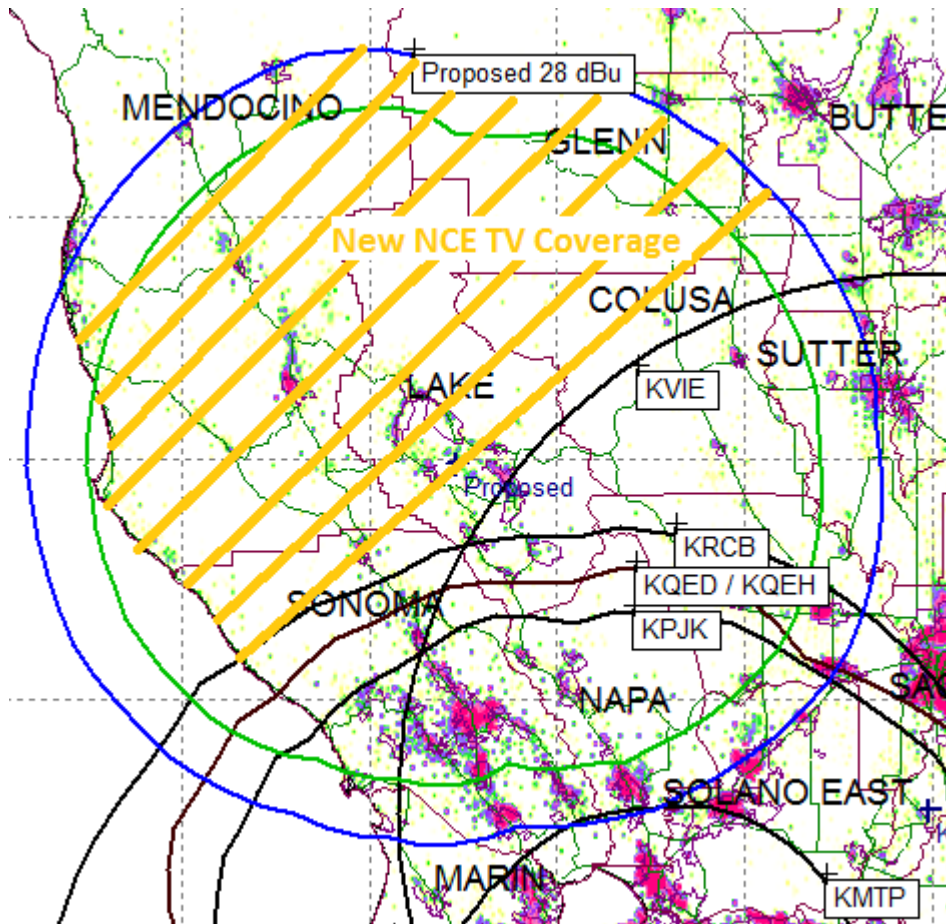
Section 7: Reference Coordinates

The proposed reference coordinates are:

38-59-23 N, 122-46-07 W

Section 8: First NCE Coverage Area

At the proposed 300 watts ERP, the total population coverage area within the noise-limited contour will be 902,162 people. The new NCE TV coverage would be 143,813 people (15.9% of the total).



Section 9: Protection to post-transition DTV facilities

The applicant has run a TV Study interference study to Full Power and Class A TV stations. The only station within the required study distance is KRCB. At the proposed 300 watts of power for Channel 6, the predicted percent interference to KRCB is 0.00%. Please see TV Study results below:


```

1 tvstudy v2.2.5 (4uoc83)
2 Database: 127.0.0.1, Study: New_Lakeport #369, Model: Longley-Rice
3 Start: 2019.05.20 14:29:58
4
5 Study created: 2019.05.20 14:29:58
6
7 Study build station data: LMS TV 2019-05-14
8
9 Proposal: NEW_LAKEPORT D6 DT APP Lakeport, CA
10 File number: New_Lakeport
11 Facility ID: 0
12 Station data: User record
13 Record ID: 163
14 Country: U.S.
15 Zone: II
16
17 Stations potentially affected by proposal:
18
19 IX Call Chan Svc Status City, State File Number Distance
20 Yes KRCB D5 DT CP COTATI, CA BLANK0000059424 139.9 km
21 Yes KRCB D5 DT BL COTATI, CA DTVBL57945 73.2
22
23 No non-directional AM stations found within 0.8 km
24
25 No directional AM stations found within 3.2 km
26
27 Record parameters as studied:
28
29 Channel: D6
30 Latitude: 38 59 23.00 N (NAD83)
31 Longitude: 122 46 7.00 W
32 Height AMSL: 1232.0 m
33 HAAT: 640.0 m
34 Peak ERP: 0.300 kW
35 Antenna: Omnidirectional
36 Elev Pattn: Generic
37
38 28.0 dBu contour:
39 Azimuth ERP HAAT Distance
40 0.0 deg 0.300 kW 507.4 m 88.9 km
41 45.0 0.300 676.1 95.1
42 90.0 0.300 759.0 98.0
43 135.0 0.300 671.5 95.0
44 180.0 0.300 491.6 88.0
45 225.0 0.300 660.0 94.6
46 270.0 0.300 789.8 99.1
47 315.0 0.300 826.8 100.4
48
49 Database HAAT does not agree with computed HAAT
50 Database HAAT: 640 m Computed HAAT: 673 m
51
52 Distance to Canadian border: 1028.3 km
53
54 Distance to Mexican border: 856.8 km
55
56 Conditions at FCC monitoring station: Livermore CA
57 Bearing: 147.5 degrees Distance: 166.1 km
58
59 Proposal is not within the West Virginia quiet zone area
60
61 Conditions at Table Mountain receiving zone:
62 Bearing: 79.5 degrees Distance: 1503.8 km
63
64
65 Study cell size: 0.50 km
66 Profile point spacing: 0.10 km
67
68 Maximum new IX to full-service and Class A: 0.50%
69 Maximum new IX to LPTV: 2.00%
70
71
72 -----
73 Interference to BLANK0000059424 CP scenario 1
74
75 Call Chan Svc Status City, State File Number Distance
76 Desired: KRCB D5 DT CP COTATI, CA BLANK0000059424
77
78 Undesireds: NEW_LAKEPORTD6 DT APP Lakeport, CA New_Lakeport 139.9 km
79
80 Service area Terrain-limited IX-free, before IX-free, after Percent New IX
81 31711.4 5,409,126 30716.1 5,251,096 30716.1 5,251,096 30710.9 5,251,050 0.02 0.00
82
83 Undesired Total IX Unique IX, before Unique IX, after
84 NEW_LAKEPORT D6 DT APP 5.2 46 5.2 46
85
86 -----

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87 Interference to DTVBL57945 BL scenario 1
88 **IX: 0.59% interference caused
89
90 Call Chan Svc Status City, State File Number Distance
91 Desired: KRCB D5 DT BL COTATI, CA DTVBL57945
92
93 Undesireds: NEW_LAKEPORTD6 DT APP Lakeport, CA New_Lakeport 73.2 km
94
95 Service area Terrain-limited IX-free, before IX-free, after Percent New IX
96 28877.2 5,324,029 28005.1 5,189,309 28005.1 5,189,309 27622.7 5,158,623 1.37 0.59
97
98 Undesired Total IX Unique IX, before Unique IX, after
99 NEW_LAKEPORT D6 DT APP 382.4 30,686 382.4 30,686
100
101 -----
102 Interference to proposal scenario 1
103 1.76% interference received
104
105 Call Chan Svc Status City, State File Number Distance
106 Desired: NEW_LAKEPORTD6 DT APP Lakeport, CA New_Lakeport
107
108 Undesireds: KRCB D5 DT CP COTATI, CA BLANK0000059424 139.9 km
109
110 Service area Terrain-limited IX-free Percent IX
111 28425.2 867,801 26707.7 843,670 26676.8 828,845 0.12 1.76
112
113 Undesired Total IX Unique IX Prcnt Unique IX
114 KRCB D5 DT CP 30.9 14,825 30.9 14,825 0.12 1.76
115
116 -----
117 Interference to proposal scenario 2
118
119 Call Chan Svc Status City, State File Number Distance
120 Desired: NEW_LAKEPORTD6 DT APP Lakeport, CA New_Lakeport
121
122 Undesireds: KRCB D5 DT BL COTATI, CA DTVBL57945 73.2 km
123
124 Service area Terrain-limited IX-free Percent IX
125 28425.2 867,801 26707.7 843,670 26679.2 843,646 0.11 0.00
126
127 Undesired Total IX Unique IX Prcnt Unique IX
128 KRCB D5 DT BL 28.4 24 28.4 24 0.11 0.00
129