

**KBPA Channel 278C1**  
**Facility ID No. 41213**  
**Austin, Texas**  
**Auxiliary License File No. 0000129795**  
**ASR No. 1063584**  
**License Application**  
**Comprehensive Technical Exhibit**  
**April 19, 2021**

## **TECHNICAL NARRATIVE**

The applicant, Waterloo Media Group, L.P. ("Waterloo"), requests authority to modify FM auxiliary station construction permit File No. 0000099670 for KBPA, Channel 278C0, Facility ID No. 41213, licensed to San Marcos, Texas.

Waterloo requests to operate the KBPA auxiliary license with 50.0 kW ERP at 238.4 m above ground level and 253.3 m HAAT from an existing tower associated with ASR number 1063584. The transmit antenna will be an ERI SHP8AC6 eight bay full wave circularly polarized omni-directional antenna with a center of radiation of 238.4 meters height above ground level. The ERI antenna will also be the transmit antenna for the licensed facility of KROX-FM, Channel 268C2, Facility ID No. 54659, Buda, Texas and an auxiliary facility for KLBJ-FM, Channel 229C, Facility ID No. 65792, Austin, Texas.

The proposed KBPA auxiliary station will not result in extension of the licensed main facility FCC F(50,50) 60 dBu contour in any direction as required in Section 73.1675(a). A contour map demonstrating compliance of Section 73.1675(a) is included in the Comprehensive Technical Exhibit. Compliance with environmental processing is demonstrated in the Comprehensive Technical Exhibit and is titled Human Exposure to Radiofrequency Electromagnetic Field & Section 106 Compliance (Environmental). The combined RFR totals of the three facilities is also included.

**KBPA Austin, Texas**  
**Auxiliary CP License Application File No. 0000129795**  
**Special Notations**

Please note the ERP shown for the proposed KBPA auxiliary facility is shown as 62 kW in the ERI Intermod Report. The report was made prior to the known ERP of the KBPA facility. The actual ERP in this KBPA minor modification application is only 50 kW.

Also note there are numerous references to two FM translators owned by Waterloo Media Group, L.P. in the license application technical certifications. They are K259AJ, Facility ID No. 82261, Austin, Texas and K274AX, Facility ID No. 139278, Austin, Texas.

K259AJ and K274AX are licensed and currently operating from separate and different antennas on the same tower as KROX-FM, the KLBJ-FM auxiliary facility and the KBPA-FM auxiliary facility. Waterloo Media Group, L.P. will be filing minor change applications to add these two translators to the combined antenna system for the aforementioned full power FM facilities.

Waterloo apologizes for any confusion created by these references

**KBPA Aux.**

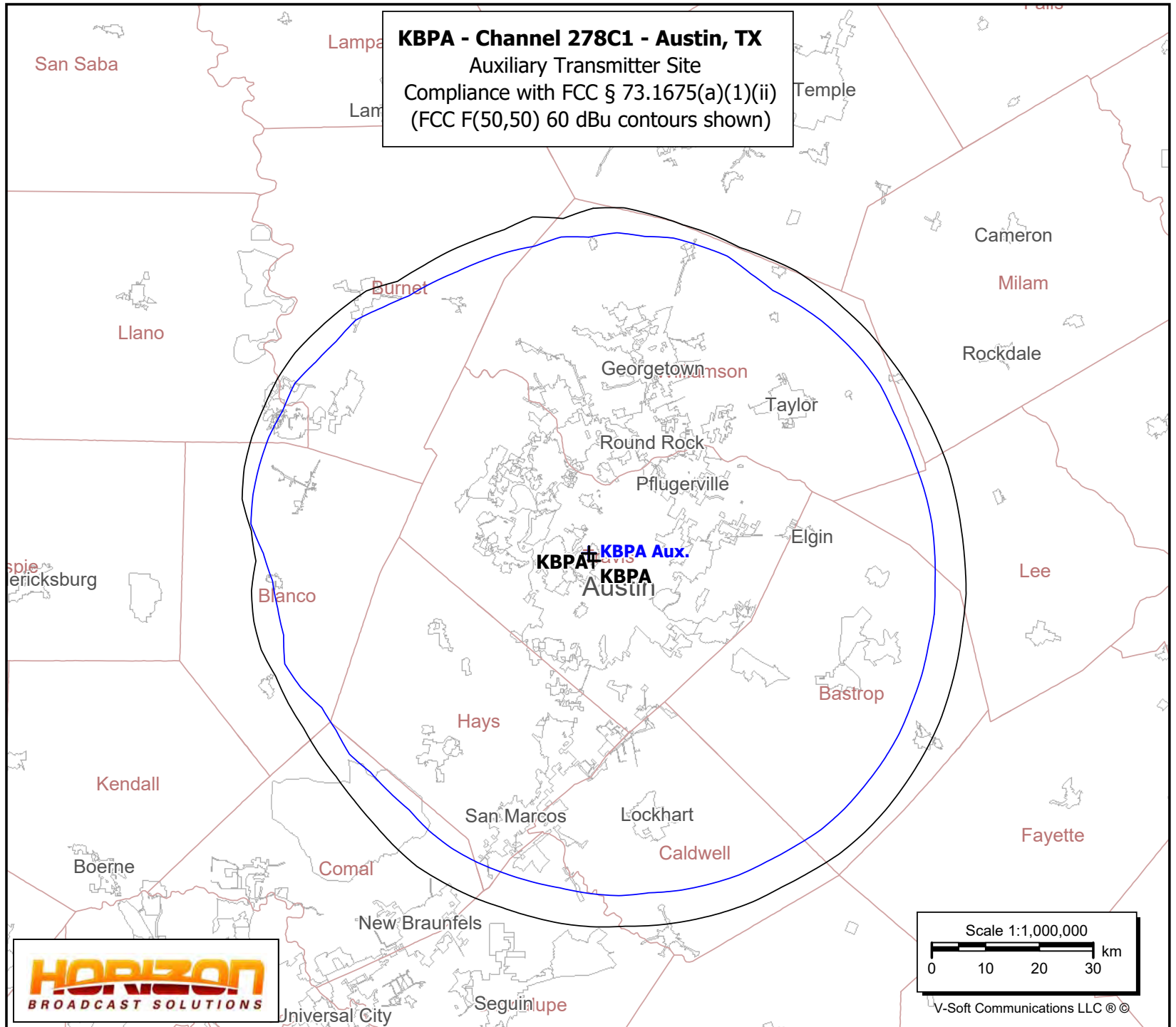
Austin, TX  
0000129795  
Latitude: 30-19-21 N  
Longitude: 097-48-04 W  
ERP: 50.00 kW  
HAAT: 252.3 m  
Channel: 278  
Frequency: 103.5 MHz  
AMSL Height: 476.2 m  
Elevation: 237.8 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: FCC Model  
Loc. Variability: 50.0%  
Time Variability: 50.0%  
HAAT Mthd: FCC

**KBPA**

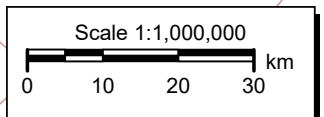
Austin, TX  
0000140276  
Latitude: 30-18-35.26 N  
Longitude: 097-47-33.97 W  
ERP: 46.00 kW  
HAAT: 326.0 m  
Channel: 278  
Frequency: 103.5 MHz  
AMSL Height: 544.0 m  
Elevation: 280.0 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: FCC Model  
Loc. Variability: 50.0%  
Time Variability: 50.0%  
HAAT Mthd: FCC

**KBPA - Channel 278C1 - Austin, TX**

Auxiliary Transmitter Site  
Compliance with FCC § 73.1675(a)(1)(ii)  
(FCC F(50,50) 60 dBu contours shown)



**HORIZON**  
BROADCAST SOLUTIONS



V-Soft Communications LLC ©

**Human Exposure to Radiofrequency Electromagnetic Field  
&  
Section 106 Compliance  
(Environmental)**

A study has been made to determine whether this proposal is in compliance with 47 C.F.R. 1.1307 of the Commission's rules and with OET Bulletin #65, dated August 1997, regarding human exposure to radio frequency radiation in the vicinity of broadcast towers. Waterloo Media Group, L.P., licensee of KBPA seeks to modify FM auxiliary station File No. 0000129795 for KBPA, Channel 278C1 Facility ID No. 41213, licensed to Austin, Texas. The transmitting site is an existing tower 284.4 meters in overall height. This tower is registered with the FCC's Antenna Structure Registration (ASR) number 1063584. The tower is located at 30° 19' 21.0" N Latitude ~ 97° 48' 04.0" W Longitude (NAD 83). The proposed antenna is a side mounted ERI SHP8AC6 eight bay full wave circularly polarized omni-directional antenna with a center of radiation of 238.4 meters height above ground level. The KBPA auxiliary facility will operate with 50.0 kilowatts ERP at 238.4 meters above ground level and 253.3 meters HAAT. The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of § 1.1306 of the FCC Rules. The proposed operation was evaluated for human exposure to RF energy using the procedures outlined in the Commission's OET Bulletin Number 65. The ERI antenna is included in the recently revised OET FM Model Program under Type 3, Opposed "U" dipole. The ERI antenna will also be the transmit antenna for the licensed facility of KROX-FM, Channel 268C2, Facility ID No. 54659, Buda, Texas and an auxiliary facility for KLBJ-FM, Channel 229C, Facility ID No. 65792 Austin, Texas.

Using the Type Three antenna selection in the Commission's FM Model Program, the maximum calculated signal density near the tower at two meters above ground level attributable to the proposed facility was calculated to be 3.488  $\mu\text{W}/\text{cm}$  at 64 meters, which is 1.744 percent of the general population/uncontrolled maximum permitted exposure limit.

The combined RFR predicted maximum calculated signal density for all three stations combined is as follows:

Call Sign	ERP	RFR level	Distance	Uncontrolled %
KBPA Aux	50.0 kW	3.488 $\mu\text{W}/\text{cm}$	64.0 meters	1.744%
KLBJ-FM Aux	100.0 kW	6.976 $\mu\text{W}/\text{cm}$	64.0 meters	3.488%
KROX-FM	12.5 kW	0.872 $\mu\text{W}/\text{cm}$	64 meters	0.436%
Total combined		11.336 $\mu\text{W}/\text{cm}$	64 meters	5.668%

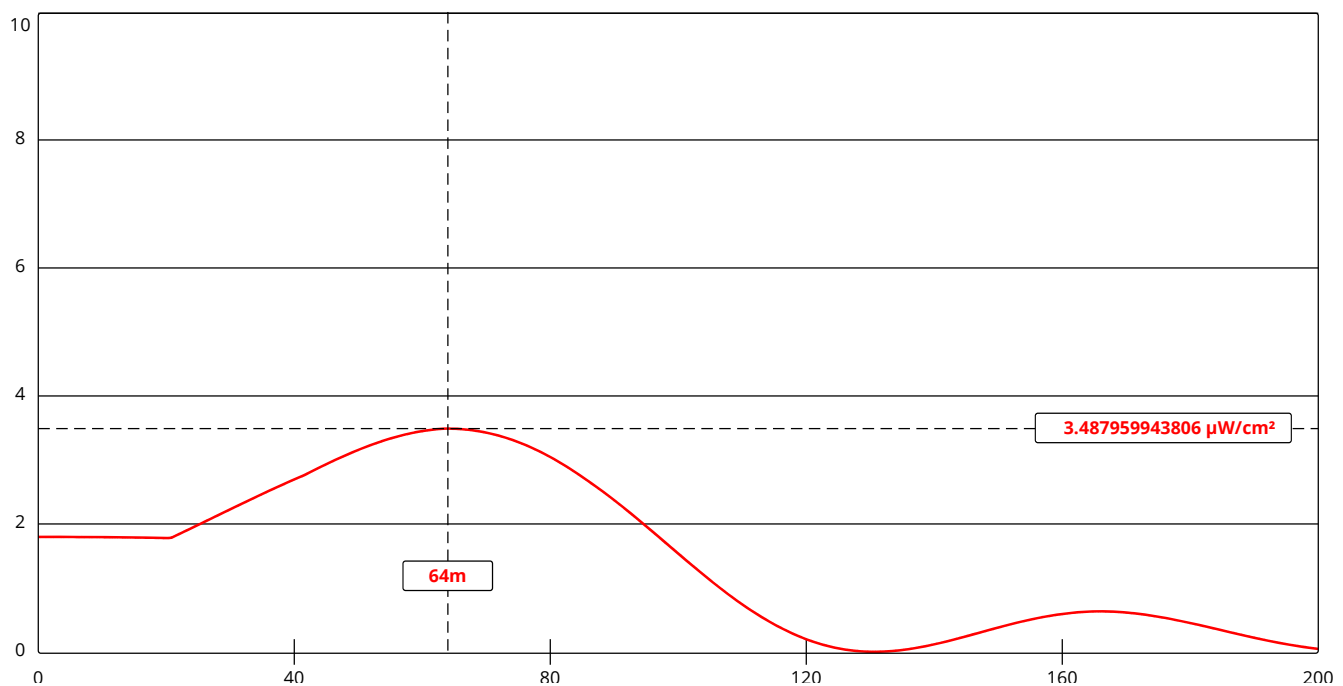
The applicant will see that signs are posted in the vicinity of the tower, warning of potential radio frequency hazards at the site. The applicant will cooperate with other users of the tower to reduce power of the facility, or discontinue operation, as necessary to limit human exposure to levels less than specified by the Federal Communications Commission should anyone be required to climb the tower for maintenance or inspection.



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# FM Model

The FM Model calculator determines the potential exposure from radiofrequency (RF) electromagnetic fields produced by FM broadcast station antennas at ground level. The FM Model software was originally developed by the FCC in 1997 as a standalone executable program and this improved version provides more precise predictions and runs via a JavaScript enabled web browser. The FM Model is originally based on measured data [published in 1985 by the EPA](#) (<http://nepis.epa.gov/Exe/ZyNET.exe/2000ED2W.TXT?ZyActionD=ZyDocument&Client=EPA&Index=1981+Thru+1985&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A\zyfiles\Index%20Data\81thru85\Tx\00000003\2000ED2W.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h|-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=p|f&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL>). [▼ Show More.....](#)



[View Tabular Results +](#)

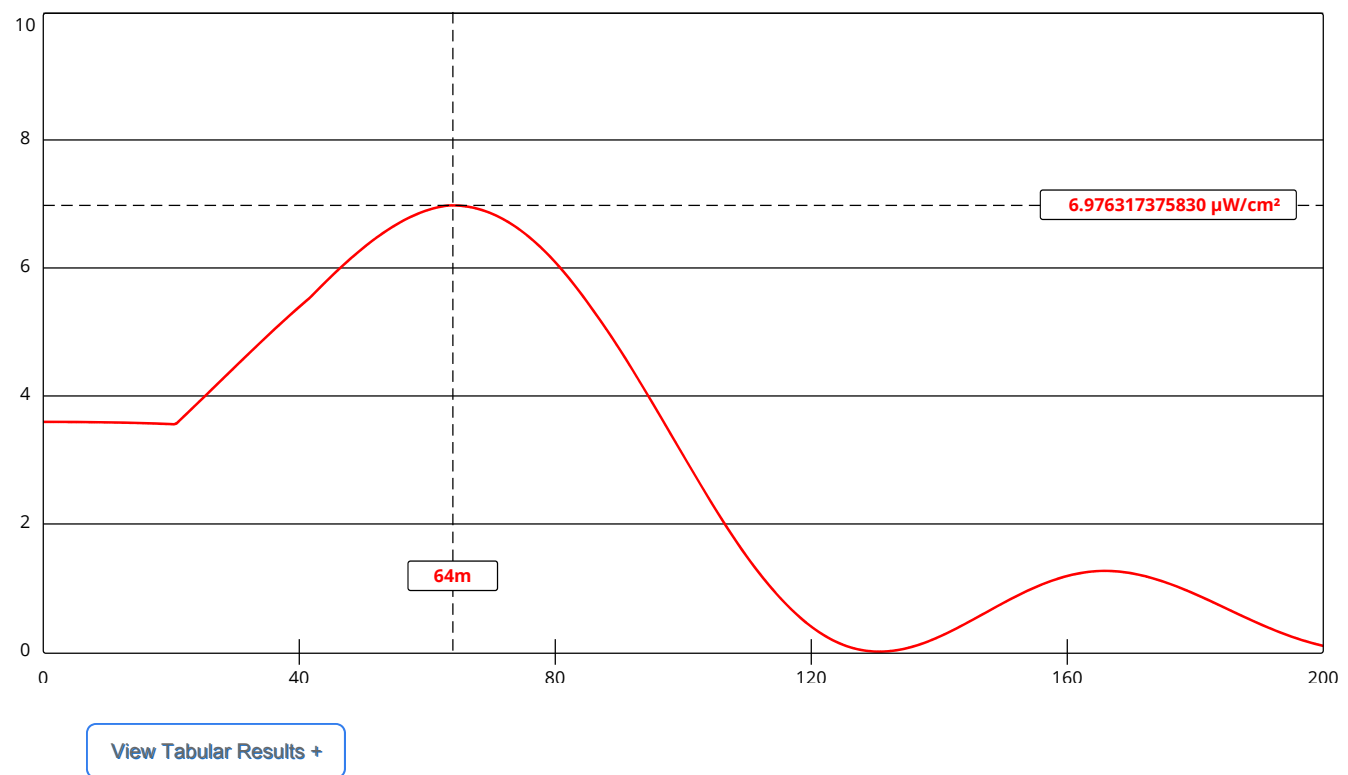
Channel Selection	Channel 278 (103.5 MHz) ▼		
<a href="#">Antenna Type +</a>	EPA Type 3: Opposed U Dipole ▼		
Height (m)	<input type="text" value="238.4"/>	Distance (m)	<input type="text" value="200"/>
ERP-H (W)	<input type="text" value="50000"/>	ERP-V (W)	<input type="text" value="50000"/>
Num of Elements	<input type="text" value="8"/>	Element Spacing (λ)	<input type="text" value="1"/>
Num of Points	<input type="text" value="500"/>	<input type="button" value="Apply"/>	



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# FM Model

The FM Model calculator determines the potential exposure from radiofrequency (RF) electromagnetic fields produced by FM broadcast station antennas at ground level. The FM Model software was originally developed by the FCC in 1997 as a standalone executable program and this improved version provides more precise predictions and runs via a JavaScript enabled web browser. The FM Model is originally based on measured data [published in 1985 by the EPA](#) (<http://nepis.epa.gov/Exe/ZyNET.exe/2000ED2W.TXT?ZyActionD=ZyDocument&Client=EPA&Index=1981+Thru+1985&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A\zyfiles\Index%20Data\81thru85\Tx\00000003\2000ED2W.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h|-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=p|f&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL>). [▼ Show More.....](#)

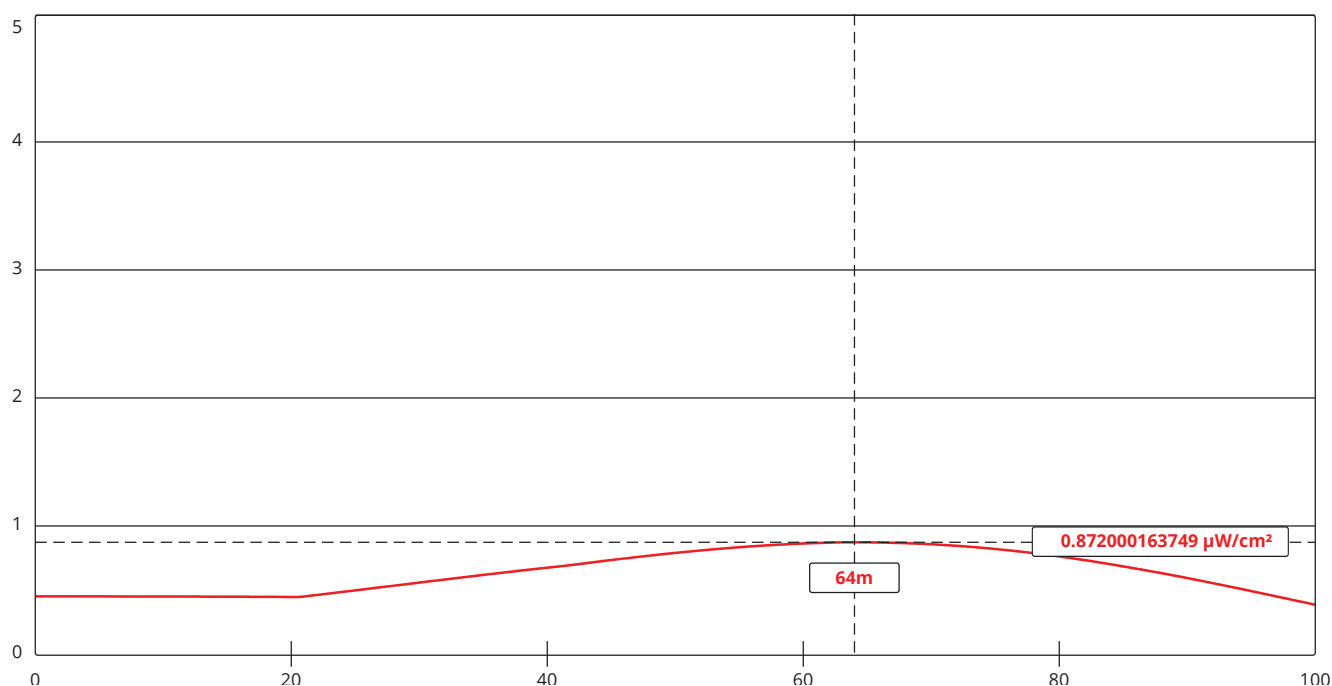


Channel Selection	Channel 234 (94.7 MHz) ▼		
<a href="#">Antenna Type</a> +	EPA Type 3: Opposed U Dipole ▼		
Height (m)	238.4	Distance (m)	200
ERP-H (W)	100000	ERP-V (W)	100000
Num of Elements	8	Element Spacing (λ)	1
Num of Points	500	Apply	

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# FM Model

The FM Model calculator determines the potential exposure from radiofrequency (RF) electromagnetic fields produced by FM broadcast station antennas at ground level. The FM Model software was originally developed by the FCC in 1997 as a standalone executable program and this improved version provides more precise predictions and runs via a JavaScript enabled web browser. The FM Model is originally based on measured data [published in 1985 by the EPA](#) (<http://nepis.epa.gov/Exe/ZyNET.exe/2000ED2W.TXT?ZyActionD=ZyDocument&Client=EPA&Index=1981+Thru+1985&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A\zyfiles\Index%20Data\81thru85\T\t\00000003\2000ED2W.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h|-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=p|f&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL>). [▼ Show More....](#)

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Channel Selection	Channel 268 (101.5 MHz) ▼		
<a href="#">Antenna Type +</a>	EPA Type 3: Opposed U Dipole ▼		
Height (m)	<input type="text" value="238.4"/>	Distance (m)	<input type="text" value="100"/>
ERP-H (W)	<input type="text" value="12500"/>	ERP-V (W)	<input type="text" value="12500"/>
Num of Elements	<input type="text" value="8"/>	Element Spacing (λ)	<input type="text" value="1"/>
Num of Points	<input type="text" value="500"/>	Apply	



**KBPA Austin, Texas  
Auxiliary License Application  
Transmitter Power Output  
April 19, 2021**

**Transmitter Power Output**

The ERI SHP 8AC6-SP 8 bay full wave broadband antenna has a power gain of 4.342. The transmission line has a loss of 0.623 dB. The combiner total losses are 0.278 dB. The total losses are 0.901 dB for an overall line efficiency of 81.265 percent.

50.0 kW divided by 4.342 divided by 0.81265 = 14.17 kW Transmitter Power Output

# **Report Of**

# **Intermodulation Product Findings**

## ***Austin, TX.***

**KLBJ-FM – 93.7 MHz.**  
**K259AJ – 99.7 MHz.**  
**KROX – 101.5 MHz.**  
**K274AX – 102.7 MHz.**  
**KBPA – 103.5 MHz.**

**Project# 38094**

***October 25, 2020***

**Electronics Research Inc.**  
**7777 Gardner Road**  
**Chandler, Indiana 47610**  
**Phone (812) 925-6000 Fax (812) 925- 4030**

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Page 9 .....	Affidavit

## Exhibits Accompanying This Report

<b>EXHIBIT A</b> .....	Antenna and Combiner Specification Sheet and Drawing
A-1.....	Drawing Depicting Antenna
A-2.....	ERI Antenna Specification Sheet
A-3.....	Drawing Depicting Combiner Module
A-4.....	ERI Combiner Specification Sheet
A-5.....	Theoretical Vertical Plane Relative Field Antenna Plots
<b>EXHIBIT B-1</b> .....	Intermodulation Product Measurement Equipment Layout
B-2.....	Broadcasting Scheme of the Multiplexed System

## REPORT OF FINDINGS AUSTIN, TEXAS BROADCAST FACILITY

**Introduction:** This report of findings is based on data collected at the FM broadcast facility located in Austin, TX. The report includes measurements offered as proof that the combined operations of KLBK-FM (93.7 MHz.), K259AJ (99.7 MHz.), KROX (101.5 MHz.), K274AX (102.7 MHz.), and KBPA (103.5 MHz.), transmitters are in compliance with the FCC Rules and Regulations as required by the Code of Federal Regulations (CFR) Title 47 section 73.317 paragraph (b) through (d). K259AJ (99.7 MHz.), and K274AX (102.7 MHz.), have the ability to operate into a separate antenna that is co-located on the tower. There affects have been considered in this report as well. In brief, the collection of measurements presented in this report shows that all possible third order inter-modulation (IM) products generated by this multiplexed and single station systems are less than the maximum allowable level as required by section 73.317 (b) through (d). Jeff Taylor of Electronics Research, Inc. located in Chandler, Indiana performed the measurements summarized herein on October 25, 2020.

**The following exhibits are provided:**

Exhibit A:

- A-1 Drawing Depicting Cog Antenna.
- A-2 SHP-8AC6-SP Antenna Specification Sheet.
- A-3 Drawing Depicting Multiplexed Scheme.
- A-4 Multiplexer Specification Sheet.
- A-5 Theoretical Vertical Plane Relative Field Antenna Plots

Exhibit B:

- B-1 Equipment Employed In Intermodulation Product Measurement.
- B-2 Broadcasting Scheme of the Multiplexed Systems.
- Table 1. Carrier Reference Levels.
- Table 2. Calculated Third Order Products.
- Table 3. Intermodulation Analysis Measurements.

**Exhibits Accompanying Report:** Exhibit A provides comprehensive information on both antenna and filters used by these radio stations. Exhibit B illustrates the broadcasting scheme of each station, the layout of the equipment used to isolate and measure potential intermodulation products and forward carrier reference levels. Found within Table 1 are the narrow band carrier frequency measurements that provide relative output signal levels for the IM analysis. Table 2 lists the calculated third order products that can be generated from FM transmitters broadcasting from the multiplexed system. The IM Analysis Measurements, in Table 3, provides detailed information obtained from the product frequency investigation.

**The Nature of Intermodulation Products (IM):** Intermodulation products result from inadequate transmitter-to-transmitter isolation. Intermodulation products are commonly generated from radio stations operating into multiplexed facilities and congested antenna broadcast sites. The mechanics associated with the phenomenon have been well documented. When two or more transmitters are coupled to each other, new spectral components are produced by the mixing of the station frequencies in the active circuits of each transmitter. The common term used to describe this phenomenon is third order product denoted by the mathematical expression  $[2(F_1)-(F_2)]$ , where  $F_1$  signifies the frequency of the transmitter that is generating the intermodulation product, and  $F_2$  signifies the frequency causing the interference.

**The Multiplexed System:** These measurements were taken with all FM stations operating from their respective antenna systems. The KLBJ-FM, K259AJ, KROX, K274AX, and KBPA, multiplexed system is fundamentally comprised of antenna, feed line and multiplexer unit. The SHP-8AC6-SP antenna, combiner units, MACXLine 450 feedline, are products of Electronics Research, Inc. Refer to Exhibit B-1, for an illustration of the Broadcasting Scheme of these stations.

To accomplish the aggregation of 3 or 4 transmitter signals into a common antenna feed and provide transmitter-to-transmitter isolation, a multiplexing scheme consisting of: (1) 783-8 Constant Impedance combiner module for 93.7 MHz., (1) 780-6 Constant Impedance combiner module for 101.5 MHz., (1) 783-4 Band Pass Filter for 103.5 MHz., (1) 955-4 "T" combiner was installed for frequencies, 99.7, and 102.7 MHz. Interconnecting "u-links", "T", and 3" switch are required to complete the combiner which is illustrated in the attached Exhibit A-3. Note: At this time the combiner is designed to operate as either a three station combined system or as a four station combined system depending on the position of the 3 1/8" switch. The multiplexer, fully assembled, exhibited transmitter port-to-port isolation in excess of -50 dB. Other performance measurements, such as match, loss, group-delay, etc, revealed that the multiplexer unit was in proper working condition. Refer to Exhibit A-4 for the Combiner Specification Sheet.

**The IM Investigation:** Directional Couplers were placed at key locations throughout the combiner to monitor and maintain the multiplexer's performance. All couplers furnished with the system are factory calibrated and capable of delivering accurate and repeatable RF measurements. To facilitate the taking of the measurements, the coupler located at the antenna output of the multiplexed system was used. Care was taken in the selection of the measurement location to ensure that the measurements would be made far removed from transmitters and any filtering used to reduce broadcast emissions. The coupler selected would normally be used for antenna reflection measurements and thus would provide greater than -38 dB directivity and a forward signal sample of -45 dB for the high-power stations and greater than -35 dB and a forward signal sample of -40 dB for the low-power stations.

The forward port of the coupler was used for sampling the outgoing carrier levels and IM products. The IM sampled signal was fed by shielded cable into a Band Pass Filter where all extraneous energy was steeply attenuated. Various attenuation pads were used, when needed, on the band pass filter and/or the Spectrum Analyzer to ensure an adequate signal level for measurements without overloading the measurement equipment. A Rohde & Schwarz Spectrum Analyzer serial# 103069 was employed to record the level of all signals investigated. A Rohde & Schwarz Network Analyzer serial# 100396 was used for selective tuning of the Band Pass Filter. The Rohde & Schwarz Spectrum Analyzer was also used to measure the close in spectral attenuation of each carrier and wide band search for any anomalies that may need further investigation. See attached Exhibit B-1 for an illustration of the measurement equipment.

Prior to recording measurements, all pertinent broadcasting equipment including Transmitters, Multiplexer, Feed Line and Antenna were adjusted to optimal performance. Also, it was confirmed before taking any measurements that all transmitters were operating at full licensed power. From the equipment setup described above, the relative output signal level of each stations forward carrier was made. The resulting signal levels of these measurements are listed in Table 1, column labeled "Adjusted Level". This level will be used as the reference level for possible IM products of each carrier and was necessary to confirm that no significant levels of spurious energy, referenced to each carrier, were present from any transmitter operating from the multiplexed system.

**Table 1 - Carrier Reference Levels.**

<b>Carrier Frequency (MHz)</b>	<b>Pad One (dB)</b>	<b>Full Scale Range (dB)</b>	<b>Scale Reading (dBm)</b>	<b>Carrier Level (dBm)</b>	<b>Notes</b>
<b>KLBJ-FM 93.7</b>	<b>10</b>	<b>---</b>	<b>16.7</b>	<b>26.7</b>	
<b>K259AJ 99.7</b>	<b>10</b>	<b>---</b>	<b>-0.3</b>	<b>9.7</b>	
<b>KROX 101.5</b>	<b>10</b>	<b>---</b>	<b>9.2</b>	<b>19.2</b>	
<b>K274AX 102.7</b>	<b>10</b>	<b>---</b>	<b>-0.2</b>	<b>9.8</b>	
<b>KBPA 103.5</b>	<b>10</b>	<b>---</b>	<b>15.7</b>	<b>25.7</b>	

Predictable third-order products due to system harmonics mixed with all on-site interfering frequencies that could be generated from the multiplexed system are calculated and listed in Table 2.

**Table 2 - Third order Products.**

<b>Carrier Frequencies</b>					
<b>Interfering Frequencies</b>	<b>93.7</b>	<b>99.7</b>	<b>101.5</b>	<b>102.7</b>	<b>103.5</b>
93.7 MHz.	----	105.7	109.3	111.7	113.3
99.7 MHz.	87.7	----	103.3	105.7	107.3
101.5 MHz.	85.9	97.9	----	103.9	105.5
102.7 MHz.	84.7	96.7	100.3	----	104.3
103.5 MHz.	83.9	95.9	99.5	101.9	----

Using the equipment previously described the IM product measurements were recorded and are listed in Table 3. The signal levels referenced to the carriers are calculated and listed in the column labeled "Level Referenced to Carrier". Refer to Exhibit B-2 for a layout of the measurement equipment.

**Table 3 – Intermodulation Measurements**

<b>IM Measurements Taken in Austin, Texas</b>										
<b>Product Frequency (MHz)</b>	<b>Transmitter Frequency (MHz)</b>	<b>Interfering Frequency (MHz)</b>	<b>Pad (dB)</b>	<b>Bandpass Filter Loss (dB)</b>	<b>Total Loss</b>	<b>Measured Level (dBm)</b>	<b>Adjusted Level (dB)</b>	<b>Carrier Reference Level (dBm)</b>	<b>Level Referenced to Carrier (dB)</b>	<b>Notes*</b>
<b>Transmitter Mixes</b>										
	93.7	Ref.	10		10	16.7	26.7	26.7		
	99.7	Ref.	10		10	-0.3	5.1	9.7		
	101.5	Ref.	10		10	9.2	19.2	19.2		
	102.7	Ref.	10		10	-0.2	9.8	9.8		
	103.5	Ref.	10		10	15.7	25.7	25.7		
84.7	93.7	102.7	10	12.7	22.7	-95.1	-72.4	26.7	-99.1	
85.9	93.7	101.5	10	13.6	23.6	-94.8	-71.2	26.7	-97.9	
87.7	93.7	99.7	10	13.2	23.2	-97.1	-73.9	26.7	-100.6	
96.7	99.7	102.7	10	12.8	22.8	-88.89	-66.09	9.7	-75.79	2
97.9	99.7	101.5	10	12.7	22.7	-96.2	-73.5	9.7	-80.2	1
100.3	101.5	102.7	10	12.5	22.5	-95.9	-73.4	19.2	-92.6	
103.3	101.5	99.7	10	12.6	22.6	-95.2	-72.6	19.2	-91.8	
103.9	102.7	101.5	10	12.6	22.6	-94.8	-72.2	9.8	-82.0	
105.7	99.7	93.7	10	12.5	22.5	-94.9	-72.4	9.7	-82.1	1
105.7	102.7	99.7	10	12.5	22.5	-94.9	-72.4	9.8	-82.2	
109.3	101.5	93.7	10	12.9	22.9	-95.2	-72.3	19.2	-91.5	
111.7	102.7	93.7	10	12.5	22.5	-95.4	-72.9	9.8	-82.7	

(1) Low Power rule Section 73.317 paragraph D.

(2) Local Carrier 96.7 MHz. KHFI

## IM Measurements Taken in Austin, Texas

Product Frequency (MHz)	Transmitter Frequency (MHz)	Interfering Frequency (MHz)	Pad (dB)	Bandpass Filter Loss (dB)	Total Loss	Measured Level (dBm)	Adjusted Level (dB)	Carrier Reference Level (dBm)	Level Referenced to Carrier (dB)	Notes*
Transmitter Mixes										
	<b>93.7</b>	<b>Ref.</b>	<b>10</b>		<b>10</b>	<b>16.7</b>	<b>26.7</b>	<b>26.7</b>		
	<b>99.7</b>	<b>Ref.</b>	<b>10</b>		<b>10</b>	<b>-0.3</b>	<b>9.7</b>	<b>9.7</b>		
	<b>101.5</b>	<b>Ref.</b>	<b>10</b>		<b>10</b>	<b>9.2</b>	<b>19.2</b>	<b>19.2</b>		
	<b>102.7</b>	<b>Ref.</b>	<b>10</b>		<b>10</b>	<b>-0.2</b>	<b>9.8</b>	<b>9.8</b>		
	<b>103.5</b>	<b>Ref.</b>	<b>10</b>		<b>10</b>	<b>15.7</b>	<b>25.7</b>	<b>25.7</b>		
83.9	93.7	103.5	10	13.6	23.6	-95.6	-72.0	26.7	<b>-98.7</b>	
84.7	93.7	102.7	10	12.7	22.7	-95.1	-72.4	26.7	<b>-99.1</b>	
85.9	93.7	101.5	10	13.6	23.6	-94.9	-71.3	26.7	<b>-98.0</b>	
87.7	93.7	99.7	10	13.2	23.2	-97.1	-73.9	26.7	<b>-100.6</b>	
99.5	101.5	103.5	10	12.7	22.7	-94.3	-71.6	19.2	<b>-90.8</b>	
100.3	101.5	102.7	10	12.7	14.1	-95.9	-81.8	19.2	<b>-101</b>	
103.3	101.5	99.7	10	12.6	22.6	-89.9	-67.3	19.2	<b>-86.5</b>	
104.3	103.5	102.7	10	14.1	24.1	-93.8	-69.7	25.7	<b>-95.4</b>	
105.5	103.5	101.5	10	14.1	24.1	-96.5	-72.4	25.7	<b>-98.1</b>	
107.3	103.5	99.7	10	13.5	23.5	-95.2	-71.7	25.7	<b>-97.4</b>	
109.3	101.5	93.7	10	12.9	22.9	-95.2	-72.3	19.2	<b>-91.5</b>	
113.3	103.5	93.7	10	12.9	22.9	-94.7	-71.8	25.7	<b>-97.5</b>	



The Spectrum Analyzer was used to check the close in spectral attenuation of the carrier to confirm the operation of the transmitter, is in compliance with Sections (b) and (c) of the FCC Rules and Regulations.

As a final proof of the systems IM Product performance, a wide band search was undertaken using the Spectrum Analyzer. The purpose for this measurement was to look for suspicious anomalies that may warrant further investigation. My search ranged the complete frequency span of the receiver and resulted in no additional investigations.

**Conclusion:** Based upon my observations and measurements taken on October 25, 2020 as summarized in this document, I, Jeff Taylor, find the subject system, specifically the transmitters and filter systems for the operation of KLBJ-FM, K259AJ, KROX, K274AX, and KBPA into their respective antennas to be in proper working order. Furthermore, based on the measured data, it is my opinion that there are no inter-modulation products in excess of 80 dB below carrier levels generated from or within the station operating on the installed system. Based on this recorded data, I conclude that of KLBJ-FM, K259AJ, KROX, K274AX, and KBPA, are in compliance with the requirements of Section 73.317 paragraph (b) through (d) of the FCC Rules and Regulations.

Respectfully submitted,  
Electronics Research, Inc.

Jeff Taylor, Field Technician

State of Indiana)  
) SS:  
County of Warrick)

**AFFIDAVIT**

I, Jeff Taylor, hereby declare that the following statements are true and correct to the best of my knowledge and belief :

- 1.) I am a Field Technician for Electronics Research, Inc ("ERI ") and have been employed by ERI for 24 years. I am familiar with and have assisted in the design, manufacturing and installation of FM Antennas and FM Multiplexers in my long tenure with ERI.
- 2.) I have either prepared and/or directly supervised the preparation of all technical information contained in this Report of Findings and to my knowledge to be accurate and true.
- 3.) ERI has been requested by Waterloo Media, L.P. on behalf of radio Stations KLBj-FM, K259AJ, KROX K274AX, and KBPA in Austin, TX. to prepare this Report Of Findings.

Jeff Taylor; Field Technician

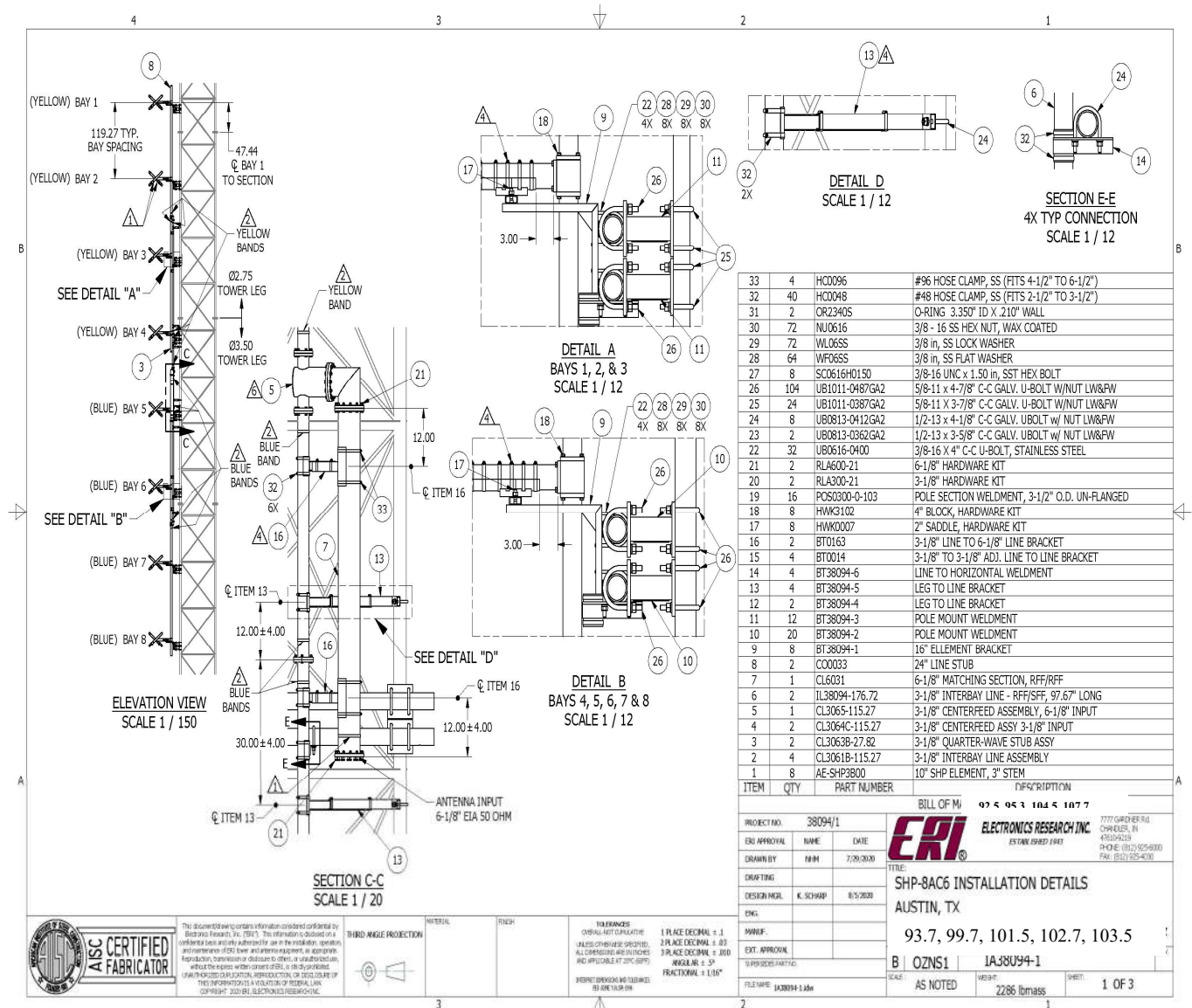
*Subscribed and sworn to before me on this 28th, day of October, 2020.*

Tabitha Heilman; Notary Public  
My commission expires January 2, 2022

*Tabitha Heilman*



# EXHIBIT, A-1



**A-2 ERI 1183 Antenna Specification Sheet**

TRANSMISSION SITE

AUSTIN, TEXAS

**General Specifications**

Antenna Type .....High Power FM-Broadcast, Suitable For Multiplexing  
 Model Number .....SHP-8AC6-SP  
 Number of Bay Levels .....Eight  
 Polarization..... Right Hand Circular Polarized

**Electrical Specifications**

Antenna Input Power Capability ..... 51 kW Max <sup>(1)</sup>  
 Operating Frequency Band ..... 93.7 ~ 103.5 Megahertz.  
 VSWR. .... <1.20:1 @ Operating Frequencies<sup>(2)</sup>  
 Azimuthal Pattern Circularity ..... Better Than +/- 2dB From RMS (Free Space)  
 Power Split ..... 50/50 (Horizontal & Vertical)  
 Frequency Specific Information:

<u>Frequency</u>	<u>Station ERP</u>	<u>Beam Tilt</u>	<u>First Null Fill</u>	<u>Second Null Fill</u>	<u>Power Gain</u>	<u>Line Loss</u> <sup>(3)</sup>	<u>Filter Loss</u> <sup>(4)</sup>	<u>Computed TPO</u>
93.7	100 KW	0.0°	0.0 %	10.8 %	4.342	-0.623 dB	-0.278 dB	28.33 kW
99.7	250 Watts	0.0°	5.5 %	0.0 %	4.424	-0.640 dB	-1.263 dB	93 Watts
101.5	12.5 KW	0.0°	14.6 %	0.4 %	4.176	-0.649 dB	-0.325 dB	3.746 kW
102.7	250 Watts	0.0°	20.7 %	1.1 %	3.930	-0.649 dB	-0.732 dB	92 Watts
103.5	62 KW	0.0°	0.0 %	10.8 %	4.154	-0.657 dB	-0.313 dB	18.66 kW

**Mechanical Specifications**

Antenna Feed System..... Fed with one Line  
 Input Connector ..... 6 1/8 "50-Ohm EIA Flanged  
 Element Deicing..... None  
 Interbay Spacing..... 119.27" Center to Center  
 Array Length ..... 74.5 Feet  
 Construction Material (Antenna)..... Galvanized Plated Steel and Stainless Steel

1) Power Capability Has Been Rated Assuming an Operating Transmission VSWR of 1.5:1

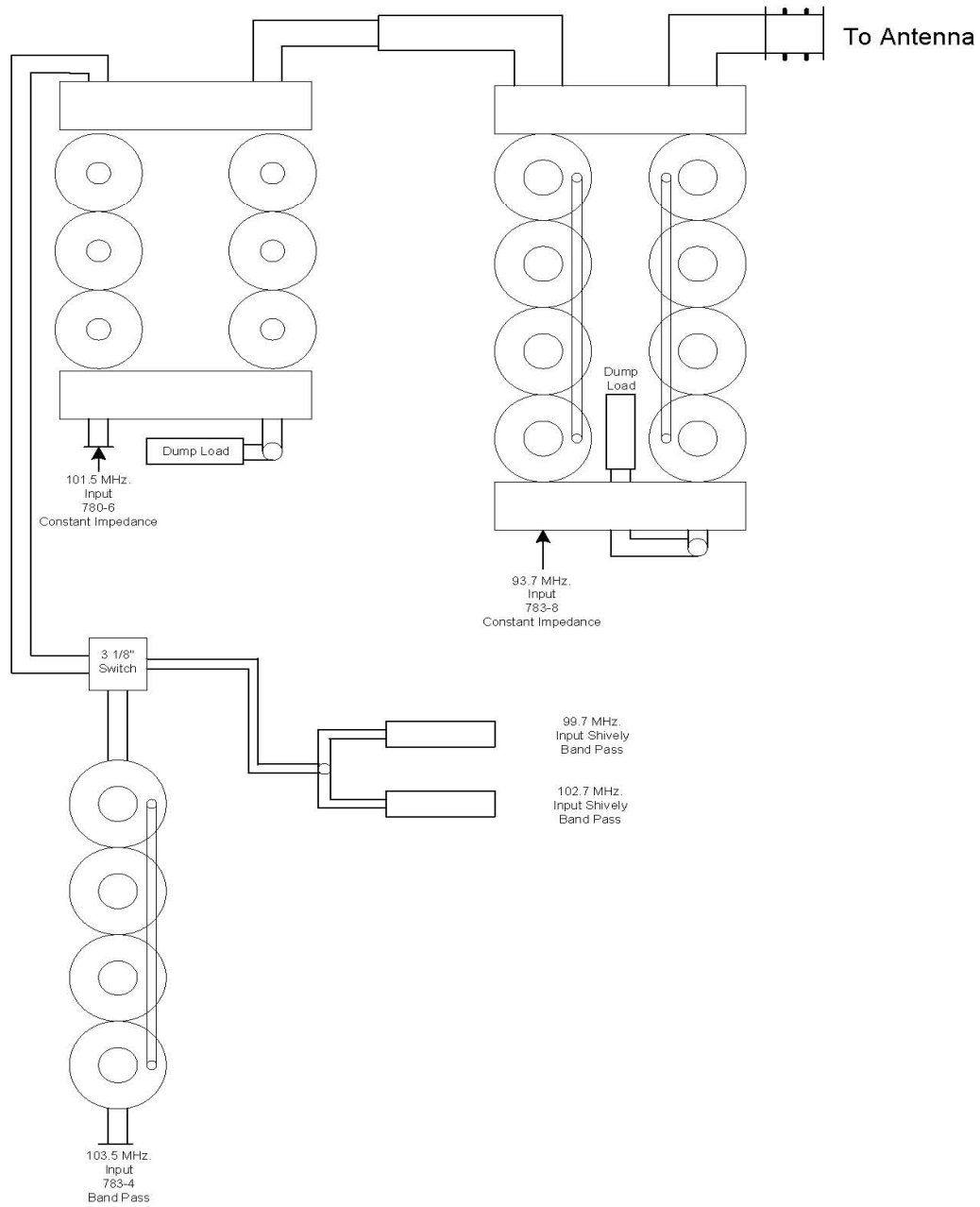
2) VSWR Specification Achieved After on Site Tuning For User Specific Frequencies.

3) Line Loss Assumes A Feed Run of 865 Feet of ERI MACXLine 4 1/16" Rigid 20 Foot Sticks.

3) Line Loss Assumes A Feed Run of 35 Feet of LDF4-50 Andrew Foam for 99.7 and 102.7 MHz.

4) Losses Taken from Actual Combiner.

Combiner Layout Austin, TX.  
Project # 38094



**A-4 ERI Combiner Specification Sheet**

TRANSMISSION SITE

AUSTIN, TEXAS

**General Specifications:**

Multiplexer Type ..... Constant Impedance, Band Pass, and “T” Combiner  
Number of Combining Units ..... Four  
Injected Port to Injected Port Isolation ..... < - 50 dB  
Output Connector ..... 6 1/8 “50 Ohm EIA (Flanged)  
Output Power (Designed) ..... 51 kW<sup>(1)</sup>

Heat Removal ..... Natural Convection Cooling  
Physical Arrangement ..... Free Standing and Mezzanine

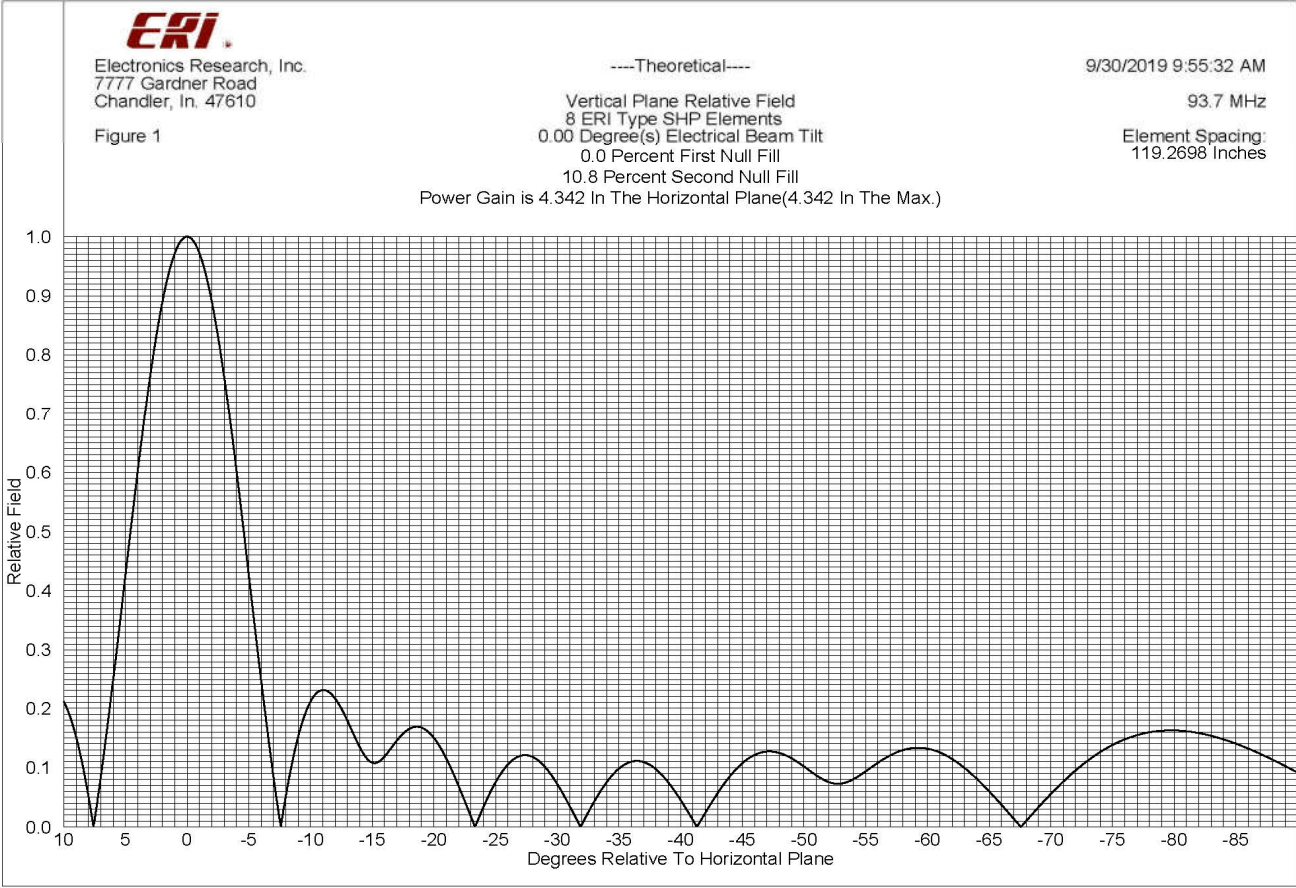
**Injected Port Specifications:**

Frequency Assignment ..... 93.7 ~ 103.5 MHz.  
Power Rating, Each Injected Port (Designed)..... 28.3 kW 93.7 MHz, 93 Watts 99.7 MHz.  
Power Rating, Each Injected Port (Designed)..... 3.74 kW 101.5 MHz, 92 Watts 102.7 MHz.  
Power Rating, Each Injected Port (Designed)..... 18.6 kW 103.5 MHz.  
Input Connector ..... 3-1/8" 50 Ohm EIA (Flanged) 93.7, 101.5, and 105.3 MHz.  
Input Connector ..... 7/8" 50 Ohm EIA (Flanged) 99.7, and 102.7 MHz.  
VSWR..... < 1.20:1 @ +/-100 KHz.<sup>(2)</sup>  
Group Delay ..... Less than 200 ns Overall Variation, Carrier @ +/- 150 KHz.  
Insertion Loss (Measured):

93.7 MHz. .... - 0.278 dB  
99.7 MHz. .... - 1.263 dB  
101.5 MHz. .... - 0.325 dB  
102.7 MHz. .... - 0.732 dB  
103.5 MHz. .... - 0.313 dB

1) Power Rating Listed is as Designed Only. Actual Power Capabilities May Vary.

2) When Terminated in 50 Ohm Resistive Load.



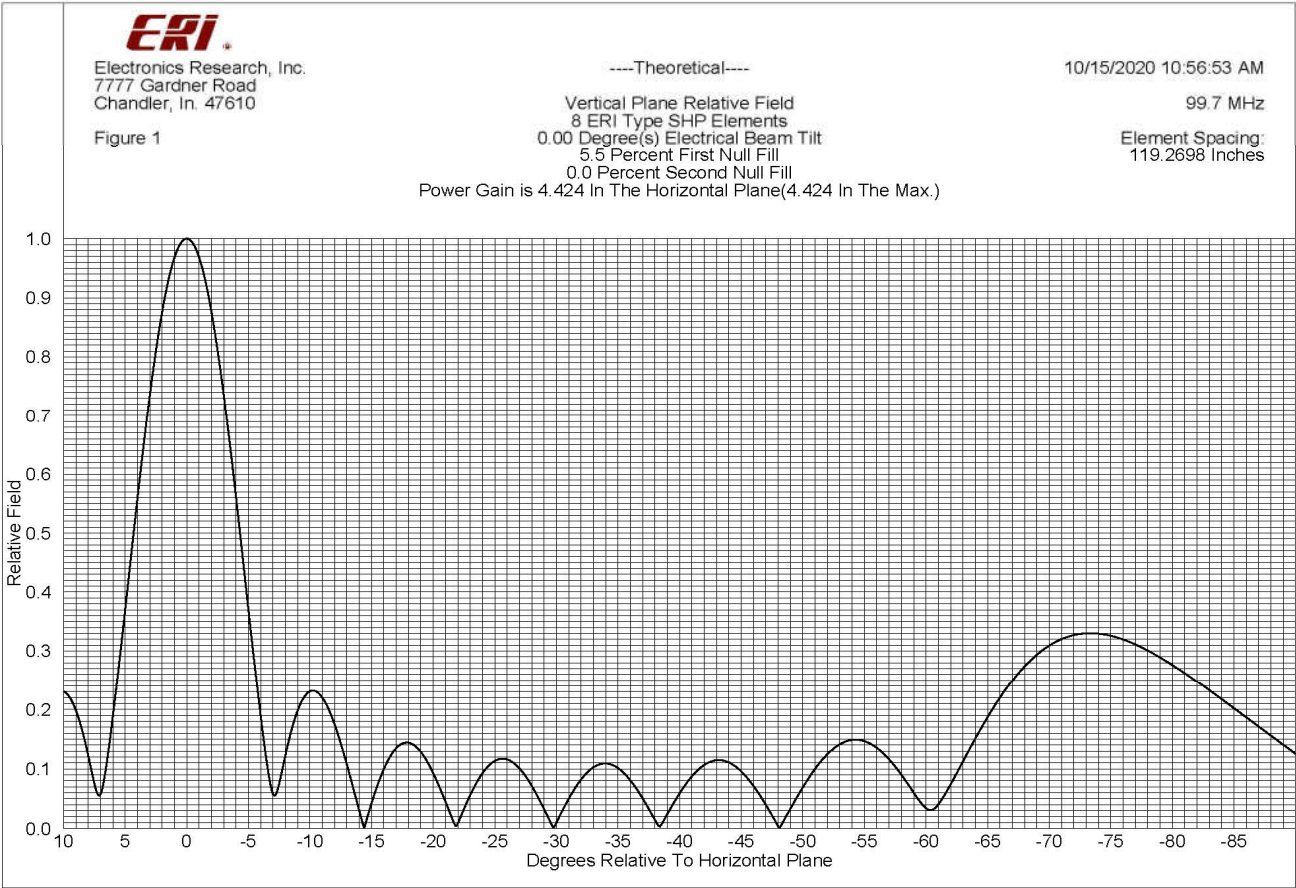
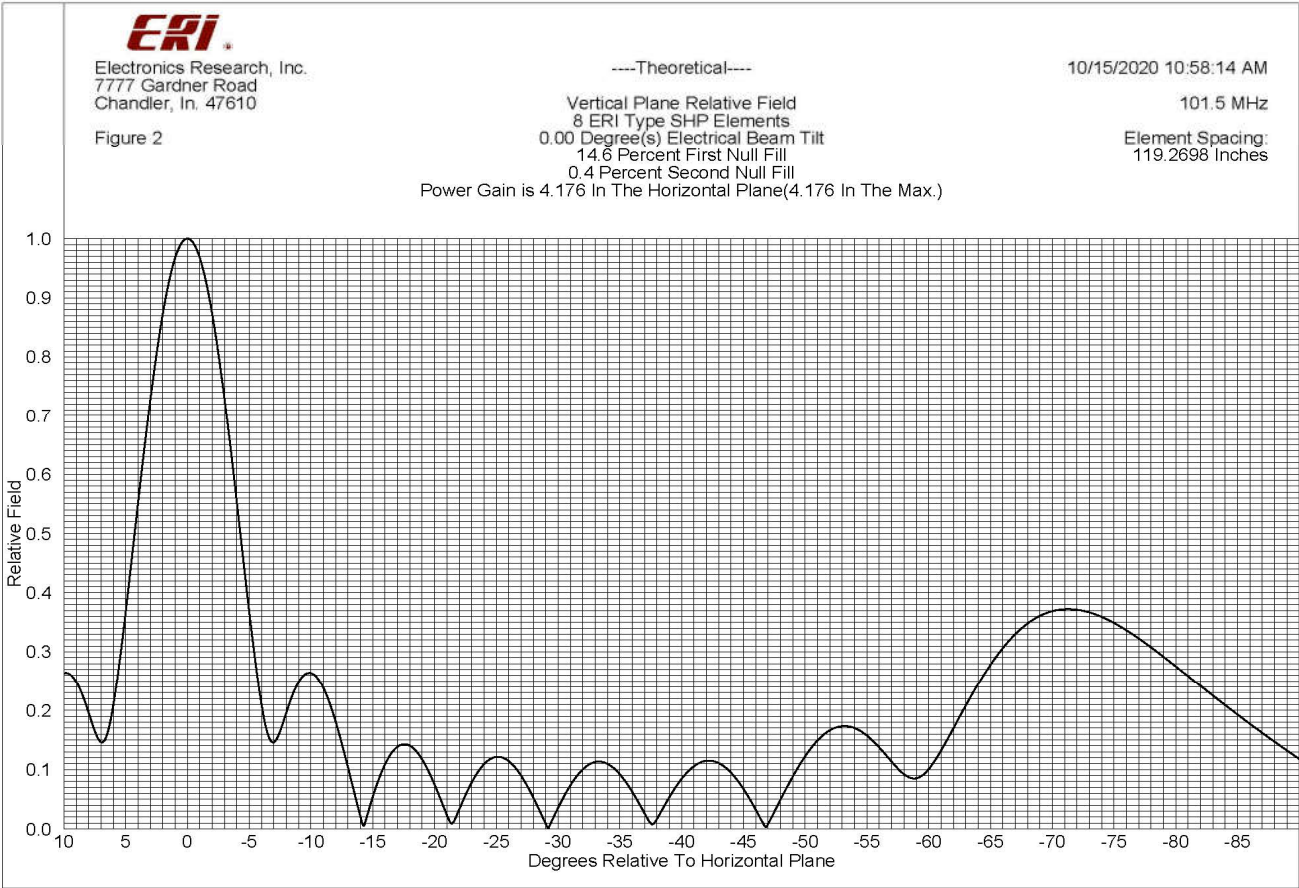
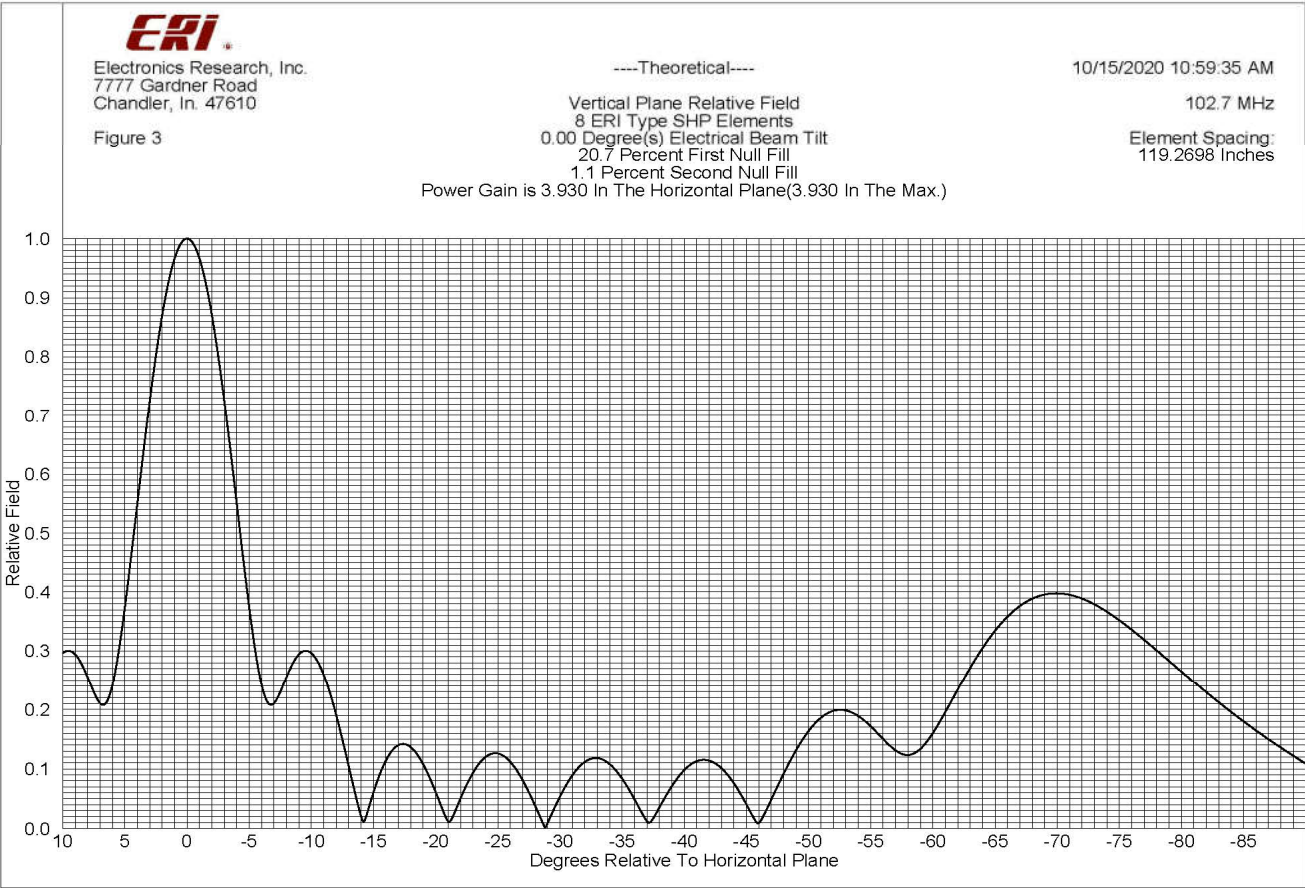
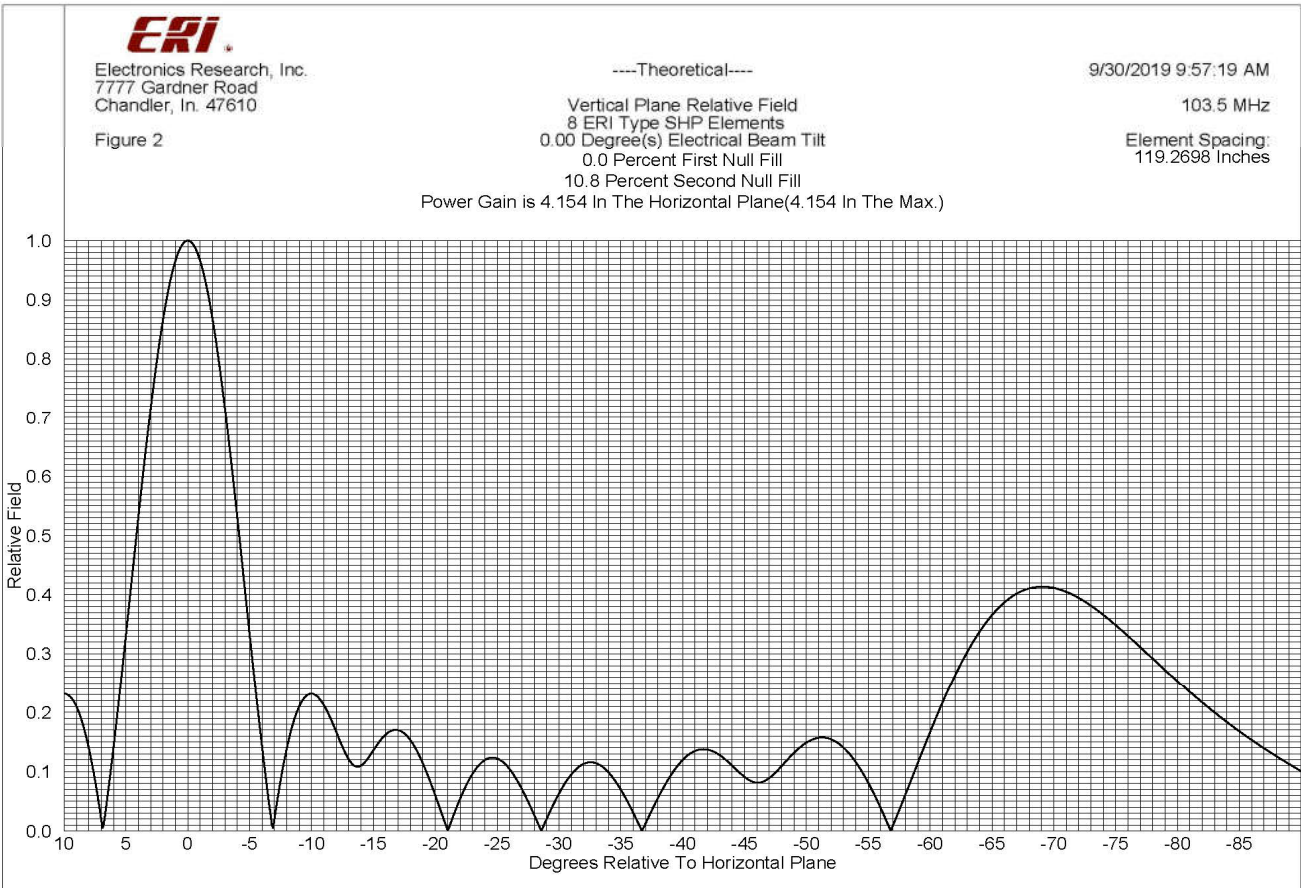




EXHIBIT A – 5







# Broadcasting Scheme and Equipment Employed in Intermodulation Measurements

