

ENGINEERING EXHIBIT
IN SUPPORT OF AN
APPLICATION FOR CONSTRUCTION PERMIT
KVTT FM Dallas, TX
91.7 MHz – 75 kW ERP – Non-Directional
Facility ID: 55768

Applicant: Covenant Educational Media, Inc.

September 2007

Carl E. Gluck

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FCC Form 340 – Section III

Statement of Carl E. Gluck

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ENGINEERING STATEMENT OF CARL E. GLUCK
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Applicant: Covenant Educational Media, Inc.

I am an engineering consultant living in Camarillo, California. My education and experience are a matter of record with the Federal Communications Commission. I am a Certified Professional Broadcast Engineer (#50261) with the Society of Broadcast Engineers.

GENERAL

I have been authorized by Covenant Educational Media, Inc., licensee of non-commercial FM Broadcast Station KVTT in Dallas, TX, to prepare this Engineering Statement, FCC Form 340 (Section VII), and the attached exhibits in support of an application for Construction Permit. In this application the applicant proposes a minor modification to the station's license to change the make and model of its antenna, and to increase the height of the antenna center of radiation while simultaneously lowering its effective radiated power to provide protection as required by the Commission's rules.

KVTT FM is licensed to serve Dallas, TX on 91.7 MHz with 100 kW ERP and a non-directional antenna. The FCC database shows KVTT was first licensed on January 10, 1980, with license BLED19781012AH.

With this application, KVTT proposes to change its antenna to a Shively Model 6017-8 eight bay circularly polarized, 4 dipole per level Lindenblad antenna, increase the antenna center of radiation to 564 meters above mean sea level, and decrease its ERP to 75 kW. The proposal is considered to be a minor change under 47 CFR 73.3571(b) of the FCC Rules. To accommodate this change, the owner of the antenna support structure KVTT's antenna is located on has applied with the FAA for approval to increase the overall height of its tower, existing FCC registration number 1053994 (FAA Study No. 2007-ASW-7814-OE), whereupon a new tower registration will be applied for to show the increased height and FAA approval.

TRANSMITTER SITE

The KVTT existing transmitter site is located at geographical coordinates (NAD-27):

32° 35' 24.51"	North Latitude
96° 58' 22.79"	West Longitude

ANTENNA SYSTEM

The proposed antenna system will consist of a Shively Labs® eight level Lindenblad configuration broadband antenna Model 6017-8. The circular 4-dipole per level antenna will be mounted with a nominal 9 foot spacing to optimize gain and downward radiation. The antenna gain is 6.43 dB, with a power gain of 4.40.

FAA NOTIFICATION AND TOWER REGISTRATION

On August 29, 2007, the owner (Sonsinger Broadcasting of Houston, L.P.) of the tower where KVTT's antenna is located applied to the FAA to increase the tower's overall height to 578 meters AMSL. This will accommodate the proposed KVTT antenna height increase to a center of radiation at 564 meters AMSL. The FAA study

number for this increase is 2007-ASW-7814-OE, and the old existing FCC Antenna Support Registration number for the tower is 1053994.

BLANKETING INTERFERENCE AND STATION INTERACTION

In response to all complaints of blanketing interference the applicant will work to mitigate the interference in accordance with 47 CFR 73.508 and 73.318 of the Rules.

There is one other non-Commercial FM broadcast station located on the proposed tower structure, KNON 207C1 Dallas, TX. There are numerous other broadcast stations (FM and TV) located on the Cedar Hill antenna farm. The applicant will work with the other facilities as necessary to resolve detrimental interaction of the facilities by the proposed facility, if any should occur.

ANTENNA HEIGHT INCREASE

Exhibit 1 is a vertical plan sketch of the proposed supporting structure and antenna. The sketch shows an antenna center of radiation at 564 meters AMSL. Exhibit 2 contains the antenna height above average terrain (HAAT) calculation using a 3 arc-second data set from the USGS National Elevation Dataset (NED) 30 meter data and based upon 36 radials. The HAAT is 369.2 meters.

COVERAGE CONTOURS

Exhibit 3 is a coverage plot showing the proposed F(50,50) 70 dBu (3.16 mV/m) and 60 dBu (1.0 mV/m) contours of the instant operation. The plot also shows the incorporated areas of Dallas and KVTT's main studio location at 11061 Shady Trail, Dallas TX 75229. This exhibit demonstrates compliance with 47 CFR 73.1125 and 47 CFR 73.315.

COMPLETE ALLOCATION STUDY

Exhibit 4 is a complete allocation study of the proposed facility showing there is no prohibited contour overlap between KVTB FM as proposed and other broadcast stations. The Exhibit was created using the FCC CDBS database as of 8/31/07 and a 3 arc-second data set from the USGS National Elevation Dataset (NED) 30 meter data and based upon 36 radials.

TV CHANNEL 6 PROTECTION

KVTB FM was first licensed on 1/10/1980 and therefore qualifies as an existing station with regard to TV6 interference per 47 CFR 73.525(b). Nevertheless Exhibit 5 demonstrates that the operation proposed in the minor modification application will reduce (compared to what is licensed today) the area of overlap of KVTB's F(50,10) 83 dBu contour and KCEN TV6's F(50,50) 47 dBu contour. The proposal satisfies the Commission's rules with regard to TV6 interference.

INTERNATIONAL BORDERS

The proposed antenna site for KVTB FM is not within 320 kilometers of the common border between the United States and Canada or Mexico.

ENVIRONMENTAL PROTECTION ACT

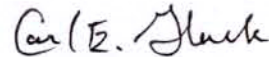
The proposed change to the existing tower, and the increase in height of the KVTB FM antenna, is excluded from environmental processing under 47 CFR 1.1306. The applicant will take radiofrequency electromagnetic exposure measurements upon completion of the construction to verify exposure limits are satisfied for controlled and

uncontrolled environments. The applicant certifies that it, in coordination with other uses of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

SUMMARY

It is submitted that the proposal described herein complies with the rules and regulations of the Federal Communications Commission. This statement, FCC Form 340, Section VII, and the attached exhibits were prepared by me or under my direct supervision and are believe to be true and correct.

DATED: September 4, 2007



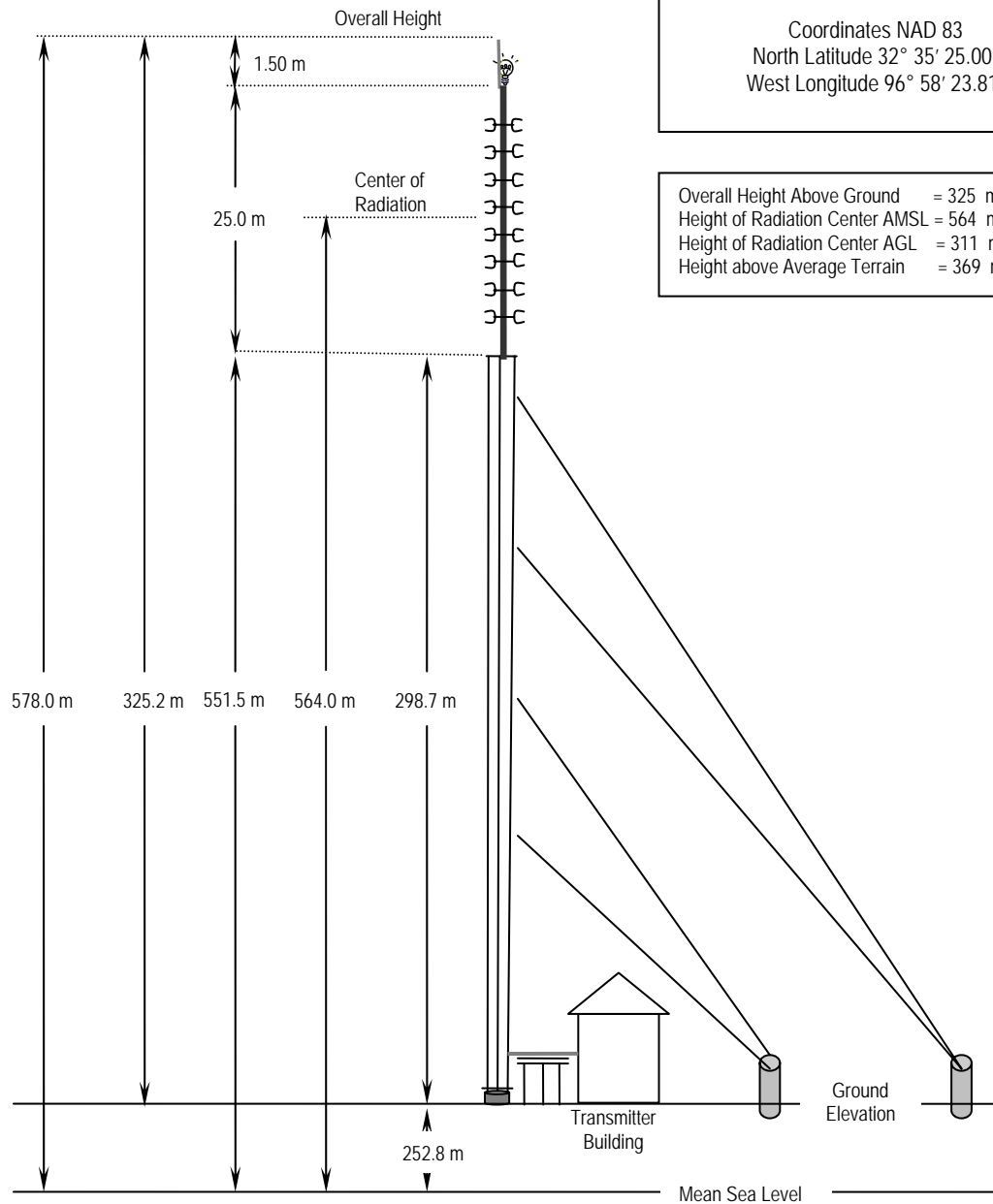
Carl E. Gluck

EXHIBIT 1

Not Drawn to Scale

Coordinates NAD 27
North Latitude 32° 35' 24.51"
West Longitude 96° 58' 22.79"

Coordinates NAD 83
North Latitude 32° 35' 25.00"
West Longitude 96° 58' 23.81"



VERTICAL PLAN ANTENNA SKETCH
KVTB FM Dallas, TX
91.7 MHz – 75 kW ERP
September 2007

Carl E. Gluck

ERP = 75 kW
Channel = 219

Azimuth Deg.T.	Ave. Elev. 3 to 16 km Meters AMSL	Effective Antenna Height Meters AAT	ERP (dBk)	F(50-50) Distance to 60 dBu Contour km
0	153.5	410.5	18.751	77.56
10	181.8	382.2	18.751	75.49
20	213.5	350.5	18.751	73.19
30	214.7	349.3	18.751	73.10
40	209.7	354.3	18.751	73.46
50	202.9	361.1	18.751	73.96
60	203.2	360.8	18.751	73.94
70	204.8	359.2	18.751	73.82
80	198.4	365.6	18.751	74.29
90	203.3	360.7	18.751	73.93
100	217.1	346.9	18.751	72.93
110	215.4	348.6	18.751	73.05
120	207.8	356.2	18.751	73.60
130	205.9	358.1	18.751	73.74
140	212.2	351.8	18.751	73.28
150	227.4	336.6	18.751	72.18
160	227.7	336.3	18.751	72.16
170	227.5	336.5	18.751	72.17
180	235.9	328.1	18.751	71.56
190	240.3	323.7	18.751	71.23
200	213.6	350.4	18.751	73.18
210	199.2	364.8	18.751	74.23
220	187.8	376.2	18.751	75.05
230	176.6	387.4	18.751	75.86
240	175.8	388.2	18.751	75.92
250	175.5	388.5	18.751	75.94
260	175.5	388.5	18.751	75.94
270	172.2	391.8	18.751	76.18
280	177.3	386.7	18.751	75.81
290	174.2	389.8	18.751	76.03
300	172.1	391.9	18.751	76.19
310	169.8	394.2	18.751	76.35
320	167.4	396.6	18.751	76.53
330	163.0	401.0	18.751	76.86
340	156.9	407.1	18.751	77.31
350	152.3	411.7	18.751	77.65
Ave. = 194.8 M		369.2 M		

Antenna Radiation Center AMSL = 564
NED 03 SEC

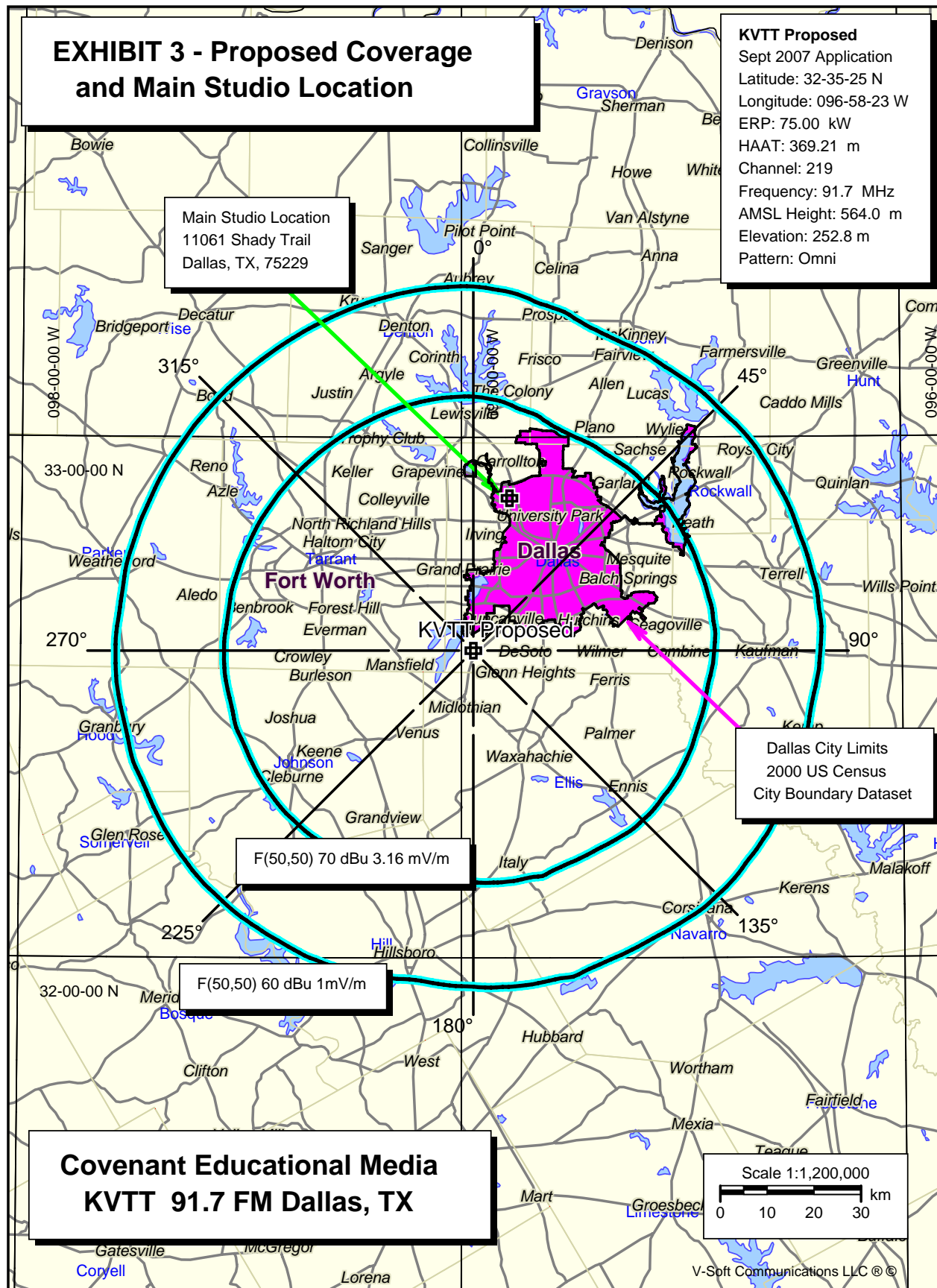
Geographic Coordinates:

N. Lat. 323525.0
W. Lng. 965823.0

EXHIBIT 3 - Proposed Coverage and Main Studio Location

KVTT Proposed
 Sept 2007 Application
 Latitude: 32-35-25 N
 Longitude: 096-58-23 W
 ERP: 75.00 kW
 HAAT: 369.21 m
 Channel: 219
 Frequency: 91.7 MHz
 AMSL Height: 564.0 m
 Elevation: 252.8 m
 Pattern: Omni

Main Studio Location
 11061 Shady Trail
 Dallas, TX, 75229



Dallas City Limits
 2000 US Census
 City Boundary Dataset

F(50,50) 70 dBu 3.16 mV/m

F(50,50) 60 dBu 1mV/m

Covenant Educational Media
KVTT 91.7 FM Dallas, TX

Scale 1:1,200,000
 0 10 20 30 km

V-Soft Communications LLC ©

EXHIBIT 4, Carl E. Gluck, Sept 2007

Covenant Educational Media, Inc.

REFERENCE CH# 219C0 - 91.7 MHz, Pwr= 75 kW, HAAT= 369.2 M, COR= 564 M
32 35 25.0 N.
96 58 23.0 W.
Average Protected F(50-50)= 74.54 km

DISPLAY DATES
DATA 08-31-07
SEARCH 08-31-07

CH CITY	CALL	TYPE ANT STATE	AZI <--	DIST FILE #	LAT LNG	PWR(kW) HAAT(M)	INT(km) COR(M)	PRO(km) LICENSEE	*IN* (Overlap in km)	*OUT*
219C Dallas	KVTT	LIC _C_ TX	0.0 0.0	0.00 BLED20000410ABF	32 35 25.0 96 58 23.0	100.000 335	181.2 534	78.3 Covenant Educational Media	-258.76*	-255.42*
06+2C Temple	KCENTV	LI _HY TX	189.1 9.0	147.89 BLCT19811231KH	31 16 24.0 97 13 14.0	100.000 573	756	126.8 Channel 6, Inc.	154.0R	-6.2M
218A Denison	KYFB	LIC _CX TX	16.8 197.1	129.04 BLED20070220ABF	33 42 10.0 96 34 05.0	4.500 67	29.3 276	20.0 Bible Broadcasting Network	25.74	0.37
220A Calisburg	KPFC	LIC DCN TX	358.2 178.2	119.77 BLED19980427KA	33 40 11.0 97 00 50.0	0.300 20	4.8 258	3.4 Camp Sweeney	37.35	1.61
217C Decatur	KDKR	APP ZEX TX	328.2 147.9	104.26 BMPED20070814AAM	33 23 12.0 97 33 57.0	100.000 544	12.6 826	88.2 Csn International	14.85	5.31
217C Decatur	KDKR	CP DEX TX	328.2 147.9	104.26 BPED20040719AAM	33 23 12.0 97 33 57.0	57.000 544	10.9 826	83.5 Csn International	16.52	10.02
221A Farmersville	KXEZ«	LIC _C_ TX	36.4 216.8	94.77 BLH20050304AAF	33 16 31.0 96 22 02.0	1.950 178	2.5 360	29.7 Metro Broadcasters - Texas	19.20	55.01
221C1 Glen Rose	KTFW-FM«	LIC NCN TX	250.7 70.1	104.72 BLH19990429KC	32 16 31.0 98 01 22.0	25.000 432	8.0 757	70.2 Lkcm Radio Group, L.p.	20.70	23.94
219A Brownwood	KHPU	LIC _C_ TX	244.0 62.9	215.05 BLED19980724KG	31 43 32.0 99 00 49.0	0.290 174	57.6 624	18.4 Howard Payne University	81.61	21.46
217C2 Decatur	KDKR	LIC _VN TX	328.2 147.9	104.26 BLED19980624KA	33 23 12.0 97 33 57.0	21.000 172	5.0 455	47.1 Csn International	22.42	46.46
218C1 Madisonville	KHML	LIC _CX TX	149.4 329.9	190.36 BLED20070607ACN	31 06 39.6 95 57 08.6	95.000 104	78.4 201	49.3 Houston Christian Broadcas	39.75	35.98
220A Durant	KSSU	LIC _C_ OK	20.6 200.9	168.75 BLED20000815AAA	34 00 45.0 96 19 45.0	1.500 104	30.6 300	20.8 Southeastern Oklahoma Stat	64.97	41.08
273C1 Hillsboro	KBRQ«	LIC ZC_ TX	191.7 11.6	86.88 BLH20010802AAW	31 49 23.0 97 09 35.0	100.000 137	0.0 305	0.0 Clear Channel Broadcasting	36.5R	50.4M
217A Commerce	KYJC	LIC _HX TX	53.5 234.1	126.15 BLED20050511ABA	33 15 37.0 95 52 59.0	0.350 53	1.3 212	10.1 Csn International, Inc.	50.68	105.80
219A Brady	VA0199	VAC __N TX	234.7 53.4	275.64	31 08 06.0 99 20 04.0	6.000 100	87.9 641	29.3	111.82	71.08

International Class A with respect to Mexico. A noncommercial educational application filed for this allotment which meets the spacing requirements of Section 73.207 with respect to Mexican stations and allotments, and which do not propose an ERP in excess of 3.0 kW or facilities in excess of 3.0 kW ERP at 100 meters HAAT (or the equivalent), may be granted without obtaining Mexican concurrence prior to grant.

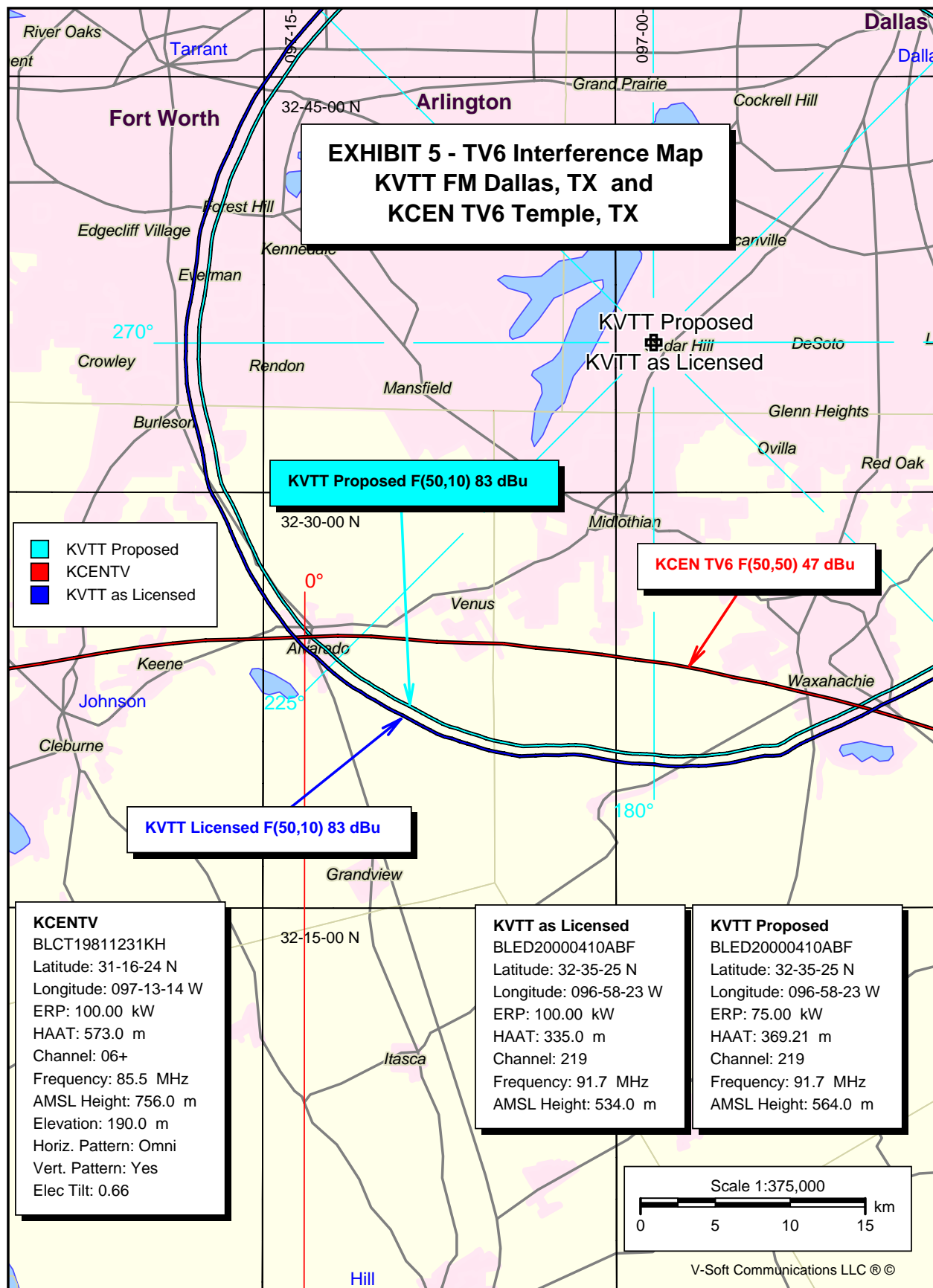
Terrain database is NED 03 SEC

ERP and HAAT are on direct line to and from reference station.

Ant Column: (D= DA Standard, Z= DA 73.215, N= Not DA 73.215, _= Omni), Polarization (C,H,V,E), Beamtilt(Y,N,X)

***affixed to 'IN' or 'OUT' values = site inside protected contour.

"«" = Station meets FCC minimum distance spacing for its class.



KVTT FM was first licensed on January 10, 1980, BLED19781012AH

Carl E. Gluck, September 2007