

NARRATIVE

This firm has been retained by the applicant in the matter of KTOV-LP, Corpus Christi, TX, facility upgrade (BMJO-000804ADC), to review the allocation study on which the cited application was based. At the request of counsel, we repeated the allocation study and also recommended other minor modifications to the proposal to correct deficiencies. The remainder of this Narrative will examine the allocation study item by item.

1. XHABTV, Matamoros, TA. Applicant proposes a directional antenna which protects this international application and also maintains radiated field strength towards the border to less than 1.0 kw over an arc from 160 degrees to 255 degrees, true (see attached exhibit, "Maximum ERP with regard to protections").

2. KCPV-LP, Victoria, TX, CP. Clears by minus offset.

3. New Application, Victoria, TX. Clears by minus offset.

4. KTBC, Austin, TX, licensed. Clears by plus offset.

5. K07TS, Falfurrias, TX, licensed. Deleted.

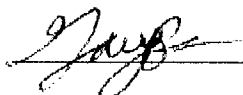
6. KJLF-LP, San Antonio, TX, licensed. Clears.

7. KHII, Corpus Christi, TX, application for DT channel, first adjacent. Deleted.

8. KTMV-LP, Corpus Christi, TX, licensed, first adjacent. Contour-protected by the directional antenna proposed.

The information provided in this report is true and correct according to my knowledge and belief. My qualifications are a matter of record with the FCC.

May 16, 2001



Gary O. Keener



Paradigm Associates, Inc.

TECHNICAL NARRATIVE

KTOV-LP
Corpus Christi,
TX

05-16-2001

John Furr & Associates Inc.

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TV Study for: KTOV-LP FCC Data Base Date: 4/2001 27-47-47

Location: CORPUS CHRISTI, TX ZONE: 3 LPTV 97-23-48

LPTV Facilities used as assumption: 98 HAAT 3.000 ERP

CALL	LOCATION	CHANNEL	ERP:KW(DA)	LATITUDE	DISTANCE	REQUIRED
STATUS	STATE	ZONE	HAAT	LONGITUDE	BEARING	CLEAR (km)

>>>>>>> Study For Channel: 7 <<<<<<<<

LPTV Market 121 km Separation is CLEAR

XHABTV	MATAMOROS, TX	7 Z	325.	26-03-30	198.6	321.3	[+0]
APP TV	-	ZONE:2	317	97-53-07	194.3	-122.7	SHORT*
KTOV-LP	F(50,10) 11 dBu = 224 km,	XHABTV	F(50,50) 56 dBu = 97 km				
KTOV-LP	F(50,10) 28 dBu = 129 km		Offset required 226: Separation				-27.5
KCPV-LP	VICTORIA, TX	7 -	Y	28-46-43	116.6	159.2	[+0]
CP TX	BPTT-000210ABS	ZONE:	0	96-58-09	21.0	-42.5	Short
KTOV-LP	F(50,10) 23 dBu = 156 km,	KCPV-LP	F(50,50) 68 dBu = 3 km*				
KTOV-LP	F(50,10) 40 dBu = 79 km		Offset required 82: Separation				+34.8
KTOV-LP	CORPUS CHRISTI, TX	7 N	3.00 Y	27-47-46	0.0	171.9	[+0]
APP TX	BMJP-000804ADC	ZONE:	96	97-23-47	138.2	-171.8	SHORT*
KTOV-LP	F(50,10) 23 dBu = 156 km,	KTOV-LP	F(50,50) 68 dBu = 16 km*				
KTOV-LP	F(50,10) 40 dBu = 79 km		Offset required 95: Separation				-94.5*
NEW	VICTORIA, TX	7 -	3.00	28-46-37	116.7	178.6	[+0]
APP TX	BNPT-000828BFX	ZONE:	160	96-57-45	21.3	-61.9	Short
KTOV-LP	F(50,10) 23 dBu = 156 km,	NEW	F(50,50) 68 dBu = 22 km				
KTOV-LP	F(50,10) 40 dBu = 79 km		Offset required 101: Separation				+15.5
KTBC	AUSTIN, TX	7 +	316.	30-18-36	281.2	326.6	[+0]
LIC TV	BLCT-870717KP	ZONE:3	384	97-47-33	352.2	-45.3	Short
KTOV-LP	F(50,10) 11 dBu = 224 km,	KTBC	F(50,50) 56 dBu = 102 km				
KTOV-LP	F(50,10) 28 dBu = 129 km		Offset required 231: Separation				+49.8
KTOV-LP	CORPUS CHRISTI, TX	7 N	.092 Y	27-47-46	0.0	159.2	[+0]
LIC TX	BLTV-910614JD	ZONE:	98	97-23-47	138.2	-159.1	SHORT*
KTOV-LP	F(50,10) 23 dBu = 156 km,	KTOV-LP	F(50,50) 68 dBu = 3 km*				
KTOV-LP	F(50,10) 40 dBu = 79 km		Offset required 82: Separation				-81.8*
K07TS	FALFURRIAS, TX	7 -	.070 Y	27-14-13	95.9	157.5	[+0]
LIC TX	BLTV-940324JH	ZONE:	42	98-08-14	229.9	-61.6	Short
KTOV-LP	F(50,10) 23 dBu = 156 km,	K07TS	F(50,50) 68 dBu = 1 km*				
KTOV-LP	F(50,10) 40 dBu = 79 km		Offset required 80: Separation				+15.7
KJLF-LP	SAN ANTONIO, TX	7 Z	.122 Y	29-18-04	194.3	160.4	[+0]
LIC TX	BLTV-980406JG	ZONE:	55	98-24-59	329.3	+34.0	Clear
KTOV-LP	F(50,10) 23 dBu = 156 km,	KJLF-LP	F(50,50) 68 dBu = 4 km*				
KTOV-LP	F(50,10) 40 dBu = 79 km		Offset required 83: Separation				+111.3
KIII	CORPUS CHRISTI, TX	8	160. Y	27-39-30	25.3	114.3	[+1]
APP TR	BPRM-000328AAX	ZONE:3	289	97-36-04	232.9	-89.0	SHORT*
KTOV-LP	F(50,50) 62 dBu = 27 km,	KIII	F(50,50) 56 dBu = 88 km*				



ALLOCATION STUDY

KTOV-LP
Corpus Christi,
TX