

**ENGINEERING STATEMENT In Support Of
Application for Minor Modification (Amended)
KMKS CH273-C1**

This application constitutes a minor change application because it implements the Commission's order in MM Docket. 91-242 authorizing KMKS to improve its facilities on channel 273C1. In order to utilize the current KMKS tower and site, the proposed facility is short-spaced to KKPN-272C2, Rockport, Texas, (Facility 12151). KKPN operates at a reduced HAAT of 136 Meters. In order to protect KKPN from interference, the applicant has proposed operating with a restricted antenna HAAT of 142 meters, thereby proving both facilities with contour protection as required by Section 73.215 of the Commission's Rules. There be no overlap between the protected contour (60Dbu, F50 50) and the interfering contour (54Dbu), F50,10), of either station .The protected contour of KMKS and the interfering contour of the KKPN are separated by 9.3 kilometer. Conversely, along the same arc, the protected contour of the KKPN and the interfering contour of KMKS are separated by 13.2 kilometers. A map of the relevant contours of both stations is attached as Exhibit 28. A construction permit (BPH-930210IA) for KMKS at this site was approved May 13,1993. Construction permit expired prior to constructed.

Environmental Considerations

Applicant proposes a location already in use as the KMKS transmitter site, and is not in an environmentally sensitive are, as defined. The applicant will either reduce or terminate transmissions in order to accommodate maintenance workers while on the tower and in near proximity to the antenna.

Larry Sandlin

A handwritten signature in black ink, appearing to read "Larry Sandlin". The signature is written in a cursive, flowing style with a prominent initial "L".

Vice President