

ENGINEERING STATEMENT

JHT Ventures, Incorporated

Licensee: 1090 kHz at Bellville, Texas

Seeks: Change Transmitter Site and Make Changes
In Antenna System, Power

November, 2009

General Engineering Statement

This engineering statement was prepared on behalf of JHT Ventures, Inc. ("JHT"), licensee of AM station KNUZ (the "Station") (prior to call sign change) (1090 kHz, .250 kW, ND-D, Bellville, Texas) (FCC ID: 48653) which is currently not operating from its licensed facilities, but rather holds an extension to an STA (BESTA-20090904ADQ) which was granted on September 11, 2009 allowing the Station to operate from a temporary long wire type facility due to the loss of its licensed transmitter site in September, 2007. The station's previously licensed tower has been dismantled and the site is no longer available for use by JHT as the station's new licensee; therefore, with this application, JHT proposes to make changes in the Station's antenna locations, antenna system and power. NO changes are requested regarding the community of license.

The instant application seeks to relocate the Station's antenna site to approximately 14.1 km east of the licensed site on a bearing of 95.1° T. It proposes to install a two-tower directional antenna system with a nominal power of 10.0 kW using the same antenna constants both during Daytime and Critical Hours operation. Both Daytime and Critical Hours operations provide 5 mV/m contour service to 100% of the community of license, Bellville, Texas. No nighttime operation of the Station is proposed in the instant application.

The proposed operation provides adequate Critical Hours protection to both Class I-B station KAAV (1090 kHz, 50 kW, U, DA-N) at Little Rock, Arkansas (FCC ID: 33253) and WBAL (1090 kHz, 50 kW, U, DA-N) at Baltimore, Maryland (FCC ID: 65679). In addition, as proposed, the Station's pattern reduces previously licensed overlap to first adjacent stations KRLD (1080 kHz, 50 kW, ND-D) at Dallas, Texas (FCC ID: 58820) and KDRY (1100 kHz, 11 kW, ND-D) at Alamo Heights, Texas (FCC ID: 47666). Various exhibits are contained in Section III, Question: 10 (a) and (c) regarding these exhibits.

Proposed Transmitter Site / Antennas

JHT proposes to relocate the Station's antenna system to the address 43704 Harpers Church Road, Bellville, Texas 77418. The site is in rural Waller County, 3.29 km (2.04 miles) west of the intersection McKenzie Road and Harpers Church Road, on the south side of Harpers Church Road. The site is 14.04 km (8.7 miles) east of the center (courthouse square) of the Community of License, Bellville, Texas. The geographic co-ordinates of the center of the array are:

N 29° - 56' - 05"

W 96° - 06' - 47"

A two tower directional antenna system is proposed for the site utilizing series fed antennas 71.70° (180.0 feet) in height. A TOWAIR search was conducted at the appropriate FCC website. The search indicates the proposed antennas do not require FAA registration; therefore, no registration is included in this application. A copy of the TOWAIR determination is included in Section III, Question 10 (a).

Field Strength Readings Used In Determining Station Contours

Field strength distances for the Station's proposed facilities were determined in part, utilizing field strength readings from FCC approved SFTA site KY5XND. The test site was sought by Matthew Provenzano, licensee of AM station KYND at Cypress, Texas on behalf of KYND and granted by Commission staff on February 18, 2009 (a copy of the authorization letter is attached in the Exhibit: 1090 kHz Exhibit which is contained in Section III, Question: 10 (a)). The test site was originally intended to establish conductivity from the site for KYND and readings were taken on the station between February 23, 2009 and April 15, 2009. Under direction of this office, the test site was established on behalf of Mr. Provenzano and readings taken every 20 degrees throughout the compass. The test antenna was located at the permitted site which is 0.067 km north northeast the proposed center of the Station's array. Readings and determined conductivity are; therefore, useful in determining contours for the proposed Station's contours and were used for that purpose in the instant application.

Though KYND has yet to make use of the readings presented in the instant application, the data are used in the instant application with the express permission of KYND's licensee, Matthew Provenzano. KYND will also make use of the data in a future application to co-locate at the proposed site along with the Station on 1090 kHz (formerly KNUZ).

Interference Reduction to First Adjacent Station KRLD and KDRY

KRLD

As proposed in the instant application, the 10 kW directional facilities of 1090 kHz reduce grandfathered Daytime overlap to first adjacent stations KRLD (1080 kHz, 50 kW, ND-D), Dallas, Texas (FCC ID: 59820) and KDRY (1100 kHz, 11.0 kW, ND-D), Alamo Heights, Texas (FCC ID: 47666). With regards KRLD, there is no currently licensed overlap of the .5 mV/m contours of the two stations and none is proposed in the instant application. However, there is overlap between the 0.25 mV/m contour of KRLD and the presently licensed .5 mV/m contour of KNUZ as well as overlap of the KNUZ 9.25 mV/m and the 0.50 mV/m of KRLD. The instant application proposes a reduced amount of overlap between the .25 mV/m of KRLD and 1090 as shown in the exhibit below:

Licensed KRLD .5 mV/m vs 1090 kHz .25 mV/m

KRLD 0.25 mV/m Overlap with Licensed 1090 kHz 0.50 mV/m	-	837.62 sq km	10,592 persons*
KRLD 0.25 mV/m Overlap with Proposed 1090 kHz 0.50 mV/m	-	762.01 sq km	8,072 persons*

Overall Reduction in Overlap = 75.61 sq km = 9.03%

Licensed KRLD .25 mV/m vs 1090 kHz .5 mV/m

KRLD 0.50 mV/m Overlap with Licensed 1090 kHz 0.25 mV/m	-	115.23 sq km	432 persons*
1090 kHz Proposed 0.25 mV/m Overlap with KRLD .5 mV/m	-	0.00 sq km	0 persons*

Overall Reduction in Overlap = 115.23 sq km = 100.0 %

The improvements in grandfathered overlap amount to 9.% in the case of the overlap between the Daytime 0.25 mV/m of KRLD and the proposed 0.50 mV/m of 1090 kHz. In the case of the overlap between the proposed 1090 kHz 0.25 mV/m and the 0.5 mV/m of KRLD, the currently licensed overlap is completely eliminated; therefore, the improvement is 100%. Graphical Evidence of the above is contained in attached Exhibit: KRLD/1090, Pages: 1 and 2.

KDRY

As currently licensed, there is significant overlap between the 0.50 mV/m of both the licensed 1090 kHz at Bellville and KDRY (AM) at Alamo Heights, Texas. The instant proposal on 1090 kHz reduces the grandfathered overlap between the .50 mV/m contours of the two stations by more than 80% from the currently licensed situation. The proposal also reduces grandfathered overlap between the 0.25 of the proposed 1090 kHz facilities and KDRY by more than 78% and the overlap between the .25 mV /m of KDRY and the 0.25 mV/m of the proposed 1090 operation by more than 13 %, all as show in the exhibit below:

Licensed KDRY .5 mV/m vs 1090 kHz .5 mV/m

KDRY .50 mV/m Overlap with Licensed 1090 kHz .50 mV/m	-	1,679.27 sq km	25,098 persons*
KDRY .50 mV/m Overlap with Proposed 1090 kHz .50 mV/m	-	328.20 sq km	4,758 persons*

Overall Reduction in Overlap = 1,351.07 sq km = 80.5 %

Licensed KDRY .5 mV/m vs 1090 kHz .25 mV/m

KDRY .50 mV/m Overlap with Licensed 1090 kHz 0.25 mV/m	-	2,460.42 sq km	31,165 persons*
KDRY .50 mV/m Overlap with Proposed 1090 kHz 0.25 mV/m	-	819.16 sq km	15,562 persons*

Overall Reduction in Overlap = 1,649.96 sq km = 66.7 %

Licensed KDRY .25 mV/m vs Proposed 1090 kHz .5 mV/m

KDRY .25 mV/m Overlap with Licensed 1090 kHz .50 mV/m - 4,946.64 sq km 55,396 persons*

KDRY .25 mV/m Overlap with Proposed 1090 kHz .50 mV/m - 4,277.01 sq km 26,701 persons*

Overall Reduction in Overlap = 696.63 sq km = 13.5 %

* Note: Data taken from U.S. Census 2000 population census

In sum, the previously licensed or “grandfathered” overlap between KRLD, KDRY respectively and 1090 kHz in Bellville is dramatically reduced by the instant proposal while providing improved service to the listening area of the 1090 kHz allocation.

Expedited Consideration

JHT, both with this filing and under separate cover, respectfully asks for Expedited Consideration of this application. The Station has either been silent or operating under STA with a very limited facilities for a number of years. The Station’s previously licensed transmitter site is not available to JHT. Indeed, tower, transmitter building, and all related equipment was long ago removed by the landlord of the previous licensee. The recent history of the license of the Station is replete with examples of the community’s frustration that the station has been in a limited condition or off the air altogether.

JHT stands ready to construct the facilities requested in this application as soon as they are granted and to return the Station to the air at the earliest possible date. Beyond the Commission’s construction permit, no additional state or local authorizations are required and the antennas do not require FAA notification or registration with the Commission. Therefore, construction of the requested facilities can commence as soon as a construction permit is granted.

Respectfully submitted,



Bob Morrow, Technical Consultant
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