

ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20054

FILED/ACCEPTED

DEC - 4 2008

Federal Communications Commission  
Office of the Secretary

In the Matter of )  
)  
Amendment of Section 73.622(b) ) (MB Docket No. 04-225)  
Digital Television Table of Allotments, ) (RM-10695)  
Santa Ana, California ) (BPRM-20030204AHA)

To: Office of the Secretary  
Attention: Chief, Media Bureau

**PETITION FOR DIGITAL CHANNEL SUBSTITUTION (RESTATED)**  
**SUBMISSION OF UPDATED ENGINEERING STATEMENT**

Trinity Christian Center of Santa Ana, Inc., d/b/a Trinity Broadcasting Network, licensee of digital broadcast station KTBN-DT, Santa Ana, California (Facility ID No. 67884) ("Petitioner" or "Trinity"), by its undersigned attorney, pursuant to an informal staff request, hereby submits an updated Engineering Statement in support of its captioned request.

The attached Engineering Statement (Attachment 1) clarifies that in evaluating the interference effects of Trinity's proposal to substitute digital channel 33 for presently allocated channel 23, it relied upon the same Longley-Rice-based software that the Commission employs in its interference studies. Specifically, Trinity's study used a cell size of 1 kilometer and an increment spacing of 0.1 kilometer along each azimuth.<sup>1</sup> As shown in Exhibit B of Attachment 1, the proposed KTBN-DT facility on Channel 33 contributes no more than 0.5 percent interference to the service population of any potentially affected post-transition DTV station or Class A low

<sup>1</sup> The Engineering Statement submitted with Trinity's October 31, 2008 filing incorrectly stated that the interference study had been based on "a cell size of 2.0 kilometers and an increment spacing of 1.0 kilometer along each radial." (See, Attachment 2, paragraph 3, from Trinity's October 31, 2008 filing.)

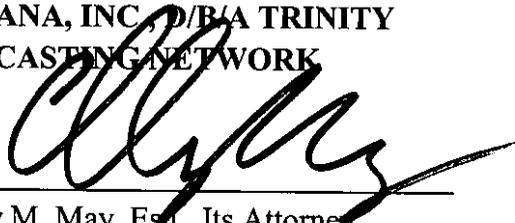
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power television station. Accordingly, Trinity's proposal meets the FCC's *de minimis* interference standards for DTV operations, and DTV channel 33 should be substituted for channel 23, Sant Ana, California.

Based on the foregoing, and the record provided in MB Docket No. 04-225 (RM-10695), the Commission is respectfully requested to amend the DTV Table of Allotments by substituting the allocation for Santa Ana, California from channel 23 to channel 33.

Respectfully submitted,

**TRINITY CHRISTIAN CENTER OF  
SANTA ANA, INC., D/B/A TRINITY  
BROADCASTING NETWORK**

By:   
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December 4, 2008

ATTACHMENT 1

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of TRINITY BROADCASTING NETWORK, licensee of digital television station KTBN-DT, Channel 23 in Santa Ana, California, in support of this amendment to its Petition for Rulemaking BPRM-20081031ACN to substitute Channel 33 as its allotted post-transition DTV channel. The purpose of this amendment is to revise the parameters of the interference analysis used to show that the proposal complies with the Commission's Rules with respect to pertinent post-transition co-channel and adjacent-channel full-service DTV facilities and Class A LPTV stations. No change in the proposed transmitter site, antenna pattern, antenna height, effective radiated power or other operating parameter is proposed herein.

We have determined that the proposed KTBN-DT operation on Channel 33 meets the FCC's recently adopted interference standards with respect to various co-channel and adjacent-channel digital television facilities as they will exist on or just before February 17, 2009, the date by which all stations must operate with the parameters adopted in the Commission's DTV Table of Allotments.

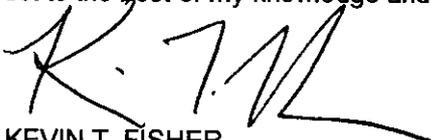
In evaluating the interference effect of this proposal, we have relied upon the same Longley-Rice-based software that the Commission employs in its studies. In this specific study a cell size of 1 kilometer and an increment spacing of 0.1 kilometer along each azimuth were used. Attached as Exhibit B is a summary printout of the results from our study. It concludes that the proposed KTBN-DT facility on Channel 33 contributes no more than 0.5 percent interference to the service population of any potentially affected post-transition DTV station or Class A LPTV station. Therefore, this proposal meets the FCC's *de minimis* interference standards for DTV operations.

SMITH AND FISHER

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EXHIBIT A

I declare, under penalty of perjury, that the foregoing statements and attached exhibit, which was prepared by me, are true and correct to the best of my knowledge and belief.

  
KEVIN T. FISHER

December 3, 2008

EXHIBIT B

Summary Study

Percent allowed new interference: 0.500  
Percent allowed new interference to Class A: 0.500  
Census data selected 2000  
Post Transition Data Base Selected ./data\_files/pt\_tvdb.sff

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 11-26-2008 Time: 10:45:27

Record Selected for Analysis

KTBN-D.P USERRECORD-01 SANTA ANA CA US  
Channel 33 ERP 1000. kW HAAT 892. m RCAMSL 01765 m  
Latitude 034-13-27 Longitude 0118-03-44  
Status APP Zone 2 Border  
Dir Antenna Make usr Model USRPAT01 Beam tilt N Ref Azimuth 0.  
Last update Cutoff date Docket  
Comments  
Applicant

Cell Size for Service Analysis 1.0 km/side

Distance Increments for Longley-Rice Analysis 0.10 km

Facility does not meet maximum height/power limits  
Channel 33 ERP = 1000.00 HAAT = 892.

Azimuth (Deg)	ERP (kW)	HAAT (m)	41.0 dBu F(50,90) (km)
0.0	0.900	418.6	58.3
45.0	0.900	360.5	55.8
90.0	202.500	576.7	104.9
135.0	868.544	1372.3	150.2
180.0	666.336	1481.0	149.5
225.0	899.575	1416.1	152.0
270.0	186.651	969.5	118.8
315.0	0.900	539.4	62.3

Evaluation toward Class A Stations

Station inside contour of Class A station  
KNET-LP 25 LOS ANGELES CA BSTA 20070216ABK

Station inside contour of Class A station  
KNET-LP 25 LOS ANGELES CA BLTTA 20060925AGZ

Station inside contour of Class A station  
KNET-LP 25 LOS ANGELES CA BPTTA 20070202ABA

Contour overlap to Class A station

KDFX-CA 33 INDIO/PALM SPRINGS CA BLTTA 20030313ALZ  
Offset Proposed Offset Class A - Required D/U ratio: 34.0

Class A Evaluation Complete

SPACING VIOLATION FOUND BETWEEN STATION

KTBN-D.P 33 SANTA ANA CA USERRECORD01

and station

SHORT TO: KPXN 30 SAN BERNARDINO CA BLCT 19940124KF  
034-11-15 0117-41-58  
Req. separation => 24.1 <= 96.6 Actual separation 33.7 Short 62.9(  
9.6) km

SHORT TO: KBAK-TV 33 BAKERSFIELD CA BLCDT 20060628ABK  
035-27-11 0118-35-25  
Req. separation 223.7 Actual separation 144.6 Short 79.1 km

SHORT TO: KBAK-TV 33 BAKERSFIELD CA DTVPLN DTVP1208  
35 -27-11 118 -35-25  
Req. separation 223.7 Actual separation 144.6 Short 79.1 km

SHORT TO: KTBN-DR 33 SANTA ANA CA BPRM 20081031ACN  
034-13-27 0118-03-44  
Req. separation 223.7 Actual separation 0.0 Short 223.7 km

LANDMOBILE SPACING VIOLATIONS FOUND

NONE

Proposed facility OK to FCC Monitoring Stations

Proposed facility OK toward West Virginia quiet zone

Proposed facility OK toward Table Mountain

Proposed facility is beyond the Canadian coordination distance

Proposed facility is within the Mexican coordination distance  
Distance to border = 207.0km

Proposed station is OK toward AM broadcast stations

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Start of Interference Analysis

Channel	Proposed Station Call	City/State	ARN
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33 KTBN-D.P SANTA ANA CA USERRECORD01

Stations Potentially Affected by Proposed Station

Chan No.	Call	City/State	Dist(km)	Status	Application	Ref.
19	KBBV-CA	BAKERSFIELD CA	144.8	LIC	BLTTA	-
20030710ABR						
19	KBBV-CA	BAKERSFIELD CA	144.8	APP	BSTA	-
20080923ABJ						
25	KNET-LP	LOS ANGELES CA	1.2	APP	BSTA	-
20070216ABK						
25	KNET-LP	LOS ANGELES CA	1.3	LIC	BLTTA	-
20060925AGZ						
25	KNET-LP	LOS ANGELES CA	1.2	APP	BPTTA	-
20070202ABA						
25	KSKP-CA	OXNARD CA	89.0	LIC	BLTTA	-
20030507ACF						
31	KBTF-CA	BAKERSFIELD CA	145.0	LIC	BLTTA	-
20041126ACC						
32	KDOC-TV	ANAHEIM CA	0.4	LIC	BLCDDT	-
20060626ACV						
32	KDOC-TV	ANAHEIM CA	0.4	PLN	DTVPLN	-
DTVP1171						
32	KDOC-TV	ANAHEIM CA	0.4	CP MOD	BMPCDDT	-
20040323ATA						
33	KBAK-TV	BAKERSFIELD CA	144.8	LIC	BLCDDT	-
20060628ABK						
33	KBAK-TV	BAKERSFIELD CA	144.8	PLN	DTVPLN	-
DTVP1208						
33	KDFX-CA	INDIO/PALM SPRINGS CA	155.2	LIC	BLTTA	-
20030313ALZ						
34	KMEX-TV	LOS ANGELES CA	0.5	CP	BPCDDT	-
20080228ABI						
34	KMEX-TV	LOS ANGELES CA	0.5	PLN	DTVPLN	-
DTVP1240						
34	KMEX-TV	LOS ANGELES CA	0.5	APP	BMPCDDT	-
20080620AGO						

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Study of this proposal found the following interference problem(s):

NONE.

**CERTIFICATE OF SERVICE**

I, Glinda M. Corbin, Office Manager in the Law Offices of Colby M. May, Esq., P.C., hereby certify that I have caused to be sent, this 4th day of December 2008, by the means designated below, a true and correct copy of the foregoing PETITION FOR DIGITAL CHANNEL SUBSTITUTION (RESTATED) SUBMISSION OF UPDATED ENGINEERING STATEMENT to the following:

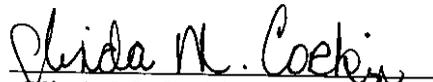
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