

August 26, 2011

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

FILED/ACCEPTED

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Federal Communications Commission
Office of the Secretary

RE: Supplement to Request for Waiver of Receive-Site Beyond 80 km Co-Channel Protection
Station KBAB-LD (the "Station")
Santa Barbara, California (FIN: 14003)
ET Docket Nos. 04-186 and 02-380

Dear Ms. Dortch:

Pursuant to the request, dated August 5, 2011, of the Commission's Office of Engineering and Technology, Biltmore Broadcasting Santa Barbara, Inc. ("Biltmore") hereby supplements its request, dated April 5, 2011, for a waiver to allow inclusion of the Station's receive site in the TV bands database. As indicated in its initial response, KBAB-LD receives and retransmits the signal of Noncommercial Educational Station KOCE-TV, Huntington Beach, California, and seeks by its waiver request to continue to do so without being impacted by external factors, including white spaces service, since Biltmore is providing the only over-the-air PBS television service in the Santa Barbara DMA.

Initially, Biltmore has reviewed the spreadsheet provided by the OET and determined it to be correct. Biltmore also wishes to make note that in computing distances, it used a calculation based on transmitter-to-transmitter distance and not one based on the edge of the television station's protected contour to receive transmitter distance. Biltmore submits that even using that computation, it is entitled to the requested waiver.

The questions posed to and the responses of Biltmore are as follows:

Question: Clarify the nature of the links between the broadcast station(s) and the receive site(s), *i.e.*, whether the TV stations you listed are being received at the listed receive sites directly over-the-air from the TV stations' transmitters, or whether the signals are coming through some intermediate means, such as TV translators.

Answer: NCE Station KOCE-TV is transmitted from the Mt. Wilson antenna farm in La Canada, California, and is received directly over-the-air at the KBAB-LD transmitter site.

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Question: For each receive site, confirm whether the channel listed is the channel being received for the TV station specified.

Answer: KBAB-LD operates on Channel 50 and KOCE-TV is received off-air on Channel 48.

Question: If there are intermediate links between the TV stations you listed and your receive sites, such as TV translators, please supply the coordinates, call signs and channel numbers of those intermediate stations to ensure that the protected contours are accurately calculated. For example, if the broadcast station is transmitted on channel 34, then translated and retransmitted on channel 16 before the signal is ultimately picked up by your receive site, the correct channel to list on the attached spreadsheet is 16 because this corresponds with the station being received.

Answer: There are no intermediate links.

Question: Confirm that the TV stations' call signs listed in the spreadsheet are correct and correspond to the station(s) actually being received at your receive site(s).

Answer: The information is correct.

Should there be any questions in regard hereto, please communicate with the undersigned.

Respectfully submitted,



Barry A. Friedman

cc: Ms. Aole Wilkins
FCC Office of Engineering and Technology