

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, Hebbronville, 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 Hebbronville.

An exhibit shows the proposed KOTX Channel 25.4C3 facility is in compliance with the Commission's radio frequency emission limits.

KOTX CP Mod App. Site Channel Study

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

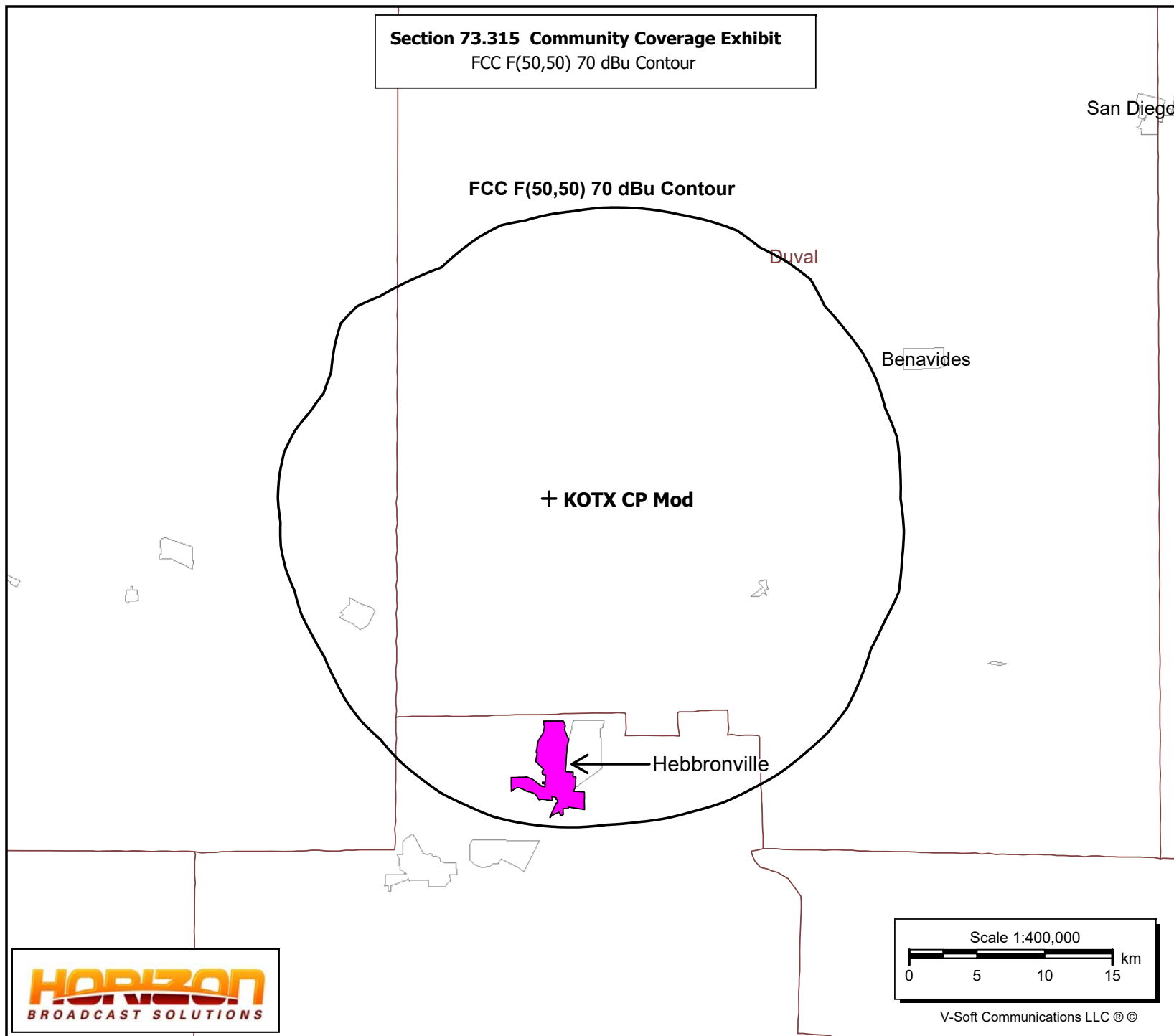
Call	Channel	Location		Azi	Dist	FCC	Page # 2
Lat.	Lng.	Ant	Power		HAAT		Margin
K254DH	LIC 254D	Corpus Christi	TX	75.4	125.4	92.5	32.9
27 47 03.1	97 27 28.0	CN	0.250 kW	0 M			
Malkan Interactive Communi			0000131259				
K253CU/K2 CP -D 253D	Laredo	TX	271.3	82.3	48.5	33.8	
27 31 13.0	99 31 20.0	DCN	0.050 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							

KOTX CP Mod

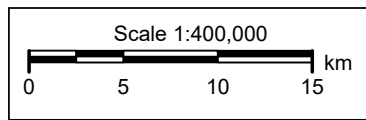
0000125145
Hebbronville, TX
Latitude: 27-30-20 N
Longitude: 098-41-23 W
ERP: 25.00 kW
HAAT: 100.0 m
Channel: 254
Frequency: 98.7 MHz
AMSL Height: 298.2 m
Elevation: 192.9 m
Horiz. Pattern: Omni
Vert. Pattern: No
Prop Model: FCC Model
Loc. Variability: 50.0%
Time Variability: 50.0%
HAAT Mthd: FCC

Section 73.315 Community Coverage Exhibit

FCC F(50,50) 70 dBu Contour



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. Xavier Entertainment, LLC ("Xavier") is the licensee of KOTX, Channel 254A, Facility ID No. 171012, Hebbbronville, 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.

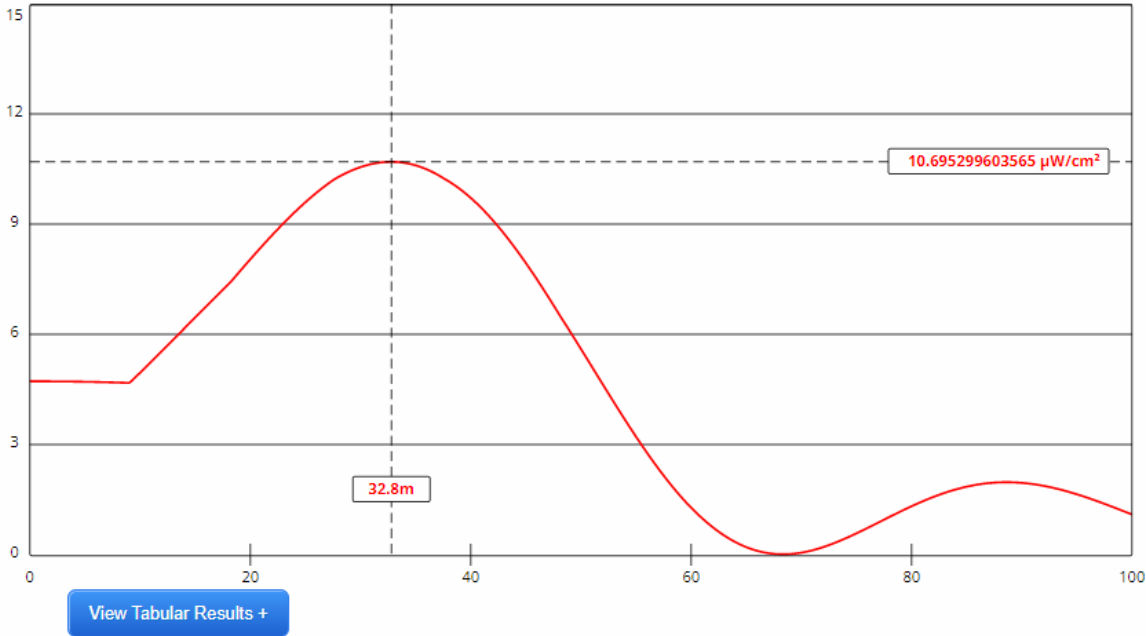
The proposed operation was evaluated for human exposure to RF energy using the procedures outlined in the Commission's OET Bulletin Number 65. The ERI antenna is included in the revised OET FM Model for Windows Program under Type 3 Opposed "U" dipole. The maximum calculated signal density near the tower 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)	<input type="text" value="105.3"/>	Distance (m)	<input type="text" value="100"/>
ERP-H (W)	<input type="text" value="25000"/>	ERP-V (W)	<input type="text" value="25000"/>
Num of Elements	<input type="text" value="6"/>	Element Spacing (?)	<input type="text" value="1"/>
Num of Points	<input type="text" value="500"/>	<input type="button" value="Apply"/>	