

Section 74.1204 - Statement of Compliance
K241CM-CP, Houston, TX
FCC File No. BMPFT-20160129AXU
FM Translator Facility ID. 140620
December, 2016

The Applicant proposes a minor modification to the above-referenced, non-reserved band, FM translator authorization. Specifically, the applicant proposed herein to slightly reduce power and utilize a different antenna at a lower height on the currently authorized tower structure. No further changes are proposed herein.

Section 74.1204(a) Contour Overlap Protection Criteria

Attached is a map which demonstrates that proposed technical facility complies with the contour overlap provisions of Section 74.1204(a) of the FCC Rules with respect to all pertinent co-channel channel (See Exhibit 1) 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

The required protection to second-adjacent channel stations KKHH(FM), Houston, TX (Channel 239C) and KHMx(FM), Houston, TX (Channel 243C) 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 the second-adjacent channel, full service stations listed above which results in contour overlap as defined in Section 74.1204 of the FCC Rules. However, as demonstrated below, the instant proposal will cause no interference to any population served by either station.

At the translator's proposed transmitter site, both full-service stations are predicted to produce an F(50,50) signal strength of 87 dBu. Therefore, in the vicinity of the second-adjacent channel translator station, the translator's relevant interfering contour is the 127 dBu contour relative to both stations. According to free space calculations, the translator's worst-case predicted 127 dBu contour will extend, at most, 45 meters from the proposed antenna. Because the proposed transmit antenna will be located 165 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 either KKHH(FM) or KHMx(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

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Key to Stations on Map

- K241CM.241D.MOD
- KBLT-LP.241L1.FAC.ID.192202
- LPFM.APP.241L1.FAC.ID.193950
- KIOX-FM.241C3.FAC.ID.27226
- K241CO.CP.241D.FAC.ID.148446

K241CM.241D.MOD

Houston, TX
Latitude: 29-27-56 N
Longitude: 095-13-23 W
ERP: 0.20 kW
Channel: 241
Frequency: 96.1 MHz
AMSL Height: 176.0 m
Horiz. Pattern: Directional

Section 74.1204 Contours

Proposed FX Interfering Contour (DASHED):
40 dBu F(50,10) to Class A & FX & LPFM
40 dBu F(50,10) to Class C, C0, C1, C2, C3
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, C, Cx, 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 1:975,000

0 10 20 30 km