

Truth and Education Corp
Section 73.870(a)(1)
Supplemental Showing
Port Arthur, TX

This statement is being prepared on behalf of Truth and Education Corp ("Truth") in support of the minor change to the licensed facility of KSAP-LP (Facility ID 133414, Port Arthur, TX.) to show a reduction in interference under the provisions of §73.870(a)(1). The instant application is proposing a change in channel from channel 245 to channel 297, with a change in antenna location coordinates.

The current license for KSAP-LP is operating on channel 245, which is a first adjacent to licensed primary KTHT Fac. ID 65308 Cleveland, TX. While the current license for KSAP-LP meets the LPFM distance separation requirements for KTHT, the predicted 60 dbu contour of KSAP-LP lies totally inside the 54 dbu contour of KTHT. Under §73.809 of the Commission's Rules, an authorized LPFM will not be permitted to continue to operate if it causes interference to the transmission of any authorized full service FM station. Therefore, since the 60 dbu contour of KSAP-LP is totally inside the 54 dbu contour of KTHT, and 32,715 people reside within the contour overlap area, actual interference is present to KTHT. A channel study was conducted, and it was determined there are no clear adjacent or I.F. channels to which the station can move.

§73.870(a)(1) of the Commission's Rules state that "Changes in frequency to adjacent or IF frequencies or, upon a technical showing of reduced interference, to any frequency" would be considered as a minor change.

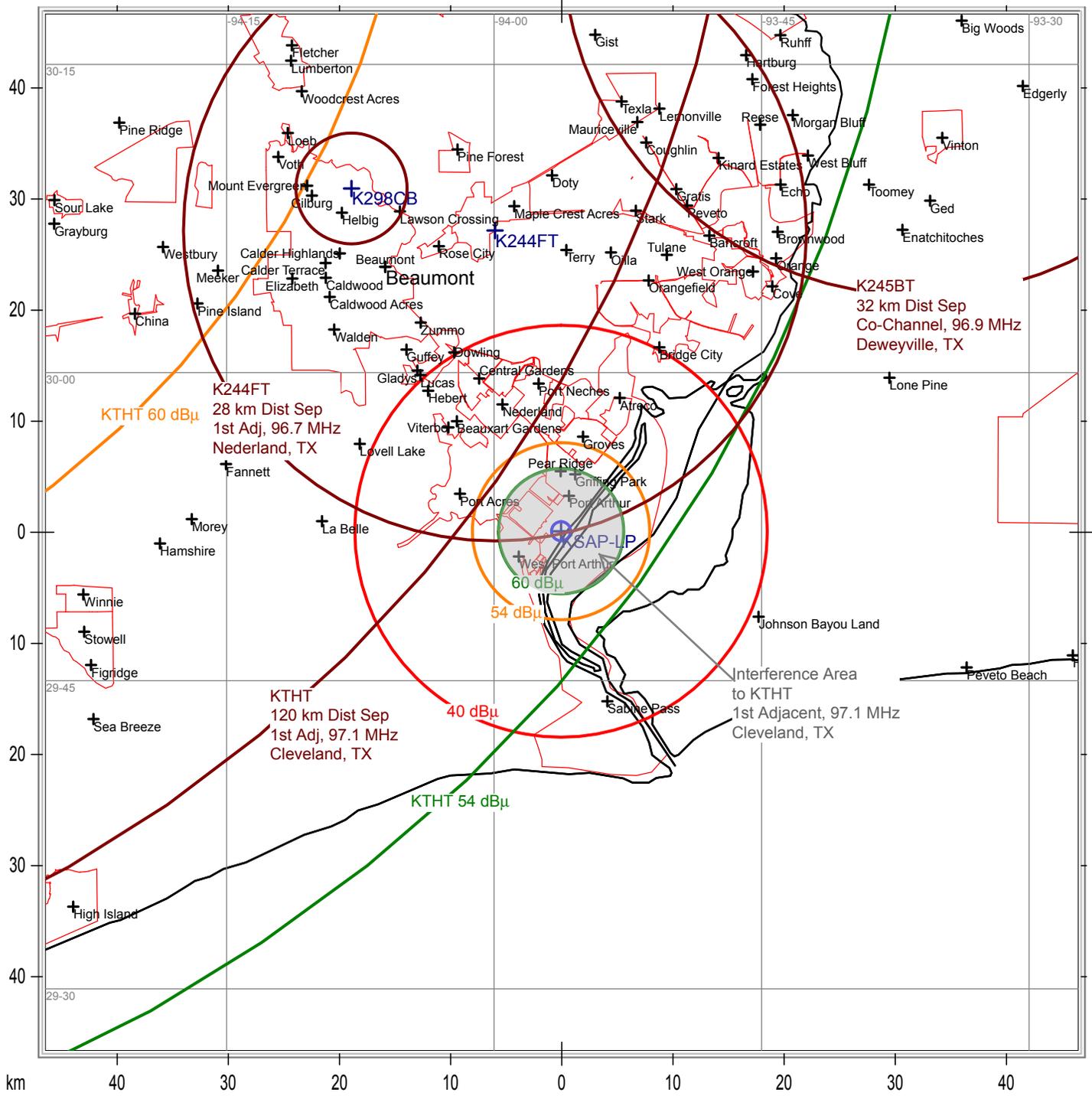
Truth is hereby submitting this application to change from channel 245 to channel 297 upon the following technical showing of reduced interference.

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The Proposed channel change to 297 reduces interference caused by removing KSAP-LP from the interfering contour of KTHT. New interference would exist with this proposal on channel 297 with licensed primary KGLK Fac. ID 59951 Lake Jackson, TX. While the new proposal meets the LPFM distance separation requirements for KGLK, the predicted 60 dbu contour of the proposal overlaps the 54 dbu contour of KGLK. The population inside the proposed overlap would be 1,783. This results in a reduction of interference from 32,715 people on channel 245 to 1,783 people on channel 297 for a total reduction of 30,932 people.

A waiver of Section §73.870 of the Commission's Rules is requested to permit a minor change application for KSAP-LP to a non-adjacent channel due to the showing of reduction of interference. The FCC has previously ruled in favor of this waiver for Core Radio Ministries Inc.'s Minor Change Application, BPL-20160201AEW. Therefore, Truth and Education Corporation respectfully requests a change to a non-adjacent channel in the instant application. The public interest will be served by the continuation of service from KSAP-LP that the public has come to rely on and expect.

KSAP-LP in Relation to Interfering Contours - 96.9 MHz (Ch. 245)



State Borders
 City Borders
 Lat/Lon Grid

Antenna Height Above Average Terrain Calculations -- Results

Input Data

Latitude **29° 56' 51.3"** North
Longitude **93° 59' 52.9"** West (NAD 83)

Height of antenna radiation center above mean sea level: **32** meters AMSL

Number of Evenly Spaced Radials = **8** 0° is referenced to True North

Results

Calculated HAAT = **30 meters**

Antenna Height Above Average Terrain calculated
using 1 km [GLOBE terrain data](#)

Individual "Radial HAAT" Values, in meters

0°	28.9 m
45°	29.3 m
90°	30.1 m
135°	30.9 m
180°	30.6 m
225°	30.5 m
270°	29.4 m
315°	27.0 m