

NEW 277A, PEARSALL, TX**EXHIBIT 22 - NARRATIVE****ENGINEERING STATEMENT**

Tower Investment Trust, Inc. ("TI") is an applicant in FM Auction 62 for a new FM broadcast station at Pearsall, Texas (BSFH-20050811AEW, Facility ID 165972; see Attachment A to the relevant Public Notice, DA 05-1598, page A-4, FM129). Staff has determined TI to be the winning bidder for this permit, and TI is therefore required to submit a complete 301-FM. The instant application is a response to that requirement.

Exhibit 23 contains a contour map of the community coverage from the TI proposal. The 70 dBu contour from the TI proposal encompasses the entire community of license (2000 Census, block data; contours calculated pursuant to 47 CFR §73.313).

The TI proposal clears the coordination distances to the Canadian border and all monitoring stations and radio observatories. The TI proposal is 128.1 km from the nearest point on the Mexican border, and thus requires Mexican concurrence. Note that the original allocation for this assignment was accepted by Mexico as a specially negotiated short-spaced allotment on September 15, 2000.

Exhibit 25 contains the interference study list, showing that the TI proposal clears all other records in the database by spacing, including all Mexican assignments. Note that the new site coordinates are more distant from the relevant Mexican assignment (218.9 km) than the original allocation coordinates (209.9 km) which were accepted by Mexico as noted above.

TI affirms that it will locate the studio in accordance with 47 CFR §73.1125. Exhibit 30 contains a radio frequency radiation study of the TI proposal, showing that it meets the requirements of 47 CFR §1.1310 and OET 65A. No other environmental impacts are known to exist from this proposal. TI affirms that it will cease transmission as necessary to prevent RF exposure to workers in excess of the regulation.

The above and attached information is true and correct as to my knowledge and belief.

March 7, 2006



Gary O. Keener