

Comprehensive Technical Exhibit
Malkan Interactive Communications LLC
KEYS (AM) Corpus Christi, Texas
FID # 39,715

KEYS is a class B station on 1440 KHz, with 1 kilowatt non-directional days and 1 kilowatt into a four tower directional antenna at night at Corpus Christi, Texas. This "Comprehensive Technical Exhibit" supports an application for a CP to change to a non directional antenna with 199 watts. The existing 146 degree tall day tower will be used for the proposed night operation and will produce 153.6 mv/per meter/at one kilometer, maintaining class B status.

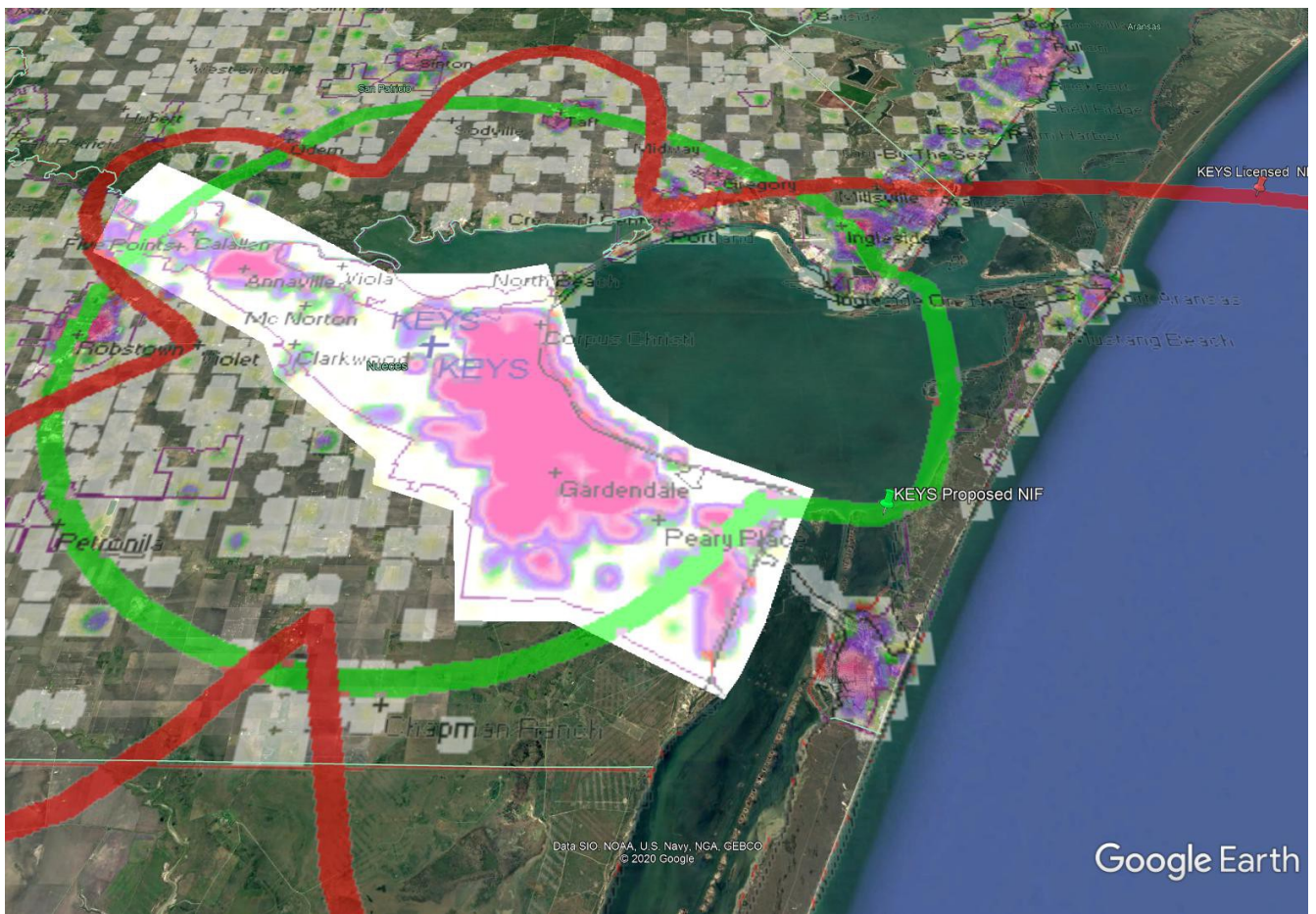
KEYS held recently expired CP BP-20170313ABG for different night parameters. KEYS (AM) day operation is not changed by this proposal. Night Interference Free includes 294K of 325K served by the present system, most inside the city of Corpus Christi. Proposed operation will cover over half of the area and three quarters of the population of Corpus Christi. Unused towers are detuned for Day operation. The same networks will be used for nights. Current Fencing and signage will continue to be adequate for the night power.

The KEYS transmitter site is in an industrial area at the west end of town. The land is part of the coastal plains typical of the area, very nearly level and just above sea level. Everything on site is subject to erosion or corrosion. A small rain can flood the site and seems to get worse as the area builds over. In addition, Hurricanes and Tropical storms visit the area most years, damaging infrastructure and works to keep the area flooded. Over the last three years we have improved fencing, repaired the ground system, replaced control cabling and improved the remote control system. The last CP expired while site work was delayed several times. The Covid-19 problem has stalled work since this spring.

Data was extracted from the online FCC database and is believed correct as of this filing. The facts stated are true and correct to the best of my knowledge.

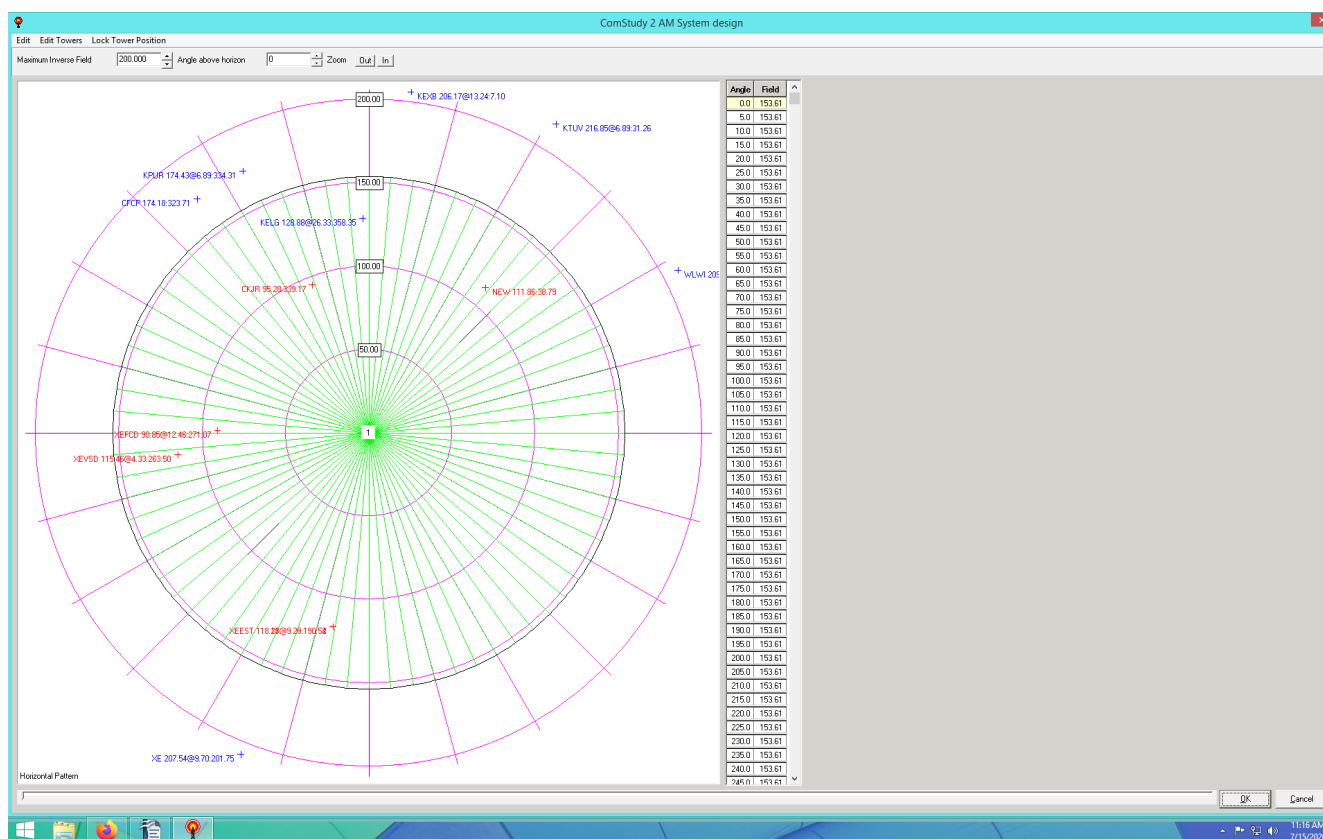
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KEYS Licensed NIF in Red & Proposed NIF in Green



The green contour shows the proposed Night Interference Free contour. It misses a small part of the west end and east end of the city.

Allocation Considerations



The items shown in blue are domestic clearances. Items in red are international and need different analysis. Of special concern are the following:

NEW OTTAWA/A CA ON OTTAWA 38.79 0.00 0.00 4.52 13.885 15355.02 150.15 15204.87 50% = 27.769, 25% = 35.939; WHKZ=27.77
WMKM=13.82 WVEI=11.54 WMAX=10.04 WFNY=9.78

XEEST/O MX DF GRANJAS MEXICO 190.52 9.29 9.29 69.36 3.973 286.36 145.19 141.17 50% = 8.513, 25% = 9.417; XENAC/A=6.34 TGMS-A=4.05 XEHW/A=3.97 XEFCD/A=2.98 XE/A=2.71

XEVSD/O MX BS VILLA CONSTITUC 263.50 4.33 4.33 29.44 4.143 703.56 149.07 554.49 50% = 8.286, 25% = 8.286; XEFCD/A=5.34
XEHW/A=4.66 KFOO=4.29

XEFCD/A MX CH CD. CAMARGO 271.07 12.46 12.46 90.94 3.695 203.17 141.32 61.85 50% = 7.391, 25% = 8.816; XEHW/A=5.11 XE/A=3.79
XEEST/ =3.77 KEXB=3.08 KFOO=2.70 KELG=2.52

XEFCD/O MX CH CD.CAMARGO 271.07 12.46 12.46 90.94 3.695 203.17 141.32 61.85 50% = 7.391, 25% = 8.816; XEHW/A=5.11 XE/A=3.79
XEEST/ =3.77 KEXB=3.08 KFOO=2.70 KELG=2.52

CKJR/A CA AB WETASKIWIN 339.17 0.00 0.00 3.36 2.990 4453.49 150.15 4303.34 50% = 5.98, 25% = 6.55; CFCP/A=5.98 KMED=2.02 KKXL=1.76

KEYS does not enter the night limits of the noted stations at the requested power. The entire study is attached as an additional exhibit to the 301.