

**TECHNICAL EXHIBIT
APPLICATION FOR MODIFICATION OF LICENSE
FM TRANSLATOR STATION K227BH
SAN ANTONIO, TX
Technical Statement**

This Technical Exhibit was prepared on behalf of FM translator station K227BH, SAN ANTONIO, TX., in support of an application for modification of license. The instant application proposes a change in transmitter location and proposed facilities.

Minor Change Application

The proposal is classified as a minor change pursuant to Section 74.1233 of the FCC Rules. See exhibit for 60 dBu (1 mV/m) contour comparison.

Predicted Coverage Contours

The predicted coverage contours shown herein were calculated in accordance with Section 73.313 of the FCC Rules. The average terrain elevations from 3 to 16 km from the proposed site were computed using the U.S.G.S. 30-second terrain database. The distances to the predicted coverage contours were determined using the average elevations of radials spaced every 1-degree of azimuth. The antenna radiation center height above average terrain and the ERP in each radial direction were used in

conjunction with the propagation prediction curves of Section 73.333 to determine the distances to the contour.

Allocation Considerations

Figure 3 summarizes the allocation study for the proposed facility. It is noted that the IF related separation requirements are not applicable to the proposal pursuant to Section 74.1204(g) of the FCC Rules as the ERP will be less than 100 Watts. The tabulation at Figure 3 lists the results of a numerical analysis of the potential for contour overlap for all nearby co-channel and first-, second-, and third-adjacent-channel facilities. For the purposes of the numerical study, the maximum HAAT and maximum ERP values were used in determining the maximum distance in any direction to the predicted coverage and interfering contours.

A waiver of Section 74.1204 of the FCC Rules is requested to the extent necessary since it is demonstrated that no actual interference will occur to KROM. A contour analysis with respect to KROM is shown in Exhibit. From the contour analysis, there will be a signal level of no less than 82.3 dBu from the KROM facility at the proposed K227BH transmitter site. The corresponding interference contour with respect to K227BH will be no less than $(82.3 \text{ dBu} + 40 \text{ dB}) = 122.3 \text{ dBu}$. The predicted interfering 122.3 dBu contour of the proposed K227BH would extend no more than 47 meters from the proposed K227BH antenna in any direction. Since the

transmitting antenna is located 190m above ground level (AGL).

Examination of the local area there is another high rise hotel located close to the proposed transmitter site the maximum highest point of the hotel is 130 Meters above ground level. Therefore, there will be no predicted interference to the KROM facility.

Based on the foregoing, it is concluded that actual interference would not occur with respect to either of the KROM facility.

Environmental Considerations

The Proposed facilities were evaluated in terms of potential radio frequency radiation exposure at ground level in accordance with OET Bulletin No. 65, "Evaluating Compliance With FCC-Specified Guidelines for Human Exposure to Radio frequency Radiation."

In accordance with 47 C.F.R. 1.1307(b)(1) Table 1, only "Part 74 – Subpart L" facilities with an ERP greater than 100 watts, are subject to routine environmental evaluation. Since the facility proposed in this application will operate with an ERP of less than 100 watts, it is "categorically excluded " The licensee will fully cooperate with other site users to temporarily reduce power or cease broadcasting, as necessary, to protect workers and others having access to the site from excessive levels of RF Radiation.