

## **TECHNICAL NARRATIVE**

This Technical Statement and attached exhibits were prepared on behalf of IHM Licenses, LLC, (“IHM”), licensee of station KVDU, Channel 281C, Facility ID No. 34528, Houma, Louisiana. IHM herein proposes to modify the license of KVDU to operate on Channel 281C, licensed to Gonzales, Louisiana.

IHM seeks to modify KVDU to specify operation on Channel 281C licensed to Gonzales, Louisiana. Gonzales is an incorporated city in the Baton Rouge, LA Urbanized Area. Houma is an incorporated city in the Houma, LA Urbanized Area. The proposed Channel 281C reference and application site coordinates are 29° 57’ 11.0” North Latitude 90° 43’ 26.0” West Longitude (NAD 83). The proposed KVDU modification is mutually exclusive with the licensed facility of KVDU. This modification is also compliant with all the requirements of 47 CFR §73.315 and with 47 CFR §73.207. IHM is proposing to implement this change at the station’s licensed tower site. As such, the Federal Aviation Administration will not be apprised of this proposal. The reference and application site tower specification is 610.5 meters in overall height, registered with the Commission as Antenna Structure Registration Number (ASRN) 1049025.

This application includes a comprehensive Section 307(b) analysis that demonstrates the proposed change of community of license would serve the public interest, as required by Section 307(b) of the Communications Act of 1934, under Priority 4 of *Revision of FM Assignment Policies and Procedures, Second Report and Order*, 90 FCC 2d 88 (1982). Both Gonzales and Houma are located in Urbanized Areas. Because this application proposes a change in KVDU’s community of license from a community in one Urbanized Area to a community in another

Urbanized Area, the proposed modification of KVDU is considered the equivalent of an “intra-Urbanized Area” move for purposes of a Section 307(b) analysis. The comprehensive Section 307(b) analysis filed with this application demonstrates that the proposed change of community of license and modification of KVDU constitutes a preferential arrangement of allotments or assignments under Section 307(b) pursuant to Allotment Priority (4) and is consistent with the policies established by the Commission in its Second Report and Order in *Rural Radio*<sup>1</sup> and the Second Order on Reconsideration in *Rural Radio*<sup>2</sup>.

<sup>1/</sup> *Policies to Promote Rural Radio Service and to Streamline Allotment and Assignment Procedures*, Second Report and Order, First Order on Reconsideration, and Second Further Notice of Proposed Rulemaking, FCC 11-28, 26 FCC Rcd 2556 (rel. Mar. 3, 2011).

<sup>2/</sup> *Policies to Promote Rural Radio Service and to Streamline Allotment and Assignment Procedures*, Second Order on Reconsideration, FCC 12-127, 27 FCC Rcd 12829 (rel. Oct 12, 2012).

# KVDU Reference and Application Site Channel Study

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REFERENCE                                     DISPLAY DATES
29 57 11.0 N.                               CLASS = C   Int = C   DATA 03-09-22
90 43 26.0 W.                               Current Spacings to 3rd Adj. SEARCH 03-09-22
----- Channel 281 - 104.1 MHz -----
Call      Channel  Location  Azi      Dist      FCC      Margin
      Lat.      Lng.      Ant      Power      HAAT
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KVDU      LIC      281C      Houma      LA      12.9      0.1      289.5      -289.4
29 57 13.7  90 43 25.3  CN      100.000 kW      593 M
      Ihm Licenses, LLC      BLH19880224KB

KWMZ-FM   LIC-N 283C2  Empire      LA      116.5      96.7      104.5      -7.8
29 33 45.8  89 49 46.2  NCN      13.500 kW      250 M
      M.A.C. Broadcasting, LLC      BLH20150130AAW

Note: KWMZ-FM is licensed under Section 73.215 contour protection with
respect to KVDU. The licensed KVDU site is fully spaced under 73.207.

WNXX      LIC      283A      Jackson      LA      336.5      96.0      94.5      1.5
30 44 44.7  91 07 32.4  CN      3.000 kW      144 M
      Guaranty Broadcasting Comp      BLH20070702AAN

KLCJ      LIC-N 281A  Oak Grove      LA      272.0      227.9      225.5      2.4
30 00 11.8  93 05 05.6  NCN      6.000 kW      94 M
      Delta Media Corporation      BLH20170622AAH

WMJU      LIC      282C3  Bude      MS      1.5      178.1      175.5      2.6
31 33 33.6  90 40 26.4  CN      25.000 kW      100 M
      North Shore Broadcasting C      BLH19990916AAL

WJSH      LIC-Z 284A  Folsom      LA      37.8      100.3      94.5      5.8
30 39 55.6  90 04 49.2  ZCN      6.000 kW      100 M
      North Shore Broadcasting C      BLH19960229KA

WDLT-FM   LIC-N 281C  Saraland      AL      75.3      305.1      289.5      15.6
30 36 45.7  87 38 41.9  NCN      100.000 kW      508 M
      Cumulus Licensing LLC      BLH20120507ABD

KLWB-FM   LIC-N 279C2  Carencro      LA      290.3      126.9      104.5      22.4
30 20 32.7  91 57 46.4  NCN      10.000 kW      283 M
      Delta Media Corporation      BLH20131101AFX

WQUE-FM   LIC      227C0  New Orleans      LA      93.0      67.6      44.5      23.1
29 55 11.7  90 01 29.3  CN      100.000 kW      300 M
      Ihm Licenses, LLC      BMLH20050808ACX

AL7462    RSV      227C0  New Orleans      LA      93.0      67.6      44.5      23.1
29 55 11.7  90 01 29.2      0.000 kW      450 M
      From CDBS      RM11627

KEZP      LIC      282C3  Bunkie      LA      309.2      201.1      175.5      25.7
31 05 14.7  92 21 34.5  CN      19.200 kW      114 M
      Smg-Alexandria, LLC      BLH20060119ADJ

KLXN      LIC-N 281A  Rosepine      LA      296.2      271.6      225.5      46.1
31 00 17.7  93 16 40.6  NCN      2.700 kW      112 M
      Educational Media Foundati      BLED20160921AAI

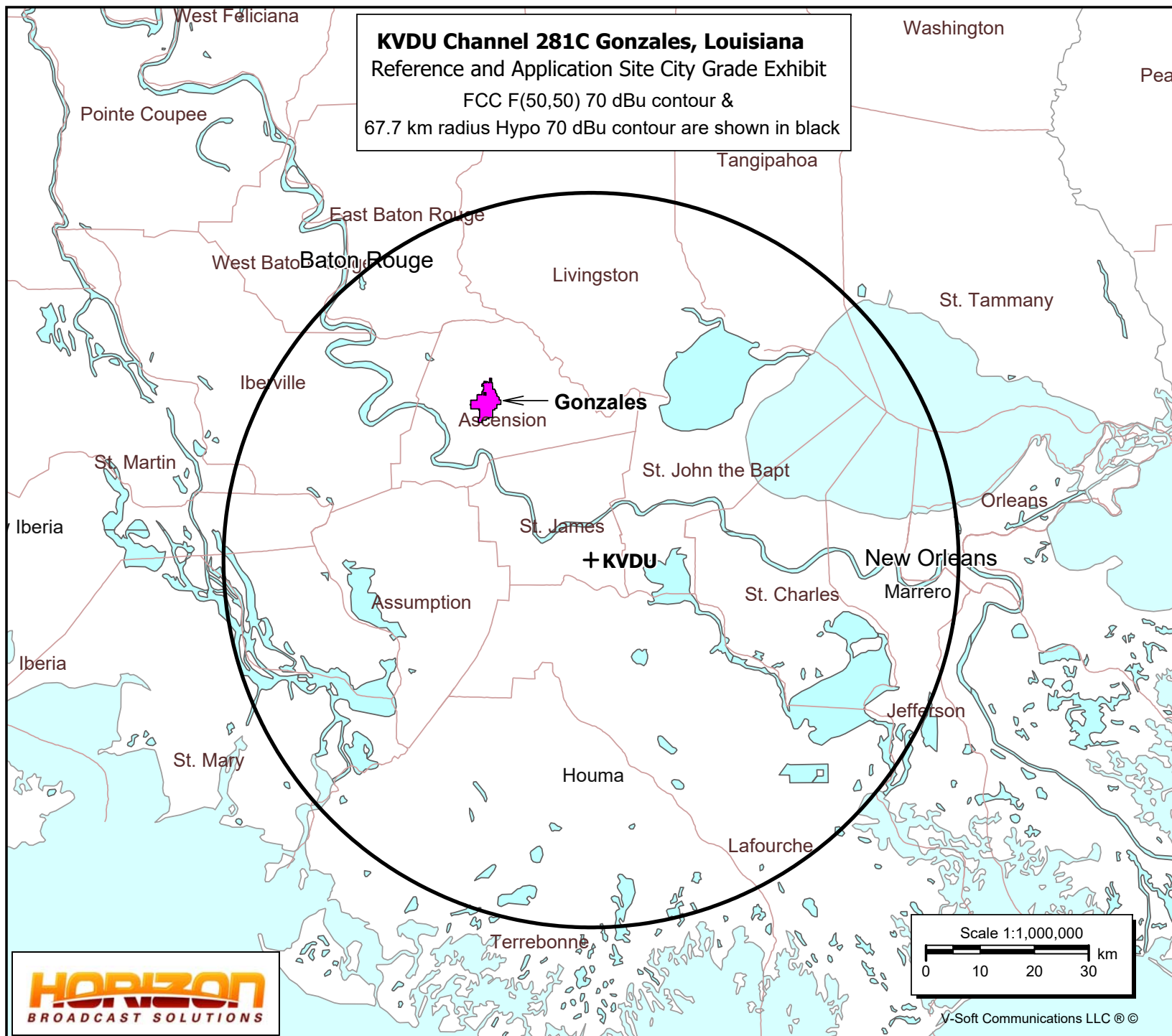
KJLO-FM   LIC      281C0  Monroe      LA      337.1      327.0      280.5      46.5
32 39 36.5  92 05 15.5  CN      100.000 kW      310 M
      Holladay Broadcasting Of L      BLH19880812KE

KNEK-FM   LIC      284C3  Washington      LA      291.7      143.6      95.5      48.1
30 25 17.7  92 06 50.4  CN      25.000 kW      100 M
      Radio License Holding Cbc,      BLH19960223KB

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Gonzales, LA  
Latitude: 29-57-11 N  
Longitude: 090-43-26 W  
ERP: 100.00 kW  
HAAT: 600.0 m  
Channel: 281  
Frequency: 104.1 MHz  
AMSL Height: 601.64 m  
Elevation: 1.2 m  
Horiz. Pattern: Omni  
Vert. Pattern: No  
Prop Model: FCC Model  
Loc. Variability: 50.0%  
Time Variability: 50.0%  
HAAT Mthd: FCC

Reference and Application Site City Grade Exhibit  
FCC F(50,50) 70 dBu contour &  
67.7 km radius Hypo 70 dBu contour are shown in black



**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. IHM Licenses, LLC, ("IHM"), is the licensee of station KVDU, Channel 281C, Facility ID No. 34528, Houma, Louisiana. IHM is proposing to modify KVDU to specify operation on Channel 281C licensed to Gonzales, LA. The transmitting site is the current licensed site. The site is registered with FCC Antenna Structure Registration (ASR) #1049025. The tower is located at 29° 57' 11.0" N ~ 90° 43' 26" W (NAD 27). The proposed antenna is a side mounted ERI SHPX-6 six bay full wavelength circularly polarized antenna. KVDU will operate with 100 kilowatts ERP at 600 meters above ground level and 600 meters HAAT. The use of existing transmitting locations has been characterized as being environmentally preferable by the Commission, according to Note 1 of § 1.1306 of the FCC Rules.

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 SHPX antenna is included in the OET's updated FM Model Program under EPA Type 3: Opposed "U" dipole. Using the EPA Type 3 selection, the maximum calculated signal density near the tower at two meters above ground level attributable to the proposed KVDU facility is  $1.276 \mu\text{W}/\text{cm}^2$  at 190.2 meters.

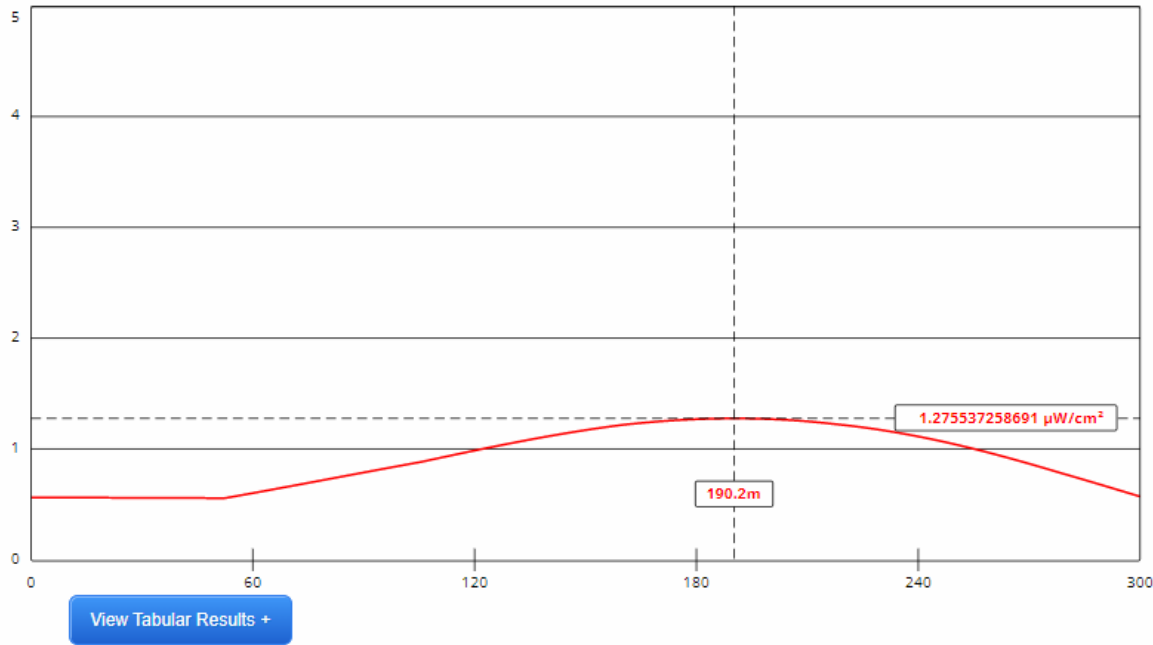
This is well below the five percent threshold limit described in 1.1307(b) regarding sites with multiple emitters, which excludes applicant from responsibility for taking any corrective action in areas where the proposal's contribution is less than five percent.

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 281 (104.1 MHz) ▼		
Antenna Type +	EPA Type 3: Opposed U Dipole ▼		
Height (m)	600	Distance (m)	300
ERP-H (W)	100000	ERP-V (W)	100000
Num of Elements	6	Element Spacing (?)	1
Num of Points	500	Apply	

Bureau/Office:  
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