

EXHIBIT 28  
(Page 1 of 7)

CONTOUR PROTECTION  
Bryan Broadcasting License Subsidiary, Inc.  
College Station, TX

The proposed KTSR facilities will be short spaced to the transmitter site specified in the pending application (BPH-19990225IF) for a construction permit to modify the operating facilities of KYKR - Beaumont, Texas. The KYKR application proposes a “one step” upgrade from Channel 236C1 to Channel 236C from a site which is short spaced to the present KTSR construction permit site and also to two other stations, pursuant to the provisions of Section 73.215 of the FCC Rules. KYKR has identified, however, an allotment reference site for Channel 236C in Beaumont which fully complies with the spacing requirements to all other stations requiring protection consideration. It should be noted that the proposed KTSR transmitter site also complies with the separation requirements outlined in Section 73.207 of the FCC Rules to this allotment reference site.

The short spacing to the KYKR application site is permitted under Section 73.215 of the FCC Rules so long as the required contour protection is provided to the proposed KYKR facilities. It should be noted that the separation between the proposed KTSR facilities and the KYKR application site complies with the table contained in Section 73.215(e) of the FCC Rules which specifies the minimum separation at which contour protection may be employed. Since KYKR operates on the same channel as the proposed KTSR facilities, Section 73.215(a) of the FCC Rules states that no overlap is permitted between the 40 dBu contour for the proposed KYKR facilities and the 60 dBu contour for the proposed KTSR facilities. Furthermore, there can be no overlap between the proposed KTSR 40 dBu contour and the proposed KYKR 60 dBu contour.

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Pursuant to Section 73.215(b)(2)(iii) of the FCC Rules, the contour projections for KYKR are based on the actual proposed operating facilities, since this application has requested processing pursuant to Section 73.215 of the FCC Rules. Terrain data from the NGDC 30 second terrain database was used in projecting the KYKR contours. Tables 28.0(a) and 28.0(b) present the contour projections for KYKR. Tables 28.1(a) and 28.1(b) present the contour projections for the proposed KTSR facilities. These contours were projected using the actual proposed operating facilities and terrain data extracted from the NGDC 30 second terrain database. Figure 28.0 shows all of these contours on an appropriate map base. As can be seen from this figure, the proposed KTSR facilities will provide the required contour protection to the facilities proposed in the KYKR application.

KYKR(APP) CH236C  
60.0 dBu CONTOUR  
(F(50,50) Curves Utilized)

BEARING (Degrees)	AVERAGE TERRAIN ELEVATION (meters)	ANTENNA HAAT (meters)	HORIZONTAL ERP (dBk)      (kW)		DISTANCE TO CONTOUR (km)
0.0 *	7.1	321.9	20.00	100.000	74.0
10.0	6.7	322.3	20.00	100.000	74.0
20.0	6.4	322.6	20.00	100.000	74.1
30.0	6.1	322.9	20.00	100.000	74.1
40.0	6.1	322.9	20.00	100.000	74.1
45.0 *	6.1	322.9	20.00	100.000	74.1
50.0	6.1	322.9	20.00	100.000	74.1
60.0	6.1	322.9	20.00	100.000	74.1
70.0	4.8	324.2	20.00	100.000	74.2
80.0	2.8	326.2	20.00	100.000	74.3
90.0 *	1.2	327.8	20.00	100.000	74.5
100.0	0.6	328.4	20.00	100.000	74.5
110.0	0.2	328.8	20.00	100.000	74.5
120.0	0.3	328.7	20.00	100.000	74.5
130.0	0.3	328.7	20.00	100.000	74.5
135.0 *	0.2	328.8	20.00	100.000	74.5
140.0	0.1	328.9	20.00	100.000	74.5
150.0	0.1	328.9	20.00	100.000	74.5
160.0	0.3	328.7	20.00	100.000	74.5
170.0	0.0	329.0	20.00	100.000	74.5
180.0 *	0.2	328.8	20.00	100.000	74.5
190.0	0.5	328.5	20.00	100.000	74.5
200.0	0.3	328.7	20.00	100.000	74.5
210.0	1.0	328.0	20.00	100.000	74.5
220.0	1.7	327.3	20.00	100.000	74.4
225.0 *	1.3	327.7	20.00	100.000	74.4
230.0	1.2	327.8	20.00	100.000	74.5
240.0	1.4	327.6	20.00	100.000	74.4
250.0	1.5	327.5	20.00	100.000	74.4
260.0	1.4	327.6	20.00	100.000	74.4
270.0 *	0.7	328.3	20.00	100.000	74.5
280.0	0.0	329.0	20.00	100.000	74.5
290.0	0.0	329.0	20.00	100.000	74.5
300.0	2.0	327.0	20.00	100.000	74.4
310.0	4.1	324.9	20.00	100.000	74.2
315.0 *	5.1	323.9	20.00	100.000	74.2
320.0	5.2	323.8	20.00	100.000	74.2
330.0	5.9	323.1	20.00	100.000	74.1
340.0	6.1	322.9	20.00	100.000	74.1
350.0	7.0	322.0	20.00	100.000	74.0

AVERAGE(\*) = 2.7 meters

TABLE 28.0(a)

KYKR(APP.) PREDICTED  
60 dBu CONTOUR

Bryan Broadcasting License Subsidiary, Inc.  
College Station, TX

KYKR(APP) CH236C  
40.0 dBu CONTOUR  
(F(50,10) Curves Utilized)

BEARING (Degrees)	AVERAGE TERRAIN ELEVATION (meters)	ANTENNA HAAT (meters)	HORIZONTAL ERP (dBk) (kW)		DISTANCE TO CONTOUR (km)
0.0 *	7.1	321.9	20.00	100.000	174.5
10.0	6.7	322.3	20.00	100.000	174.6
20.0	6.4	322.6	20.00	100.000	174.6
30.0	6.1	322.9	20.00	100.000	174.6
40.0	6.1	322.9	20.00	100.000	174.6
45.0 *	6.1	322.9	20.00	100.000	174.6
50.0	6.1	322.9	20.00	100.000	174.6
60.0	6.1	322.9	20.00	100.000	174.6
70.0	4.8	324.2	20.00	100.000	174.8
80.0	2.8	326.2	20.00	100.000	175.1
90.0 *	1.2	327.8	20.00	100.000	175.3
100.0	0.6	328.4	20.00	100.000	175.3
110.0	0.2	328.8	20.00	100.000	175.4
120.0	0.3	328.7	20.00	100.000	175.4
130.0	0.3	328.7	20.00	100.000	175.4
135.0 *	0.2	328.8	20.00	100.000	175.4
140.0	0.1	328.9	20.00	100.000	175.4
150.0	0.1	328.9	20.00	100.000	175.4
160.0	0.3	328.7	20.00	100.000	175.4
170.0	0.0	329.0	20.00	100.000	175.4
180.0 *	0.2	328.8	20.00	100.000	175.4
190.0	0.5	328.5	20.00	100.000	175.3
200.0	0.3	328.7	20.00	100.000	175.4
210.0	1.0	328.0	20.00	100.000	175.3
220.0	1.7	327.3	20.00	100.000	175.2
225.0 *	1.3	327.7	20.00	100.000	175.3
230.0	1.2	327.8	20.00	100.000	175.3
240.0	1.4	327.6	20.00	100.000	175.2
250.0	1.5	327.5	20.00	100.000	175.2
260.0	1.4	327.6	20.00	100.000	175.2
270.0 *	0.7	328.3	20.00	100.000	175.3
280.0	0.0	329.0	20.00	100.000	175.4
290.0	0.0	329.0	20.00	100.000	175.4
300.0	2.0	327.0	20.00	100.000	175.2
310.0	4.1	324.9	20.00	100.000	174.9
315.0 *	5.1	323.9	20.00	100.000	174.8
320.0	5.2	323.8	20.00	100.000	174.8
330.0	5.9	323.1	20.00	100.000	174.7
340.0	6.1	322.9	20.00	100.000	174.6
350.0	7.0	322.0	20.00	100.000	174.5

AVERAGE(\*) = 2.7 meters

TABLE 28.0(b)

KYKR(APP.) PREDICTED  
40 dBu CONTOUR

Bryan Broadcasting License Subsidiary, Inc.  
College Station, TX

KTSR (CP MOD) CH236C2  
60.0 dBu CONTOUR  
(F(50,50) Curves Utilized)

BEARING (Degrees)	AVERAGE TERRAIN ELEVATION (meters)	ANTENNA HAAT (meters)	HORIZONTAL ERP (dBk)      (kW)		DISTANCE TO CONTOUR (km)
0.0 *	107.6	156.0	15.59	36.190	50.1
10.0	110.2	153.4	15.59	36.190	49.7
20.0	101.9	161.7	15.59	36.190	50.8
30.0	100.5	163.1	15.59	36.190	51.0
40.0	101.1	162.5	15.59	36.190	50.9
45.0 *	99.8	163.8	15.59	36.190	51.0
50.0	100.3	163.3	15.59	36.190	51.0
60.0	97.8	165.8	15.59	36.190	51.3
70.0	96.1	167.5	15.59	36.190	51.5
80.0	97.1	166.5	15.59	36.190	51.3
90.0 *	97.6	166.0	15.59	36.190	51.3
100.0	95.1	168.5	15.59	36.190	51.6
110.0	93.0	170.6	15.59	36.190	51.8
120.0	92.7	170.9	15.59	36.190	51.8
130.0	97.4	166.2	15.59	36.190	51.3
135.0 *	99.8	163.8	15.59	36.190	51.0
140.0	98.9	164.7	15.59	36.190	51.1
150.0	94.4	169.2	15.59	36.190	51.6
160.0	88.5	175.1	15.59	36.190	52.3
170.0	81.2	182.4	15.59	36.190	52.9
180.0 *	71.2	192.4	15.59	36.190	53.8
190.0	70.9	192.7	15.59	36.190	53.8
200.0	69.9	193.7	15.59	36.190	53.9
210.0	69.6	194.0	15.59	36.190	53.9
220.0	70.5	193.1	15.59	36.190	53.8
225.0 *	72.1	191.5	15.59	36.190	53.7
230.0	73.9	189.7	15.59	36.190	53.6
240.0	72.9	190.7	15.59	36.190	53.6
250.0	73.5	190.1	15.59	36.190	53.6
260.0	74.8	188.8	15.59	36.190	53.5
270.0 *	76.8	186.8	15.59	36.190	53.3
280.0	76.7	186.9	15.59	36.190	53.3
290.0	78.0	185.6	15.59	36.190	53.2
300.0	78.2	185.4	15.59	36.190	53.2
310.0	83.9	179.7	15.59	36.190	52.7
315.0 *	88.4	175.2	15.59	36.190	52.3
320.0	91.4	172.2	15.59	36.190	52.0
330.0	96.2	167.4	15.59	36.190	51.5
340.0	101.4	162.2	15.59	36.190	50.8
350.0	104.7	158.9	15.59	36.190	50.5

AVERAGE(\*) = 89.2 meters

TABLE 28.1(a)

KTSR PROPOSED  
60 dBu CONTOUR

Bryan Broadcasting License Subsidiary, Inc.  
College Station, TX

KTSR (CP MOD) CH236C2  
40.0 dBu CONTOUR  
(F(50,10) Curves Utilized)

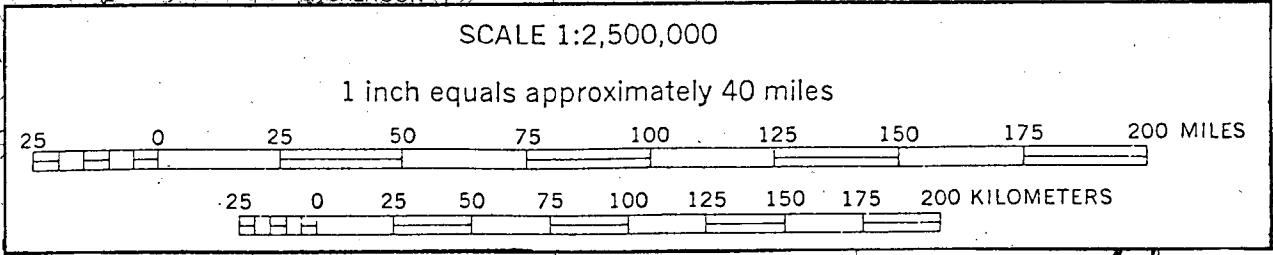
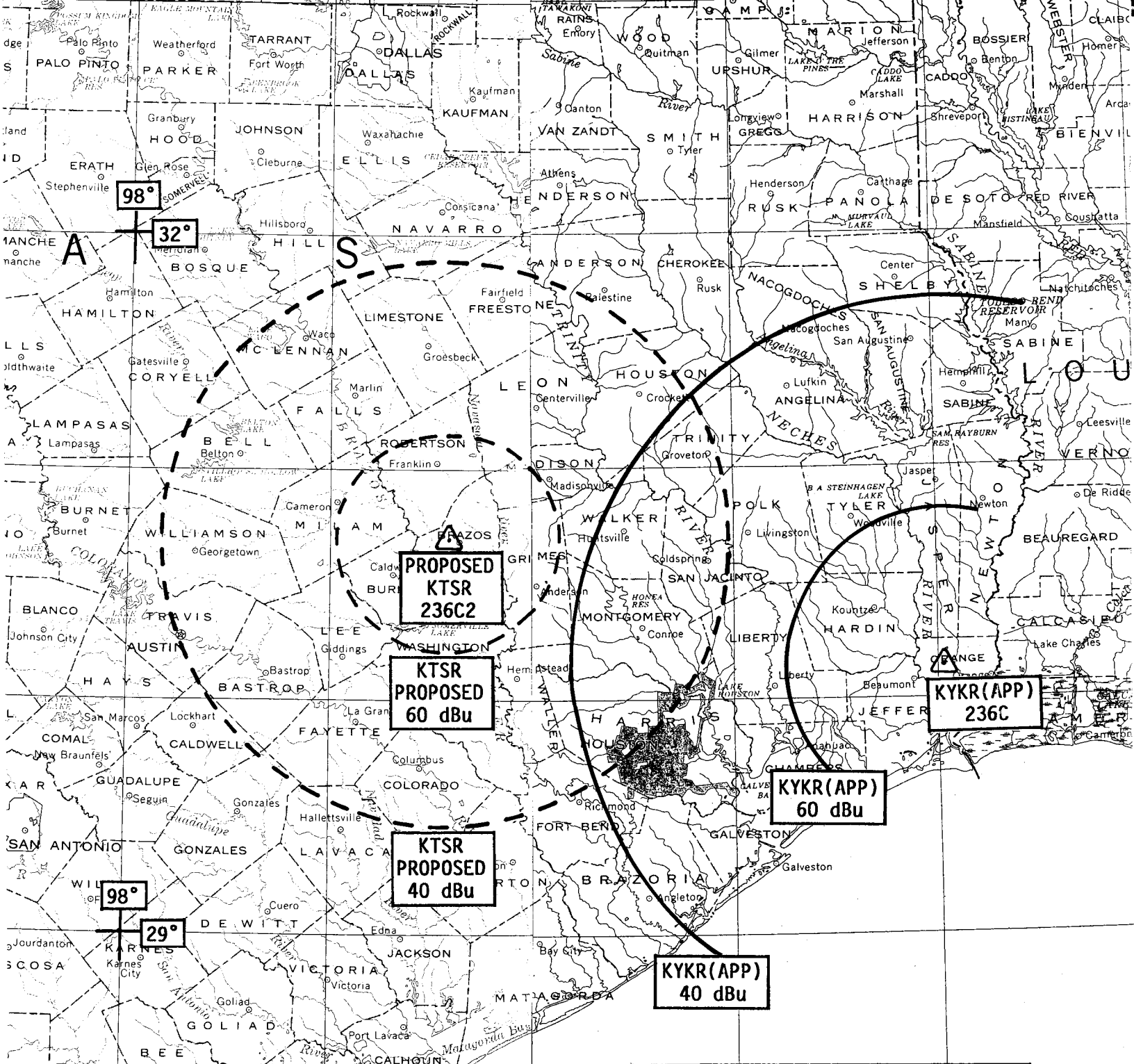
BEARING (Degrees)	AVERAGE TERRAIN ELEVATION (meters)	ANTENNA HAAT (meters)	HORIZONTAL ERP (dBk)      (kW)		DISTANCE TO CONTOUR (km)
0.0 *	107.6	156.0	15.59	36.190	131.4
10.0	110.2	153.4	15.59	36.190	131.0
20.0	101.9	161.7	15.59	36.190	132.2
30.0	100.5	163.1	15.59	36.190	132.3
40.0	101.1	162.5	15.59	36.190	132.3
45.0 *	99.8	163.8	15.59	36.190	132.4
50.0	100.3	163.3	15.59	36.190	132.4
60.0	97.8	165.8	15.59	36.190	132.7
70.0	96.1	167.5	15.59	36.190	132.9
80.0	97.1	166.5	15.59	36.190	132.8
90.0 *	97.6	166.0	15.59	36.190	132.7
100.0	95.1	168.5	15.59	36.190	133.0
110.0	93.0	170.6	15.59	36.190	133.3
120.0	92.7	170.9	15.59	36.190	133.3
130.0	97.4	166.2	15.59	36.190	132.7
135.0 *	99.8	163.8	15.59	36.190	132.4
140.0	98.9	164.7	15.59	36.190	132.5
150.0	94.4	169.2	15.59	36.190	133.1
160.0	88.5	175.1	15.59	36.190	133.9
170.0	81.2	182.4	15.59	36.190	134.8
180.0 *	71.2	192.4	15.59	36.190	136.0
190.0	70.9	192.7	15.59	36.190	136.0
200.0	69.9	193.7	15.59	36.190	136.1
210.0	69.6	194.0	15.59	36.190	136.2
220.0	70.5	193.1	15.59	36.190	136.0
225.0 *	72.1	191.5	15.59	36.190	135.9
230.0	73.9	189.7	15.59	36.190	135.6
240.0	72.9	190.7	15.59	36.190	135.8
250.0	73.5	190.1	15.59	36.190	135.7
260.0	74.8	188.8	15.59	36.190	135.5
270.0 *	76.8	186.8	15.59	36.190	135.3
280.0	76.7	186.9	15.59	36.190	135.3
290.0	78.0	185.6	15.59	36.190	135.1
300.0	78.2	185.4	15.59	36.190	135.1
310.0	83.9	179.7	15.59	36.190	134.4
315.0 *	88.4	175.2	15.59	36.190	133.9
320.0	91.4	172.2	15.59	36.190	133.5
330.0	96.2	167.4	15.59	36.190	132.9
340.0	101.4	162.2	15.59	36.190	132.2
350.0	104.7	158.9	15.59	36.190	131.8

AVERAGE(\*) = 89.2 meters

TABLE 28.1(b)

KTSR PROPOSED  
40 dBu CONTOUR

Bryan Broadcasting License Subsidiary, Inc.  
College Station, TX



**CARL E. SMITH CONSULTING ENGINEERS**  
 2324 N. CLEVE-MASS RD., BOX 807  
 BATH, OHIO 44210-0807  
 330/659-4440

**FIG. 28.0**

**FM ALLOCATION STUDY  
 TOWARD KYKR(APP) - BEAUMONT, TX**

Bryan Broadcasting License Subsidiary, Inc.  
 College Station, TX