

**Engineering Statement and Waiver Request
Construction Permit Application to Modify Auxiliary Facility
KTXH Houston, TX
Channel 19**

This application proposes to replace the current auxiliary antenna, increase the effective radiated power (ERP) from 475 kW to 1,000 kW and slightly increase the radiation center above mean sea level (RCAMSL) from 549.0 meters to 553.0 meters. This is a broadband panel antenna that will also serve KTXH's sister station KRIV. The new facility will allow the station to reach more of the viewers that are normally served by its main facility when that facility is out of service for maintenance. A TVStudy analysis using the default settings indicates the proposal will not cause any new interference above the de minimis limit (A copy of the analysis results are provided in an attachment to this application).

It is noted the proposed ERP is above the permitted limit for the height; however, it is permissible in that the ERP level was previously approved in the recently granted construction permit (File # 0000149928) for the KTXH main antenna facility that has a higher radiation center.

It is further noted that there are some minor contour excursions beyond that of the main facility antenna due to slight differences in the patterns of the two broadband panel antennas. As shown in the attached contour comparison below, the excursions are very minor and reducing the power to resolve the problem would cause an undesired and unnecessary service loss elsewhere in the coverage area. In view this, the applicant respectfully requests a waiver to permit the minor excursions.

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