

MINOR MODIFICATION APPLICATION  
K239CG Bonham, TX to 280D

March 2021

**TECHNICAL STATEMENT**

This technical statement and attached exhibits have been prepared on behalf of Vision Media Group, Inc. (“KFYN”), licensee of translator station K239CG, Facility identifier 79287. The applicant proposes to modify the license of BLFT-20160330AOR to change frequency to a noncontiguous channel, 280D. K239CG has been experiencing significant incoming interference from other co-channel stations and has identified another frequency which it believes will afford a better interference profile to better serve the listeners in the Bonham area. The proposed change is in accordance with the revised 47 C.F.R §74.1233(a)(1) which allows (with respect to noncontiguous channel changes):

*that a simple engineering statement of mitigation of interference at the requested frequency is sufficient as a threshold standard to permit the translator applicant to request a channel change as a minor modification.<sup>1</sup>*

Specifically, K239CG experiences significant incoming co-channel interference from KKAJ (239C2). This interference can get particularly bad in spring and summer months when ducting takes place. The local staff has listened to several other channel options in the Bonham area and has identified a much quieter channel, 280D (103.9MHz) as a preferred frequency. On 280D, other than a 1 watt translator 52km away, there are no pertinent co-channel interferers at or near the existing tower site in Bonham, TX.

---

<sup>1</sup> MB Docket No. 18-119, FCC 19-40, Document [Citation 84 FR 27735, para 3].

K239CG on 280D will continue to operate as a fill-in translator for AM station KFYN (1420kHz, Class D). Facility ID #6347 in compliance with 47 CFR 74.1201(g). There will be no change to the facility other than the frequency.

### Facilities Proposed

Location (NAD83)	33° 33' 16" N Latitude, 96° 13' 25" W Longitude
Channel	280D (103.9MHz)
Tower Overall AGL Height-	98m
Tower ASR	1218550 (Exhibit C)
Proposed Antenna	ERI LPX-1E
Antenna AGL Height-	96m
Site AMSL Height-	192m
COR AMSL Height	288m
ERP	250w Non-Directional

### Interference Study

ComStudy 2.2 search of channel 280 (103.9 MHz Class D) at 33-33-16.0 N, 96-13-25 W.

CALL	CITY	ST CHN CL	DIST	SEP	BRNG	CLEARANCE	
KESN	ALLEN	TX 277 C	56.52	0.00	268.2	-14.98 dB	Exhibit A
K280GD	DURANT	OK 280 D	51.92	0.00	340.8	1.07 dB	Exhibit B
KFYN-FM	DETROIT	TX 282 C2	67.47	0.00	70.2	7.43 dB	Exhibit B
KVIL	HIGHLAND PARK-DALLAS	TX 279 C	127.70	0.00	213.1	9.91 dB	
KMKT	BELLS	TX 226 C3	25.49	12.00	307.0	13.5	IF OK
KKDA-FM	DALLAS	TX 283 C	127.70	0.00	213.1	15.32 dB	
K281CS	MCKINNEY	TX 281 D	63.92	0.00	211.7	20.10 dB	
KKUS	TYLER	TX 281 C2	136.70	0.00	149.4	26.21 dB	
KRWJ-LP	ROCKWALL	TX 281 LP100	84.99	13.00	201.9	26.90 dB	
KVIL	HIGHLAND PARK-DALLAS	TX 279 C	127.67	0.00	213.1	29.20 dB	
KQXC-FM	WICHITA FALLS	TX 280 C2	218.06	0.00	280.8	29.82 dB	
KPGG	ASHDOWN	AR 280 A	199.32	0.00	87.9	30.03 dB	
KEJC-LP	DALLAS	TX 281 LP100	104.65	13.00	211.6	31.47 dB	

## **COMPLIANCE, 74.1201(g), 74.1233(a)(1), and 74.1204(a)**

Exhibit A demonstrates compliance with 74.1204(a). There are no impermissible contour overlaps to any other facilities other than 3rd adjacent KESN (277C). Exhibit B demonstrates, in accordance with 74.1204(d) that there will be no actual interference to KESN at ground level from the proposed translator using a single element antenna (ERI LPX-1E). KESN generates 74.38dB of signal at the non-directional translator on 277C. As demonstrated, there is no location at ground level where the translator will establish over 114.38dB of signal.

Exhibit C demonstrates compliance with 74.1201(g) governing the use of a translator as a fill-in for an AM station. The 60dBu contour of the proposed translator will be completely contained within the 2mV/m contour of KFYN(AM) and is within 25 miles of the KFYN transmitter.

### **Environmental Exhibit**

The proposed K239CG facility as proposed on channel 280D will utilize a non-directional antenna located on an existing tower (ASR 1218550) owned by KFYN. The ASR for the tower is attached as Exhibit D. The RF density near the tower was calculated using the proposed ERI LPX-1E antenna at 250 watts horizontal and vertical.

Using the FCC program “FM Model for Windows”, it was calculated that the proposed antenna contributes approximately  $0.42 \mu\text{W}/\text{cm}^2$  or 0.21% of the total allowable  $200 \mu\text{W}/\text{cm}^2$ . There are no other non-excluded facilities on the tower.

Because the RF level is under 5% of the allowable public exposure level the proposed operation is considered fully compliant and is categorically excluded from further environmental review under §1.1306 of the FCC rules and regulations.

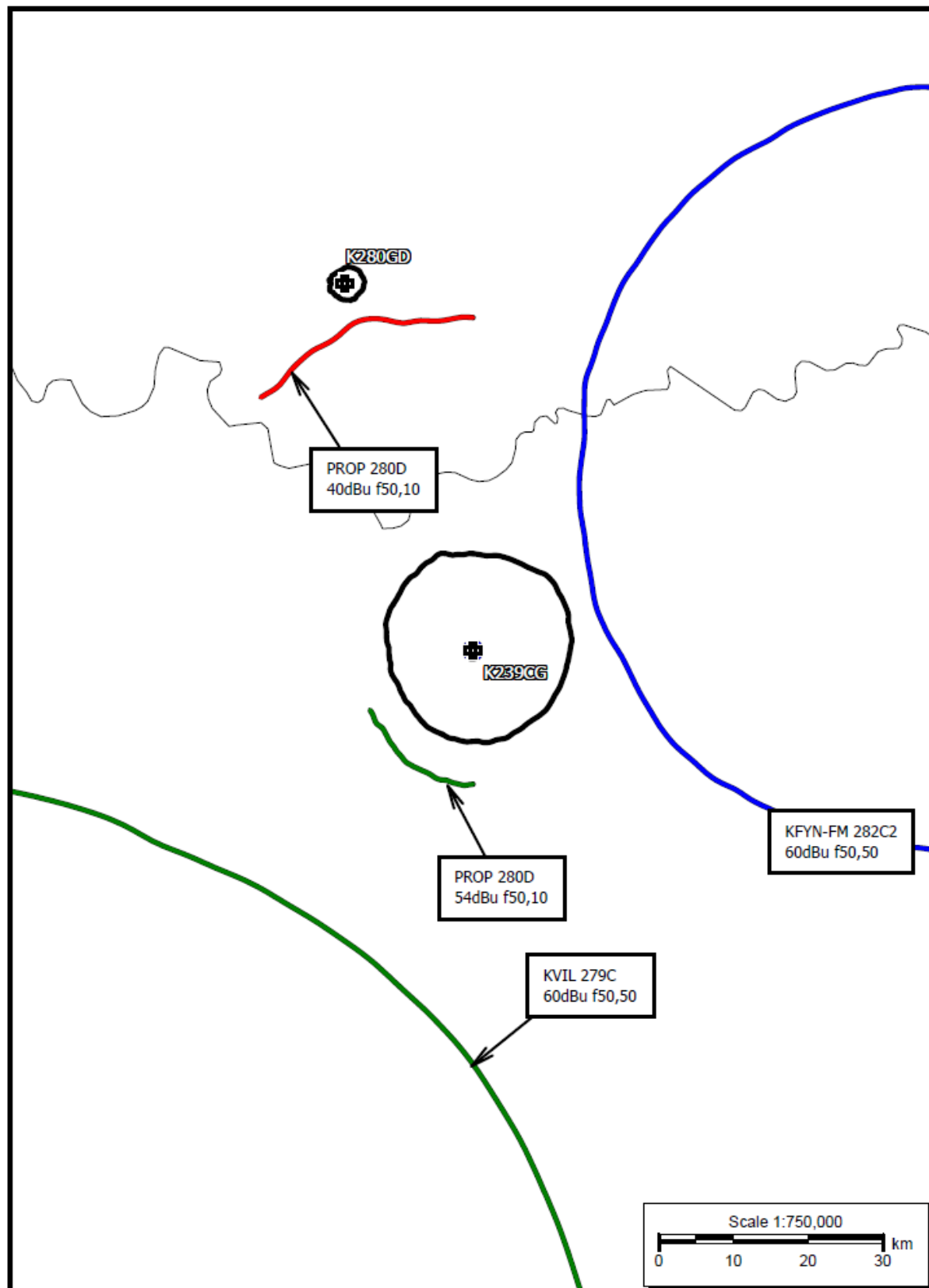
Respectfully Submitted

A handwritten signature in cursive script, reading "Bert Goldman".

Bert Goldman  
Goldman Engineering Mgmt.  
560 Perkins Way  
Auburn, CA 95603  
(214) 395-5067  
[bert@bgoldman.net](mailto:bert@bgoldman.net)

EXHIBIT A- 74.1204(a) Compliance (contour Overlaps)

K239CG on 280D, 74.1204(a) Compliance



## EXHIBIT B- 74.1204(d) Compliance to KESN, 277C

K239CG Bonham , TX, Showing Protection to KESN , Channel: 277  
 Geographic Coordinates: N. 33 33 16.00 W. 96 13 24.90  
 74.1204(d) Study - Using NED 03 SEC Terrain Database  
 Translator or LPFM Maximum Licensed ERP = 0.25 kw, Channel: 280  
 Translator or LPFM Antenna Height AG = 96 meters  
 K239CG Antenna Azimuth Model = Vertical Model Name = LPX1H

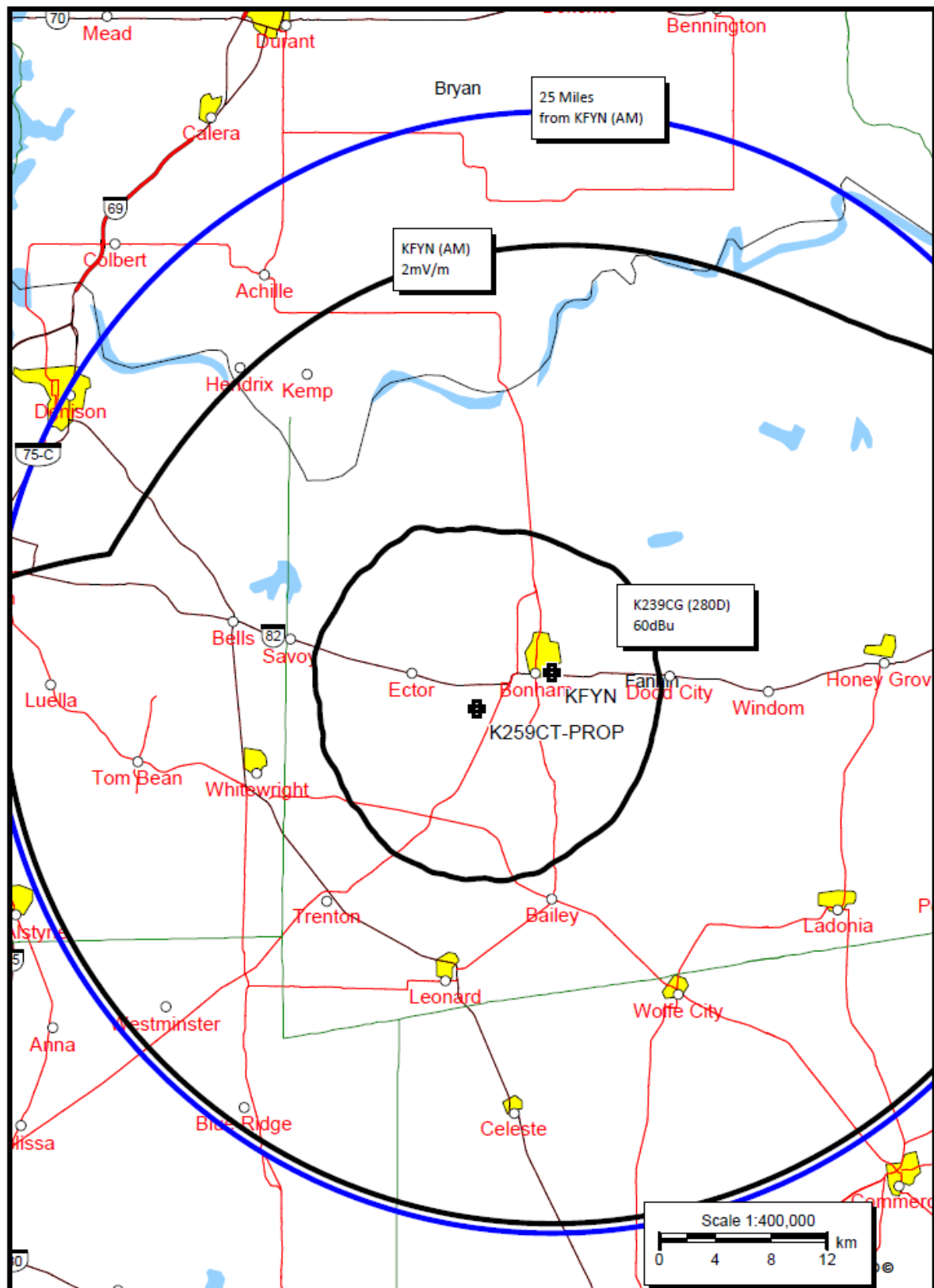
Protected Station's Contour = 74.37727 dBu  
 Translator's or LPFM's full Interference contour 114.37727

Review Azimuth = 0 Degrees True  
 Horizontal Relative Field at Review Azimuth = 1.000  
 Translator/LPFM ERP on the horizontal at Review Azimuth = 0.25 kw  
 Distance between stations = 56.4 km  
 Protected Station= KESN, 98 kw, 821 M meters COR AMSL

Depression Angle From Degree(Deg)	Vertical Relative Field	Horizontal Relative Field	ERP (kw)	Dist to IX Contour Along Dep. Angle(m)	Dist to IX Contour From Tower Base(m)	Height IX Above Ground (m)
00.00	1.0	1.0	0.2500	211.8881	211.8881	096.000
05.00	0.993	1.0	0.2465	210.4048	209.6042	077.662
10.00	0.974	1.0	0.2372	206.3790	203.2436	060.163
15.00	0.941	1.0	0.2214	199.3867	192.5927	044.395
20.00	0.897	1.0	0.2012	190.0636	178.6014	030.994
25.00	0.843	1.0	0.1777	178.6216	161.8862	020.511
30.00	0.78	1.0	0.1521	165.2727	143.1303	013.364
35.00	0.709	1.0	0.1257	150.2286	123.0601	009.832
40.00	0.633	1.0	0.1002	134.1252	102.7458	009.786
45.00	0.554	1.0	0.0767	117.3860	083.0044	012.996
50.00	0.473	1.0	0.0559	100.2231	064.4221	019.225
55.00	0.394	1.0	0.0388	083.4839	047.8844	027.614
60.00	0.317	1.0	0.0251	067.1685	033.5843	037.830
65.00	0.245	1.0	0.0150	051.9126	021.9392	048.951
70.00	0.181	1.0	0.0082	038.3517	013.1171	059.961
75.00	0.124	1.0	0.0038	026.2741	006.8002	070.621
80.00	0.077	1.0	0.0015	016.3154	002.8331	079.932
85.00	0.041	1.0	0.0004	008.6874	000.7572	087.346
90.00	0.016	1.0	0.0001	003.3902	000.0000	092.610

# EXHIBIT B- 74.1201(g) Compliance to KFYN (AM Fill-in)

## PROP 280D, 74.1201(g) Compliance



## EXHIBIT C- ANTENNA STRUCTURE REGISTRATION

### Registration 1218550

 [Map Registration](#)

Registration Detail			
Reg Number	1218550	Status	Constructed
File Number	A1063534	Constructed	06/01/2001
EMI	No	Dismantled	
NEPA	No		
Antenna Structure			
Structure Type			
<b>Location</b> (in NAD83 Coordinates)			
Lat/Long	33-33-16.0 N 096-13-25.0 W	Address	1.5 miles southwest of Bonham, Texas
City, State	Bonham , TX		
Zip	75418	County	FANNIN
Center of AM Array		Position of Tower in Array	
<b>Heights (meters)</b>			
Elevation of Site Above Mean Sea Level		Overall Height Above Ground (AGL)	
192.1		98.2	
Overall Height Above Mean Sea Level		Overall Height Above Ground w/o Appurtenances	
290.3		98.2	
<b>Painting and Lighting Specifications</b>			
FCC Paragraphs 1, 3, 11, 21			
<b>FAA Notification</b>			
FAA Study	97-ASW-0570-OE	FAA Issue Date	05/01/1997
<b>Owner &amp; Contact Information</b>			
FRN	0007834039	Owner Entity Type	Corporation
<b>Owner</b>			
Vision Media Group, Inc. Attention To: Creta L. Carter II 801 S. Armstrong Ave. Denison , TX 75020		P: (903)815-0030 F: E: notguiltybis@yahoo.com	
<b>Contact</b>			
Carter , Creta L II Attention To: Creta L. Carter II 801 S. Armstrong Ave. Denison , TX 75020		P: (903)815-0030 F: E: notguiltybis@yahoo.com	
<b>Last Action Status</b>			
Status	Constructed	Received	01/05/2017
Purpose	Notification	Entered	01/05/2017
Mode	Interactive		