

**Engineering Statement and Waiver Request**  
**Construction Permit Modification Application for Auxiliary Facility**  
**KRIV Houston, TX Channel 26**  
**February 11, 2024**

The purpose of this application is to modify auxiliary facility Construction Permit File No. 0000218549. The proposed modification is to replace the narrow cardioid antenna pattern with a broader pattern that provides better coverage of the market. The proposed new antenna has slightly less gain than the previously proposed antenna; therefore, there is a slight reduction (approximately 1.1 dB) in the effective radiated power (ERP).

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 770.9 kW effective radiated power (ERP) is above that allowed for the height it should be considered permissible in that it is less than the currently authorized power (1,000 kW) and 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 only occur over water. 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: 02373\_02092024\_KRIV\_22204, Model: Longley-Rice  
Start: 2024.02.09 15:24:41

Study created: 2024.02.09 15:24:41

Study build station data: LMS TV 2024-01-30

Proposal: KRIV D26 DX APP HOUSTON, TX  
File number: 02373\_02092024\_KRIV\_22204  
Facility ID: 22204  
Station data: User record  
Record ID: 1987  
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
Yes	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: 771 kW  
Antenna: DIE TFU\_24WB\_VP\_R\_C160\_CH26\_V9\_HPOL\_FCC\_ 67.0 deg  
Elev Pattn: Generic  
Elec Tilt: 1.00

40.0 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	762 kW	534.9 m	116.5 km
45.0	487	537.2	112.5
90.0	697	536.2	115.8
135.0	654	535.9	115.2
180.0	240	537.0	106.0
225.0	310	535.9	108.3
270.0	128	534.7	100.3
315.0	571	530.6	113.6

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

ERP exceeds maximum  
ERP: 771 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%

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Interference to BLANK0000125086 LIC scenario 1

Desired:	Call KYAZ	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	02373_02092024_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	37175.5 6,031,615	-0.03 0.03
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	240.1	4,969	43.9	2,939			
KETH-TV D24 DT CP	400.5	3,203	392.5	3,186	204.4	1,173	
KPXD-TV D25 DT LIC	20.0	314	20.0	314	20.0	314	

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Interference to BLANK0000125086 LIC scenario 2

Desired:	Call KYAZ	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	02373_02092024_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	37263.6 6,031,856	0.40 0.06
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	240.1	4,969	204.0	4,835			
KETH-TV D24 DT LIC	152.3	1,066	144.3	1,049	116.3	932	
KPXD-TV D25 DT LIC	20.0	314	20.0	314	20.0	314	

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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	02373_02092024_KRIV_22	314.7

WLPB-TV	D25	DT	CP	BATON ROUGE, LA	BLANK0000225883	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	31.9	173				4.0 0
KTAL-TV D26 DT LIC	490.6	3,337		442.8	3,079	462.7 3,164

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Interference to BLANK0000190646 LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	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	02373_02092024_KRIV_22	286.4
	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	
KRIV D26 DX APP	4.0	0				0.0 0
KPXL-TV D26 DT LIC	528.7	2,187		528.7	2,187	524.6 2,187
XHRIO D26 DT LIC	35.8	0		35.8	0	35.8 0

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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	02373_02092024_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
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41255.3	1,094,332	41122.7	1,092,958	39686.2	1,085,702	39686.2	1,085,702	0.00	0.00
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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

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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	02373_02092024_KRIV_22	342.1
	K250B-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	144.7	4,163			8.0 436
K250B-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	220.7 2,654
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

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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	02373_02092024_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	37306.7 1,673,182	0.15 0.04

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 451.6 44,922	403.4 6,145		
KPXD-TV D25 DT LIC 439.7 10,425	88.7 2,447		
KRIS-TV D26 DT LIC 4.0 0	0.0 0		
KTAL-TV D26 DT LIC 44.5 148	16.2 42		
KPXL-TV D26 DT LIC 235.5 46,925	131.6 5,556		
KDFI D27 DT LIC 585.0 19,445	234.1 11,467		
KBVO D27 DT LIC 119.7 2,764	51.9 78		

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Interference to BLANK0000063140 LIC scenario 1

Desired:	Call	Chan	Svc	Status	City, State	File Number	Distance
	KBTV-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	02373_02092024_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	26605.1 733,825	-0.14 -0.25

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 12.0 18	8.0 0		
KTVE D27 DT LIC 12.0 56	12.0 56		
KATC D28 DT LIC 52.2 109	52.2 109		
KUGB-CD D28 DC CP 4.0 18	0.0 0		

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Interference to BLANK0000063140 LIC scenario 2

Call	Chan	Svc	Status	City, State	File Number	Distance
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Desired:	KBTB-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	02373_02092024_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	26605.1 733,825	-0.14 -0.25

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	12.0	18		8.0 0
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

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Interference to proposal scenario 1

	Call	Chan	Svc	Status	City, State	File Number	Distance
Desired:	KRIV	D26	DX	APP	HOUSTON, TX	02373_02092024_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	
38857.0	6,065,848	38821.0	6,065,544	38407.8	6,053,710	1.06	0.20
Undesired		Total IX		Unique IX		Prct Unique IX	
KYAZ D25 DT LIC	4.0	8		4.0 8		0.01	0.00
KBCA D26 DT LIC	8.0	18		0.0 0		0.00	0.00
KRIS-TV D26 DT LIC	16.1	120		4.0 37		0.01	0.00
KTAL-TV D26 DT LIC	20.0	343		0.0 0		0.00	0.00
KPXL-TV D26 DT LIC	8.0	18		0.0 0		0.00	0.00
KXXV D26 DT LIC	336.7	9,163		304.6 8,737		0.78	0.14
KBTB-TV D27 DT LIC	64.4	2,626		64.4 2,626		0.17	0.04



