

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In re Applications of)
)
THREE ANGELS BROADCASTING)
NETWORK, INC)
) File No. BDISDVA-20121029ABE
For Construction Permit) Facility ID No. 67013
For Minor Modification of)
Station K21DO, Palm Springs, California)

To: Secretary, Federal Communications Commission
Attn: The Chief, Video Division, Media Bureau

INFORMAL OBJECTION

Entravision Holdings, LLC ("Entravision"), by its attorneys, hereby files this Informal Objection to the above-referenced application of Three Angels Broadcasting Network, Inc. ("TAN"), the licensee of Class A Station K21DO, Palm Springs, California. In that application, TAN seeks a construction permit for a digital Class A displacement station of K21DO to Channel 11 at Palm Springs, California (the "Application"). TAN's Application fails to meet the requirements for a displacement application and, as a result, must be either dismissed or denied. In support thereof, Entravision states as follows.

In baseball, the umpires are required to apply a fundamental rule that when a batter has incurred three strikes, it is out and must sit down. This applicant has already had its three strikes, in the form of displacement applications for Channels 22, 30 and 27 that have all been dismissed.¹ Now, it seeks, for a fourth time, displacement relief. As Entravision will show herein, the fourth time is no better than the previous three and TAN has struck out and should not

¹ File Nos. BDISDTA-20090721ACF, BDISDTA-20110830ABI, and BDISTA-20121015AAX.

be permitted to continue taking advantage of scarce Commission resources as it fumbles for a solution to whatever problem it perceives is affecting its current operations.

Station K21DO currently broadcasts on Output Channel 21. In place of Channel 21, TAN requests displacement relief to Channel 11. For purposes of seeking displacement relief, TAN is required to meet the terms and conditions set out in *Freeze on the Filing of Applications for New Digital Low Power Television and TV Translator Stations*, 25 FCC Rcd 15120 (2010). In that *Public Notice*, the Commission described the standard applicable to a station's qualification for displacement applications as follows (*id.* at 15121):

Furthermore, displacement applications will continue to be accepted where the applicant demonstrates actual interference from existing full-power television stations, as well as displacement applications filed by stations operating on channels 52 through 68.

As evidence in the Technical Exhibit attached hereto as Exhibit A, TAN has failed to provide any support for the conclusion that K21DO's current service is affected by interference from a full-service television station or a channels 52 through 68 displacee. On the contrary, Exhibit A tells us that the licensed operations of K21DO "is not predicted to either cause or receive excessive interference from any station."

The broadcast stations that TAN makes particular reference to fail to provide the necessary interference to qualify for K21DO's displacement. Station KPMR, operating on Channel 21 at distant Santa Barbara, California, will only cause 0.14% interference to K21DO. This is, of course, below the 0.5% threshold. As for TAN's references to Low Power Television Stations K21GI and K20HZ, the displacement rules do not apply as these are not full-service stations. If there are interference issues arising from these LPTV stations, Part 74 provides a basis for a basis for TAN objecting to the applications or the Stations' operations. However, it does not give TAN the opportunity to seek or obtain displacement relief.

Both the history of TAN's displacement filings and the instant application teach us that this is a party that has adopted the practice of submitting an application and then awaiting a Commission decision as to whether it complies with Commission rules or not. While this might well be a procedure that works in fishing, where one casts out one's rod and line in the hope that a fish will be caught, the Commission deserves more from its licensees than to serve as a testing ground for TAN's lack of analytical skills. In denying TAN's fourth displacement effort, TAN should be admonished to review the Commission's rules and only to submit applications where there is a reasonable likelihood that the Commission will consider them positively. For TAN to require the Commission to review constantly its applications and cause other parties to have file objections, is a waste of valuable time, money and effort. There is no longer a reason for this to be tolerated.

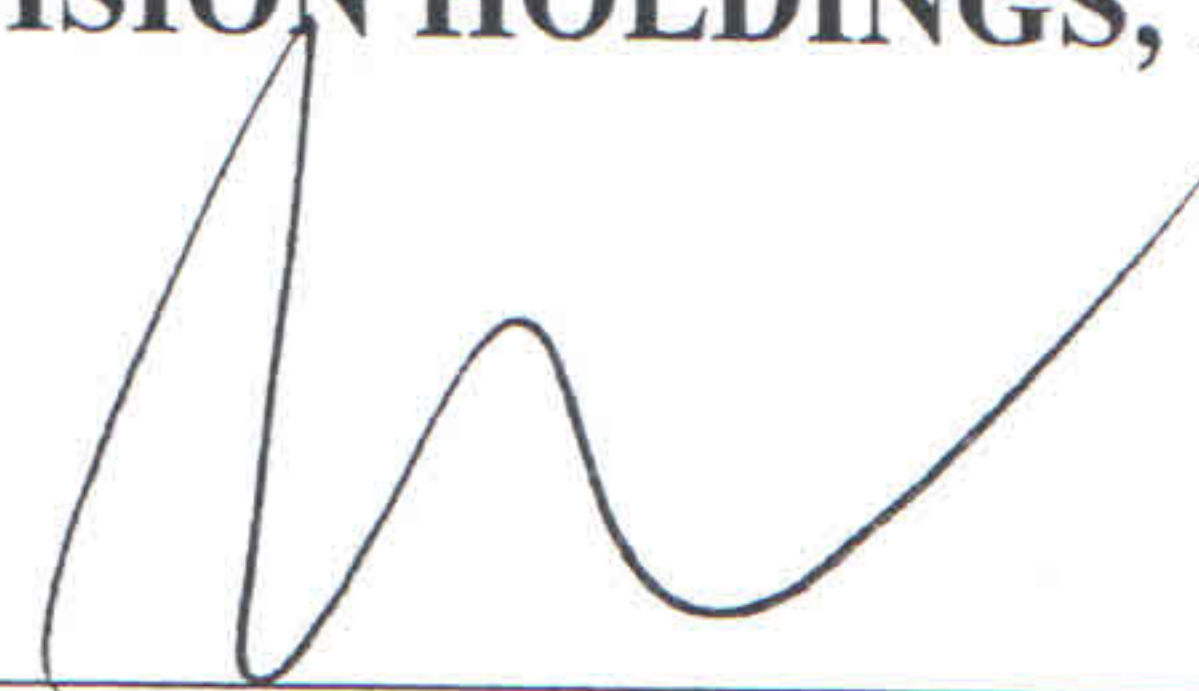
WHEREFORE, it is respectfully requested that the application filed by Three Angels Broadcasting Network, Inc. for displacement relief for Station K21DO, to Output Channel 11,

should be dismissed or, in the alternative, denied.

Respectfully submitted,

ENTRAVISION HOLDINGS, LLC

By: _____



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Dated: December 17, 2012

EXHIBIT A

TECHNICAL EXHIBIT
PREPARED IN SUPPORT OF
AN OBJECTION TO
DTV DISPLACEMENT APPLICATION
LPTV STATION K21DO
FCC FILE NO. BDISDVA-20121029ABE
FCC FACILITY ID 67013
PALM SPRINGS, CALIFORNIA
CH 11 1.5 KW (MAX-DA)

This technical exhibit was prepared in support of an objection to the pending DTV channel 11 displacement application (BDISDVA-20121029ABE, Facility ID 67013) of LPTV station K21DO at Palm Springs, California (Facility ID 128168). Specifically, the purpose of this technical exhibit is to demonstrate that the K21DO application does qualify for displacement relief.

Station K21DO is currently licensed (BLTTL-19941013JF) to operate on analog channel 21 with a directional antenna (DA) maximum effective radiated power (ERP) of 9.2 kilowatts (kW) and an antenna radiation center height above mean sea level (RCAMSL) of 498 meters. The pending displacement application (BDISDVA-20121029ABE) proposes digital operation on channel 11 with a DA maximum ERP of 1.5 kW and an RCAMSL of 488 meters.

Pursuant to the FCC's Public Notice entitled "Freeze on the Filing of Applications for New Digital Low Power Televisions and TV Translator Stations" (DA 10-2070, released: October 28, 2010), in order to qualify for displacement an applicant must demonstrate that interference is from an existing full-power television station. Thus, an analysis of the interference potential for K21DO's licensed analog operation was conducted based on the procedures outlined in the FCC's OET-69 Bulletin using a 1 kilometer grid and 1 kilometer terrain distance increment and the 2000 U.S. Census data.¹ The results are provided in Figure 1. As indicated, the licensed K21DO operation is not predicted to either cause or receive excessive interference from any station. In fact, K21DO's licensed operation is not predicted to receive any interference (0%) and only causes 0.14% interference to the licensed

¹ The implementation of the OET-69 Bulletin utilized for this analysis is identical to the implementation used by the FCC.

operation of KPMR on channel 21 at Santa Barbara, California (up to 0.5% is permitted). Therefore, K21DO does not qualify for displacement.²

I hereby declare under penalty of perjury that the forgoing is true and correct to the best of my personal knowledge and belief.



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December 13, 2012

² It is noted that the K21DO displacement application justifies displacement based on excessive interference caused by its licensed analog operation to a pending application for KPMR and the licensed and proposed operations of LPTV station K21GI on channel 21 at Morongo Valley, California, and excessive interference received by its licensed analog operation from pending applications for LPTV station K20HZ on channels 20 and 21 at Palm Springs, California and the licensed and proposed operations of LPTV station K21GI on channel 21 at Morongo Valley. As noted above, our calculations do not show interference caused to, or received from, these stations by K21DO's licensed analog operation. However, even presuming that was the case it would not be a basis for displacement pursuant to the FCC's displacement criteria.

OET-69 TV INTERFERENCE ANALYSIS PROGRAM

Percent allowed new interference: 0.500
Percent allowed new interference to non Class A LPTV: 2.000
TW Census data selected 2000
Data Base Selected
/export/home/cdbs/pt_tvdb.sff

Date: 12-12-2012 Time: 10:31:09

Record Selected for Analysis

K21DO BLTTL -19941013JF PALM SPRINGS/INDIO CA US
Channel 21 ERP 9.2 kW HAAT 00424 m RCAMSL 00498 m
Latitude 033-52-12 Longitude 0116-25-44
Status LIC Zone Border M Offset -
Dir Antenna Make CDB Model 00000000019637 Beam tilt N Ref Azimuth 200.0
Last update 00000000 Cutoff date 00000000 Docket
Comments
Applicant THREE ANGELS BROADCASTING NETWORK, I

Cell Size for Service Analysis 1.0 km/side

Distance Increments for Longley-Rice Analysis 1.00 km

Not full service station
Service Class = CA
Maximum height/power limits not checked

Site number	1			
Azimuth	ERP	HAAT	74.0 dBu F(50,50)	
(Deg)	(kW)	(m)	(km)	
0.0	0.238	33.0	3.3	
45.0	0.263	33.0	3.4	
90.0	2.421	178.7	13.5	
135.0	9.072	425.2	28.6	
180.0	1.219	378.9	16.8	
225.0	1.917	356.3	18.5	
270.0	9.090	264.6	23.6	
315.0	1.859	211.1	13.6	

Database HAAT(MAX) does not agree with computed HAAT(MAX)
Database HAAT(MAX): 424 Computed HAAT(MAX): 425

Evaluation from Class A Station

Contour overlap to station
KPMR 21 SANTA BARBARA CA BPCDT 20120817ABD

Contour overlap to station
KPMR 21 SANTA BARBARA CA BLCDT 20110607ABB

Contour Overlap Evaluation from Class A Complete

Contour Overlap Evaluation from LPTV Station to LPTV Stations

Station inside contour of station
K20HZ 20 PALM SPRINGS CA BLTTL 20070227ACR

Station inside contour of station
K20HZ 20 PALM SPRINGS CA BDFCDTL 20111209HJP

Contour overlap to station
K21KS-D 21 JOSHUA TREE, ETC. CA BDCCDTT 20061030AHG

Contour overlap to station
K21GR 21 JOSHUA TREE, ETC. CA BLTT 20080902AEB

Contour overlap to station
K21GI 21 MORONGO VALLEY CA BLTT 20050516AUD

Station inside contour of station
K21GI 21 MORONGO VALLEY CA BDFCDTT 20120109ACZ

Contour overlap to station
NEW 21 RIVERSIDE CA BNPDTL 20090825AAL

Contour overlap to station
K21AC 21 VICTORVILLE, ETC. CA BLTT 19820105IG

Station inside contour of station
K20HZ 22 PALM SPRINGS CA BDISDTL 20110617AAS

Contour Overlap Evaluation from LPTV to LPTV Stations Complete

Contour Overlap to Proposed Station

Station
K20HZ 20 PALM SPRINGS CA BLTTL20070227ACR

Is inside contour of station
K21DO 21 PALM SPRINGS/INDIO CA BLTTL 19941013JF

Station

K21GI 21 MORONGO VALLEY CA BLTT20050516AUD causes

Contour overlap to station

K21DO 21 PALM SPRINGS/INDIO CA BLTTL 19941013JF

Station

K21AC 21 VICTORVILLE, ETC. CA BLTT19820105IG causes

Contour overlap to station

K21DO 21 PALM SPRINGS/INDIO CA BLTTL 19941013JF

Contour Overlap Evaluation to Proposed Station Complete

Checks to Site Number 01

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 = 141.5km

Proposed station is 3.00km from AM station
THOUSAND PALMS CA KNWZ Status: L Antenna: DA2

Proposed station is 3.00km from AM station
CATHEDRAL CITY CA KPSF Status: Antenna: DA2

Start of Interference Analysis

Channel	Call	Proposed Station City/State	ARN
21	K21DO	PALM SPRINGS/INDIO CA	BLTTL 19941013JF

Stations Potentially Affected by Proposed Station

Chan	Call	City/State	Dist (km)	Status	Application	Ref. No.
20	K20HZ	PALM SPRINGS CA	0.5	LIC	BLTTL	-20070227ACR
20	K20HZ	PALM SPRINGS CA	0.5	APP	BDFCDTL	-20111209HJP
21	K21KS-D	JOSHUA TREE, ETC. CA	49.3	CP	BDCCDTT	-20061030AHG
21	K21GR	JOSHUA TREE, ETC. CA	31.5	LIC	BLTT	-20080902AEB
21	K21GI	MORONGO VALLEY CA	24.2	LIC	BLTT	-20050516AUD
21	K21GI	MORONGO VALLEY CA	24.2	APP	BDFCDTT	-20120109ACZ
21	NEW	RIVERSIDE CA	29.8	APP	BNPDTL	-20090825AAL
21	KPMR	SANTA BARBARA CA	333.7	APP	BPCDT	-20120817ABD
21	KPMR	SANTA BARBARA CA	332.6	LIC	BLCDT	-20110607ABB
21	K21AC	VICTORVILLE, ETC. CA	114.0	LIC	BLTT	-19820105IG

22 K20HZ PALM SPRINGS CA 0.5 APP BDISDTL -20110617AAS

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Analysis of Interference to Affected Station 1

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
20	K20HZ	PALM SPRINGS CA	BLTTL	-20070227ACR

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application	Ref. No.
18	KUSI-TV	SAN DIEGO CA	138.2	LIC	BLCDT	-20060515ADM
19	KLPS-LP	INDIO CA	20.5	CP	BDFCDTL	-20090319ACW
19	KLPS-LP	INDIO CA	20.6	LIC	BLTTL	-19980922JE
19	NEW	WHITE WATER CA	28.1	APP	BNPDTL	-20100514ACF
20	K20IM-D	BARSTOW CA	123.6	CP	BPTTL	-20081009ANQ
21	K21GI	MORONGO VALLEY CA	24.3	LIC	BLTT	-20050516AUD
21	K21GI	MORONGO VALLEY CA	24.3	APP	BDFCDTT	-20120109ACZ
21	K21DO	PALM SPRINGS/INDIO CA	0.5	LIC	BLTTL	-19941013JF
21	NEW	RIVERSIDE CA	29.3	APP	BNPDTL	-20090825AAL
23	KVMD	TWENTYNINE PALMS CA	39.9	LIC	BLCDT	-20060615AAB
23	KVMD	TWENTYNINE PALMS CA	140.3	APP	BPCDT	-20100325ACD
23	KVMD	TWENTYNINE PALMS CA	113.8	APP	BPCDT	-20100325ACD
23	KVMD	TWENTYNINE PALMS CA	39.9	APP	BPCDT	-20100325ACD

Proposal causes no interference

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Analysis of Interference to Affected Station 2

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
20	K20HZ	PALM SPRINGS CA	BDFCDTL	-20111209HJP

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application	Ref. No.
19	KLPS-LP	INDIO CA	20.5	CP	BDFCDTL	-20090319ACW
19	KLPS-LP	INDIO CA	20.6	LIC	BLTTL	-19980922JE
19	NEW	WHITE WATER CA	28.1	APP	BNPDTL	-20100514ACF
20	K20IM-D	BARSTOW CA	123.6	LIC	BLDTL	-20100630BDO
20	K20IM-D	BARSTOW CA	123.6	CP	BPTTL	-20081009ANQ
20	K20LH-D	RIDGECREST CA	212.5	LIC	BLDTT	-20120316ACR
20	KTUD-CD	LAS VEGAS NV	263.4	LIC	BLDTL	-20090923AEB
21	K21KS-D	JOSHUA TREE, ETC. CA	49.7	CP	BDCCDTT	-20061030AHG
21	K21GR	JOSHUA TREE, ETC. CA	31.9	LIC	BLTT	-20080902AEB
21	K21GI	MORONGO VALLEY CA	24.3	LIC	BLTT	-20050516AUD
21	K21GI	MORONGO VALLEY CA	24.3	APP	BDFCDTT	-20120109ACZ
21	K21DO	PALM SPRINGS/INDIO CA	0.5	LIC	BLTTL	-19941013JF
21	NEW	RIVERSIDE CA	29.3	APP	BNPDTL	-20090825AAL

Proposal causes no interference

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Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
21	K21KS-D	JOSHUA TREE, ETC. CA	BDCDDT	-20061030AHG

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application	Ref. No.
20	K20HZ	PALM SPRINGS CA	49.7	APP	BDFCDTL	-20111209HJP
21	K21EA	LAKE HAVASU CITY AZ	156.8	LIC	BLTT	-19930525IK
21	K21EA	LAKE HAVASU CITY AZ	156.8	CP MOD	BMPDPT	-20111025ABS
21	KRPO-LD	QUARTZSITE AZ	219.1	LIC	BLDTL	-20110926AEA
21	K21FU	TOPOCK AZ	180.1	CP MOD	BMPDPT	-20111024AFW
21	K21FU	TOPOCK, ETC. AZ	180.1	LIC	BLTT	-20040521AAQ
21	NEW	CALEXICO CA	158.6	APP	BMJADTL	-20100517AAU
21	KDUG-LP	HEMET CA	126.1	LIC	BLTTL	-20080813ABI
21	K21GR	JOSHUA TREE, ETC. CA	33.1	LIC	BLTT	-20080902AEB
21	K21GI	MORONGO VALLEY CA	54.3	LIC	BLTT	-20050516AUD
21	K21GI	MORONGO VALLEY CA	54.3	APP	BDFCDTT	-20120109ACZ
21	NEW	NEWBERRY SPRINGS CA	124.6	APP	BDCDDT	-20120612ACQ
21	K21DO	PALM SPRINGS/INDIO CA	49.3	LIC	BLTTL	-19941013JF
21	NEW	RIVERSIDE CA	79.1	APP	BNPDTL	-20090825AAL
21	KPMR	SANTA BARBARA CA	372.1	APP	BPCDT	-20120817ABD
21	KPMR	SANTA BARBARA CA	371.1	LIC	BLCDDT	-20110607ABB
21	K21AC	VICTORVILLE, ETC. CA	135.9	LIC	BLTT	-19820105IG
21	KVPX-LD	LAS VEGAS NV	223.9	APP	BDISDTL	-20120201AJH
22	K20HZ	PALM SPRINGS CA	49.7	APP	BDISDTL	-20110617AAS

Proposal causes no interference

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Analysis of Interference to Affected Station 4

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
21	K21GR	JOSHUA TREE, ETC. CA	BLTT	-20080902AEB

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application	Ref. No.
20	K20HZ	PALM SPRINGS CA	31.9	APP	BDFCDTL	-20111209HJP
21	KDUG-LP	HEMET CA	101.2	LIC	BLTTL	-20080813ABI
21	K21KS-D	JOSHUA TREE, ETC. CA	33.1	CP	BDCDDT	-20061030AHG
21	K21GI	MORONGO VALLEY CA	23.2	LIC	BLTT	-20050516AUD
21	K21GI	MORONGO VALLEY CA	23.2	APP	BDFCDTT	-20120109ACZ
21	K21DO	PALM SPRINGS/INDIO CA	31.5	LIC	BLTTL	-19941013JF
21	NEW	RIVERSIDE CA	57.3	APP	BNPDTL	-20090825AAL
21	KPMR	SANTA BARBARA CA	339.1	APP	BPCDT	-20120817ABD
21	KPMR	SANTA BARBARA CA	338.0	LIC	BLCDDT	-20110607ABB

21	K21AC	VICTORVILLE, ETC. CA	104.2	LIC	BLTT	-19820105IG
22	K20HZ	PALM SPRINGS CA	31.9	APP	BDISDTL	-20110617AAS
23	KVMD	TWENTYNINE PALMS CA	47.8	LIC	BLCDT	-20060615AAB
23	KVMD	TWENTYNINE PALMS CA	104.1	APP	BPCDT	-20100325ACD
23	KVMD	TWENTYNINE PALMS CA	47.8	APP	BPCDT	-20100325ACD
36	KNBC	LOS ANGELES CA	127.6	APP	BMPCDT	-20100811ABJ
36	K36GO	MORONGO VALLEY CA	23.2	LIC	BLTT	-20060331AEU
23	KVMD	TWENTYNINE PALMS CA		APP	BPCDT	-20100325ACD
36	KNBC	LOS ANGELES CA		APP	BMPCDT	-20100811ABJ
36	KNBC	LOS ANGELES CA		APP	BMPCDT	-20100811ABJ
36	KNBC	LOS ANGELES CA		APP	BMPCDT	-20100811ABJ

Proposal causes no interference

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Analysis of Interference to Affected Station 5

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
21	K21GI	MORONGO VALLEY CA	BLTT	-20050516AUD

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application	Ref. No.
18	KSCI	LONG BEACH CA	140.5	LIC	BLCDT	-20100412AEF
20	K20HZ	PALM SPRINGS CA	24.3	LIC	BLTTL	-20070227ACR
20	K20HZ	PALM SPRINGS CA	24.3	APP	BDFCDTL	-20111209HJP
21	KDUG-LP	HEMET CA	79.2	LIC	BLTTL	-20080813ABI
21	K21KS-D	JOSHUA TREE, ETC. CA	54.3	CP	BDCCDTT	-20061030AHG
21	K21GR	JOSHUA TREE, ETC. CA	23.2	LIC	BLTT	-20080902AEB
21	K21DO	PALM SPRINGS/INDIO CA	24.2	LIC	BLTTL	-19941013JF
21	NEW	RIVERSIDE CA	38.7	APP	BNPDTL	-20090825AAL
21	KPMR	SANTA BARBARA CA	318.7	APP	BPCDT	-20120817ABD
21	KPMR	SANTA BARBARA CA	317.7	LIC	BLCDT	-20110607ABB
21	K21AC	VICTORVILLE, ETC. CA	91.2	LIC	BLTT	-19820105IG
22	K20HZ	PALM SPRINGS CA	24.3	APP	BDISDTL	-20110617AAS
22	NEW	TWIN PEAKS CA	48.6	APP	BNPDTL	-20090831ABD
23	KVMD	TWENTYNINE PALMS CA	24.9	LIC	BLCDT	-20060615AAB
23	KVMD	TWENTYNINE PALMS CA	129.8	APP	BPCDT	-20100325ACD
23	KVMD	TWENTYNINE PALMS CA	91.1	APP	BPCDT	-20100325ACD
23	KVMD	TWENTYNINE PALMS CA	24.9	APP	BPCDT	-20100325ACD
24	KBEH	OXNARD CA	140.5	APP	BPCDT	-20091119ACZ
24	KBEH	OXNARD CA	140.5	LIC	BLCDT	-20091119ACV
28	KCET	LOS ANGELES CA	140.7	LIC	BLEDT	-20090615ADO
28	KCET	LOS ANGELES CA	140.7	APP	BMPEDT	-20090206ACI
29	KFTR-DT	ONTARIO CA	141.1	LIC	BLCDT	-20100401AFY
29	KFTR-DT	ONTARIO CA	141.1	APP	BPCDT	-20100426ACW
35	KRCA	RIVERSIDE CA	140.5	LIC	BLCDT	-20091112AIM
36	KNBC	LOS ANGELES CA	140.9	LIC	BLCDT	-20070820ACK
36	KNBC	LOS ANGELES CA	108.8	APP	BMPCDT	-20100811ABJ
36	KNBC	LOS ANGELES CA	140.9	APP	BMPCDT	-20100811ABJ
36	K36GO	MORONGO VALLEY CA	0.0	LIC	BLTT	-20060331AEU
24	KBEH	OXNARD CA		APP	BPCDT	-20091119ACZ
36	KNBC	LOS ANGELES CA		APP	BMPCDT	-20100811ABJ
36	KNBC	LOS ANGELES CA		APP	BMPCDT	-20100811ABJ

Proposal causes no interference

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Analysis of Interference to Affected Station 6

Analysis of current record

Channel	Call	City/State	Application Ref. No.
21	K21GI	MORONGO VALLEY CA	BDFCDTT -20120109ACZ

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application Ref. No.
20	K20HZ	PALM SPRINGS CA	24.3	LIC	BLTTL -20070227ACR
20	K20HZ	PALM SPRINGS CA	24.3	APP	BDFCDTL -20111209HJP
21	K21FU	TOPOCK AZ	226.4	CP MOD	BMPDPTT -20111024AFW
21	K21FP	BAKERSFIELD CA	251.9	CP	BDFCDTT -20120720ADA
21	K21FP	BAKERSFIELD CA	251.9	LIC	BLTT -20021009AAE
21	NEW	CALEXICO CA	180.1	APP	BMJADTL -20100517AAU
21	KDUG-LP	HEMET CA	79.2	LIC	BLTTL -20080813ABI
21	K21KS-D	JOSHUA TREE, ETC. CA	54.3	CP	BDCCDPTT -20061030AHG
21	K21GR	JOSHUA TREE, ETC. CA	23.2	LIC	BLTT -20080902AEB
21	NEW	NEWBERRY SPRINGS CA	96.7	APP	BDCCDPTT -20120612ACQ
21	K21DO	PALM SPRINGS/INDIO CA	24.2	LIC	BLTTL -19941013JF
21	K21IN-D	RIDGECREST, ETC. CA	188.5	LIC	BLDPTT -20090622AAK
21	NEW	RIVERSIDE CA	38.7	APP	BNPDTL -20090825AAL
21	KPMR	SANTA BARBARA CA	318.7	APP	BPCDT -20120817ABD
21	KPMR	SANTA BARBARA CA	317.7	LIC	BLCDT -20110607ABB
21	K21AC	VICTORVILLE, ETC. CA	91.2	LIC	BLTT -19820105IG
21	KVPX-LD	LAS VEGAS NV	249.8	APP	BDISDTL -20120201AJH
22	KMRZ-LD	LOS ANGELES CA	141.7	APP	BSTA -20111220AFQ
22	K20HZ	PALM SPRINGS CA	24.3	APP	BDISDTL -20110617AAS
22	NEW	TWIN PEAKS CA	48.6	APP	BNPDTL -20090831ABD

Proposal causes no interference

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Analysis of Interference to Affected Station 7

Analysis of current record

Channel	Call	City/State	Application Ref. No.
21	NEW	RIVERSIDE CA	BNPDTL -20090825AAL

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist (km)	Status	Application Ref. No.
20	K20HZ	PALM SPRINGS CA	29.3	LIC	BLTTL -20070227ACR
20	K20HZ	PALM SPRINGS CA	29.3	APP	BDFCDTL -20111209HJP
21	K21FU	TOPOCK AZ	258.4	CP MOD	BMPDPTT -20111024AFW
21	K21FP	BAKERSFIELD CA	263.9	CP	BDFCDTT -20120720ADA
21	K21FP	BAKERSFIELD CA	264.0	LIC	BLTT -20021009AAE
21	NEW	CALEXICO CA	162.2	APP	BMJADTL -20100517AAU
21	KDUG-LP	HEMET CA	47.3	LIC	BLTTL -20080813ABI

21	K21KS-D	JOSHUA TREE, ETC. CA	79.1	CP	BDCCDTT	-20061030AHG
21	K21GR	JOSHUA TREE, ETC. CA	57.3	LIC	BLTT	-20080902AEB
21	K21GI	MORONGO VALLEY CA	38.7	LIC	BLTT	-20050516AUD
21	K21GI	MORONGO VALLEY CA	38.7	APP	BDFCDTT	-20120109ACZ
21	NEW	NEWBERRY SPRINGS CA	127.6	APP	BDCCDTT	-20120612ACQ
21	K21DO	PALM SPRINGS/INDIO CA	29.8	LIC	BLTTL	-19941013JF
21	K21IN-D	RIDGECREST, ETC. CA	212.0	LIC	BLDTT	-20090622AAK
21	KPMR	SANTA BARBARA CA	311.8	APP	BPCDT	-20120817ABD
21	KPMR	SANTA BARBARA CA	310.8	LIC	BLCDT	-20110607ABB
21	K21AC	VICTORVILLE, ETC. CA	109.5	LIC	BLTT	-19820105IG
21	KVPX-LD	LAS VEGAS NV	288.1	APP	BDISDTL	-20120201AJH
22	KMRZ-LD	LOS ANGELES CA	136.2	APP	BDISDTL	-20090602ACM
22	KFLA-LD	LOS ANGELES CA	136.2	APP	BDISDTL	-20090629ACM
22	KMRZ-LD	LOS ANGELES CA	136.2	CP	BDISDTL	-20120611ABA
22	KMRZ-LD	LOS ANGELES CA	136.2	APP	BSTA	-20111220AFQ
22	NEW	LOS ANGELES CA	136.2	APP	BDCCDTL	-20121116AMQ
22	K20HZ	PALM SPRINGS CA	29.3	APP	BDISDTL	-20110617AAS
22	NEW	TWIN PEAKS CA	58.7	APP	BNPDTL	-20090831ABD

Proposal causes no interference

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Analysis of Interference to Affected Station 8

Analysis of current record

Channel	Call	City/State	Application Ref. No.
21	KPMR	SANTA BARBARA CA	BPCDT -20120817ABD

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
21	K21DO	PALM SPRINGS/INDIO CA	333.7	LIC	BLTTL -19941013JF

Proposal causes no interference

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Analysis of Interference to Affected Station 9

Analysis of current record

Channel	Call	City/State	Application Ref. No.
21	KPMR	SANTA BARBARA CA	BLCDT -20110607ABB

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
21	K21DO	PALM SPRINGS/INDIO CA	332.6	LIC	BLTTL -19941013JF

Total scenarios = 1

Result key: 1
Scenario 1 Affected station 9
Before Analysis

Results for: 21A CA SANTA BARBARA BLCDT 20110607ABB LIC
HAAT 930.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1637010	43475.4
not affected by terrain losses	1363527	32827.7
lost to NTSC IX	0	0.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	0	0.0

Potential Interfering Stations Included in above Scenario 1

After Analysis

Results for: 21A CA SANTA BARBARA BLCDT 20110607ABB LIC
HAAT 930.0 m, ATV ERP 1000.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	1637010	43475.4
not affected by terrain losses	1363527	32827.7
lost to NTSC IX	1957	1.0
lost to additional IX by ATV	0	0.0
lost to ATV IX only	0	0.0
lost to all IX	1957	1.0

Potential Interfering Stations Included in above Scenario 1

21N CA PALM SPRINGS/INDIO BLTTL 19941013JF LIC

Percent new IX = 0.1435%

Worst case new IX 0.1435% Scenario 1

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Analysis of Interference to Affected Station 10

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
21	K21AC	VICTORVILLE, ETC. CA	BLTT	-19820105IG

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
18	KSCI	LONG BEACH CA	83.7	LIC	BLCDT	-20100412AEF
20	K20IM-D	BARSTOW CA	34.8	LIC	BLDTL	-20100630BDO
20	K20IM-D	BARSTOW CA	34.8	CP	BPTTL	-20081009ANQ
21	K21FP	BAKERSFIELD CA	161.1	CP	BDFCDTT	-20120720ADA
21	K21FP	BAKERSFIELD CA	161.1	LIC	BLTT	-20021009AAE
21	KDUG-LP	HEMET CA	112.6	LIC	BLTTL	-20080813ABI
21	K21GR	JOSHUA TREE, ETC. CA	104.2	LIC	BLTT	-20080902AEB
21	K21GI	MORONGO VALLEY CA	91.2	LIC	BLTT	-20050516AUD
21	K21GI	MORONGO VALLEY CA	91.2	APP	BDFCDTT	-20120109ACZ
21	NEW	NEWBERRY SPRINGS CA	47.0	APP	BDCDDTT	-20120612ACQ

21	K21DO	PALM SPRINGS/INDIO CA	114.0	LIC	BLTTL	-19941013JF
21	K21IN-D	RIDGECREST, ETC. CA	103.1	LIC	BLDTT	-20090622AAK
21	NEW	RIVERSIDE CA	109.5	APP	BNPDTL	-20090825AAL
21	KPMR	SANTA BARBARA CA	245.9	APP	BPCDT	-20120817ABD
21	KPMR	SANTA BARBARA CA	244.8	LIC	BLCDT	-20110607ABB
22	KMRZ-LD	LOS ANGELES CA	83.4	APP	BSTA	-20111220AFQ
22	KVVB-LP	LUCERNE VALLEY CA	32.7	APP	BDISTT	-20070705AEY
22	NEW	TWIN PEAKS CA	51.0	APP	BNPDTL	-20090831ABD
23	KVMD	TWENTYNINE PALMS CA	77.1	LIC	BLCDT	-20060615AAB
23	KVMD	TWENTYNINE PALMS CA	93.5	APP	BPCDT	-20100325ACD
23	KVMD	TWENTYNINE PALMS CA	0.2	APP	BPCDT	-20100325ACD
23	KVMD	TWENTYNINE PALMS CA	77.1	APP	BPCDT	-20100325ACD
24	KBEH	OXNARD CA	83.7	APP	BPCDT	-20091119ACZ
24	KBEH	OXNARD CA	83.7	LIC	BLCDT	-20091119ACV
28	KCET	LOS ANGELES CA	83.1	LIC	BLEDT	-20090615ADO
28	KCET	LOS ANGELES CA	83.1	APP	BMPEDT	-20090206ACI
29	KFTR-DT	ONTARIO CA	83.3	LIC	BLCDT	-20100401AFY
29	KFTR-DT	ONTARIO CA	83.3	APP	BPCDT	-20100426ACW
35	KRCA	RIVERSIDE CA	83.7	LIC	BLCDT	-20091112AIM
36	K36JH	BARSTOW CA	0.5	LIC	BLTTL	-20090401AXW
36	KNBC	LOS ANGELES CA	83.2	LIC	BLCDT	-20070820ACK
36	KNBC	LOS ANGELES CA	42.9	APP	BMPCDT	-20100811ABJ
36	KNBC	LOS ANGELES CA	123.5	APP	BMPCDT	-20100811ABJ
36	KNBC	LOS ANGELES CA	83.2	APP	BMPCDT	-20100811ABJ
36	KNBC	LOS ANGELES CA	123.5	APP	BMPCDT	-20100811ABJ
24	KBEH	OXNARD CA		APP	BPCDT	-20091119ACZ

Proposal causes no interference

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Analysis of Interference to Affected Station 11

Analysis of current record

Channel	Call	City/State	Application Ref. No.
22	K20HZ	PALM SPRINGS CA	BDISDTL -20110617AAS

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application Ref. No.
21	K21KS-D	JOSHUA TREE, ETC. CA	49.7	CP	BDCCDTT -20061030AHG
21	K21GR	JOSHUA TREE, ETC. CA	31.9	LIC	BLTT -20080902AEB
21	K21GI	MORONGO VALLEY CA	24.3	LIC	BLTT -20050516AUD
21	K21GI	MORONGO VALLEY CA	24.3	APP	BDFCDTT -20120109ACZ
21	K21DO	PALM SPRINGS/INDIO CA	0.5	LIC	BLTTL -19941013JF
21	NEW	RIVERSIDE CA	29.3	APP	BNPDTL -20090825AAL
22	NEW	BAKERSFIELD CA	264.5	APP	BNPDTL -20090825BUG
22	KVYE	EL CENTRO CA	174.4	LIC	BLCDT -20070604ABN
22	KMRZ-LD	LOS ANGELES CA	156.3	APP	BDISDTL -20090602ACM
22	KFLA-LD	LOS ANGELES CA	156.3	APP	BDISDTL -20090629ACM
22	KMRZ-LD	LOS ANGELES CA	156.3	CP	BDISDTL -20120611ABA
22	KMRZ-LD	LOS ANGELES CA	156.3	APP	BSTA -20111220AFQ
22	NEW	LOS ANGELES CA	156.3	APP	BDCCDTL -20121116AMQ
22	KVVB-LP	LUCERNE VALLEY CA	81.3	APP	BDISTT -20070705AEY
22	NEW	TWIN PEAKS CA	67.5	APP	BNPDTL -20090831ABD
22	KVMY	LAS VEGAS NV	271.1	LIC	BLCDT -20090220ABX

22	K22DR	LAUGHLIN NV	218.0	LIC	BLTT	-19911118JJ
23	KVMD	TWENTYNINE PALMS CA	39.9	LIC	BLCDDT	-20060615AAB
23	KVMD	TWENTYNINE PALMS CA	113.8	APP	BPCDDT	-20100325ACD
23	KVMD	TWENTYNINE PALMS CA	39.9	APP	BPCDDT	-20100325ACD
23	KVMD	TWENTYNINE PALMS CA		APP	BPCDDT	-20100325ACD

Proposal causes no interference

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Analysis of Interference to Affected Station 12

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
21	K21DO	PALM SPRINGS/INDIO CA	BLTTTL	-19941013JF

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
18	KUSI-TV	SAN DIEGO CA	138.6	LIC	BLCDDT	-20060515ADM
19	KSWB-TV	SAN DIEGO CA	138.7	LIC	BLCDDT	-20040722AAO
19	KSWB-TV	SAN DIEGO CA	138.7	CP	BPCDDT	-20080620ADN
20	K20HZ	PALM SPRINGS CA	0.5	LIC	BLTTTL	-20070227ACR
20	K20HZ	PALM SPRINGS CA	0.5	APP	BDFCDDL	-20111209HJP
21	KDUG-LP	HEMET CA	76.9	LIC	BLTTTL	-20080813ABI
21	K21KS-D	JOSHUA TREE, ETC. CA	49.3	CP	BDCCDDT	-20061030AHG
21	K21GR	JOSHUA TREE, ETC. CA	31.5	LIC	BLTT	-20080902AEB
21	K21GI	MORONGO VALLEY CA	24.2	LIC	BLTT	-20050516AUD
21	K21GI	MORONGO VALLEY CA	24.2	APP	BDFCDDL	-20120109ACZ
21	NEW	RIVERSIDE CA	29.8	APP	BNPDDL	-20090825AAL
21	KPMR	SANTA BARBARA CA	333.7	APP	BPCDDT	-20120817ABD
21	KPMR	SANTA BARBARA CA	332.6	LIC	BLCDDT	-20110607ABB
21	K21AC	VICTORVILLE, ETC. CA	114.0	LIC	BLTT	-19820105IG
22	K20HZ	PALM SPRINGS CA	0.5	APP	BDISDDL	-20110617AAS
23	KVMD	TWENTYNINE PALMS CA	40.0	LIC	BLCDDT	-20060615AAB
23	KVMD	TWENTYNINE PALMS CA	140.7	APP	BPCDDT	-20100325ACD
23	KVMD	TWENTYNINE PALMS CA	113.9	APP	BPCDDT	-20100325ACD
23	KVMD	TWENTYNINE PALMS CA	40.0	APP	BPCDDT	-20100325ACD
36	KNBC	LOS ANGELES CA	127.2	APP	BMPCDDT	-20100811ABJ
36	K36GO	MORONGO VALLEY CA	24.2	LIC	BLTT	-20060331AEU
36	KNBC	LOS ANGELES CA		APP	BMPCDDT	-20100811ABJ
36	KNBC	LOS ANGELES CA		APP	BMPCDDT	-20100811ABJ
36	KNBC	LOS ANGELES CA		APP	BMPCDDT	-20100811ABJ

Total scenarios = 1

Result key: 2
Scenario 1 Affected station 12
Before Analysis

Results for:	21N CA PALM SPRINGS/INDIO	BLTTTL	19941013JF	LIC
		POPULATION	AREA (sq km)	
within Noise Limited Contour	258871	1126.0		
not affected by terrain losses	251022	1083.5		
lost to NTSC IX	0	0.0		

lost to additional IX by ATV	0	0.0
lost to all IX	0	0.0

Potential Interfering Stations Included in above Scenario 1

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FINISHED FINISHED FINISHED FINISHED FINISHED FINISHED

CERTIFICATE OF SERVICE

I, Barry A. Friedman, hereby certify that I have served on this 17th day of December, 2012, a copy of the foregoing **INFORMAL OBJECTION** on the following parties by first-class mail, postage pre-paid:

Mr. Moses Primo
Three Angels Broadcasting Network, Inc.
P.O. Box 220
West Frankfort, Illinois 62896

Mr. Hossein Hashemzadeh*
Video Division
Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554



Barry A. Friedman

*By Hand