

**Allocation Study****1. Compliance with 47 C.F.R. 73.207**

The proposed facility meets all minimum distance separation requirements with regard to co-channel, first, second, or third adjacent channel stations, and those separated by 53/54 channels, except the license of KBPA Channel 278C1 Austin, Texas (FIN 41213). The proposed facility is 14.6 kilometers short-spaced to KBPA.

This application proposes contour protection for KBPA according to the guidelines of 47 C.F.R. 73.215. Section 47 C.F.R. 73.215(e) states that the minimum separation requirement between a class A and a class C1 facility, which are separated by 200 kHz, is 111 km. Exhibit 17-A shows that KBPA is separated from the proposed facility by 118.37 km.

Therefore, the proposed facility is permitted to use contour protection toward the short-space facilities (See Exhibit 20 for compliance with contour protection requirements).

**2. Fully Spaced Theoretical Site**

A theoretical fully spaced allotment site was identified with the filing for the original construction permit (BPED-20190206AAJ) and this application does not seek to change the allotment coordinates.

# Educational Media Foundation

Exhibit 17-A

5700 West Oaks Boulevard ♦ Rocklin ♦ California ♦ 95765

Balcones Heights, TX

## Proposed Site Spacing

REFERENCE

29 26 29.90 N.

CLASS = A Int = AA

98 30 22.80 W.

Current Spacings to 3rd Adj.

DISPLAY DATES

DATA 04-14-21

SEARCH 04-14-21

----- Channel 279 - 103.7 MHz -----

Call	Channel	Location	Azi	Dist	FCC	Margin
KXAI	CP -N 279A	Balcones Heights TX	298.0	8.81	115.0	-106.2
KBPA	LIC-N 278C1	Austin TX	35.3	118.37	133.0	-14.6
KXAI	LIC 279C1	Refugio TX	146.0	187.61	200.0	-12.4
KAXA	LIC-N 279A	Mountain Home TX	314.2	117.61	115.0	2.6
KZLR	CP 279C1	Odem TX	154.7	206.14	200.0	6.1
KROM	LIC-N 225C1	San Antonio TX	128.3	29.86	22.0	7.9
KSAH-FM	LIC 281C1	Pearsall TX	197.3	83.62	75.0	8.6
KBQQ	LIC 280C3	Smiley TX	94.3	108.67	89.0	19.7
KHHL	LIC 276C2	Karnes City TX	120.1	94.38	55.0	39.4
KEEP	LIC-N 276A	Bandera TX	309.4	72.89	31.0	41.9
KSAG	LIC 277A	Pearsall TX	233.4	78.79	31.0	47.8
KEWP	LIC-N 278A	Uvalde Estates TX	258.5	127.66	72.0	55.7
KJAK	CP -Z 277A	Pearsall TX	233.8	93.36	31.0	62.4
AL9005	VAC 280C	Ciudad Acuna CI	267.5	235.26	165.0	70.3
KBey	LIC 280A	Burnet TX	7.1	145.14	72.0	73.1

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Reference station has protected zone issue: Mexico