

**PROPOSED MINOR CHANGE
License BLH- 20181031AAR
KQTX (FM) Quanah TX
FACID 198725**

TECHNICAL STATEMENTS

This instant application requests modification of the licensed facility to a new tower location, height and effective radiated power while maintaining the authorized operating channel and class. The applicant proposes to modify the license to commonly-owned ASR 1012216 and combine with the commonly-owned KPRO(FM) antenna.

MULTIPLE OWNERSHIP CONSIDERATION

The proposed minor change to a licensed facility does not affect the ownership limits of the licensee. A complete Multiple Ownership Study of this licensee was recently presented to the FCC in the Assignment application File Number LMS-0000140940 Submitted 08/09/2021, a copy of which is attached for this application as well. The change in location for KQTX (FM) herein does not alter the certifications in that previous showing which demonstrate compliance with Multiple Ownership Limits.

ANTENNA TECHNICAL INFORMATION

The proposed allotment coordinates provided in the application meet all requires mileage separations. The allotment point provides 100% 70dBu coverage over the currently authorized community of license. The proposed facility meets all mileage separation requirements and will provide 70dBu community contour coverage as noted below.

COMPLIANCE WITH ENGINEERING STANDARDS AND ASSIGNMENT REQUIREMENTS

The proposed facility meets all distance separation requirements for the channel and class at the proposed location.

The 70dB Community Contour is demonstrated with Standard Longley Rice calculations to cover more than 50% of the area and population of the current community of license. Using 3 second terrain calculations, the attached maps demonstrate more than sufficient coverage over the community of license to meet this threshold.

MULTIPLE OWNERSHIP REVIEW

As a non-ranked Nielsen Audio market, the market definition for the purpose of Multiple Ownership Compliance is based on contour overlap of the proposed facilities, which includes both the Assignor and the Proposed Assignee, and all other facilities in the allocation landscape. Because of the rural nature of these signals, the first glance at the market definition may not clearly demonstrate proper compliance with 47 C.F.R. §73.3555(a).

Attached is the Market Map of the proposed Assignee, following the approval of the transaction herein. This map shows the proposed ownership structure of the Assignee as:

KCHT (FM) – Fac. ID170985
KCTX (AM)- Fac. ID 25186
KCTX-FM- Fac. ID 18567
KOLJ(AM) – Fac. ID 24250
KQTX(FM)- Fac. ID 198725
KWHW(AM)- Fac. ID 1195
KWHW-FM - Fac. ID 1196
KQTZ(FM) – Fac. ID22820

A complete review of this map indicates that, following approval of the Assignment proposed herein, there is no overlap at all between any of the AM properties currently held by the Proposed Assignee and that of the Assignor. While there is overlap between KCTX (AM) and KOLJ (AM) held by the Proposed Assignee, neither of those stations overlap KWHW (AM) held by the Assignor. Each of the 3 AM stations is the only AM service to their respective communities and is the only AM service in each of their respective counties

The map further demonstrates that the 1 of the 3 FM s held by the Proposed Assignee does not intersect either of the FM signals held by the Assignor. Thus, station KCHT (FM) stands alone as a non-overlap FM facility; and KCTX (AM) stands alone as a non-overlap facility with respect to any of the facilities held by the Assignor. **At no point on the entire map do more than 3 of the commonly-owned FM signals and 1 AM signal overlap, which is well within the compliance required in 47 C.F.R. §73.3555(a) for markets of just 15 signals.** While these rural signals do have contour overlap, none of that overlap constitutes a violation of the Multiple Ownership Rules in that there exists at no point of more than 4 commonly owned AM or FM facilities in a market defined as 42 signals, 32 commercial and 10 noncommercial facilities. KQTX (FM) is also the combination station with KOLJ (AM) as the only aural AM&FM services to Quanah, which is specifically permitted under 47 C.F.R. §73.3555(a).

Also attached is the complete Market Definition map, using the contour overlap method, which depicts the entire landscape of AM and FM signals which are intersected with the combined facilities above. Those additional signals total 34 stations, which include 10 NCE FM signals (60dBu Green), 19 Commercial FM signals (70dBu Orange) and 5 AM signals (5.0mV Black) contours.

NCE FM Stations:

KZES-FM TX ESTELLINE
KVED TX VERNON
KQOU OK CLINTON
KTHL OK ALTUS
KTHF OK HAMMON
KOCU OK ALTUS
KKVO OK ALTUS
KCBK OK FREDERICK
KHEB OK GRANITE
KSIF TX WELLINGTON

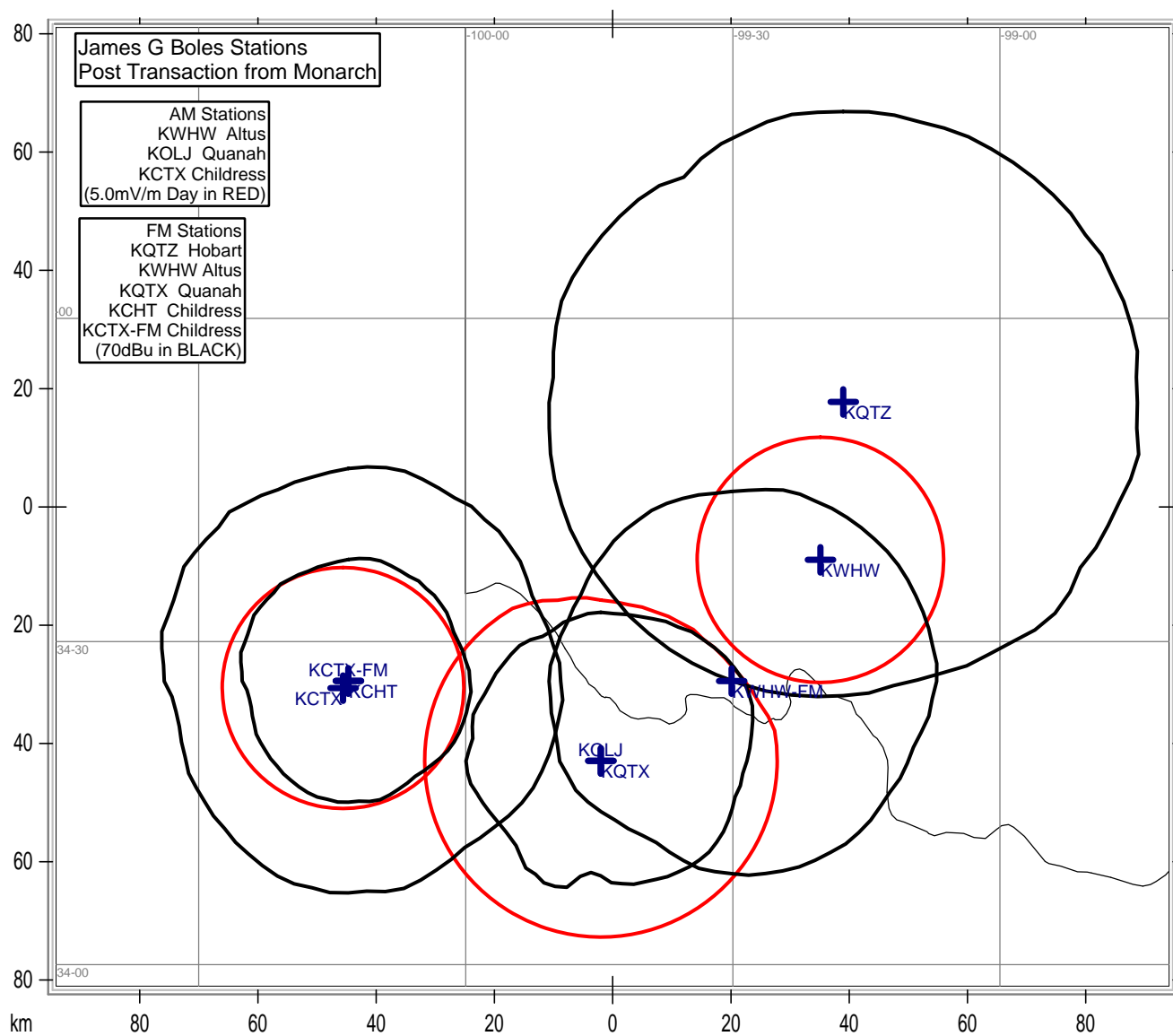
Commercial FM Stations:

KOLI TX ELECTRA
KSOC OK TIPTON
KXOO OK ELK CITY
KWEY-FM OK CLINTON
KYBE OK FREDERICK
KECO OK ELK CITY
KHIM OK MANGUM
KHWL OK LONE WOLF
KJCM OK SNYDER
KKRE OK HOLLIS
KKZU OK SAYRE
KJOK OK HOLLIS

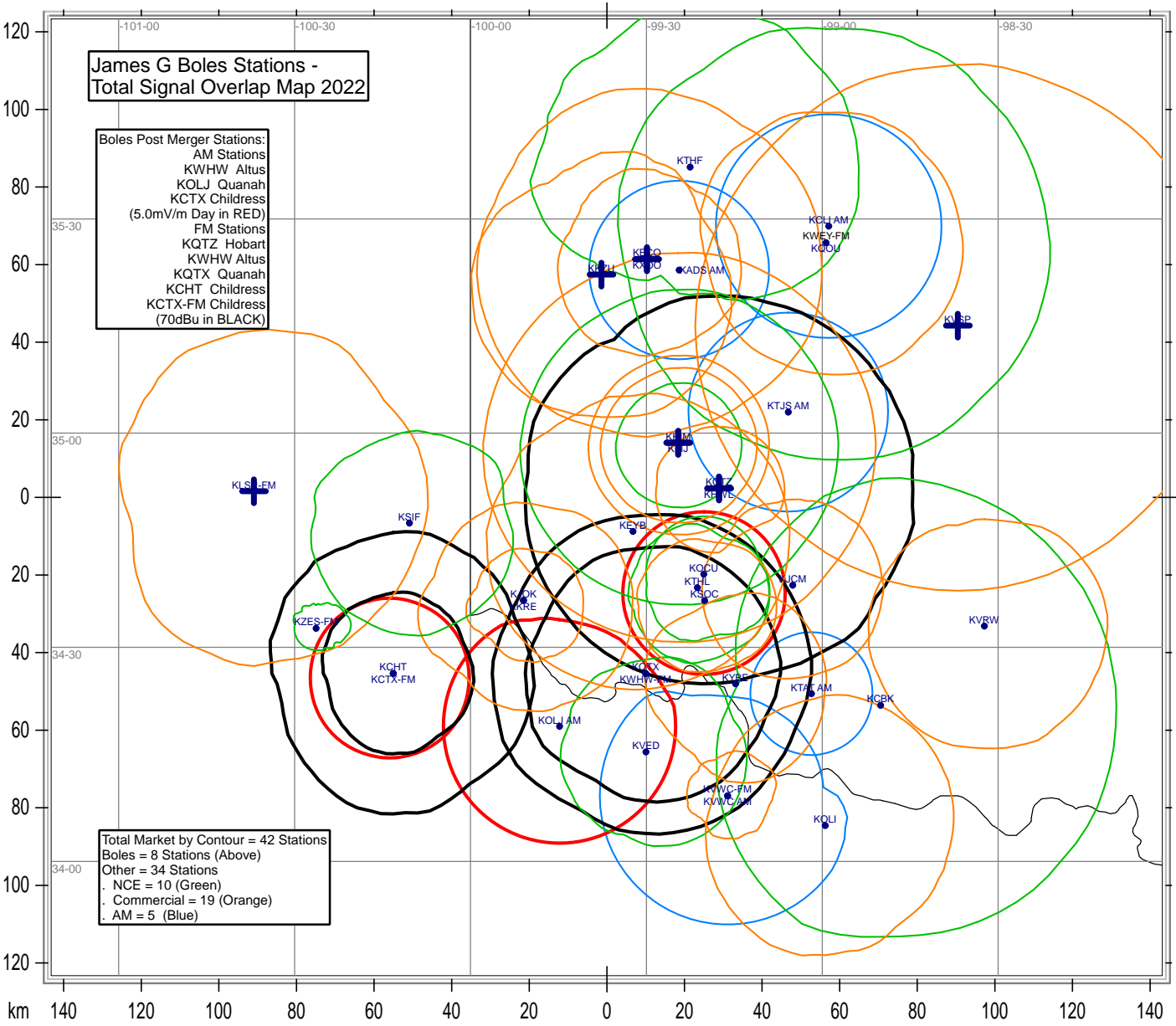
AM Stations:

KADS OK Elk City
KCLI OK Clinton
KTAT OK Frederick
KTJS OK Hobart
KVWC TX Vernon

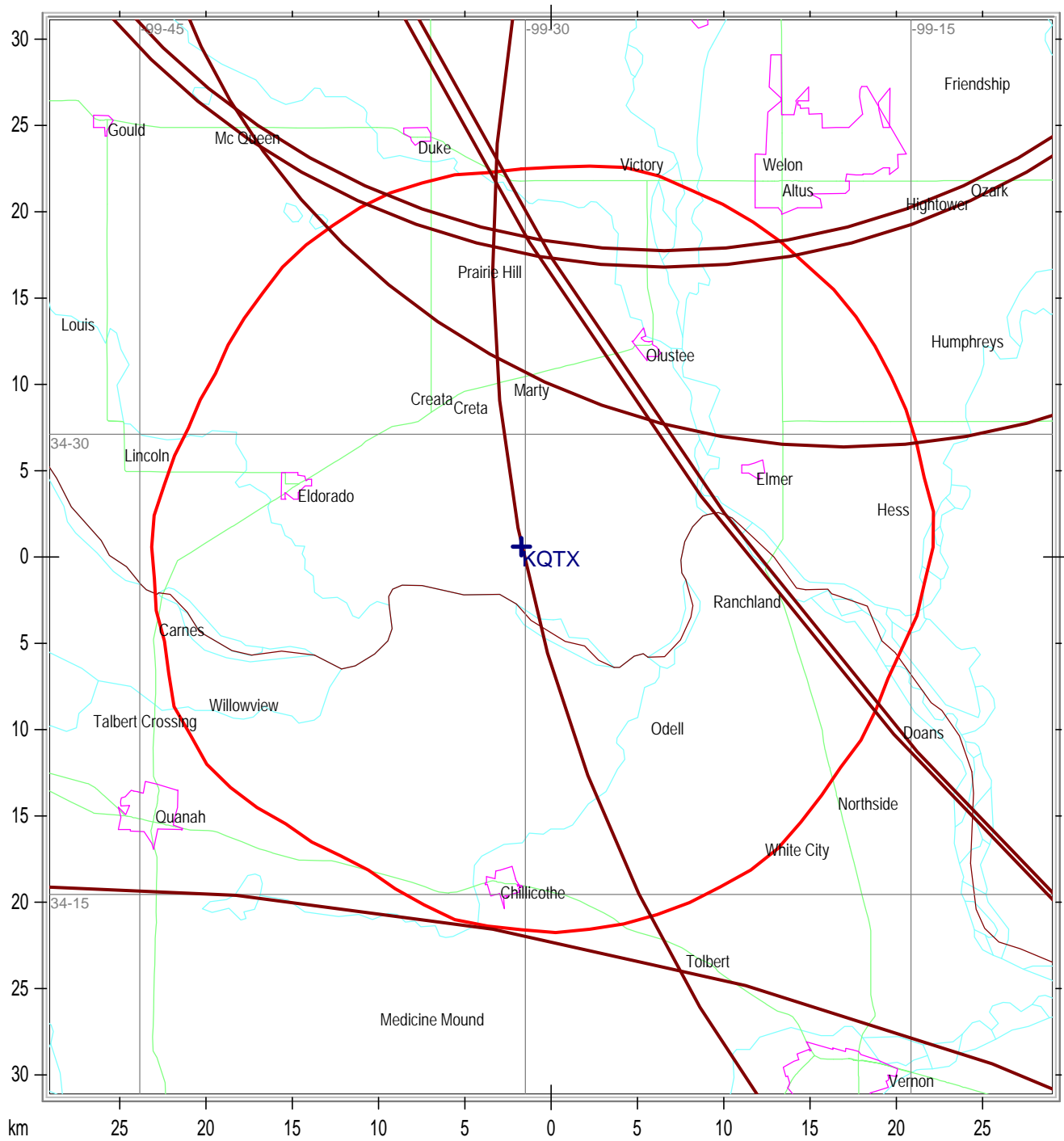
Total Market Signal Count = 42 Stations



State Borders Lat/Lon Grid

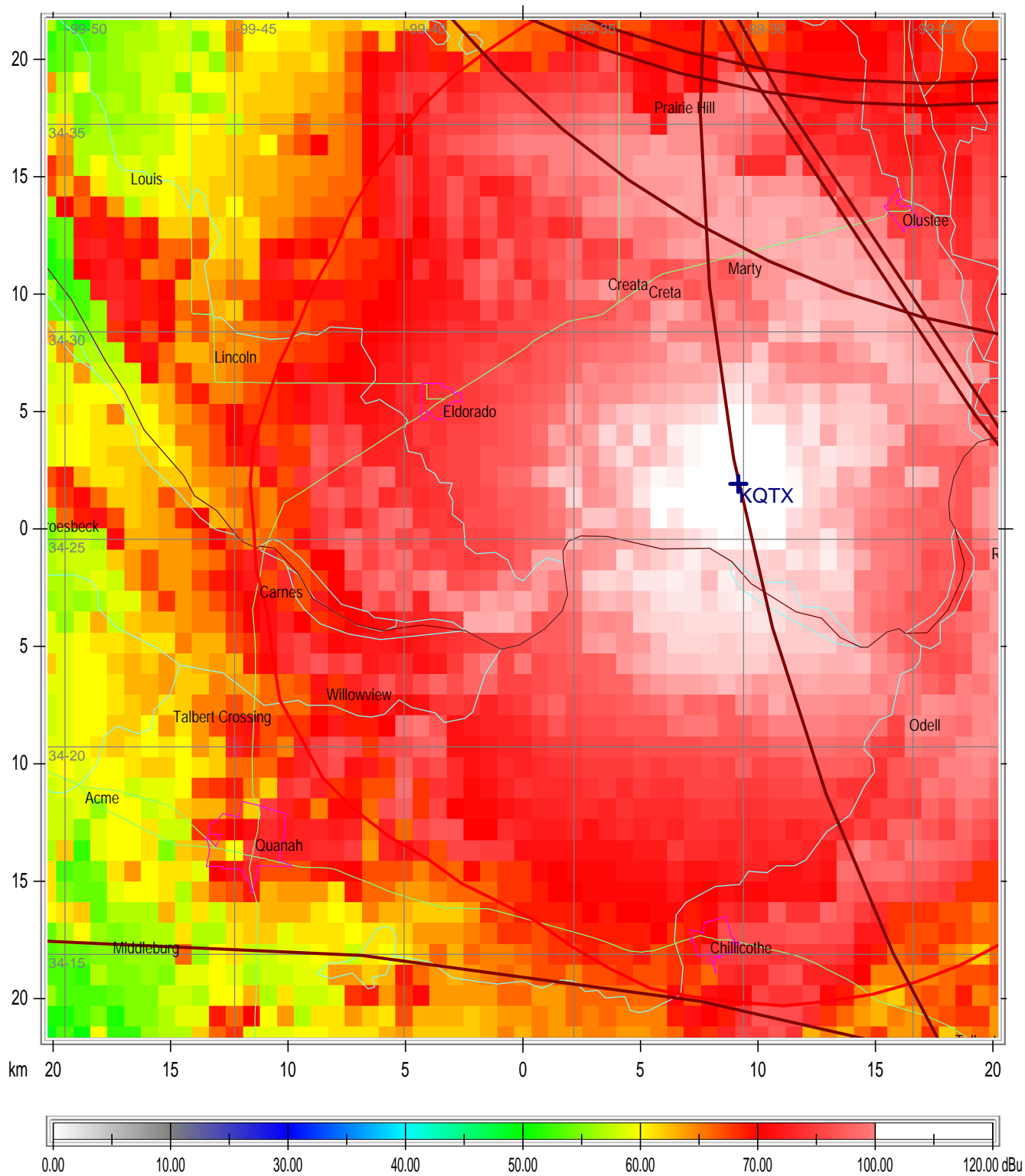


FCC 70dBu (50,50) Contour Map



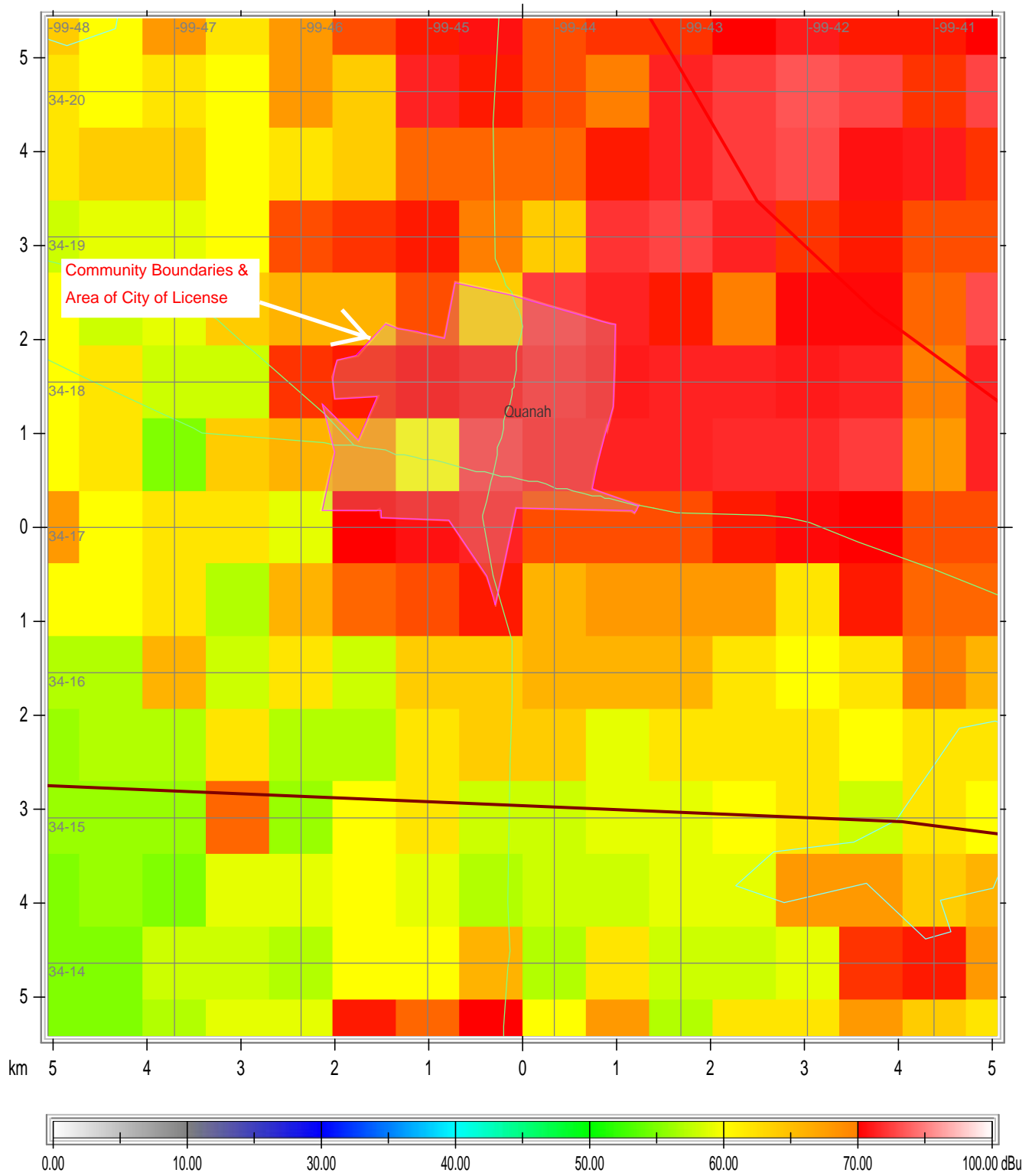
State Borders City Borders Highways Water Features Lat/Lon Grid

70dBu Longley Rice Showing - Large Scale



— State Borders
 — City Borders
 — Highways
 — Water Features
 — Lat/Lon Grid

70dBu Longley Rice Showing - Close Scale



State Borders City Borders Highways Water Features Lat/Lon Grid