ENGINEERING NARRATIVE

IN SUPPORT OF APPLICATION FOR CONSTRUCTION PERMIT

FOR INCENTIVE AUCTION REASSIGNMENT CHANNEL

Prepared for

PRIME TIME CHRISTIAN BROADCASTING, INC.

KMLM-DT CH 15 Facility ID 53541 27.9 kW DA RC 1034.2 M AMSL

ODESSA, TEXAS

Summary

Prime Time Christian Broadcasting, Inc. ("PTCB") specifies herein its post-auction CH 15 transmission facilities. The proposed facility is based on continued operation from the licensed site and antenna RC on FCC Tower Registration #1053974 which is a leased communications tower with other TV and FM radio stations. The licensed PSI CH 42 directional Aldena is a single channel slot antenna that cannot be retuned and moved from CH 42 to CH 15. The antenna will be replaced with a new antenna having the same horizontal plane radiation pattern, aperture and RC AMSL. The CH 15 antenna will be an Alive Telecom model ATC-BCE228B-V3-15 elliptically polarized antenna or equivalent. The community boundary for Odessa, Texas is located inside the 45.8 dBu F(50,90) city grade contour.

Attached herein is the TVStudy version 2.2.2 output which demonstrates that the proposed facility complies with the requirements for expedited processing in that there is no new interference to any station, the proposed population is 100 percent of the baseline population and the proposed coverage contour does not exceed the baseline contour.

Environmental

The proposed site is an existing site.

The proposed antenna system, as stated above, consists of a slot antenna type ATC-BCE228B-V3-15 elliptically polarized mounted on the side of an existing tower in an area inaccessible to the public. The H.Pol. maximum ERP at any azimuth is 27.9 kilowatts and the maximum V.Pol. ERP is 6.97 kilowatts. The V.Pol. ERP will not exceed the H.Pol.P at any azimuth. The antenna radiation center is 142.7 meters above ground. Utilizing formula 10 OF OET Bulletin No. 65, Edition 97-01, a value F of 0.1 has been used to calculate the power density 2 meters above ground. The maximum power density is 0.58 uW/cm squared. This value is 0.18% of the General Population exposure per section 1.1310. Based on this analysis it is believed that the proposed facility is in compliance with OET-65 Guidelines.

The applicant will reduce power or cease transmission as required to meet FCC OET-65 Worker Safety Guidelines.

OET-69 Bulletin, TVStudy Output

Study created: 2017.07.07 15:04:56

Study build station data: LMS TV 2017-06-21 (6)

Proposal: KMLM-DT D15 DT BL ODESSA, TX

File number: DTVBL53541

Facility ID: 53541

Station data: LMS TV 2017-06-21 (6)

Record ID: DTVBL53541

Country: U.S.

Non-U.S. records included

Stations potentially affected:

Call	Chan	Svc Stati	ıs City, State	File Number	Distance
KXVA	D15	DT LIC	ABILENE, TX	BLCDT20110520ADO	256.4 km
KCIT	D15	DT LIC	AMARILLO, TX	BLANK000004834	368.8
KFOX-TV	7 D15	DT LIC	EL PASO, TX	BLCDT20051103AAE	395.9
KJTL	D15	DT LIC	WICHITA FALLS, TX	BLCDT20090303ACS	409.6

KPTB-DT	D16	DT	LIC	LUBBOCK, TX	BLCDT20090210AFA	173.2
KSAN-TV	D16	DT	LIC	SAN ANGELO, TX	BLANK0000004868	182.3
XHOCH	D15	DT	LIC	OJINAGA, CH	BLANKBPFS20160304AAK	342.8
LICITACIO	ND15	DT	LIC	CIUDAD ACUNA, CI	BLANKBPFS20131206AEK	334.1

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D15

Latitude: 32 2 54.43 N (NAD83)

Longitude: 102 18 5.52 W

Antenna: PSI-PSILPMBFA/42 (ID 85183) 0.0 deg

38.8 dBu contour:

Azimuth	ERP	HAAT	Distance		
0.0 deg	1.12 kW	136.6 m	46.8 km		
45.0	4.46	147.0	54.3		
90.0	27.3	162.2	63.9		
135.0	9.55	152.6	58.2		
180.0	17.9	136.3	59.9		
225.0	19.9	127.5	59.7		
270.0	1.74	123.5	48.1		
315.0	2.51	121.5	49.8		

Database HAAT does not agree with computed HAAT Database HAAT: $145~\mathrm{m}$ Computed HAAT: $138~\mathrm{m}$

Distance to Canadian border: 1884.0 km

**Proposal is within coordination distance of Mexican border Distance to Mexican border: 241.0 km

Page 3

Conditions at FCC monitoring station: Kingsville TX
Bearing: 139.1 degrees Distance: 666.1 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone: Bearing: 344.5 degrees Distance: 934.4 km

No land mobile station failures found

Study cell size: 2.00 km Profile point spacing: 1.00 km

Maximum new IX to full-service and Class A: 0.50%

Maximum new IX to LPTV: 2.00%

No IX check failures found.

OET-69 Bulletin, tvix Study

tvstudy v2.2.2

Database: 127.0.0.1, Study: DTVBL53541 (257), Model: Longley-Rice

Start: 2017.07.07 15:05:22

Study created: 2017.07.07 15:04:56

Study build station data: LMS TV 2017-06-21 (6)

Proposal: KMLM-DT D15 DT BL ODESSA, TX

File number: DTVBL53541

Facility ID: 53541

Station data: LMS TV 2017-06-21 (6)

Record ID: DTVBL53541

Country: U.S.

Non-U.S. records included

Stations potentially affected:

Call	Chan	Svc	Status	City, State	File Number	Distance
KXVA	D15	DT	LIC	ABILENE, TX	BLCDT20110520ADO	256.4 km
KCIT	D15	DT	LIC	AMARILLO, TX	BLANK000004834	368.8
KFOX-TV	D15	DT	LIC	EL PASO, TX	BLCDT20051103AAE	395.9
KJTL	D15	DT	LIC	WICHITA FALLS, TX	BLCDT20090303ACS	409.6
KPTB-DT	D16	DT	LIC	LUBBOCK, TX	BLCDT20090210AFA	173.2
KSAN-TV	D16	DT	LIC	SAN ANGELO, TX	BLANK000004868	182.3
XHOCH	D15	DT	LIC	OJINAGA, CH	BLANKBPFS20160304AAK	342.8
LICITACIO	ND15	DT	LIC	CIUDAD ACUNA, CI	BLANKBPFS20131206AEK	334.1

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D15

Latitude: 32 2 54.43 N (NAD83)

Longitude: 102 18 5.52 W

Height AMSL: 1034.2 m

HAAT: 145.0 m Peak ERP: 27.9 kW

Antenna: PSI-PSILPMBFA/42 (ID 85183) 0.0 deg

38.8 dBu contour:

ERP	HAAT	Distance		
1.12 kW	136.6 m	46.8 km		
4.46	147.0	54.3		
27.3	162.2	63.9		
9.55	152.6	58.2		
17.9	136.3	59.9		
19.9	127.5	59.7		
1.74	123.5	48.1		
2.51	121.5	49.8		
	1.12 kW 4.46 27.3 9.55 17.9 19.9 1.74	1.12 kW 136.6 m 4.46 147.0 27.3 162.2 9.55 152.6 17.9 136.3 19.9 127.5 1.74 123.5		

Page 5

Database HAAT does not agree with computed HAAT Database HAAT: 145 m Computed HAAT: 138 m

Distance to Canadian border: 1884.0 km

**Proposal is within coordination distance of Mexican border

Distance to Mexican border: 241.0 km

Conditions at FCC monitoring station: Kingsville TX

Bearing: 139.1 degrees Distance: 666.1 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone: Bearing: 344.5 degrees Distance: 934.4 km

No land mobile station failures found

Study cell size: 2.00 km

Profile point spacing: 1.00 km

Maximum new IX to full-service and Class A: 0.50%

Maximum new IX to LPTV: 2.00%

Interference to BLCDT20110520ADO LIC, scenario 1 Proposal causes no interference.

Interference to BLCDT20110520ADO LIC, scenario 2 Proposal causes no interference.

Interference to BLANK0000004834 LIC, scenario 1 Proposal causes no interference.

Interference to BLCDT20051103AAE LIC, scenario 1 Proposal causes no interference.

Interference to BLCDT20090303ACS LIC, scenario 1 Proposal causes no interference.	
Interference to BLCDT20090303ACS LIC, scenario 2 Proposal causes no interference.	
Interference to BLCDT20090303ACS LIC, scenario 3 Proposal causes no interference.	
Interference to BLCDT20090303ACS LIC, scenario 4 Proposal causes no interference.	
Interference to BLCDT20090210AFA LIC, scenario 1 Proposal causes no interference.	
Interference to BLCDT20090210AFA LIC, scenario 2 Proposal causes no interference.	
Interference to BLANK000004868 LIC, scenario 1 Proposal causes no interference.	
Interference to BLANKBPFS20160304AAK LIC, scenario 1 Proposal causes no interference.	
Interference to BLANKBPFS20131206AEK LIC, scenario 1 Proposal causes no interference.	
Interference to BLANKBPFS20131206AEK LIC, scenario 2 Proposal causes no interference.	

Interference to proposal, scenario 1

Call Chan Svc Status City, State File Number
Desired: KMLM-DT D15 DT BL ODESSA, TX DTVBL53541

Undesireds: KXVA D15 DT LIC ABILENE, TX BLCDT20110520ADO 256.4 km XHOCH D15 DT LIC OJINAGA, CH BLANKBPFS20160304AAK 342.8

XHOCH D15 DT LIC OJINAGA, CH BLANKBPFS20160304AAK 342.8 LICITACIOND15 DT LIC CIUDAD ACUNA, CI BLANKBPFS20131206AEK 334.1

 Service area
 Terrain-limited
 IX-free
 Percent IX

 9663.9
 293,289
 9635.9
 293,289
 9631.9
 293,285
 0.04
 0.00

Undesired Total IX Unique IX Prcnt Unique IX KXVA D15 DT LIC 4.0 4 4.0 4 0.04 0.00

Coverage Baseline for Post -Auction Table of Allotments

Ter. limited Noise Limited Interfer. Free

Distance

		KMLM-										
535	1 BLCDT20081231AAS	DT	15	ODESSA	TX	DT	9663.9	293289	9635.9	293289	9631.9	293285

Proposed population 100% of Baseline

 P_{age}

Conclusion

Based on the information supplied herein, and accompanying application for construction permit, it is believed that the proposed facilities meet all applicable FCC requirements for construction permit.

The foregoing was prepared on behalf of Prime Time Christian Broadcasting, Inc. by Clarence M. Beverage of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The undersigned certifies, under penalty of perjury, that the statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.

On Deurge

By _____

Clarence M. Beverage

for Communications Technologies, Inc.

Marlton, New Jersey

July 7, 2017

