

TECHNICAL EXHIBIT
MINOR AMENDMENT TO APPLICATION
NEW FM STATION (FACILITY ID 171016)
TRENT, TEXAS

MARCH 10, 2009

CH 221C3 13 KW 139 M

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Technical Narrative

This Technical Exhibit of which this narrative is part was prepared on behalf of KM Communications, Inc., in support of an amendment to the application for a new FM allotment assigned to Sweetwater, Texas (MM-FM615-C3) in FCC Auction 70. The pending application on file specifies a directional antenna maximum effective radiated power (ERP) of 15.5 kW and an antenna height above average terrain (HAAT) of 128 meters.¹ Section 73.215 processing with respect to two stations was requested.

Proposed Facilities

This amendment proposes to modify the proposed transmitter site by 1.3 kilometers, reduce the ERP, increase antenna HAAT and employ a non-directional antenna. Processing pursuant to Section 73.215 is still requested, but only to one station. The proposed site coordinates are (NAD27): 32-38-05 N, 100-07-51 W (see Figure 1). It is proposed to operate with a non-directional ERP of 13 kW and antenna HAAT of 139 meters (equivalent to maximum Class C3 facilities). A sketch of the proposed structure is shown in Figure 2. The proposed antenna structure has been registered with the FCC and assigned ASRN 1267199.

Interference Concerns

The 115 dBu predicted "blanketing" contour of the proposed station would extend radially 1.4 kilometers from the transmitting site. No interference is expected. However, the applicant recognizes its responsibility to resolve complaints of interference,

¹ See BNPH-2007002ADT

including blanketing and receiver-induced interference as required by Sections 73.315(b), 73.316(e) and 73.318.

Proposed Coverage Analysis

Figure 3 is a map showing the predicted FCC coverage contours for the proposed operation. The FCC predicted 70 dBu coverage contour will encompass the entire Trent city limits as derived from 2000 U.S. Census data.

The overall average HAAT (139 meters, rounded to the nearest meter) was determined using the N.G.D.C. 30-second terrain database and 8 evenly spaced radials (every 45 degrees of azimuth).

Allocation Study

Sheet 1 of Figure 4 is an allocation study for channel 221C3 from the proposed allotment reference point coordinates. The allotment reference point meets the FCC's minimum separation requirements, specified in Section 73.207(b) of the Commission's Rules, to all assignments and stations. Sheet 2 of Figure 4 is a site map showing the proposed allotment reference point.

Sheet 1 of Figure 5 is an allocation study for channel 221C3 from the proposed site. As indicated the proposed site meets the FCC's minimum separation requirements, specified in Section 73.207(b) of the Commission's Rules, to all assignments and stations except to (1) a newly proposed FM station, on channel 219 at Abilene, Texas, (2) licensed station KTFW-FM (Glen Rose, Texas) and (3) a vacant allotment for channel 221C2 at Matador, Texas. There are no other allocation issues.

The newly proposed, non-commercial station at Abilene (BNPED-20071018AOU) appears to be erroneously classified as a Class C1 station. The proposed ERP/HAAT combination of 1.1 kW/104 meters should be classified as a Class A station (it is

noted that in exhibit 16 of the Abilene proposal the allocation study references a Class A station not Class C1). The minimum separation distance requirement between 2nd-adjacent Class C3/A stations is 42 kilometers and the proposed separation distance is 62.8 kilometers. Thus, it appears that the proposal complies with the minimum required separation distance for a *Class A* station proposed at Abilene in BNPED-20071018AOU. It is also noted that as a later filed application, the Abilene proposal would be required to protect the already pending Trent, Texas (KM Communications) application on file in any event.

Regarding the vacant allotment for channel 221C2 at Matador, this allotment has been reassigned to channel 244C2 in a one-step application for construction permit, which has ultimately been granted.² Thus, this former vacant allotment on channel 221 has been ignored.

Processing pursuant to the short-spacing provisions is requested with respect to station KTFW-FM. Station KTFW-FM is being protected using contour overlap procedures (see Figure 5). The protected and interfering contours for KTFW-FM were generated using actual facilities (25 kW/432 meters) since KTFW-FM already operates pursuant to Section 73.215.

Mexican Coordination

The vacant allotment at Sweetwater, Texas has already been coordinated with Mexico based on a Class C3 facility from the allotment reference coordinates. The proposed Trent allotment reference point is located 316 kilometers from the closest point of the Mexican Border. The allotment reference point is located 4.7 kilometers east (or further away from the Mexican Border) of the already coordinated Sweetwater reference point and does not proposed any change in channel or class. Therefore, it is not believed that coordination is required. However, if the FCC differs in this view, coordination with Mexico is respectfully requested.

² See BNPH-20070502ABZ

The proposed Trent, TX transmitter site is located 340 kilometers from the closest point of the Mexican Border. This is beyond the required coordination distance (320 kilometers)

Community of License Change – Section 307(b)

1. Proposal

It is proposed to reallocate Channel 221C3 from Sweetwater, Texas to Channel 221C3 at Trent, Texas.

2. City Populations and Local Service

Sweetwater, Texas has a 2000 U.S. Census population of 11,415 persons. Sweetwater would have two aural services remaining, KXOX(AM) and KXOX-FM. Trent, Texas has a U.S. Census population of 318 persons and has no local FM or AM service. Thus, the proposal will result in first local aural transmission service.

3. Urbanized Area Considerations

Trent is not located within any urbanized area. The proposed 70 dBu contour for the allotment reference coordinates will not encompass any portion of the Abilene Urbanized area. The existing Channel 221C3 allotment at Sweetwater 70 dBu contour does not encompass any urbanized area.

4. 60 dBu Gain and Loss Areas and Available Aural Services

The Channel 221C3 Sweetwater loss area contains 648 persons over 369 square kilometers. The Channel 221C3 Trent gain area contains 798 persons over 369 square kilometers. It has been determined that there are at least 3 other licensed FM services available to the Loss Area while the Gain Area has at least 5 other services.

5. 70 dBu and 60 dBu Coverage

The following tabulates the area and population within the 70 dBu and 60 dBu contours depicted in Figure 3.

Contour	Population (2000 Census)	Area (sq. km)
70 dBu	6,202	1,671
60 dBu	76,529	4,758

Contour locations calculated in accordance with the provisions of Section 73.313. Population calculated using a computer program that utilizes the 2000 U.S. Census database of "population centroids".

6. Protected FM and AM Services Available

It has been determined that there are at least 5 protected FM services available to Sweetwater and at least 4 to Trent as shown in Figure 7.

Radiofrequency Electromagnetic Field Exposure

The proposed FM facility was evaluated in terms of potential radio frequency (RF) energy exposure at ground level to workers and the general public. Based on the FCC's FM Model program using a 6-bay "rototiller" antenna, the calculated power density at a point 2 meters above ground level will not exceed 0.004 mW/cm^2 , which is less than 5% of the FCC's recommended limit of 0.2 mW/cm^2 for FM channels, applicable to general population/uncontrolled exposure areas.

Access to the transmitting site will be restricted and appropriately marked with warning signs. In the event that workers or other authorized personnel enter restricted areas or climb the tower, appropriate measures will be taken to assure worker safety with respect to radio frequency radiation exposure. Such measures include reducing the average exposure by

spreading out the work over a longer period of time, wearing "accepted" RFR protective clothing and/or RFR exposure monitors or scheduling work when the station is at reduced power or shut down. The proposed operation appears to be otherwise categorically excluded from environmental processing.

It is noted that this statement only addresses the potential for radiofrequency electromagnetic field exposure. All other aspects of the environmental processing analysis will be or already have been provided to the FCC by the tower owner.

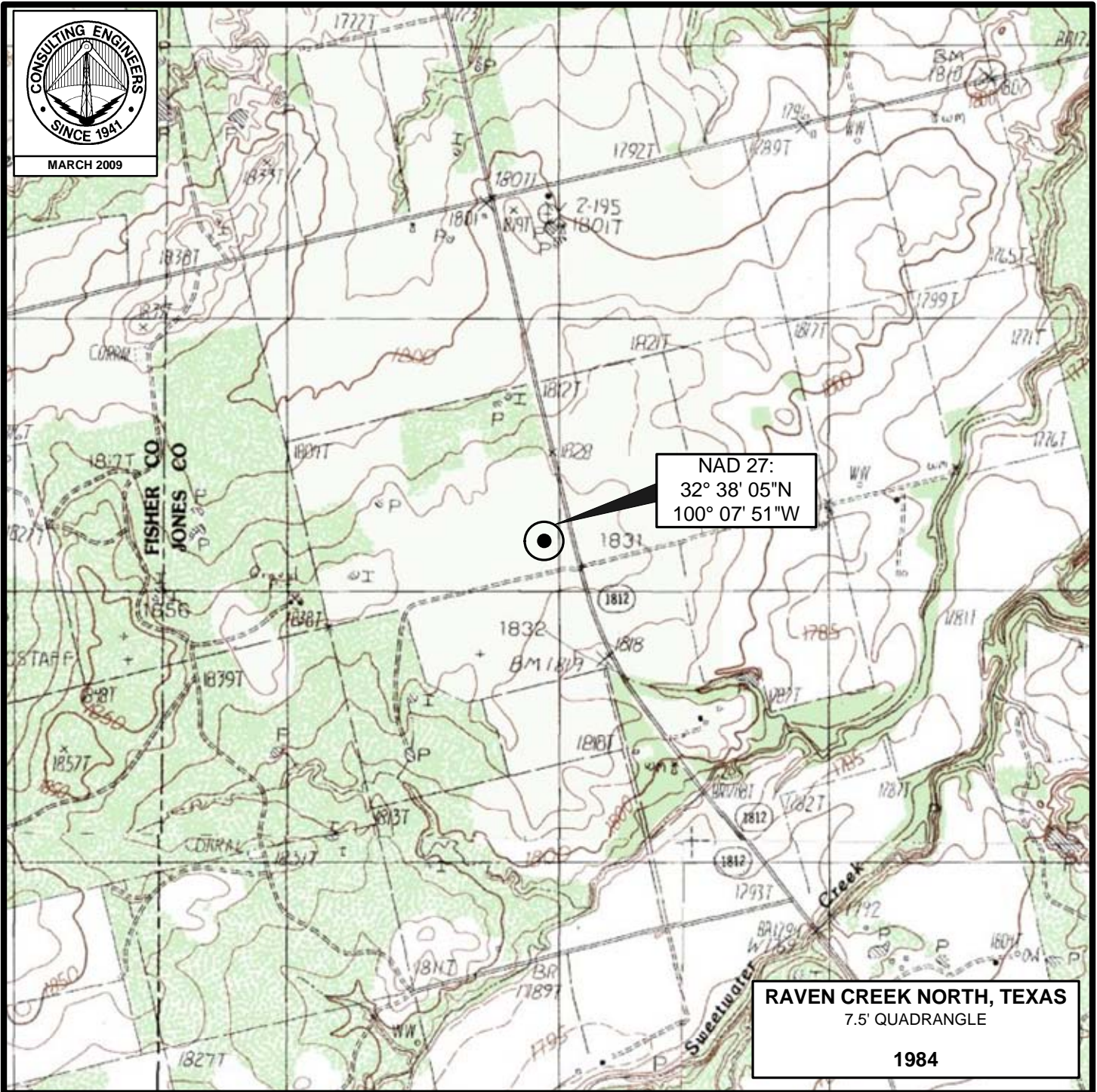


Jonathan N. Edwards

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March 10, 2009

Figure 1



PROPOSED TRANSMITTER SITE

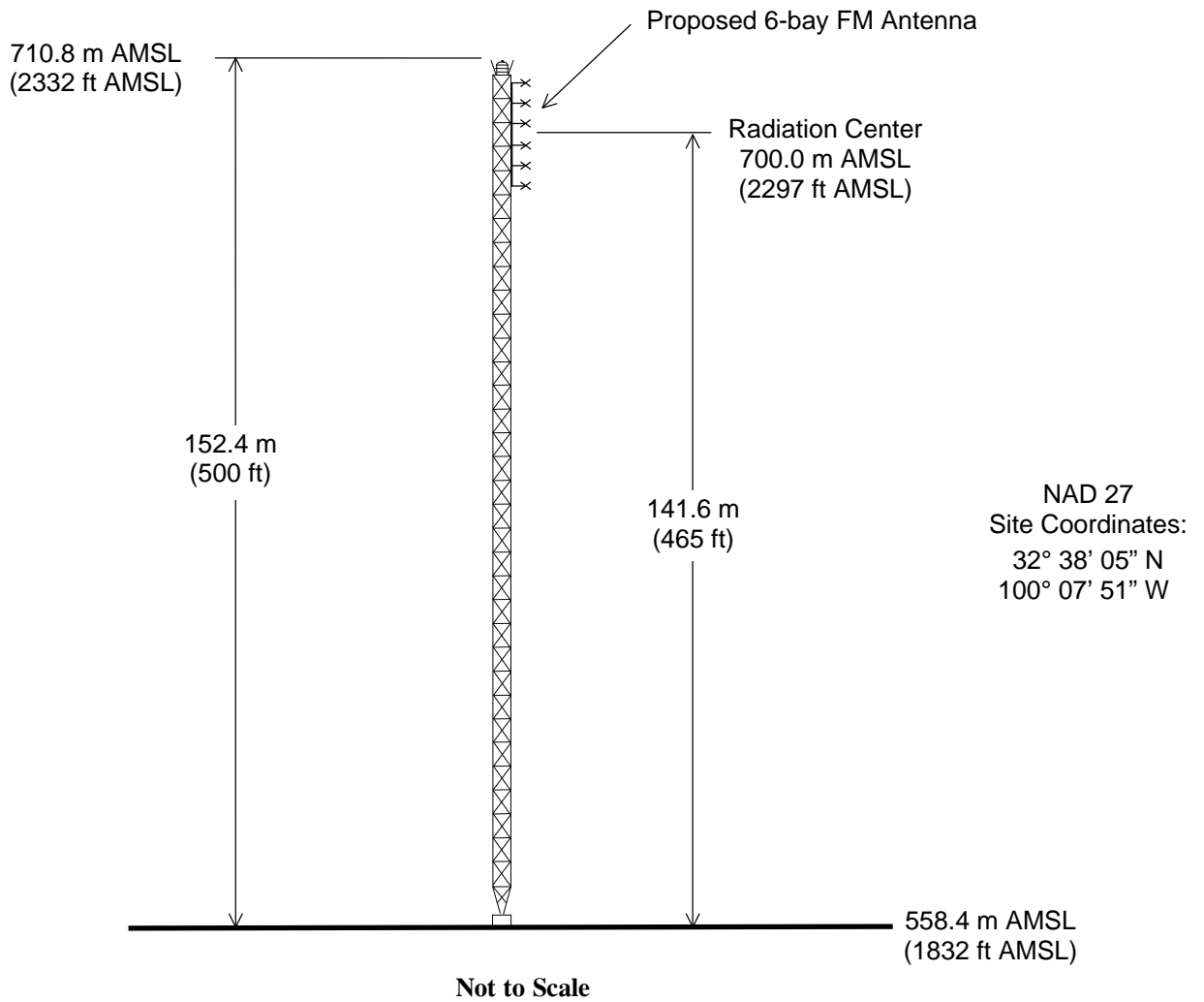
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Figure 2



ASRN: 1267199



PROPOSED ANTENNA AND SUPPORTING STRUCTURE

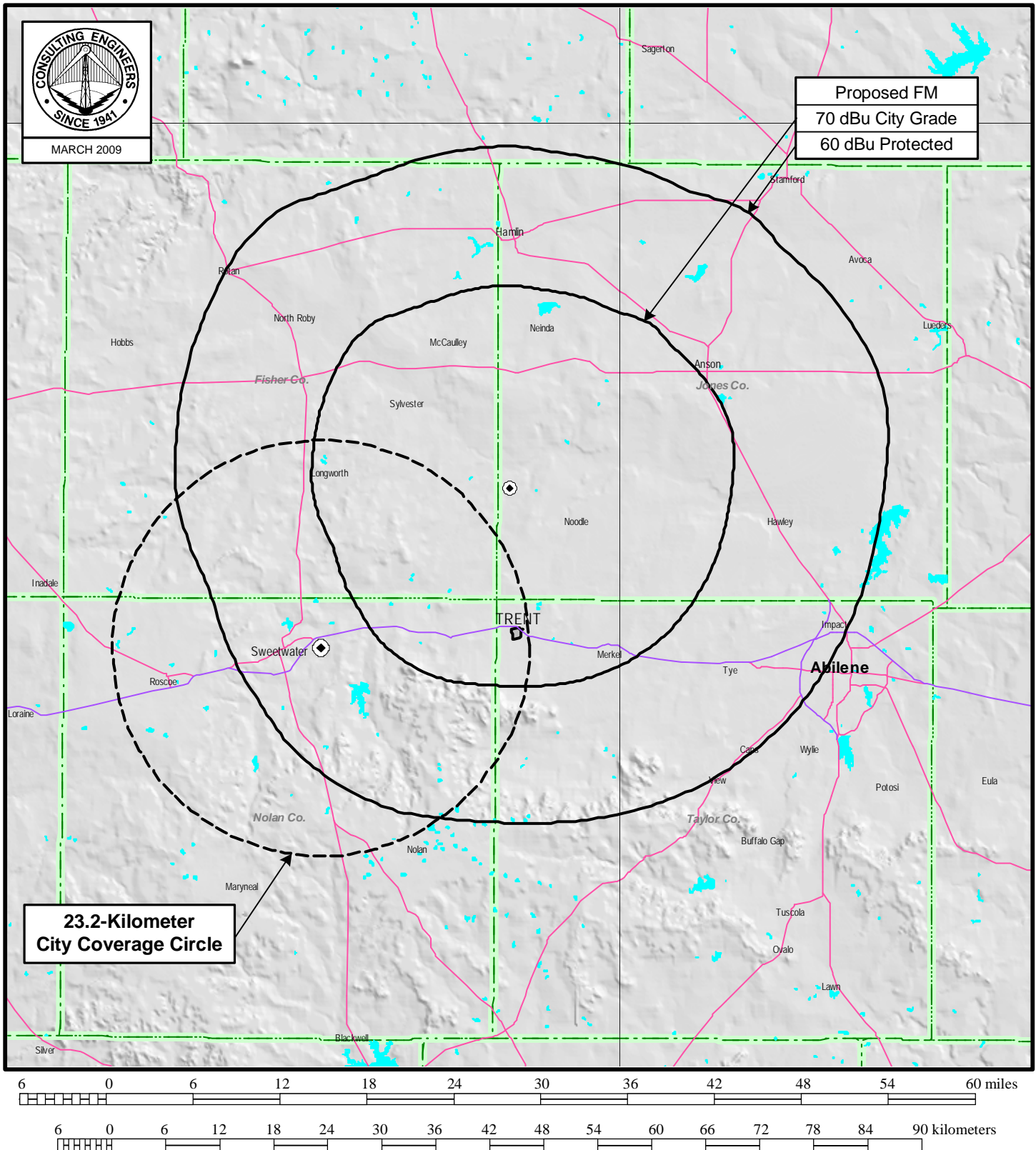
NEW FM STATION

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Figure 3



PREDICTED COVERAGE CONTOURS

NEW FM STATION

TRENT, TEXAS

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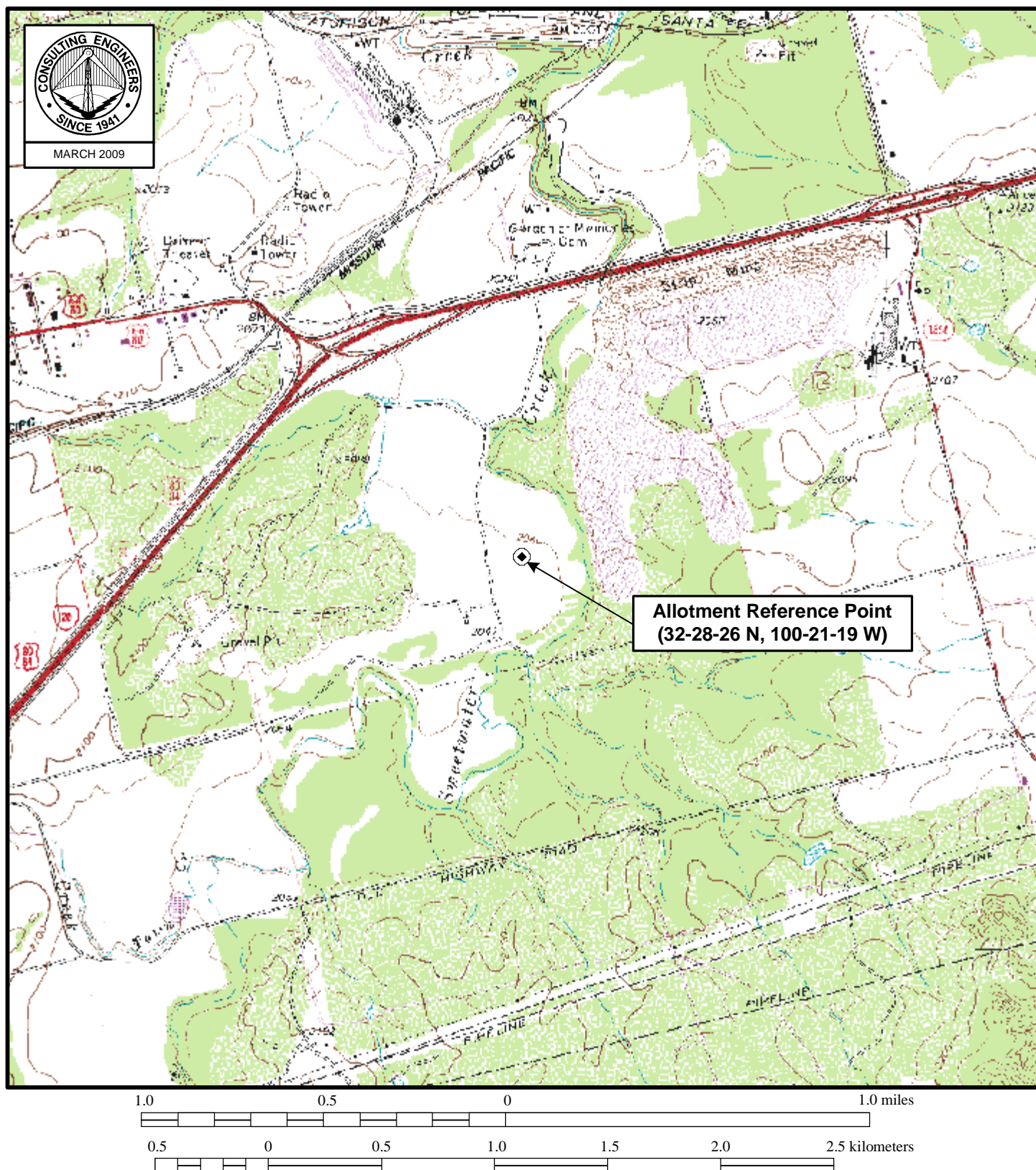
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TRENT, TX (ALLOTMENT REF POINT) FM SEPARATION STUDY

Channel: 221 Coordinates: 032-28-26 100-21-19
Class: C3 Buffer Distance: 50 km

Date: 03/10/2009
Page: 1 of 1

Callsign Fac. ID	Status ARN	Chan. ID	Serv. Type	Freq. MHz	City Class DA Ant. ID	ERP(kW)	State HAAT(m)	Latitude Longitude	Dist.(km) Bear.(deg)	Sep.(km) 73.215	Spacing(km) Comment
NEW 175361	APP BNPED	219 20071018	FM AOU	91.7 C1	ABILENE N	1.1	TX 104	032-21-11 099-33-05	76.8 99.88	76 70 N	0.8 CLOSE
NEW 170142	APP BNPED	219 20071019	FM ACO	91.7 A	ABILENE N	0.23	TX 168	032-17-06 099-44-23	61.6 109.8	42 36 N	19.6 CLEAR
NEW 171817	APP BNPED	219 20071019	FM ACW	91.7 C2	ALBANY D 83952	25	TX 184	032-39-31.5 099-27-10.7	87.18 76.09	56 50 N	31.18 CLEAR
KMEO 90953	LIC BLED	220 20060602	FM AAY	91.9 C3	MERTZON N	6.5	TX 159	031-25-16 100-32-36	118.08 188.67	99 89 N	19.08 CLEAR
NEW 171016	RSV	221	FA	92.1	TRENT C3		TX	032-28-26 100-21-19	0 0	153 142	
<i>Applicant's proposed allotment</i>											
NEW 171016	APP BNPH	221 20070502	FM ADT	92.1 C3	TRENT D 78914	15.5	TX 128	032-37-32 100-07-10	27.81 52.59	153 142 Y	
<i>Applicant's pending application</i>											
	VAC RM 10277	221	FA	92.1 C2	MATADOR		TX	034-03-56 100-36-43	178.14 352.39	177 166	1.14 CLOSE
KTFW-FM 65314	LIC BLH	221 19990429	FM KC	92.1 C1	GLEN ROSE N	25	TX 432	032-16-31 098-01-22	220.61 95.13	211 200 Y	9.61 CLOSE
KNFM 28202	LIC BLH	222 19880614	FM KC	92.3 C	MIDLAND	100	TX 300	032-05-51 102-17-21	186.89 257.55	176 165 N	10.89 CLEAR
	DEL RM bh-3*	222	FR	92.3 C2	SEYMOUR		TX	033-34-49 099-18-01	157.39 38.36	117 106	40.39 CLEAR
KZNO 164196	USE RM 9778	222	FA	92.3 C2	SEYMOUR		TX	033-34-49 099-18-01	157.39 38.36	117 106 N	40.39 CLEAR
KZNO 164196	CP BNPH	222 20050103	FM AGP	92.3 C2	SEYMOUR N	50	TX 150	033-34-49 099-18-00	157.4 38.36	117 106 N	40.4 CLEAR
	ADD RM bh-2*	222	FR	92.3 C2	SEYMOUR		TX	033-35-59 099-18-42	158.41 37.57	117 106	41.41 CLEAR
	ADD RM bh-3*	222	FR	92.3 C2	SEYMOUR		TX	033-35-59 099-18-42	158.41 37.57	117 106	41.41 CLEAR
KULL 22158	LIC BLH	223 20070410	FM ADE	92.5 C2	ABILENE N	27.5	TX 202	032-16-35 099-35-38	74.93 106.87	56 50 N	18.93 CLEAR
KHXS 50790	LIC BLH	274 20021018	FM AAT	102.7 C1	MERKEL N	100	TX 227	032-24-39 100-06-26	24.35 106.7	24	0.35 CLOSE



PROPOSED ALLOTMENT REFERENCE POINT

NEW FM STATION

TRENT, TEXAS

CH 221C3 13 kW 139 M

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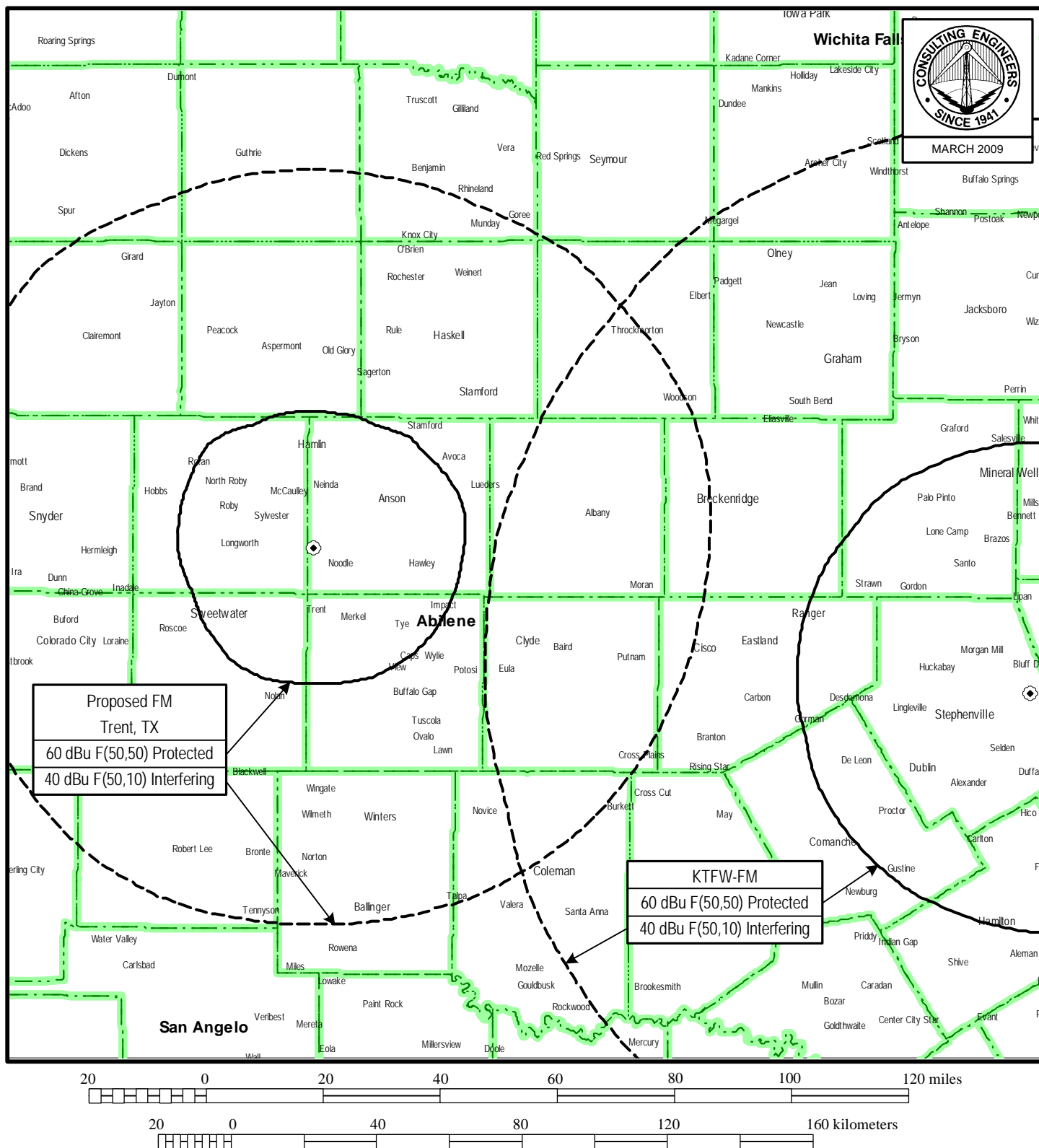
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TRENT, TX (PROPOSED SITE) FM SEPARATION STUDY

Channel: 221 Coordinates: 032-38-05 100-07-51
Class: C3 Buffer Distance: 50 km

Date: 03/10/2009
Page: 1 of 1

Callsign Fac. ID	Status ARN	Chan. Class	Serv. DA	Freq. Ant. ID	City	ERP(kW)	State HAAT(m)	Latitude Longitude	Dist.(km) Bear.(deg)	Sep.(km) 73.215	Spacing(km) Comment
NEW 175894	APP BNPED	218 20071018	FM ANW	91.5 A	INGRAM D 81848	1.25	TX 88	033-03-05.7 099-18-04.4	90.39 58.89	42 36 N	48.39 CLEAR
NEW 175361	APP BNPED	219 20071018	FM AOU	91.7 C1	ABILENE N	1.1	TX 104	032-21-11 099-33-05	62.78 119.8	76 70 N	-13.22 SHORT
Proposed facilities are that of a fully-spaced Class A station - see text											
NEW 171817	APP BNPED	219 20071019	FM ACW	91.7 C2	ALBANY D 83952	25	TX 184	032-39-31.5 099-27-10.7	63.66 87.41	56 50 N	7.66 CLOSE
NEW 170142	APP BNPED	219 20071019	FM ACO	91.7 A	ABILENE N	0.23	TX 168	032-17-06 099-44-23	53.44 136.56	42 36 N	11.44 CLEAR
KMEO 90953	LIC BLED	220 20060602	FM AAY	91.9 C3	MERTZON N	6.5	TX 159	031-25-16 100-32-36	140.1 196.18	99 89 N	41.1 CLEAR
NEW 171016	APP BNPH	221 20070502	FM ADT	92.1 C3	TRENT D 78914	15.5	TX 128	032-37-32 100-07-10	1.48 133.7	153 142 Y	-151.52 SHORT
Applicant's pending application											
NEW 171016	RSV C3	221	FA	92.1	TRENT		TX	032-28-26 100-21-19	27.61 229.69	153 142	-125.39 SHORT
Applicant's proposed allotment											
	VAC RM 10277	221	FA	92.1	MATADOR		TX	034-03-56 100-36-43	164.89 344.44	177 166	-12.11 SHORT
Allotment reassigned to channel 244C2 - see text											
KTFW-FM 65314	LIC BLH	221 19990429	FM KC	92.1 C1	GLEN ROSE N	25	TX 432	032-16-31 098-01-22	202.18 100.86	211 200 Y	-8.82 SHORT
Protected under Section 73.215 using contour overlap											
	DEL RM bh-3*	222	FR	92.3	SEYMOUR		TX	033-34-49 099-18-01	130.41 36.12	117 106	13.41 CLEAR
KZNO 164196	USE RM 9778	222	FA	92.3	SEYMOUR		TX	033-34-49 099-18-01	130.41 36.12	117 106 N	13.41 CLEAR
KZNO 164196	CP BNPH	222 20050103	FM AGP	92.3 C2	SEYMOUR N	50	TX 150	033-34-49 099-18-00	130.43 36.13	117 106 N	13.43 CLEAR
	ADD RM bh-2*	222	FR	92.3	SEYMOUR		TX	033-35-59 099-18-42	131.53 35.19	117 106	14.53 CLEAR
	ADD RM bh-3*	222	FR	92.3	SEYMOUR		TX	033-35-59 099-18-42	131.53 35.19	117 106	14.53 CLEAR
KNFM 28202	LIC BLH	222 19880614	FM KC	92.3 C	MIDLAND	100	TX 300	032-05-51 102-17-21	211.69 254.16	176 165 N	35.69 CLEAR
KULL 22158	LIC BLH	223 20070410	FM ADE	92.5 C2	ABILENE N	27.5	TX 202	032-16-35 099-35-38	64.25 128.2	56 50 N	8.25 CLOSE
KHXS 50790	LIC BLH	274 20021018	FM AAT	102.7 C1	MERKEL N	100	TX 227	032-24-39 100-06-26	24.93 174.91	24	0.93 CLOSE



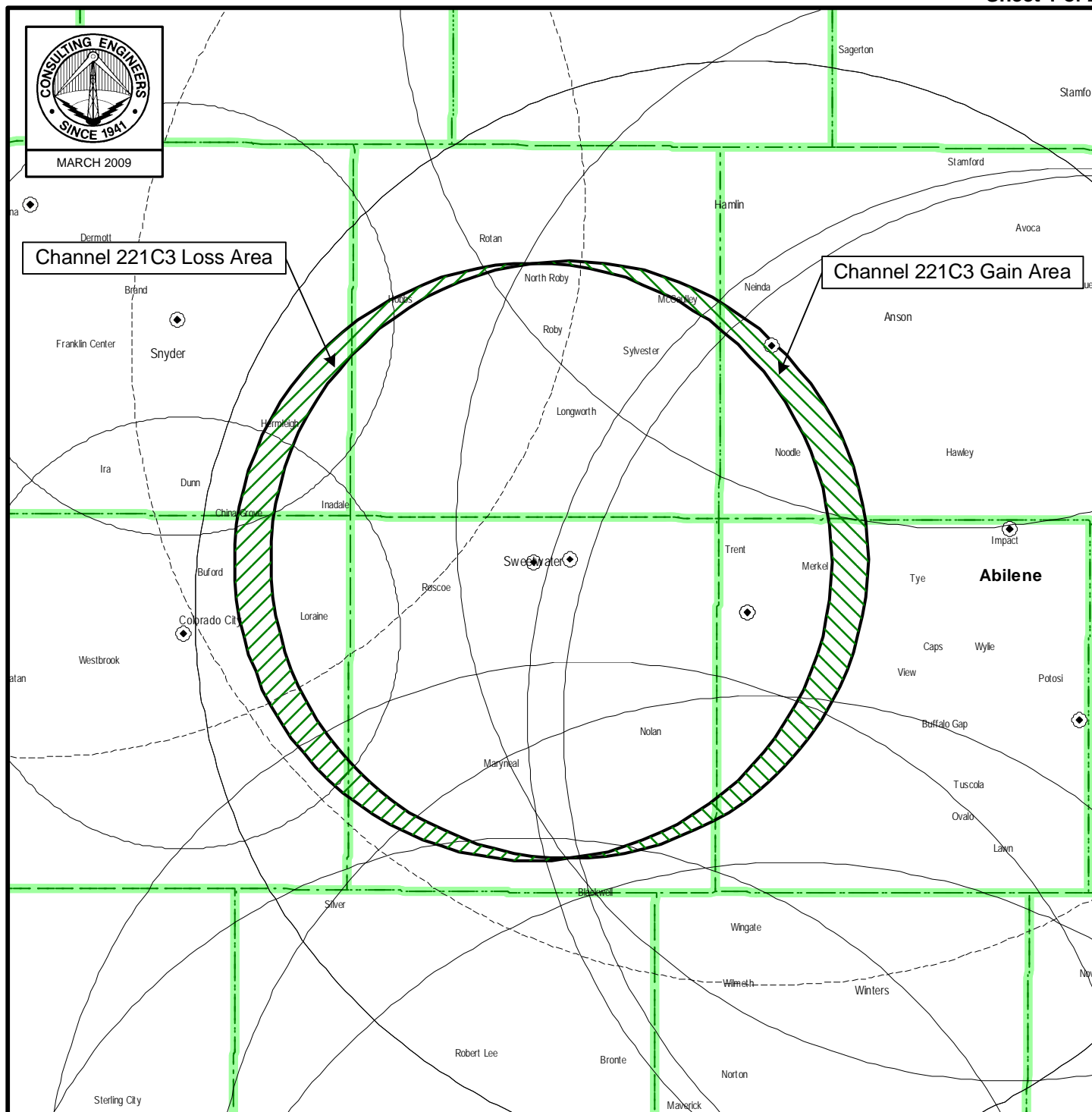
PROPOSED SITE ALLOCATION STUDY

NEW FM STATION

TRENT, TEXAS

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GAIN / LOSS MAP

NEW FM STATION

TRENT, TEXAS

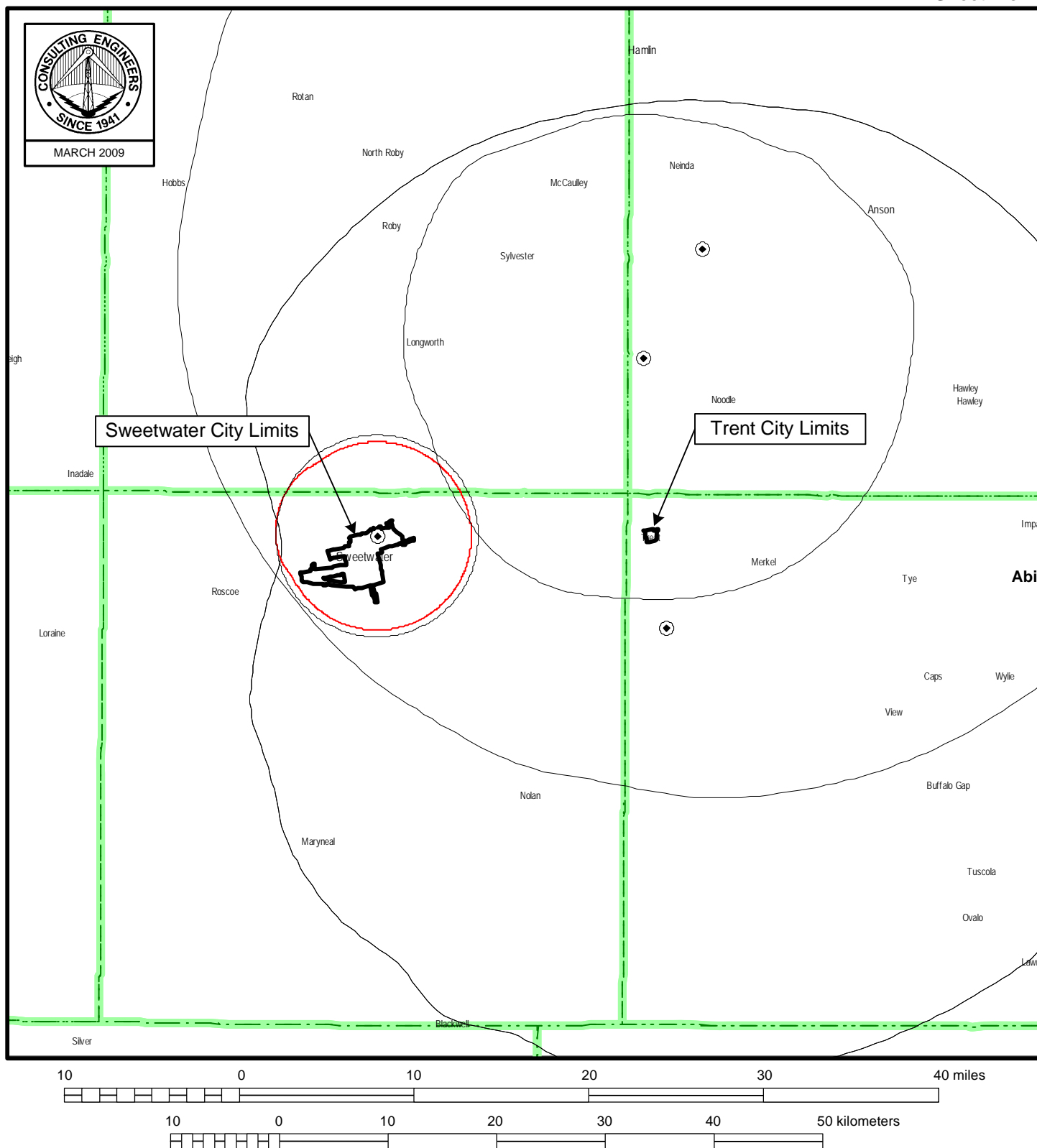
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Tabulation of Other Stations Available to Gain - Loss Area

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Channel</u>
KAGT	ABILENE	TX	213
KCRN-F	SAN ANGELO	TX	230
KORQ	BAIRD	TX	236
KVRP-F	HASKELL	TX	246
KGKL-F	SAN ANGELO	TX	248
KELI	SAN ANGELO	TX	254
KLYD	SNYDER	TX	255
KBCY	TYE	TX	259
KSNY-F	SNYDER	TX	268
KHXS	MERKEL	TX	274
KKCN	BALLINGER	TX	276
KCDD	HAMLIN	TX	279
KEAN-F	ABILENE	TX	286
KAUM	COLORADO CITY	TX	296



OTHER FM PROTECTED SERVICES AVAILABLE TO SWEETWATER & TRENT

NEW FM STATION

TRENT, TEXAS

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Tabulation of Other Protected Services Available

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Channel/Freq.</u>
NEW	TRENT	TX	221
KXOX-FM	SWEETWATER	TX	244
KBCY	TYE	TX	259
KHXS	MERKEL	TX	274
KCDD	HAMLIN	TX	279
KXOX(AM)	SWEETWATER	TX	1240