

**Section 74.1204 - Statement of Compliance**  
**AM Revitalization 250-Mile Window Application**  
**K228FC, Kingsville, TX to Houston, TX, Channel 277**  
**FM Translator Facility ID. 138173**  
**July, 2016**

The Applicant proposes to modify the above-referenced, non-reserved band, FM translator authorization pursuant to the announced “*Second FM translator application modification window for AM stations to modify and/or relocate FM translator stations (Second Modification Window)*”.<sup>1</sup> The FM translator will relocate, change frequency and rebroadcast Class B AM station KNTH(AM), Houston, TX (Facility ID 61174). As discussed below, the instant proposal complies with the protection requirements set forth in Section 74.1204 of the FCC Rules.

Section 74.1204(a) Contour Overlap Protection Criteria

Attached are two maps which demonstrate that proposed technical facility complies with the contour overlap provisions of Section 74.1204(a) of the FCC Rules with respect to all pertinent cochannel (See Exhibit 1) and first-adjacent channel (See Exhibit 2) assignments, authorizations and applications. The instant proposal is well clear of all other relevant co-channel and first-adjacent channel protection considerations not represented herein.

Section 74.1204(d) Second/Third-Adjacent Channel Protection

Attached is a map (See Exhibit 2) which demonstrate that proposed technical facility complies with the contour overlap provisions of Section 74.1204(a) of the FCC Rules with respect to second-adjacent channel station KHJK(FM), La Porte, TX (Channel 279C). The required protection to second-adjacent channel station KLTN(FM), Houston, TX (Channel 275C0) is discussed below. The instant proposal is well clear of all other relevant second and third-adjacent channel protection considerations not represented herein.

The proposed transmitting antenna will be located within the protected contour of KLTN(FM) resulting in contour overlap as defined in Section 74.1204 of the FCC Rules. However, at the translator’s proposed transmitter site, KLTN(FM) is predicted to produce an F(50,50) signal strength of 81 dBu. Therefore, in the vicinity of the second-adjacent channel translator station, the translator’s relevant interfering contour is the 121 dBu contour relative to KLTN(FM). According to free space calculations, the translator’s

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<sup>1</sup> See FCC Public Notice (DA 1491), *Media Bureau Announces Filing Dates and Procedures for AM Station Filing Window for FM Translator Modifications and Availability of FM Translator Technical Tools*, Released December 23, 2015.

predicted interfering contour will extend only 97.4 meters from the proposed transmit antenna. Because the proposed transmit antenna will be located 155 meters above ground level, the predicted interference area will neither reach ground level nor reach any people. Therefore, the proposed minor change will cause no interference to any population served by KLTN(FM).

Accordingly, the proposed facility satisfies Section 74.1204(d) of the FCC Rules because it has been “demonstrated that no actual interference will occur due to lack of population or such other factors as may be applicable”.

# Section 74.1204 CoChannel Contour Overlap Study

Exhibit 1

July, 2016

## Key to Stations on Map

- APP.277D.FAC.ID.138173
- LPFMAPP.277L1.FAC.ID.197148
- KJOJ-FM.CP.277C.FAC.ID.69565
- KJOJ-FM.277C.FAC.ID.69565

### APP.277D.FAC.ID.138173

Houston, TX  
Latitude: 29-59-34.20 N  
Longitude: 095-28-17.20 W  
ERP: 0.25 kW  
Channel: 277  
Frequency: 103.3 MHz  
AMSL Height: 190.0 m  
Horiz. Pattern: Directional

## Section 74.1204 Contours

### Proposed FX Interfering Contour (DASHED):

- 40 dBu F(50,10) to Class A & FX & LPFM
- 37 dBu F(50,10) to Class B1 FM Station
- 34 dBu F(50,10) to Class B FM Station

### Relevant Protected Contours (SOLID):

- Class A & FX & LPFM = 60 dBu F(50,50)
- Class B1 FM Station = 57 dBu F(50,50)
- Class B FM Station = 54 dBu F(50,50)

Scale 1:1,125,000

0 10 20 30 km

Section 74.1204 First-Adjacent  
Channel Contour Overlap Study

Exhibit 2

July, 2016

Key to Stations on Map

- APP.277D.FAC.ID.138173
- KCYBLP.278L1.FAC.ID.193417
- KYBYLP.278L1.FAC.ID.192989

APP.277D.FAC.ID.138173

Houston, TX  
Latitude: 29-59-34.20 N  
Longitude: 095-28-17.20 W  
ERP: 0.25 kW  
Channel: 277  
Frequency: 103.3 MHz  
AMSL Height: 190.0 m  
Horiz. Pattern: Directional

KYBYLP.278L1.FAC.ID.192989

KCYBLP.278L1.FAC.ID.193417

APP.277D.FAC.ID.138173

Section 74.1204 Contours

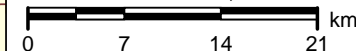
Proposed FX Interfering Contour (DASHED):

54 dBu F(50,10) to Class A & FX & LPFM  
51 dBu F(50,10) to Class B1 FM Station  
48 dBu F(50,10) to Class B FM Station

Relevant Protected Contours (SOLID):

Class A & FX & LPFM = 60 dBu F(50,50)  
Class B1 FM Station = 57 dBu F(50,50)  
Class B FM Station = 54 dBu F(50,50)

Scale 1:547,917



Section 74.1204 2nd & 3rd Adjacent  
Channel Contour Overlap Study

Exhibit 3

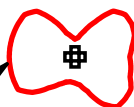
July, 2016

Key to Stations on Map

- APP.277D.FAC.ID.138173
- KHJK.279C.FAC.ID.48676

**APP.277D.FAC.ID.138173**

Houston, TX  
Latitude: 29-59-34.20 N  
Longitude: 095-28-17.20 W  
ERP: 0.25 kW  
Channel: 277  
Frequency: 103.3 MHz  
AMSL Height: 190.0 m  
Horiz. Pattern: Directional



Section 74.1204 Contours

Proposed FX Interfering Contour (SMALL):  
100 dBu F(50,10) to Class A & FX & LPFM  
97 dBu F(50,10) to Class B1 FM Station  
94 dBu F(50,10) to Class B FM Station

Relevant Protected Contours (SOLID):  
Class A & FX & LPFM = 60 dBu F(50,50)  
Class B1 FM Station = 57 dBu F(50,50)  
Class B FM Station = 54 dBu F(50,50)