

**Engineering Statement and Waiver Request
Construction Permit Application for Auxiliary Facility
KRIV Houston, TX Channel 26
July 24, 2023**

The purpose of this application is to add an additional auxiliary facility. The proposed new facility for KRIV will share an existing broadband antenna at a nearby site (2.1 km) currently utilized by sister station KTXH. 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 Appendix A below). It is further noted and is also shown in Appendix B that the City Grade service contour of the proposed facility will fully encompass the city of license.

Although the 1,000 kW effective radiated power (ERP) is above that allowed for the height it should be considered permissible in that it does not exceed that of the licensed main facility and the overall coverage area is smaller than that provided by the main facility.

It is also noted that there are some very minor contour excursions beyond that of the main facility antenna due to slight differences in the patterns of the two antennas (Main and Auxiliary). As shown in the attached contour comparison below in Appendix B, 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 of this, the applicant respectfully requests a waiver of FCC Rules Section 73.1675(a)(1) to permit the minor contour excursions.

In view of the above and the supporting information provided in the appendices, it is believed KRIV's proposal is justified and it would be in the public interest to grant this application.

William R. Meintel
Senior Partner
Meintel, Sgrignoli, & Wallace, LLC

APPENDIX A

tvstudy v2.2.5 (4uoc83)

Database: localhost, Study: 02127_07232023_KRIV_22204, Model: Longley-Rice

Start: 2023.07.23 16:03:08

Study created: 2023.07.23 16:03:07

Study build station data: LMS TV 2023-07-23

Proposal: KRIV D26 DX APP HOUSTON, TX

File number: 02127_07232023_KRIV_22204

Facility ID: 22204

Station data: User record

Record ID: 1870

Country: U.S.

Zone: III

Search options:

Non-U.S. records included

Baseline record excluded if station has CP

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
Yes	KYAZ	D25	DT	LIC	KATY, TX	BLANK0000125086	0.0 km
Yes	KBCA	D26	DT	LIC	ALEXANDRIA, LA	BLANK0000078715	314.7
No	KRIS-TV	D26	DT	LIC	CORPUS CHRISTI, TX	BLANK0000190646	286.4
Yes	KTAL-TV	D26	DT	LIC	TEXARKANA, TX	BLANK0000192877	397.9
Yes	KPXL-TV	D26	DT	LIC	UVALDE, TX	BLCDT20090612AHU	342.1
Yes	KXXV	D26	DT	LIC	WACO, TX	BLCDT20050630AFE	262.1
Yes	KBTW-TV	D27	DT	LIC	PORT ARTHUR, TX	BLANK0000063140	161.0
No	XHRIO	D26	DT	LIC	MATAMOROS, TA	BLANKBPFS20160318AAK	463.5

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D26

Latitude: 29 33 45.20 N (NAD83)

Longitude: 95 30 35.90 W

Height AMSL: 554.8 m

HAAT: 536.0 m

Peak ERP: 1000 kW
Antenna: DIE TFU_24WB_R_WC_07202005_AZPAT_FCC_FIL 0.0 deg
Elev Pattn: Generic
Elec Tilt: 0.75

40.0 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	810 kW	534.9 m	117.1 km
45.0	994	537.2	119.2
90.0	707	536.2	115.9
135.0	347	535.9	109.3
180.0	56.6	537.0	93.5
225.0	97.7	535.9	98.0
270.0	121	534.7	99.8
315.0	393	530.6	110.1

Database HAAT does not agree with computed HAAT
Database HAAT: 536 m Computed HAAT: 535 m

ERP exceeds maximum
ERP: 1000 kW ERP maximum: 429 kW

Distance to Canadian border: 1765.2 km

Distance to Mexican border: 422.3 km

Conditions at FCC monitoring station: Kingsville TX
Bearing: 225.1 degrees Distance: 330.6 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:
Bearing: 325.6 degrees Distance: 1468.3 km

Study cell size: 2.00 km
Profile point spacing: 1.00 km

Maximum new IX to full-service and Class A: 0.50%
Maximum new IX to LPTV: 2.00%

Interference to BLANK0000125086 LIC scenario 1

Desired:	Call KYZA	Chan D25	Svc DT	Status LIC	City, State KATY, TX	File Number BLANK0000125086	Distance
Undesireds:	KRIV	D26	DT	BL	HOUSTON, TX	DTVBL22204	2.1 km
	KRIV	D26	DX	APP	HOUSTON, TX	02127_07232023_KRIV_22	0.0
	KETH-TV	D24	DT	CP	HOUSTON, TX	BLANK0000214658	0.9
	KPXD-TV	D25	DT	LIC	ARLINGTON, TX	BLANK0000073172	364.2
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
37692.1	6,038,257	37640.0	6,038,071	37163.3	6,033,388	37219.5 6,034,554	-0.15 -0.02
Undesired		Total IX		Unique IX, before		Unique IX, after	
KRIV D26 DT BL	64.2	1,183	56.2	1,166			
KRIV D26 DX APP	0.0	0	0.0	0			
KETH-TV D24 DT CP	400.5	3,203	392.5	3,186	400.5	3,203	
KPXD-TV D25 DT LIC	20.0	314	20.0	314	20.0	314	

Interference to BLANK0000125086 LIC scenario 2

Desired:	Call KYZA	Chan D25	Svc DT	Status LIC	City, State KATY, TX	File Number BLANK0000125086	Distance
Undesireds:	KRIV	D26	DT	BL	HOUSTON, TX	DTVBL22204	2.1 km
	KRIV	D26	DX	APP	HOUSTON, TX	02127_07232023_KRIV_22	0.0
	KETH-TV	D24	DT	LIC	HOUSTON, TX	BLEDT20101019ABX	1.0
	KPXD-TV	D25	DT	LIC	ARLINGTON, TX	BLANK0000073172	364.2
Service area		Terrain-limited		IX-free, before		IX-free, after	Percent New IX
37692.1	6,038,257	37640.0	6,038,071	37411.5	6,035,525	37467.7 6,036,691	-0.15 -0.02
Undesired		Total IX		Unique IX, before		Unique IX, after	
KRIV D26 DT BL	64.2	1,183	56.2	1,166			
KRIV D26 DX APP	0.0	0	0.0	0			
KETH-TV D24 DT LIC	152.3	1,066	144.3	1,049	152.3	1,066	
KPXD-TV D25 DT LIC	20.0	314	20.0	314	20.0	314	

Interference to BLANK0000078715 LIC scenario 1

Desired:	Call KBCA	Chan D26	Svc DT	Status LIC	City, State ALEXANDRIA, LA	File Number BLANK0000078715	Distance
Undesireds:	KRIV	D26	DT	BL	HOUSTON, TX	DTVBL22204	312.7 km
	KRIV	D26	DX	APP	HOUSTON, TX	02127_07232023_KRIV_22	314.7

WLPB-TV	D25	DT	CP	BATON ROUGE, LA	BLANK0000035855	148.1
KTAL-TV	D26	DT	LIC	TEXARKANA, TX	BLANK0000192877	257.5

Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX
24260.9	479,260	24225.2	479,219	23730.6	475,882	23730.6	475,882	0.00 0.00

Undesired		Total IX		Unique IX, before		Unique IX, after
KRIV D26 DT BL	51.8	258		4.0	0	
KRIV D26 DX APP	51.8	225				4.0 0
KTAL-TV D26 DT LIC	490.6	3,337		442.8	3,079	442.8 3,112

Interference to BLANK0000192877 LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	KTAL-TV	D26	DT	LIC	TEXARKANA, TX	BLANK0000192877	
Undesireds:	KRIV	D26	DT	BL	HOUSTON, TX	DTVBL22204	396.0 km
	KRIV	D26	DX	APP	HOUSTON, TX	02127_07232023_KRIV_22	397.9
	KBCA	D26	DT	LIC	ALEXANDRIA, LA	BLANK0000078715	257.5
	KOTV-DT	D26	DT	LIC	TULSA, OK	BLANK0000116553	378.8
	KXXV	D26	DT	LIC	WACO, TX	BLCDT20050630AFE	356.4
	KTVE	D27	DT	LIC	EL DORADO, AR	BLCDT20070105ABH	167.1

Service area		Terrain-limited		IX-free, before		IX-free, after		Percent New IX
41255.3	1,094,332	41122.7	1,092,958	39686.2	1,085,702	39686.2	1,085,702	0.00 0.00

Undesired		Total IX		Unique IX, before		Unique IX, after
KRIV D26 DT BL	12.1	297		0.0	0	
KRIV D26 DX APP	4.1	9				0.0 0
KBCA D26 DT LIC	552.4	3,558		419.9	1,421	419.9 1,421
KOTV-DT D26 DT LIC	4.0	11		4.0	11	4.0 11
KXXV D26 DT LIC	48.3	1,516		40.2	1,228	40.2 1,228
KTVE D27 DT LIC	960.2	4,299		839.8	2,459	839.8 2,459

Interference to BLCDT20090612AHU LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	KPXL-TV	D26	DT	LIC	UVALDE, TX	BLCDT20090612AHU	
Undesireds:	KRIV	D26	DT	BL	HOUSTON, TX	DTVBL22204	343.6 km
	KRIV	D26	DX	APP	HOUSTON, TX	02127_07232023_KRIV_22	342.1
	K25OB-D	D25	DC	LIC	SAN ANTONIO, TX	BLANK0000145156	85.1
	KRIS-TV	D26	DT	LIC	CORPUS CHRISTI, TX	BLANK0000190646	250.1

KXXV	D26	DT	LIC	WACO, TX	BLCDDT20050630AFE	253.4
KBVO	D27	DT	LIC	LLANO, TX	BLCDDT20090622ABA	126.3
KCOR-CD	D27	DC	LIC	SAN ANTONIO, TX	BLANK0000115083	58.3

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
33991.4 2,257,007	32404.9 2,243,520	30744.0 2,214,228	30740.0 2,214,228	0.01 0.00

Undesired	Total IX	Unique IX, before	Unique IX, after
KRIV D26 DT BL	116.6 2,901	4.0 436	
KRIV D26 DX APP	136.7 3,903		8.0 436
K25OB-D D25 DC LIC	216.1 5,650	84.1 2,098	84.1 2,098
KRIS-TV D26 DT LIC	589.8 19,003	228.8 2,910	224.8 2,910
KXXV D26 DT LIC	1191.8 20,259	758.5 6,677	766.5 6,794
KBVO D27 DT LIC	196.4 428	36.1 117	36.1 117
KCOR-CD D27 DC LIC	4.0 62	4.0 62	4.0 62

Interference to BLCDDT20050630AFE LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	KXXV	D26	DT	LIC	WACO, TX	BLCDDT20050630AFE	
Undesireds:	KRIV	D26	DT	BL	HOUSTON, TX	DTVBL22204	262.1 km
	KRIV	D26	DX	APP	HOUSTON, TX	02127_07232023_KRIV_22	262.1
	KPXD-TV	D25	DT	LIC	ARLINGTON, TX	BLANK0000073172	142.8
	KRIS-TV	D26	DT	LIC	CORPUS CHRISTI, TX	BLANK0000190646	398.8
	KTAL-TV	D26	DT	LIC	TEXARKANA, TX	BLANK0000192877	356.4
	KPXL-TV	D26	DT	LIC	UVALDE, TX	BLCDDT20090612AHU	253.4
	KDFI	D27	DT	LIC	DALLAS, TX	BLANK0000074883	142.1
	KBVO	D27	DT	LIC	LLANO, TX	BLCDDT20090622ABA	140.4

Service area	Terrain-limited	IX-free, before	IX-free, after	Percent New IX
38991.9 1,771,620	38695.5 1,748,287	37362.6 1,673,836	37366.6 1,674,066	-0.01 -0.01

Undesired	Total IX	Unique IX, before	Unique IX, after
KRIV D26 DT BL	395.7 44,268	347.5 5,491	
KRIV D26 DX APP	387.7 27,806		343.5 5,261
KPXD-TV D25 DT LIC	439.7 10,425	88.7 2,447	88.7 2,447
KRIS-TV D26 DT LIC	4.0 0	0.0 0	0.0 0
KTAL-TV D26 DT LIC	44.5 148	16.2 42	16.2 42
KPXL-TV D26 DT LIC	235.5 46,925	131.6 5,556	135.6 21,788
KDFI D27 DT LIC	585.0 19,445	234.1 11,467	234.1 11,467
KBVO D27 DT LIC	119.7 2,764	51.9 78	51.9 78

Interference to BLANK0000063140 LIC scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	KBTW-TV	D27	DT	LIC	PORT ARTHUR, TX	BLANK0000063140	
Undesireds:	KRIV	D26	DT	BL	HOUSTON, TX	DTVBL22204	159.0 km
	KRIV	D26	DX	APP	HOUSTON, TX	02127_07232023_KRIV_22	161.0
	KTVE	D27	DT	LIC	EL DORADO, AR	BLCDT20070105ABH	365.1
	KATC	D28	DT	LIC	LAFAYETTE, LA	BLCDT20071109AAV	163.9
	KUGB-CD	D28	DC	CP	HOUSTON, TX	BLANK0000127537	160.7
	Service area	Terrain-limited		IX-free, before		IX-free, after	Percent New IX
26681.2	734,008	26681.2	734,008	26569.1	731,971	26553.0 731,971	0.06 0.00
Undesired				Total IX	Unique IX, before	Unique IX, after	
KRIV D26 DT BL	48.0			1,872	44.0 1,854		
KRIV D26 DX APP	64.0			1,872		60.0 1,854	
KTVE D27 DT LIC	12.0			56	12.0 56	12.0 56	
KATC D28 DT LIC	52.2			109	52.2 109	52.2 109	
KUGB-CD D28 DC CP	4.0			18	0.0 0	0.0 0	

Interference to BLANK0000063140 LIC scenario 2

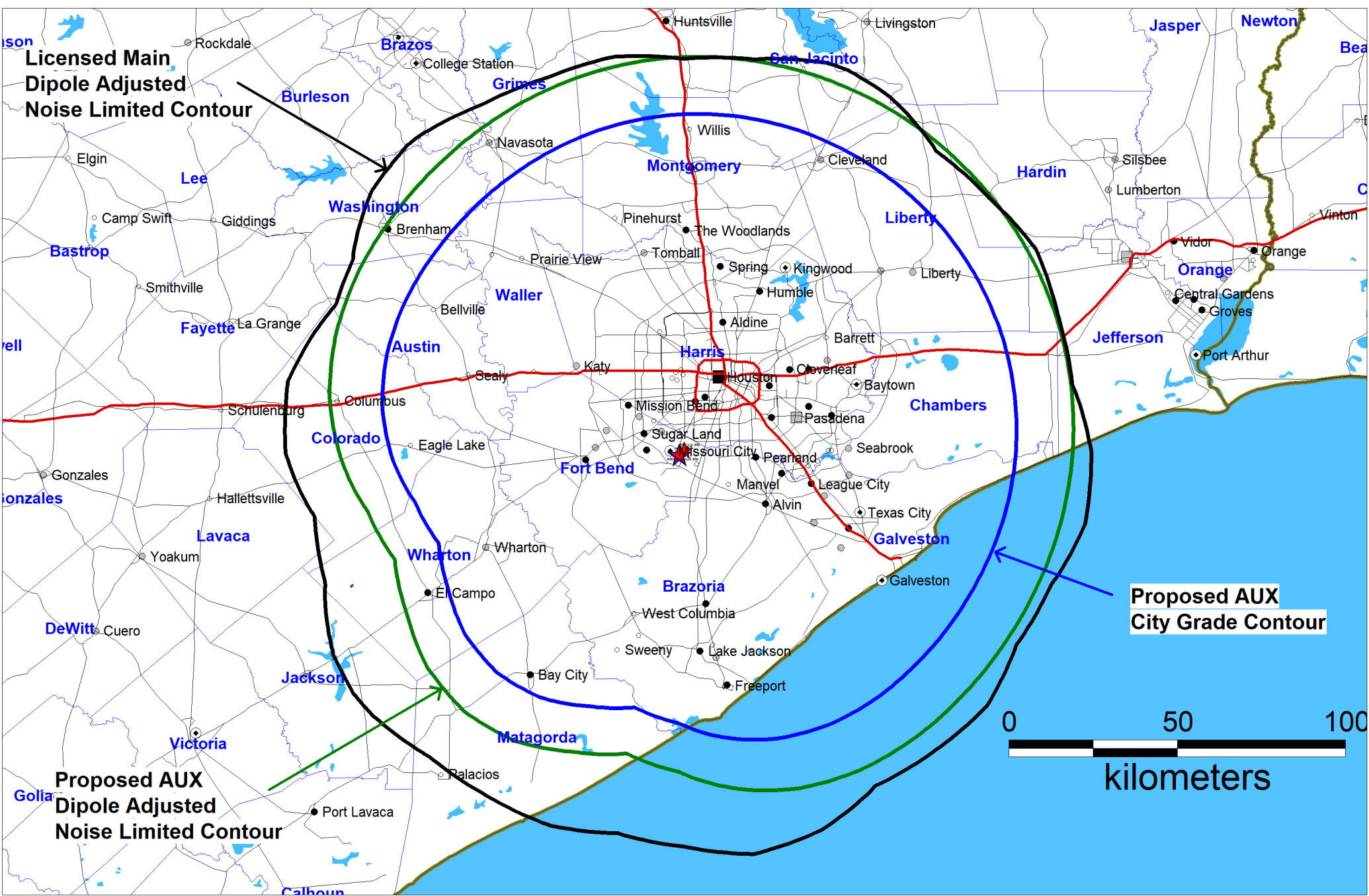
	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	KBTW-TV	D27	DT	LIC	PORT ARTHUR, TX	BLANK0000063140	
Undesireds:	KRIV	D26	DT	BL	HOUSTON, TX	DTVBL22204	159.0 km
	KRIV	D26	DX	APP	HOUSTON, TX	02127_07232023_KRIV_22	161.0
	KTVE	D27	DT	LIC	EL DORADO, AR	BLCDT20070105ABH	365.1
	KATC	D28	DT	LIC	LAFAYETTE, LA	BLCDT20071109AAV	163.9
	KUGB-CD	D28	DC	LIC	HOUSTON, TX	BLDTA20120801ALF	160.7
	Service area	Terrain-limited		IX-free, before		IX-free, after	Percent New IX
26681.2	734,008	26681.2	734,008	26569.1	731,971	26553.0 731,971	0.06 0.00
Undesired				Total IX	Unique IX, before	Unique IX, after	
KRIV D26 DT BL	48.0			1,872	44.0 1,854		
KRIV D26 DX APP	64.0			1,872		60.0 1,854	
KTVE D27 DT LIC	12.0			56	12.0 56	12.0 56	
KATC D28 DT LIC	52.2			109	52.2 109	52.2 109	
KUGB-CD D28 DC LIC	4.0			18	0.0 0	0.0 0	

Interference to proposal scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	KRIV	D26	DX	APP	HOUSTON, TX	02127_07232023_KRIV_22	
Undesireds:	KYAZ	D25	DT	LIC	KATY, TX	BLANK0000125086	0.0 km
	KBCA	D26	DT	LIC	ALEXANDRIA, LA	BLANK0000078715	314.7
	KRIS-TV	D26	DT	LIC	CORPUS CHRISTI, TX	BLANK0000190646	286.4
	KTAL-TV	D26	DT	LIC	TEXARKANA, TX	BLANK0000192877	397.9
	KPXL-TV	D26	DT	LIC	UVALDE, TX	BLCDT20090612AHU	342.1
	KXXV	D26	DT	LIC	WACO, TX	BLCDT20050630AFE	262.1
	KBTB-TV	D27	DT	LIC	PORT ARTHUR, TX	BLANK0000063140	161.0

Service area	Terrain-limited	IX-free	Percent IX
36733.4 6,061,421	36701.3 6,060,944	36139.1 6,048,743	1.53 0.20

Undesired	Total IX	Unique IX	Prcnt Unique IX
KYAZ D25 DT LIC 16.1 465 16.1 465 0.04 0.01			
KBCA D26 DT LIC 8.0 138 0.0 0 0.00 0.00			
KRIS-TV D26 DT LIC 20.1 164 8.1 37 0.02 0.00			
KTAL-TV D26 DT LIC 24.0 403 4.0 0 0.01 0.00			
KPXL-TV D26 DT LIC 8.0 62 0.0 0 0.00 0.00			
KXXV D26 DT LIC 276.6 8,612 240.5 8,082 0.66 0.13			
KBTB-TV D27 DT LIC 257.6 3,087 257.6 3,087 0.70 0.05			



Appendix B

KRIV Proposed New AUX
ERP 1,000 kW RCAMSL 554.8 m AUX Antenna: DIE TFU-24WB-R WC