

***AMENDMENT TO APPLICATION
FOR CONSTRUCTION PERMIT***

**PROPOSED NEW FM TRANSLATOR STATION
LONGVIEW, TEXAS
FACILITY ID: 156836
103.7 MHz / 0.250 kW ERP / ND**

E-STRING WIRELESS, LTD.

JULY, 2013

AMENDMENT TO APPLICATION FOR CONSTRUCTION PERMIT

The following engineering statement and attached exhibits have been prepared for **E-String Wireless, Ltd.** ("E-String"), applicant for a new FM translator station to serve Longview, Texas, and are in support of their amendment to application for construction permit.¹

This amendment is being submitted as part of the Commission's Translator Auction 83 settlement process. The original E-String application for Longview was assigned FCC File No. BNPFT-20030317JNV. This application was assigned to MX Group 468, which consists of a total of three applications. The other constituents of the MX Group are BNPFT-20030317JJI at Carthage, Texas filed by E-String, and BNPFT-20030317IJU at Longview, Texas filed by Millennium Broadcasting Corp ("Millennium"). Previously, E-String submitted an amendment to the original Carthage application, thereby extricating that application from the group, and eliminating its mutual exclusivities with the other members.

This amendment, in combination with a companion amendment to the original Millennium application, will eliminate the mutual exclusivities between the two remaining facilities. Under these jointly prepared amendments, Millennium will relocate to the tower proposed by E-String in the original Longview application and change channel of operation. E-String will remain at the originally proposed height and channel, but change the center of radiation height and change to a non-directional antenna. Both this amendment and the Millennium amendment are expected to be filed on the same day.

¹ The Facility ID for the proposed translator facility is 156836.

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Canton, IL 61520

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The proposed facility would operate on channel 279 with an effective radiated power of 250 Watts at a center of radiation of 174.0 meters AMSL.² As was previously stated, no change in the channel of operation is proposed. Since no change in the site location is proposed either, the proposed changes to the originally proposed facility are minor in nature.

The proposed facility would not impact LPFM licensing opportunities within any of the Appendix A markets. The proposed facility is located outside the grid of the Tyler-Longview market, but within the grid buffer of this market. The Tyler-Longview market is a spectrum available market at the 20x20 grid. As a result, it is necessary and sufficient to demonstrate that the proposed facility would not impact LPFM licensing opportunities within the grid on channels 277 through 281. Exhibits E-1 through E-5 are individual maps for each of these channels, and contain the grid preclusion study for the channel of interest. The magenta shaded areas on each of the maps illustrate those areas within the region that are already precluded from LPFM operation by virtue of other facilities in the vicinity.

The proposed facility complies with the provisions of Section 74.1204 of the Commission's Rules. Exhibit E-6 is a tabular allocation study for the proposed facility. As this study demonstrates, the proposed facility would comply with all of the contour overlap requirements to all proposed and authorized facilities. It should be noted that this study neglects the Millennium application, as it considers the channel change to that facility previously discussed. This tabular study is graphically depicted in Exhibit E-7.

² The average terrain for the proposed facility is defined by the 240 degrees true radial on which the average elevation is 85.7 meters AMSL. Terrain was sampled from the FCC 30-second terrain database.

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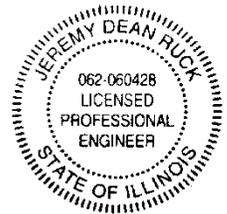
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The proposed facility would not create a significant environmental impact, and is exempt from environmental processing. The facility would utilize an existing tower that is registered with the Commission. In addition, the facility would not constitute an RF exposure hazard to the general public.

The Commission's *FM Model* software package predicts a maximum power density at ground level of $0.741 \mu\text{W}/\text{cm}^2$ at a distance of 72 meters from the tower base. This value is low enough the proposed facility is categorically excluded. Millennium certifies that it will coordinate with all other users of the site to ensure that workers and other personnel having access to the site are not exposed to levels of radiofrequency radiation in excess of the applicable safety standards. Such coordination will include, but is not necessarily limited to, a reduction in transmitter power or cessation of operation.

The preceding statement and attached exhibits have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.



Above signature is digitized copy of actual signature
License Expires November 30, 2013

Jeremy D. Ruck, PE
July 17, 2013

JEREMY RUCK & ASSOCIATES, INC.

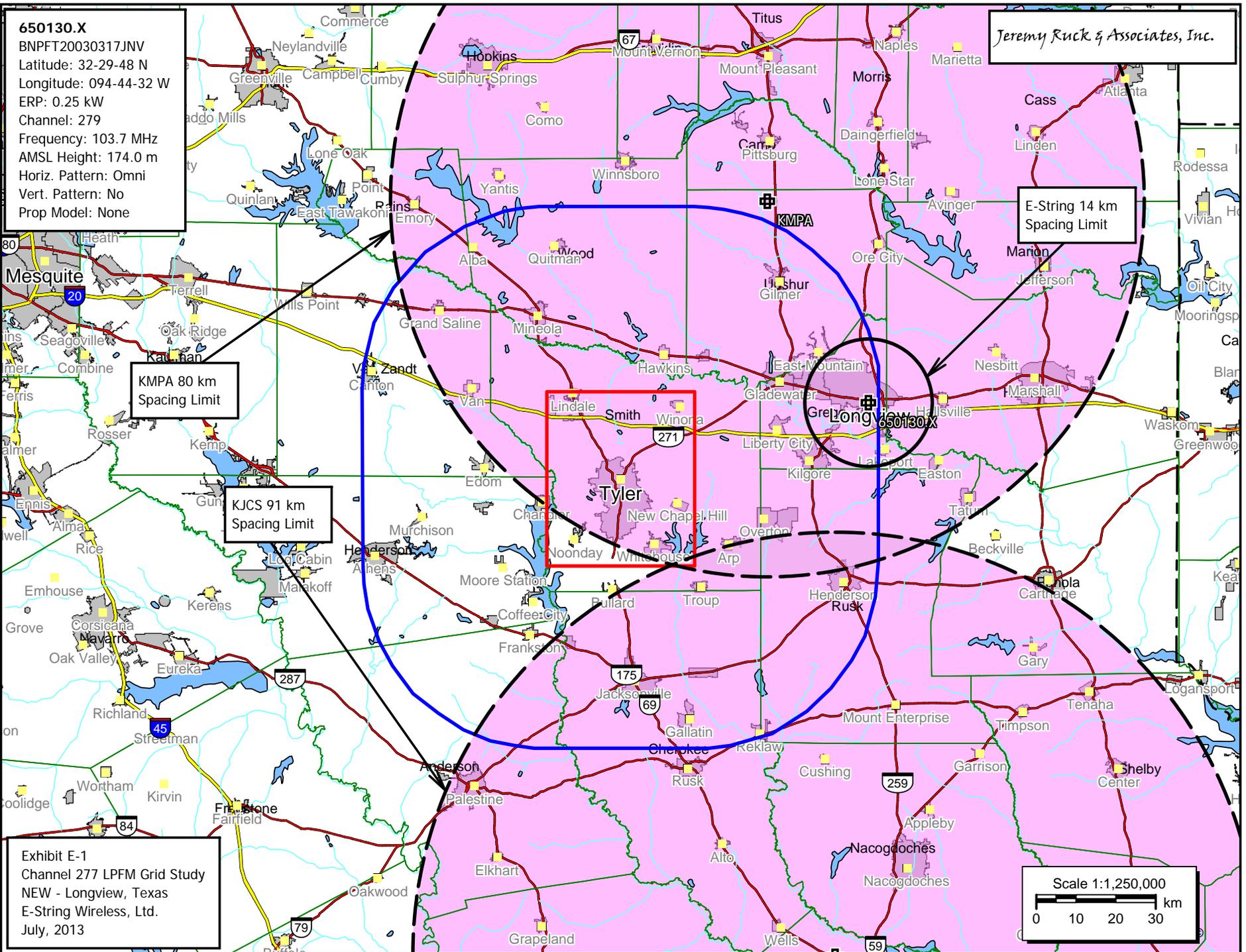
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7.17.2013

650130.X
BNPFT20030317JNV
Latitude: 32-29-48 N
Longitude: 094-44-32 W
ERP: 0.25 kW
Channel: 279
Frequency: 103.7 MHz
AMSL Height: 174.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

Jeremy Ruck & Associates, Inc.

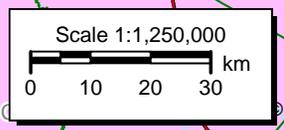


E-String 14 km
Spacing Limit

KMPA 80 km
Spacing Limit

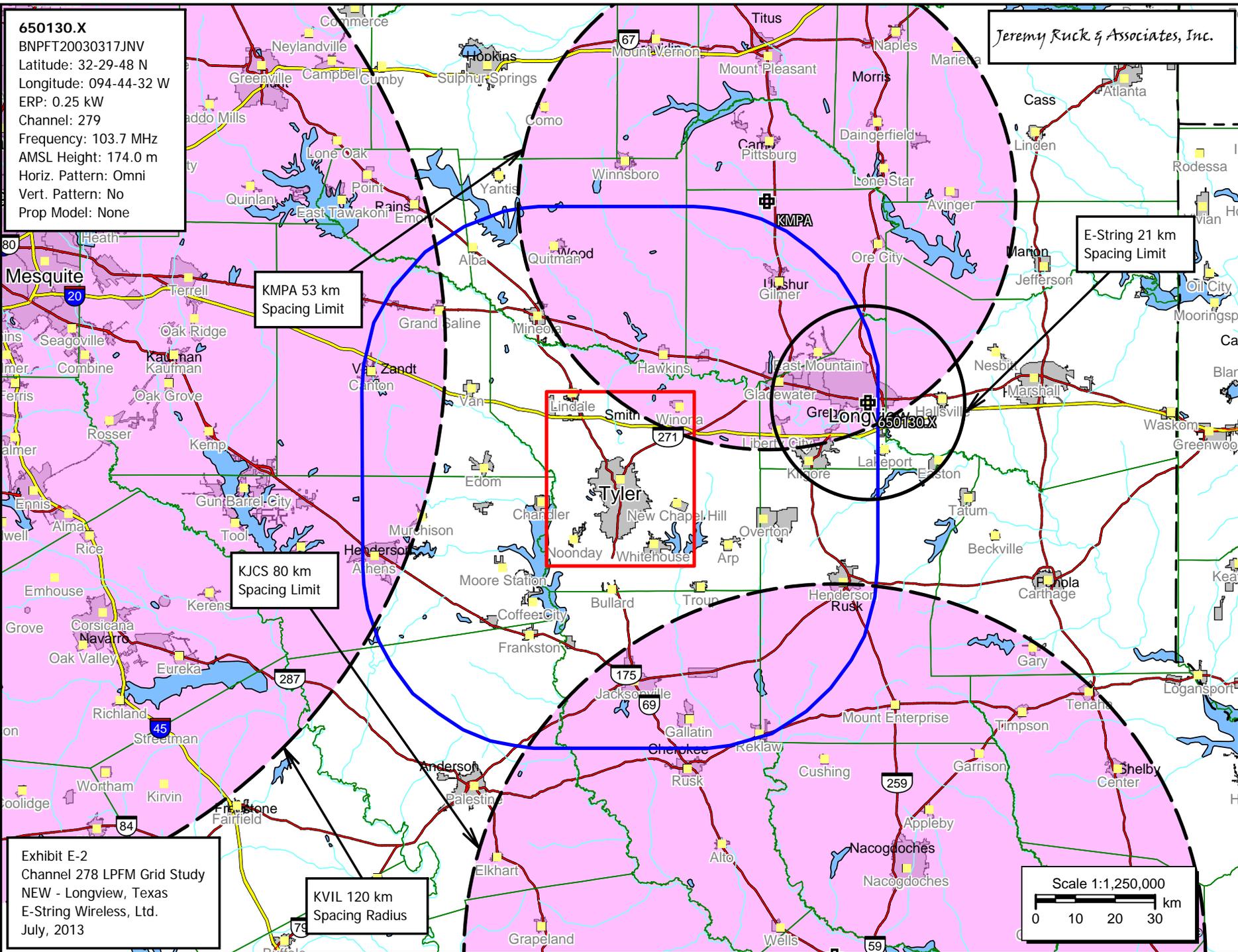
KJCS 91 km
Spacing Limit

Exhibit E-1
Channel 277 LPFM Grid Study
NEW - Longview, Texas
E-String Wireless, Ltd.
July, 2013



650130.X
BNPFT20030317JNV
Latitude: 32-29-48 N
Longitude: 094-44-32 W
ERP: 0.25 kW
Channel: 279
Frequency: 103.7 MHz
AMSL Height: 174.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

Jeremy Ruck & Associates, Inc.



E-String 21 km Spacing Limit

KMPA 53 km Spacing Limit

KJCS 80 km Spacing Limit

KVIL 120 km Spacing Radius

Exhibit E-2
Channel 278 LPMF Grid Study
NEW - Longview, Texas
E-String Wireless, Ltd.
July, 2013



650130.X
BNPFT20030317JNV
Latitude: 32-29-48 N
Longitude: 094-44-32 W
ERP: 0.25 kW
Channel: 279
Frequency: 103.7 MHz
AMSL Height: 174.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

Jeremy Ruck & Associates, Inc.

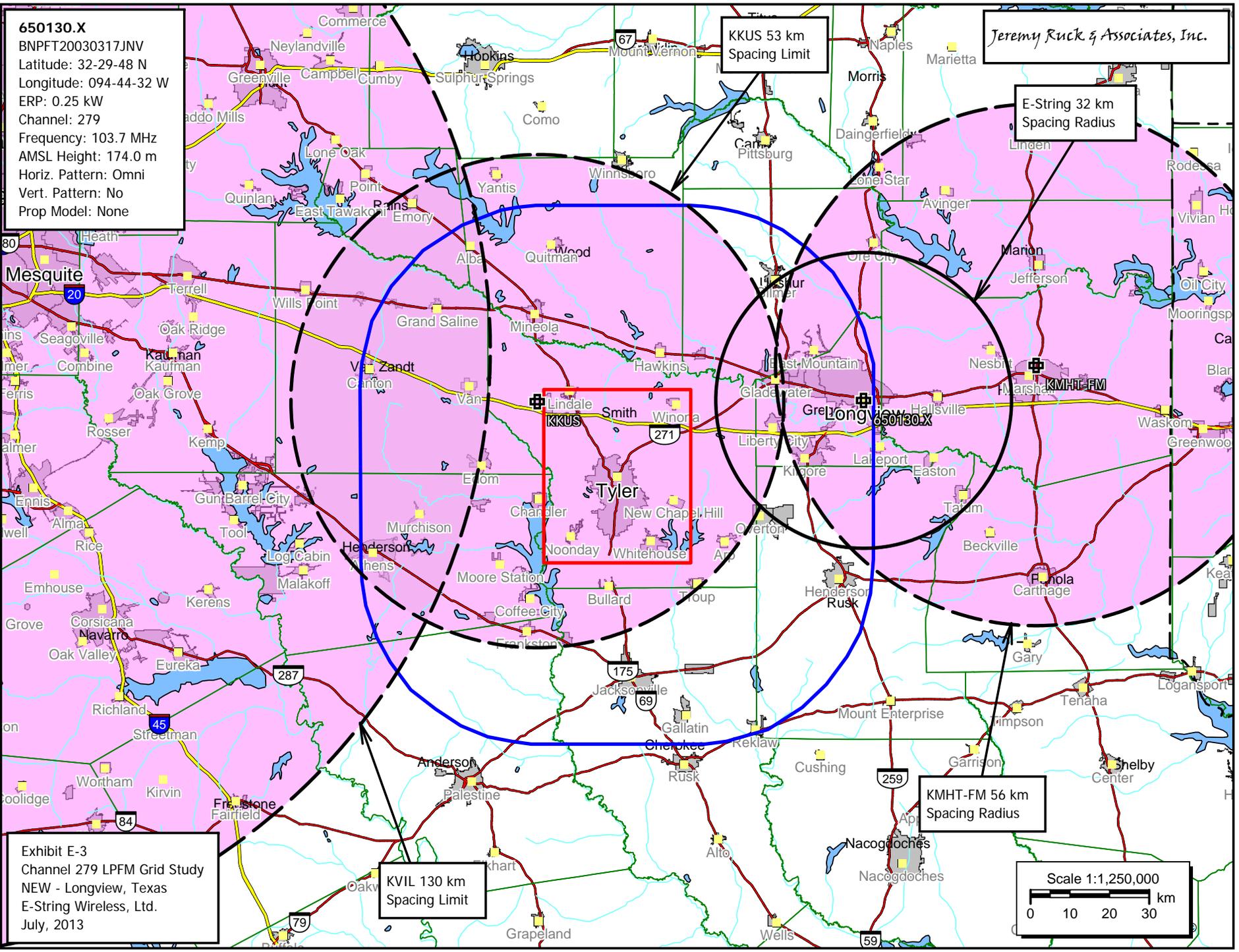
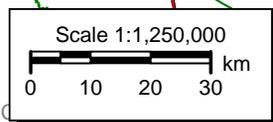
KKUS 53 km
Spacing Limit

E-String 32 km
Spacing Radius

KMHT-FM 56 km
Spacing Radius

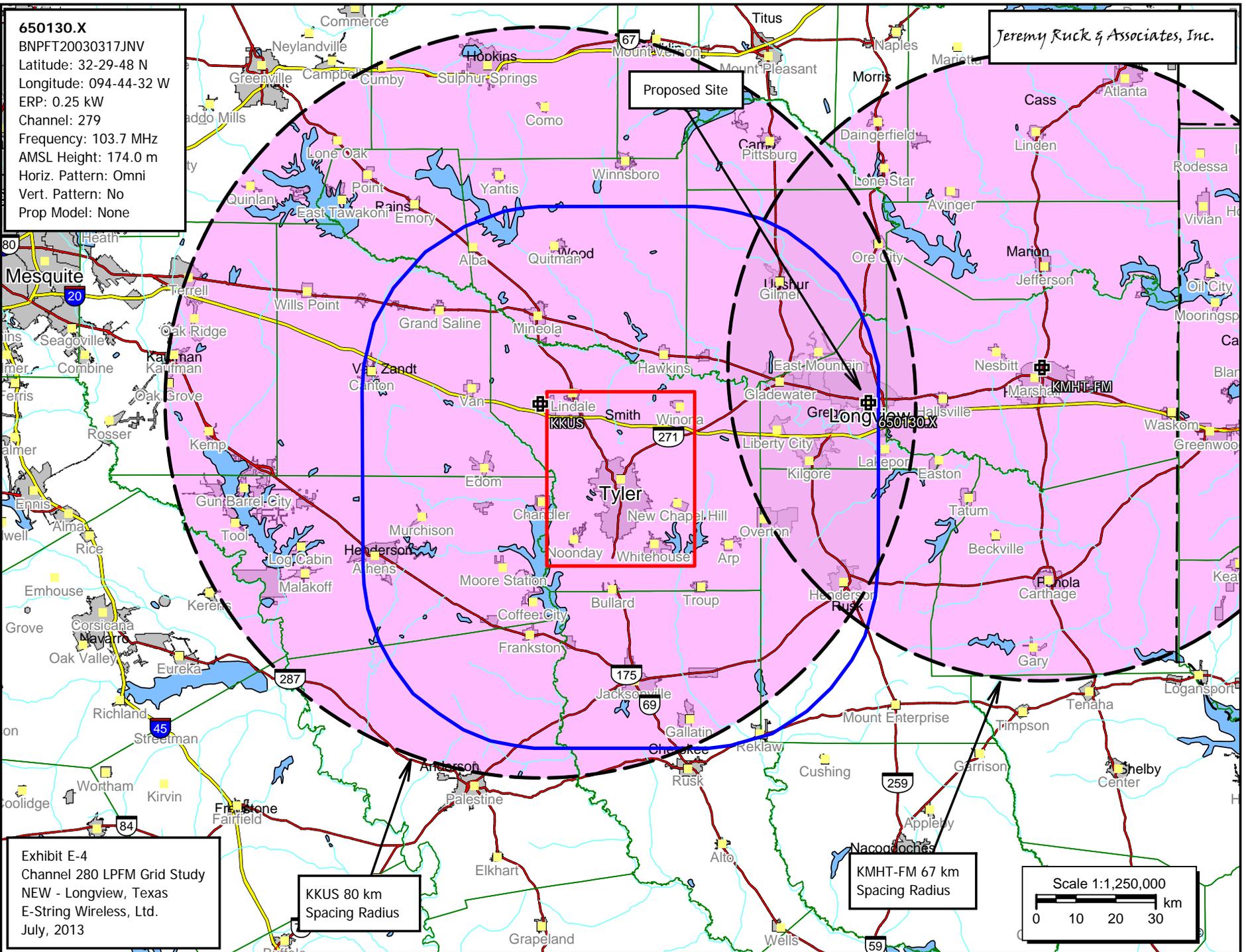
KVIL 130 km
Spacing Limit

Exhibit E-3
Channel 279 LPFM Grid Study
NEW - Longview, Texas
E-String Wireless, Ltd.
July, 2013



650130.X
BNPFT20030317JNV
Latitude: 32-29-48 N
Longitude: 094-44-32 W
ERP: 0.25 kW
Channel: 279
Frequency: 103.7 MHz
AMSL Height: 174.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

Jeremy Ruck & Associates, Inc.



Proposed Site

KKUS
Tyler

650130.X
Longview

KMHT-FM

Exhibit E-4
Channel 280 LPFM Grid Study
NEW - Longview, Texas
E-String Wireless, Ltd.
July, 2013

KKUS 80 km
Spacing Radius

KMHT-FM 67 km
Spacing Radius

Scale 1:1,250,000
0 10 20 30 km

650130.X
BNPFT20030317JNV
Latitude: 32-29-48 N
Longitude: 094-44-32 W
ERP: 0.25 kW
Channel: 279
Frequency: 103.7 MHz
AMSL Height: 174.0 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: None

Jeremy Ruck & Associates, Inc.

Proposed Site

KKUS
Tyler

Longview
650130.X

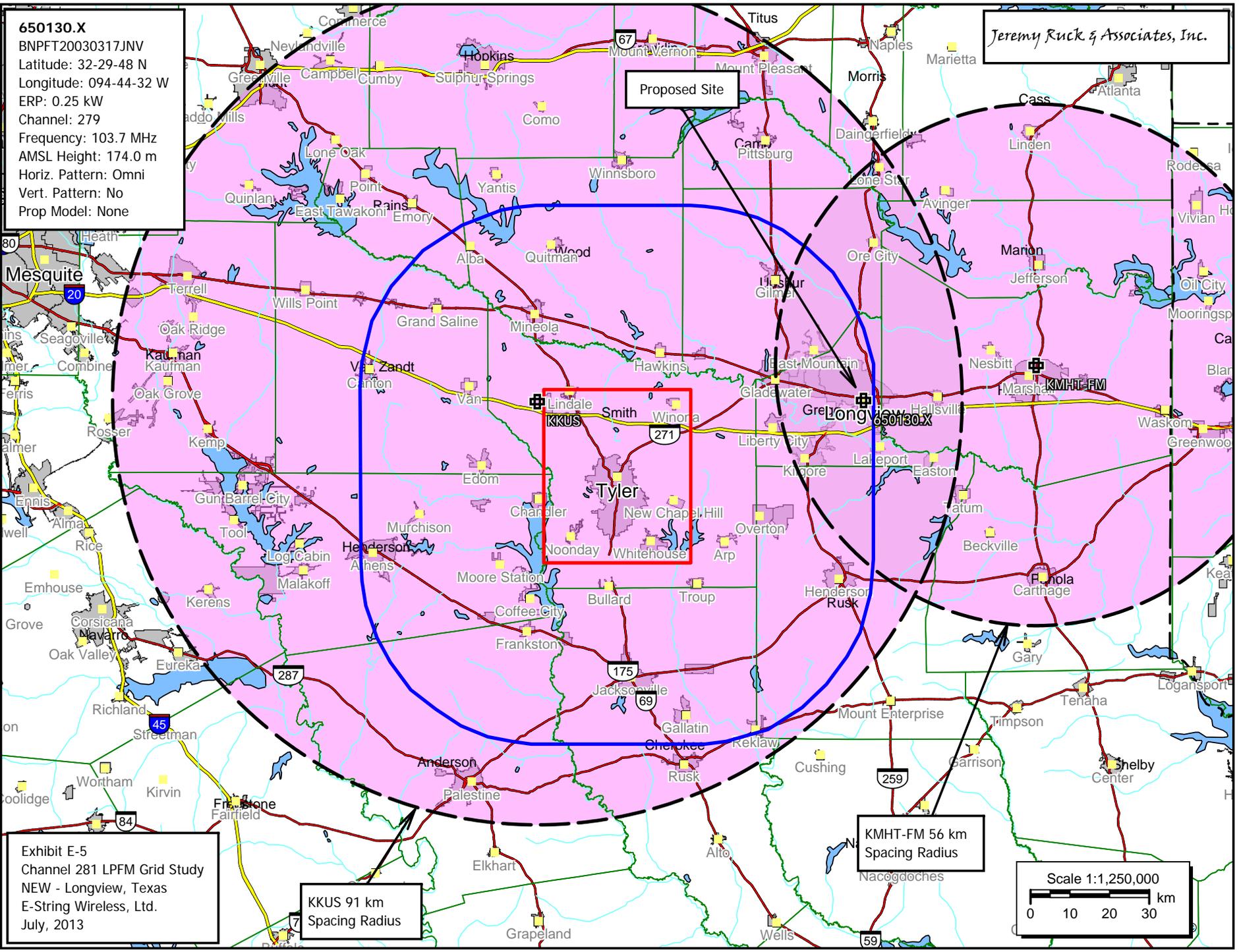
KMHT-FM

Exhibit E-5
Channel 281 LPFM Grid Study
NEW - Longview, Texas
E-String Wireless, Ltd.
July, 2013

KKUS 91 km
Spacing Radius

KMHT-FM 56 km
Spacing Radius

Scale 1:1,250,000
0 10 20 30 km



Jeremy Ruck & Associates, Inc.
 Consulting Engineers - Canton, Illinois

Exhibit E-6 - Tabular Allocation Study

NEW - Longview, Texas

REFERENCE CH# 279D - 103.7 MHz, Pwr= 0.25 kW, HAAT= 72.7 M, COR= 174 M
 32 29 48.0 N.
 94 44 32.0 W.
 Average Protected F(50-50)= 11.08 km
 Omni-directional

DISPLAY DATES
 DATA 07-17-13
 SEARCH 07-17-13

CH CITY	CALL	TYPE STATE	ANT	AZI <--	DI ST FILE #	LAT LNG	PWR(kW) HAAT (M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
279D Longview	650130	APP DH_ TX		0.0 0.0	0.00 BNPFT20030317JNV	32 29 48.0 94 44 32.0	0.250 75	36.0 176	10.6 E-string Wireless, Ltd	-46.6*	-46.1*
279A Mount Enterprise	AL0976	VAC TX		174.6 354.6	58.72 RM11494	31 58 15.0 94 41 01.0	6.000 100	84.0 231	26.1 Jer Licenses, Lic	-37.3*	-8.9
280A Marshall	KMHT-FM	LIC_CX TX		78.4 258.6	37.41 BMLH20100514AJJ	32 33 50.0 94 21 04.0	1.850 129	33.7 227	21.7 Hanszen Broadcast Group, I	-6.4	0.1
276C2 Pittsburg	KMPA	LIC_NCX TX		333.5 153.4	47.71 BLH20030623AHD	32 52 50.0 94 58 13.0	10.000 205	4.5 320	45.2 Waller Broadcasting, Inc.	32.8	1.4
279D Carthage	1562946	APP_C_ TX		133.7 314.0	54.88 BNPFT20030317JJI	32 09 17.0 94 19 15.0	0.250	28.8 135	8.6 E-string Wireless, Ltd	14.0	4.4
279C Highland Park-dalla	KVIL	LIC_CY TX		273.4 92.2	208.85 BLH19990216KB	32 35 19.0 96 58 05.0	100.000 507	190.3 698	86.4 Cbs Radio Texas Inc.	6.7	82.9
280D Henderson	K280FH	LIC_C_ TX		190.0 9.9	35.18 BLFT20100804AAS	32 11 06.0 94 48 25.0	0.099	15.9 228	11.0 Jerry T. Hanszen	7.5	7.1
279A Haughton	KBTT	LIC_CN LA		86.4 267.0	108.92 BLH19930308KE	32 33 11.0 93 34 56.0	6.000 100	88.3 157	29.5 Access. 1 Louisiana Holding	9.7	44.1
278C2 New Boston	KZRB	LIC_CN TX		5.5 185.6	102.57 BLH19961216KA	33 24 54.0 94 38 10.0	50.000 150	81.0 252	54.6 B & H Broadcasting Systems	10.8	32.9
226C1 Tyler	KTYL-FM«	LIC_NC_ TX		216.7 36.5	32.78 BLH19980612KC	32 15 35.0 94 57 02.0	82.000 286	75.3 420	50.0 Townsquare Media Tyler Lic	21.5R	11.3M
281C2 Tyler	KKUS	LIC_CN TX		270.0 89.6	69.36 BLH19900515KE	32 29 40.0 95 28 55.0	50.000 150	6.0 290	51.9 Access. 1 Texas License Com	51.5	16.1
282A Carthage	KGAS-FM	LIC_CN TX		143.0 323.2	49.24 BLH19920918KF	32 08 33.0 94 25 39.0	6.000 100	2.7 191	27.8 Hanszen Broadcasting	34.3	20.3

Terrain database is FCC NGDC 30 Sec , R= 73.215 qualifying spacings or FCC minimum Spacings in KM, M= Margin in KM
 In & Out distances between contours are shown at closest points. Reference zone= West Zone, Co to 3rd adjacent.
 All separation margins (if shown) include rounding
 Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)
 "*"affixed to 'IN' or 'OUT' values = site inside protected contour.
 « = Station meets FCC minimum distance spacing for its class.

