

TECHNICAL NARRATIVE

April 28, 2022

This Technical Statement and attached exhibits were prepared on behalf of Xavier Entertainment, LLC ("Xavier"), licensee of KOTX, Channel 254A, Facility ID No. 171012, Hebbbronville, Texas. KOTX was granted construction permit LMS file No. 0000125145 for Channel 254C3 on November 15, 2021. Xavier herein is modifying construction permit 0000125145 to relocate to a different tower site. The proposal is described in its entirety for the convenience of the FCC staff but the actual requests are made by the application itself.

The proposed KOTX Channel 254C3 application site coordinates are located at 27° 30' 20" North Latitude and 98° 41' 23" West Longitude (NAD 83). The application site is located within 320 kilometers of the border with Mexico. Mexican concurrence was obtained for the existing permit and should not be required. However, should additional coordination with Mexico be required Xavier requests and will accept a conditional construction permit issued prior to notification of acceptance of the proposed modification from the Mexican government.

The application site is a new tower 113.1 meters in overall height and registered with Antenna Structure Registration ("ASR") number 1322260. This modification is also compliant with all the requirements of 47CFR §73.207.

The proposed KOTX facility would operate with 25.0 kW ERP non-directional at 105.3 meters above ground level and 100 meters HAAT. The FCC F(50,50) 70 dBu contour covers 100 percent of Hebbbronville.

An exhibit shows the proposed KOTX Channel 254C3 facility is in compliance with the Commission's radio frequency emission limits.

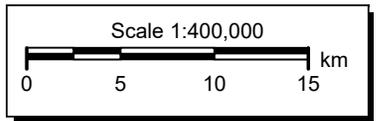
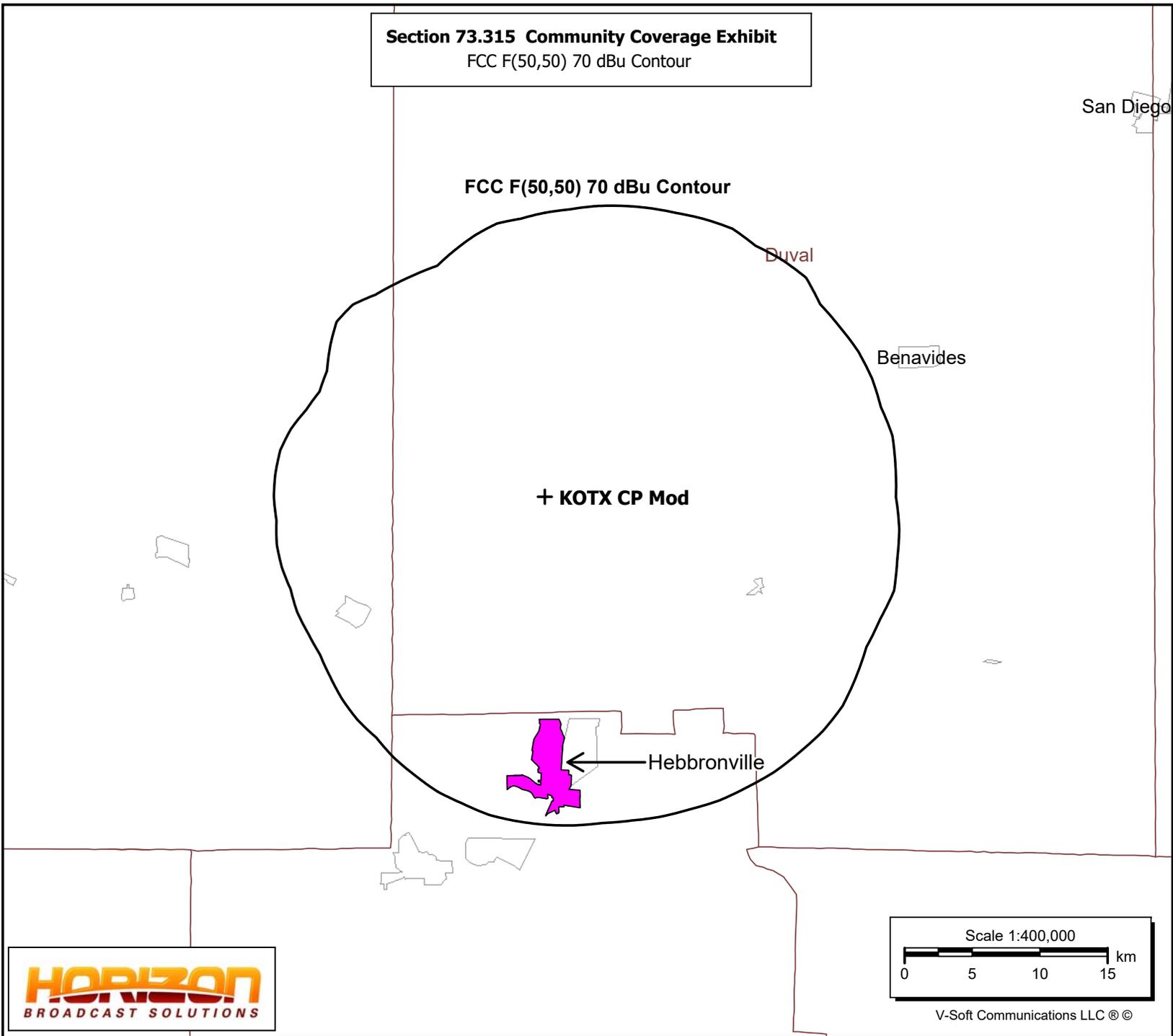
KOTX CP Mod App. Site Channel Study

REFERENCE						DISPLAY DATES		
27 30 20.0 N.	CLASS = C3 Int = B1					DATA	04-28-22	
98 41 23.0 W.	Current Spacings to 3rd Adj.					SEARCH	04-28-22	
----- Channel 254 - 98.7 MHz -----								
Call	Channel	Location	Azi	Dist	FCC	Margin		
Lat.	Lng.	Ant	Power	HAAT				
KOTX	CP	254C3	Hebbronville	TX	339.9	7.2	152.5	-145.3
27 33 59.6	98 42 53.7	CN	24.000 kW			102 M		
	Xavier Entertainment, LLC		0000125145					
KOTX	LIC-N	254A	Hebbronville	TX	175.2	21.9	141.5	-119.6
27 18 31.1	98 40 16.0	NCN	1.000 kW			19 M		
	Xavier Entertainment, LLC		BLH20150327AMM					
K254AZ	LIC	254D	Alice	TX	63.3	61.5	92.5	-31.1
27 45 09.1	98 07 56.0	CN	0.100 kW			99 M		
	Gab LLC		BLFT20070709AAR					
DKMRV	VAC	255A	San Isidro	TX	169.8	89.0	88.5	0.46
26 42 55.2	98 31 51.1		0.000 kW			100 M		
	From CDBS							
KGBT-FM	LIC	253C	Mcallen	TX	150.6	176.0	175.5	0.51
26 07 15.2	97 49 18.9	CN	100.000 kW			304 M		
	Tichenor License Corporati		BLH19950330KB					
NEW	APP	255A	San Isidro	TX	169.2	90.8	88.5	2.3
26 42 03.5	98 31 05.7	CN	6.000 kW			88 M		
	Mekaddesh Group Corporatio		0000159008					
KTXN-FM	LIC	254C1	Victoria	TX	47.3	215.7	210.5	5.2
28 48 46.9	97 03 45.9	CN	100.000 kW			77 M		
	Broadcast Equities Texas,		BLH19850402KR					
KRRG	LIC	251C1	Laredo	TX	271.4	82.3	75.5	6.8
27 31 15.0	99 31 20.1	CN	100.000 kW			213 M		
			BLH19821108BB					
KGBT-FM	RSV	253C	Mcallen	TX	147.5	184.1	175.5	8.6
26 06 12.3	97 41 46.0		0.000 kW			600 M		
	From CDBS							
XHNKFM	LIC-D	257B	Nuevo Laredo	TA	269.2	81.6	70.5	11.2
27 29 35.1	99 30 57.2	DHN	9.550 kW			35 M		
XHNKFM	ALO	257B	Nuevo Laredo	TA	269.2	81.6	70.5	11.2
27 29 35.1	99 30 57.2		0.000 kW			150 M		
XHNKFM	USE	257B	Nuevo Laredo	TA	269.2	81.6	70.5	11.2
27 29 35.1	99 30 57.2		0.000 kW			150 M		
	From CDBS							
KLMO-FM	LIC-Z	255C1	Dilley	TX	340.2	169.5	143.5	26.0
28 56 34.9	99 16 48.1	ZCN	92.000 kW			220 M		
	Humberto Lopez DbA Dilley		BLH20050324ABT					
KRYS-FM	LIC	256C1	Corpus Christi	TX	74.9	107.4	75.5	31.9
27 45 11.9	97 38 15.3	CN	100.000 kW			284 M		
	Ihm Licenses, LLC		BLH20150115AAD					

Call	Channel	Location		Azi	Dist	FCC	Page # 2
Lat.	Lng.	Ant	Power		HAAT		Margin
K254DH	LIC 254D	Corpus Christi		TX 75.4	125.4	92.5	32.9
27 47 03.1	97 27 28.0	CN	0.250 kW	0 M			
	Malkan Interactive Communi		0000131259				
K253CU/K2	CP -D 253D	Laredo		TX 271.3	82.3	48.5	33.8
27 31 13.0	99 31 20.0	DCN	0.050 kW	0 M			
	Faith And Power Communicat		0000118423				
K253CT/K2	CP 253D	Laredo North		TX 280.2	86.9	48.5	38.4
27 38 28.6	99 33 22.9	CN	0.050 kW	0 M			
	Gape Group LLC		0000113435				
KLBD	LIC 201A	Premont		TX 113.2	60.9	11.5	49.4
27 17 21.1	98 07 24.0	CN	0.100 kW		67 M		
	The Worship Center Of King		BLED20100222AAM				
KMZZ	CP 252A	Bishop		TX 78.7	95.7	41.5	54.2
27 40 17.0	97 44 17.7	CN	6.000 kW		75 M		
	Claro Communications, Ltd.		0000129560				
AL3578	VAC 254B1	Allende		CI 294.4	233.3	174.5	58.8
28 21 18.9	100 51 28.3		0.000 kW		100 M		
	From CDBS						

Section 73.315 Community Coverage Exhibit
FCC F(50,50) 70 dBu Contour

KOTX CP Mod
0000125145
Hebbronville, TX
Latitude: 27-30-20 N
Longitude: 098-41-23 W
ERP: 25.00 kW
HAAT: 100.0 m
Channel: 254
Frequency: 98.7 MHz
AMSL Height: 298.2 m
Elevation: 192.9 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: FCC Model
Loc. Variability: 50.0%
Time Variability: 50.0%
HAAT Mthd: FCC



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. Xavier Entertainment, LLC ("Xavier") is the licensee of KOTX, Channel 254A, Facility ID No. 171012, Hebronville, Texas. Xavier is modifying KOTX construction permit LMS File No. 0000125145 to relocate to a newly approved tower site. The proposed KOTX application site is a new tower 113.1 meters in overall height and is registered with Antenna Structure Registration ("ASR") number 1322260. The application site coordinates are 27° 30' 20" North Latitude and 98° 41' 23" West Longitude (NAD 83). The transmit antenna will be a side mounted ERI Model LP6C six bay full wave circularly polarized antenna with a center of radiation of 105.3 meters AGL. The proposed KOTX facility would operate with 25.0 kW ERP non-directional at 100 meters HAAT.

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 revised OET FM Model for Windows Program under Type 3 Opposed "U" dipole. The maximum calculated signal density near the tower at two meters above ground level attributable to the proposed facility is $10.695 \mu\text{W}/\text{cm}^2$ at 32.8 meters, which is 5.348 percent of the general population/uncontrolled maximum permitted exposure limit.

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.

FM Model

Radio Frequency Safety

FCC Policy on Human Exposure

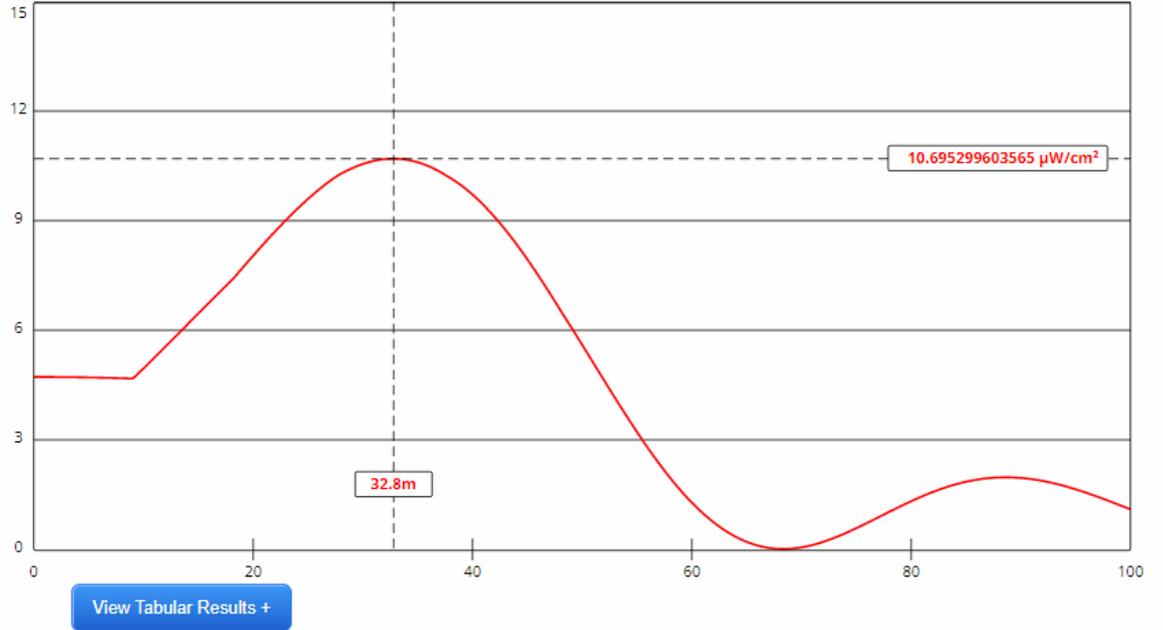
RF Safety FAQ

Body Tissue Dielectric Parameters

RF Safety Highlighted Releases

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. [Show More....](#)



Channel Selection	Channel 254 (98.7 MHz) ▼		
Antenna Type +	EPA Type 3: Opposed U Dipole ▼		
Height (m)	105.3	Distance (m)	100
ERP-H (W)	25000	ERP-V (W)	25000
Num of Elements	6	Element Spacing (?)	1
Num of Points	500	Apply	