

**Engineering Statement and Wavier Request
Construction Permit Modification Application for Auxiliary Facility
KRIV Houston, TX Channel 26
May 12, 2023**

The purpose of this application is to change the antenna make and model specified in the current construction permit, file number 152144. The change is necessary as the manufacturer (RFS) of the currently specified antenna has ceased providing broadcast antennas. There will be no change in the effective radiated power (ERP) 1,000 kW or the radiation center above mean sea level (RCAMSL) 553 meters.

The antenna is broadband and will also serve KRIV's 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.

It is 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 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 is justified in requesting this change and that it would be in the public interest to grant its request.

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

Appendix A

tvstudy v2.2.5 (4uoc83)

Database: localhost, Study: 02086_05112023_KRIV_22204, Model: Longley-Rice

Start: 2023.05.11 13:41:56

Study created: 2023.05.11 13:41:55

Study build station data: LMS TV 2023-05-07

Proposal: KRIV D26 DX APP HOUSTON, TX

File number: 02086_05112023_KRIV_22204

Facility ID: 22204

Station data: User record

Record ID: 1850

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 | 2.1 km |
| Yes | KBCA | D26 | DT | LIC | ALEXANDRIA, LA | BLANK0000078715 | 312.7 |
| Yes | KRIS-TV | D26 | DT | LIC | CORPUS CHRISTI, TX | BLANK0000190646 | 288.5 |
| Yes | KTAL-TV | D26 | DT | LIC | TEXARKANA, TX | BLANK0000192877 | 396.0 |
| Yes | KPXL-TV | D26 | DT | LIC | UVALDE, TX | BLCDT20090612AHU | 343.6 |
| Yes | KXXV | D26 | DT | LIC | WACO, TX | BLCDT20050630AFE | 262.1 |
| Yes | KBTW-TV | D27 | DT | LIC | PORT ARTHUR, TX | BLANK0000063140 | 159.0 |
| No | XHRIO | D26 | DT | LIC | MATAMOROS, TA | BLANKBPFS20160318AAK | 465.5 |

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 34 29.00 N (NAD83)
Longitude: 95 29 38.00 W
Height AMSL: 553.0 m
HAAT: 534.0 m
Peak ERP: 1000 kW
Antenna: ATC BCSE24C2_U_HP_HPOL_CH26_FCC_FILE 347.0 deg
Elev Pattn: ATC BCSE24C2_U_HP_Ch26_EL_Pat
Elec Tilt: 1.00

40.0 dBu contour:

| Azimuth | ERP | HAAT | Distance |
|---------|--------|---------|----------|
| 0.0 deg | 929 kW | 534.3 m | 118.3 km |
| 45.0 | 814 | 536.4 | 117.2 |
| 90.0 | 914 | 535.4 | 118.3 |
| 135.0 | 894 | 534.0 | 118.0 |
| 180.0 | 191 | 534.8 | 103.8 |
| 225.0 | 554 | 533.8 | 113.5 |
| 270.0 | 235 | 532.1 | 105.5 |
| 315.0 | 747 | 529.0 | 116.0 |

ERP exceeds maximum

ERP: 1000 kW ERP maximum: 433 kW

Distance to Canadian border: 1763.2 km

Distance to Mexican border: 424.1 km

Conditions at FCC monitoring station: Kingsville TX

Bearing: 225.1 degrees Distance: 332.7 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:

Bearing: 325.5 degrees Distance: 1468.1 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

| | Call | Chan | Svc | Status | City, State | File Number | Distance |
|--------------------|-----------|-----------------|-----------|-------------------|---------------|------------------------|----------------|
| Desired: | KYAZ | D25 | DT | LIC | KATY, TX | BLANK0000125086 | |
| Undesireds: | KRIV | D26 | DT | BL | HOUSTON, TX | DTVBL22204 | 2.1 km |
| | KRIV | D26 | DX | APP | HOUSTON, TX | 02086_05112023_KRIV_22 | 2.1 |
| | KETH-TV | D24 | DT | LIC | HOUSTON, TX | BL EDT20101019ABX | 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 | 36499.4 6,027,232 | 2.44 0.14 |
| 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 | | 1088.5 | 10,394 | | | 968.3 9,459 | |
| KETH-TV D24 DT LIC | | 152.3 | 1,066 | 144.3 | 1,049 | 32.1 131 | |
| KPXD-TV D25 DT LIC | | 20.0 | 314 | 20.0 | 314 | 20.0 314 | |

Interference to BLANK0000078715 LIC scenario 1

| | Call | Chan | Svc | Status | City, State | File Number | Distance |
|--------------------|---------|-----------------|---------|-------------------|-----------------|------------------------|----------------|
| Desired: | KBCA | D26 | DT | LIC | ALEXANDRIA, LA | BLANK0000078715 | |
| Undesireds: | KRIV | D26 | DT | BL | HOUSTON, TX | DTVBL22204 | 312.7 km |
| | KRIV | D26 | DX | APP | HOUSTON, TX | 02086_05112023_KRIV_22 | 312.7 |
| | 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 | 258 | | | 4.0 0 | |
| KTAL-TV D26 DT LIC | | 490.6 | 3,337 | 442.8 | 3,079 | 442.8 3,079 | |

Interference to BLANK0000190646 LIC scenario 1

| | Call | Chan | Svc | Status | City, State | File Number | Distance |
|----------|---------|------|-----|--------|--------------------|-----------------|----------|
| Desired: | KRIS-TV | D26 | DT | LIC | CORPUS CHRISTI, TX | BLANK0000190646 | |

| | | | | | | | |
|-------------|---------|-----|----|-----|---------------|------------------------|----------|
| Undesireds: | KRIV | D26 | DT | BL | HOUSTON, TX | DTVBL22204 | 288.5 km |
| | KRIV | D26 | DX | APP | HOUSTON, TX | 02086_05112023_KRIV_22 | 288.5 |
| | KPXL-TV | D26 | DT | LIC | UVALDE, TX | BLCDT20090612AHU | 250.1 |
| | XHRIO | D26 | DT | LIC | MATAMOROS, TA | BLANKBPFS20160318AAK | 203.5 |

| | | | | |
|-----------------|-----------------|-----------------|-----------------|----------------|
| Service area | Terrain-limited | IX-free, before | IX-free, after | Percent New IX |
| 30490.9 565,112 | 30426.3 565,044 | 29861.8 562,857 | 29861.8 562,857 | 0.00 0.00 |

| | | | |
|--------------------------------|-------------|-------------------|------------------|
| Undesired | Total IX | Unique IX, before | Unique IX, after |
| KRIV D26 DT BL 0.0 0 | 0.0 0 | 0.0 0 | |
| KRIV D26 DX APP 16.1 45 | | 0.0 0 | |
| KPXL-TV D26 DT LIC 528.7 2,187 | 528.7 2,187 | 512.6 2,142 | |
| XHRIO D26 DT LIC 35.8 0 | 35.8 0 | 35.8 0 | |

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 | 02086_05112023_KRIV_22 | 396.0 |
| | 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 | 0.0 0 | |
| KRIV D26 DX APP 12.1 297 | | 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 | 02086_05112023_KRIV_22 | 343.6 |
| | 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 | BLCDT20050630AFE | 253.4 |
| | KBVO | D27 | DT | LIC | LLANO, TX | BLCDT20090622ABA | 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 156.7 | 3,829 | | 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 | 754.5 6,677 |
| 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 BLCDT20050630AFE LIC scenario 1

| | | | | | | | |
|-------------|---------|------|-----|--------|--------------------|------------------------|----------|
| Desired: | Call | Chan | Svc | Status | City, State | File Number | Distance |
| | KXXV | D26 | DT | LIC | WACO, TX | BLCDT20050630AFE | |
| Undesireds: | KRIV | D26 | DT | BL | HOUSTON, TX | DTVBL22204 | 262.1 km |
| | KRIV | D26 | DX | APP | HOUSTON, TX | 02086_05112023_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 | BLCDT20090612AHU | 253.4 |
| | KDFI | D27 | DT | LIC | DALLAS, TX | BLANK0000074883 | 142.1 |
| | KBVO | D27 | DT | LIC | LLANO, TX | BLCDT20090622ABA | 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 | 37215.0 1,672,933 | 0.40 0.05 |

| | | | |
|--------------------------|----------|-------------------|------------------|
| 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 543.3 | 45,171 | | 495.1 6,394 |
| 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 | 131.6 5,556 |

| | | | | | | |
|-----------------|-------|--------|-------|--------|-------|--------|
| 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 | 02086_05112023_KRIV_22 | 159.0 |
| | 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 | 26537.1 731,971 | 0.12 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 | 79.9 | 1,872 | | 75.9 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 | 02086_05112023_KRIV_22 | 159.0 |
| | 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 | 26537.1 731,971 | 0.12 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 | 79.9 | 1,872 | | 75.9 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 |

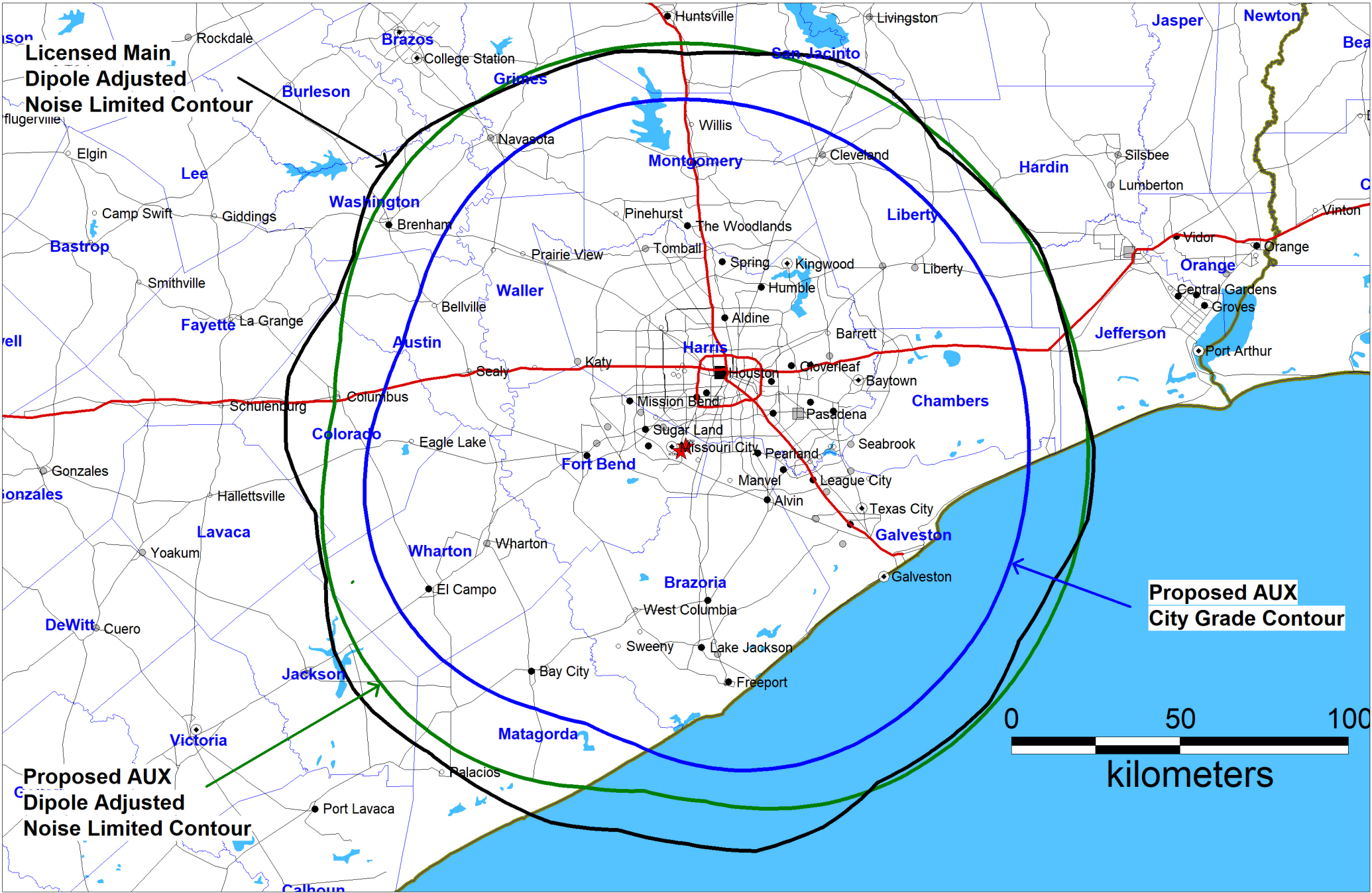
KUGB-CD D28 DC LIC 4.0 18 0.0 0 0.0 0

Interference to proposal scenario 1

| | Call | Chan | Svc | Status | City, State | File Number | Distance |
|-------------|---------|------|-----|--------|--------------------|------------------------|----------|
| Desired: | KRIV | D26 | DX | APP | HOUSTON, TX | 02086_05112023_KRIV_22 | |
| Undesireds: | KYAZ | D25 | DT | LIC | KATY, TX | BLANK0000125086 | 2.1 km |
| | KRIS-TV | D26 | DT | LIC | CORPUS CHRISTI, TX | BLANK0000190646 | 288.5 |
| | KTAL-TV | D26 | DT | LIC | TEXARKANA, TX | BLANK0000192877 | 396.0 |
| | KPXL-TV | D26 | DT | LIC | UVALDE, TX | BLCDT20090612AHU | 343.6 |
| | KXXV | D26 | DT | LIC | WACO, TX | BLCDT20050630AFE | 262.1 |
| | KBTB-TV | D27 | DT | LIC | PORT ARTHUR, TX | BLANK0000063140 | 159.0 |

| Service area | Terrain-limited | IX-free | Percent IX |
|----------------------|----------------------|----------------------|--------------|
| 40884.1 6,076,920 | 40804.0 6,076,756 | 40185.8 6,068,096 | 1.52 0.14 |

| Undesired | Total IX | Unique IX | Prcnt Unique IX |
|--|----------|-----------|-----------------|
| KYAZ D25 DT LIC 52.2 2,006 52.2 2,006 0.13 0.03 | | | |
| KRIS-TV D26 DT LIC 28.1 258 16.1 37 0.04 0.00 | | | |
| KTAL-TV D26 DT LIC 8.0 34 0.0 0 0.00 0.00 | | | |
| KPXL-TV D26 DT LIC 4.0 164 0.0 0 0.00 0.00 | | | |
| KXXV D26 DT LIC 312.5 4,515 292.4 4,260 0.72 0.07 | | | |
| KBTB-TV D27 DT LIC 237.4 2,102 237.4 2,102 0.58 0.03 | | | |



Appendix B

KRIV AUX CP-MOD

ERP 1,000 kW RCAMSL 553 m AUX Antenna: ATC -BCSE24C2-U-HP Rot. 347 Degrees