

TECHNICAL EXHIBIT
Request for Waiver of Minor Change Distance Limitation
Request for Second-Adjacent Spacing Waiver
Modification of LPFM Station Construction Permit

Texas Youth Organization (“TEXAS”) is the permittee of unbuilt Low Power FM (“LPFM”) station KRQP-LP, Facility ID 194985, Channel 273L1, Euless, TX (BNPL- 20131104AVH). TEXAS seeks to modify the KRQP-LP Construction Permit (“CP”) to utilize a different transmitting location. No change in channel is proposed.

This statement supports TEXAS’ s request for waivers of the minor change distance limitation of §73.870(a) and second-adjacent channel minimum separation requirement §73.807.

Request for Waiver of Minor Change Distance Limitation

The proposed site is located 6.9 km from the authorized site. The minor change rule §73.870(a) restricts changes in site location to a maximum distance of 5.6 km. TEXAS herein requests a waiver of the site relocation limit in order to allow the proposed relocation distance of 6.9 km.

The existing CP specifies operation with a side-mounted antenna to be installed on an existing tower structure. The authorized tower is owned by American Tower. (“American”). TEXAS has been advised that the structure “cannot accommodate any other antenna or transmission line” due to capacity concerns. Therefore, since the tower authorized in KRQP-LP’s CP cannot accommodate any additional antennas, TEXAS cannot construct KRQP-LP at the authorized location for reasons beyond TEXAS’ s control.

A search of the FCC’s ASR database shows only six other registered tower structure within the 5.6 km distance limit for a minor change. Each site has been contacted and personally inspected to see if KRQP-LP can be accommodated. Since KRQP-LP is very close to Dallas/Ft.Worth International Airport and the terrain elevation is so high, structures within the 5.6km limit are not very tall and can only accommodate a few tenants per site. Each situation has been noted below.

Site # 1: (ASRN: 1274025) SBA
Tower at capacity and can’t accommodate any other tenant.

Site # 2: (ASRN: 1282412) AT&T
Tower not at capacity but can’t accommodate any other tenant because of future carrier upgrade.

Site # 3: (ASRN: 1042648) City of Colleyville, TX
City of Colleyville notified us that this tower is at capacity)

Site # 4: (ASNR: 1282552) AT&T

Tower at capacity and can't accommodate any other tenant.

Site # 5: (ASNR: 1055644) AT&T

Tower not at capacity but can't accommodate any other tenant due to ground space limitations.

Site # 6: (ASRN: 1047201) AT&T

Tower at capacity and can't accommodate any other tenant.

As to any existing non-registered structures within 5.6 km of the KRQP-LP CP site, much of the area is single-family residential area. TEXAS personnel have searched the area within 5.6 km of the CP site and found no tall buildings, poles, or any other structure suitable to support an antenna for KRQP-LP.

Request for Second Adjacent Waiver for KDMX & KDGE (MAIN)

Application requests a waiver for a location which is short-spaced on a second-adjacent channel with BLH-20050713AAA, callsign KDMX, class C, status LIC, DALLAS, TX, channel 275, facility ID 47739 & BLH-20050713AAB, callsign KDGE, class C, status LIC, FORT WORTH-DALLAS, TX, channel 271, facility ID 9620. Both stations are located at the same site, height, and ERP.

Undesired-to-Desired Ratio Method

BLH-20050713AAA f(50,50) signal:	80.3 dBu
Second-adjacent protection:	+ 40 dB
Interference-zone boundary:	120.3 dBu
Distance to 120.3 dBu:	36 m (HAAT = 56 m, ERP <= 0.0279 kW)

With the proposed antenna radiation center located 37 meters above the ground, the interference zone clears the ground and does not touch occupied structures nor major roadways, thus no population will be subject to interference from the proposed station according to the undesired-to-desired ratio method.

Request for Second Adjacent Waiver for KDMX & KDGE (AUX)

Application requests a waiver for a location which is short-spaced on a second-adjacent channel with BLH-20141222AFH, callsign KDMX, class C, status LIC, DALLAS, TX, channel 275, facility ID 47739 & BLH-20141222AFE, callsign KDGE, class C, status LIC, FORT WORTH-DALLAS, TX, channel 271, facility ID 9620. Both stations are located at the same site, height, and ERP.

Undesired-to-Desired Ratio Method

BLH-20141222AFH f(50,50) signal:	81.8 dBu
Second-adjacent protection:	+ 40 dB
Interference-zone boundary:	121.8 dBu
Distance to 121.8 dBu:	30 m (HAAT = 56 m, ERP <= 0.0279 kW)

With the proposed antenna radiation center located 37 meters above the ground, the interference zone clears the ground and does not touch occupied structures nor major roadways, thus no population will be subject to interference from the proposed station according to the undesired-to-desired ratio method.

AERIAL VIEW

