

**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.  
----- Channel 279 - 103.7 MHz -----

DISPLAY DATES  
DATA 04-14-21  
SEARCH 04-14-21

| 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