

SELLMEYER ENGINEERING
BROADCAST AND COMMUNICATION CONSULTING ENGINEERS
P.O. Box 356 McKinney, Texas 75070
MEMBER AFCCE
(214) 495-9764

EXHIBIT E-1

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GRAHAM NEWSPAPERS, INC.
RADIO STATION KLXK
BRECKENRIDGE, TEXAS
AUGUST, 2002

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ENGINEERING STATEMENT
APPLICATION FOR CONSTRUCTION PERMIT
GRAHAM NEWSPAPERS, INC.
RADIO STATION KLXK
BRECKENRIDGE, TEXAS
AUGUST 28, 2002

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This Firm has been retained by Graham Newspapers, Incorporated, ("GNI"), licensee of Station KLXK, Breckenridge, Texas to prepare this Engineering Statement in support of its application for construction permit. The instant application proposes a minor change in the effective radiated power of Station KLXK.

SPECIAL CONSIDERATIONS

Graham Newspapers, Incorporated acquired the license and construction permit file number BPH-19980612IA for Station KLXK from the previous licensee. The proposed site is owned by American Tower Company. Negotiations to utilize the existing site for the authorized facilities were begun in December, 2001 and continued through May, 2002 with no satisfactory outcome. GNI was advised by American Tower Company following a structural study that the tower would not support the proposed antenna system and associated transmission line. In early June, 2002 a search was begun for a suitable site on which to construct suitable facilities. Such a site has been located approximately 1.1 kilometers north of the present site.

A discussion was held with Edward DeLaHunt, Associate Chief of the Aural Services Branch of the Media Bureau regarding the lack of time to construct the proposed facilities. Mr. DeLaHunt advised the undersigned to file a new Form 301 application and request cancellation of construction permit file number BPH-19980612IA upon acceptance of the instant application. Such cancellation is hereby requested.

PROPOSED TRANSMITTER SITE & ANTENNA SYSTEM

The proposed transmitter site exceeds the minimum spacings under Section 73.207 of the Rules. The antenna system will be a six element, side mounted antenna employing full wave spacing. A vertical sketch of the proposed tower and antenna system is attached hereto as Exhibit E1-1. The tower is not yet registered, but the FAA has been notified of the proposed construction. An amendment will be filed reporting the registration number upon completion of the registration process.

COVERAGE CALCULATIONS

The distances to contours were calculated by a computer program maintained by this Firm which accurately emulates the F(50,50) curves contained in Section 73.333 of the Rules. The height

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above average terrain for the eight standard radials was calculated from a program which uses linear interpolation of the NGDC thirty second terrain database.

The elevation at ground level at the proposed site was taken from the Breckenridge, Texas topographic map, a copy of which is attached as Exhibit E1-3. The center of radiation of the antenna above mean sea level was calculated from the ground level elevations and the center of radiation above ground level.

The proposed facility satisfies all allocation requirements of Section 73.315 of the rules. It will illuminate the entire city limits of Breckenridge, Texas with a signal strength in excess of 3.16 mV/M (70 dBu). The proposed location meets all of the spacing requirements of Section 73.207 of the Rules. Exhibit E1-2 is a spacing study at the proposed transmitter site.

Exhibit E1-4 is a map showing the present and proposed service contours plotted at five degree intervals. Exhibit E1-5 is a tabulation of the distances to the proposed service contours calculated and plotted at five degree intervals. Exhibit E1-6 is a tabulation of the distances to the existing service contours calculated and plotted at five degree intervals.

The main studio location will remain at the present location in downtown Breckenridge, Texas.

Due to the remote location of the transmitting facility, no receiver induced intermodulation problems are expected to occur. Should any such problems be reported, MBC will undertake the necessary remedies in accordance with the Rules of the Commission.

ANSI RADIATION COMPLIANCE

The proposed facility will operate with 50 kilowatts effective radiated power from a height above ground level of 141.7 meters. The worst case power density at six feet above ground level is calculated to be 171 uW/Sq. cM. or 17.1 percent of the maximum permissible exposure level for controlled exposure. This is 85.6 percent of the 200 uW/Sq. cM. maximum permissible exposure level for uncontrolled for uncontrolled areas.

The power density was calculated using the "worst case" model of OST Bulletin 65 edition 97-01. It is evident that the proposed facility will be in compliance with Commission Guidelines. During maintenance periods when it is necessary for work to be performed within hazardous areas, the station will reduce power to the extent required or cease operation for the period necessary. The tower base and transmitter building will be fenced to limit access to authorized personnel. Sufficient warning signs will be posted in the area to warn casual visitors to the site of the potential for radiofrequency radiation exposure.

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ENVIRONMENTAL MATTERS

The facility is located on an new tower in rural central Texas. No significant disturbance of the land to construct and maintain the proposed facilities. The site is in an area which is not affected by any of the environmental factors of Section 1.1307 of the Rules.

Upon grant of this application, the applicant is prepared to promptly construct the facilities and place the station in operation.

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CERTIFICATION OF ENGINEER

I hereby state that:

I am President of Sellmeyer Engineering

The Firm of Sellmeyer Engineering has been retained by Graham Newspapers, Inc. to prepare this Engineering Exhibit

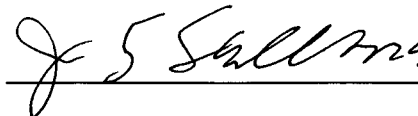
I am a graduate of Arizona State University with the degree of Bachelor of Science in Engineering

I am a Registered Professional Engineer in the States of Ohio and Texas

My qualifications as an Engineer are a matter of record with the Federal Communications Commission

This Engineering Exhibit was prepared by me personally or under my direct supervision, and

All facts stated herein are true and correct to the best of my knowledge and belief.



J. S. Sellmeyer, P. E.

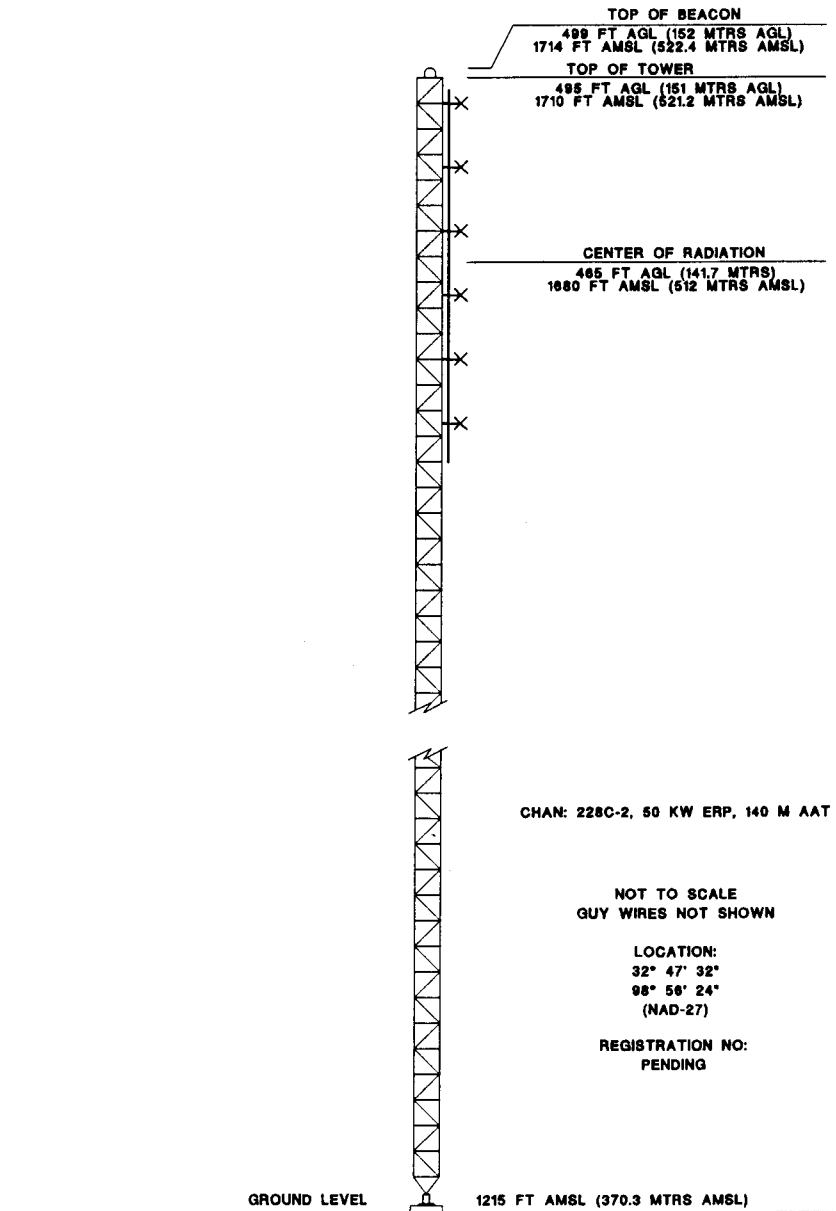
August 28, 2002

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EXHIBIT E1-1
VERTICAL SKETCH OF PROPOSED ANTENNA SYSTEM
GRAHAM NEWSPAPERS, INC.
RADIO STATION KLXK
CHANNEL 228C-2
BRECKENRIDGE, TEXAS



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EXHIBIT E1-2 GRAHAM NEWSPAPERS, INC. RADIO STATION KLXX CHANNEL 228C-2, XXX MTRS AAT BRECKENRIDGE, TEXAS

FM Study for: KLXX 32-47-32
Location: BRECKENRIDGE, TX Channel Class: C2 98-56-24
[*] by HAAT indicates calculated as missing in database.
Call City, State Chan Class Freq kW Latitude Dist. Required
Status Proponent File Number HAAT Longitude Azm. Clear (km)

>>>>>> Study For Channel 228 93.5 mHz <<<<<<<<

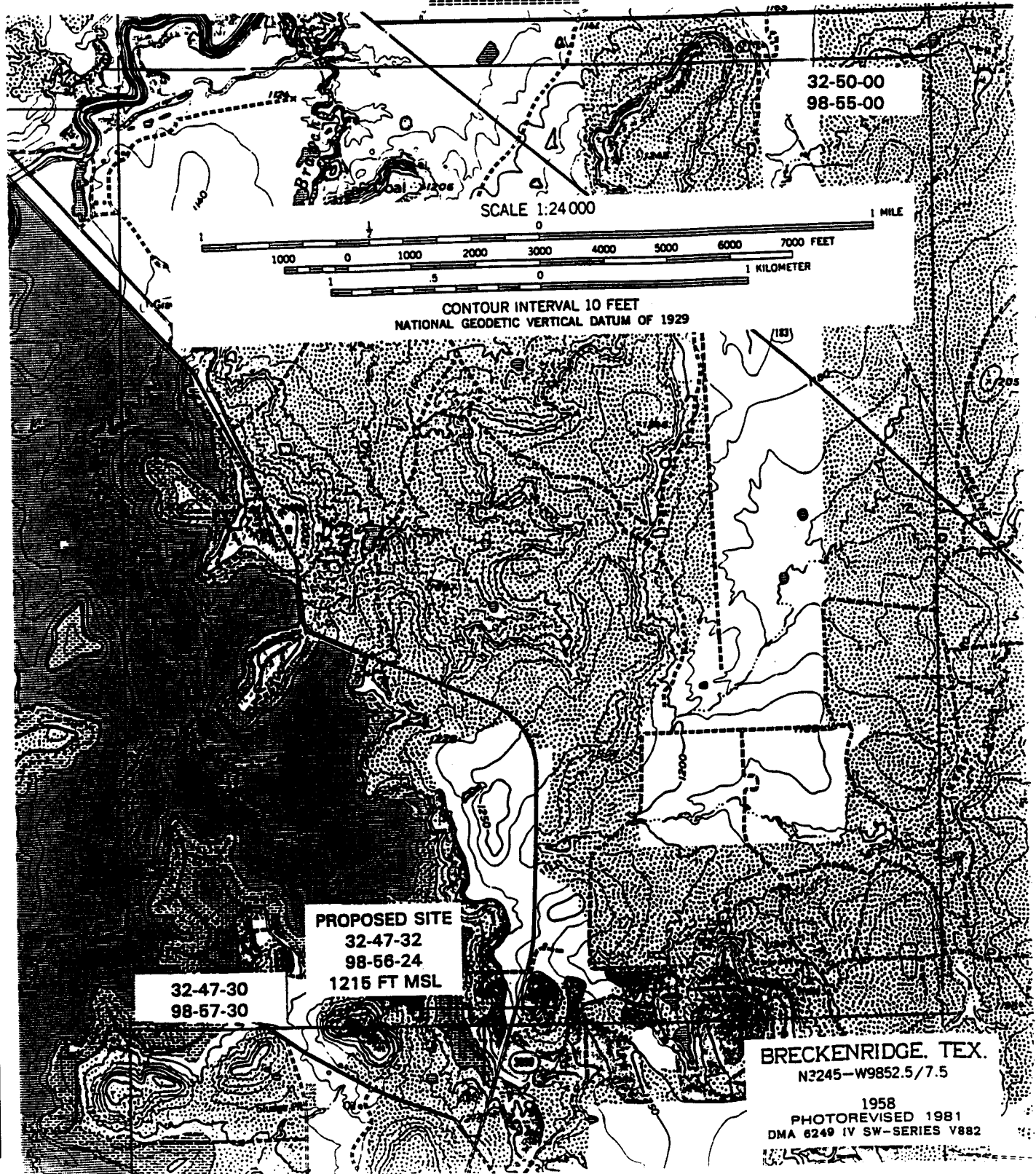
KLXX	BRECKENRIDGE, TX	228 C3	93.5	12.5	32-46-55	1.1	177	
LIC	Fac. No. 7702	BLH-19930614KE	136		98-56-22	177.4	-175.9	SHORT
KLXX	BRECKENRIDGE, TX	228 C3	93.5	50.0	32-46-55	1.1	190.0	
CP	Fac. No. 7702	BPH-199806121A	130		98-56-22	177.4	-188.9	SHORT
KICM	KRUM, TX	229 C1	93.7	14.0	33-26-13	153.5	158	*
APP	Fac. No. 36289	BMPH-20000725AAZ	299		97-29-05	61.8	-4.5	SHORT
		Use of 73.215 for short spacing requires:	144				+9.5	CLOSE
ALLOC	KRUM, TX	229 C1	93.7		33-27-59	157.53	158	
RSV	Fac. No. 36289	-	0		97-27-15	61.3	-0.47	CLOSE
KRKZ	ALTUS, OK	228 C2	93.5	45.0	34-26-20	189.94	190	
LIC	Fac. No. 1196	BLH-19890227KG	161		99-30-08	344.2	-0.06	CLOSE
ALLOC	BUFFALO GAP, TX	227 A	93.3		32-16-55	106.31	106	
ADD		RM-10171	0		99-53-54	238.1	+0.31	CLOSE
ALLOC	ARCHER CITY, TX	230 C1	93.9		33-36-58	91.6	79	
ADD		Docket-2000-148	0		98-51-42	4.5	+12.6	CLOSE
ALLOC	OLNEY, TX	282 C2	104.3		33-08-47	39.9	20	
VAC	Fac. No. 95317	Docket-1997-225	0		98-52-00	9.9	+19.9	CLEAR
KSEYFM	SEYMOUR, TX	230 C2	93.9	50.0	33-32-52	89.4	58	
CP	Fac. No. 71535	BPH-20000406ABD	150		99-16-29	339.7	+31.4	CLEAR
KSTVFM	DUBLIN, TX	226 C3	93.1	7.00+	32-10-57	91.3	56	
APP	Fac. No. 15742	BMPH-199904021E	178		98-17-12	137.6	+35.3	CLEAR
ALLOC	SEYMOUR, TX	230 C2	93.9		33-35-59	96.0	58	
DEL		Docket-2000-148	0		99-18-42	338.9	+38.0	CLEAR

* 73.215 application

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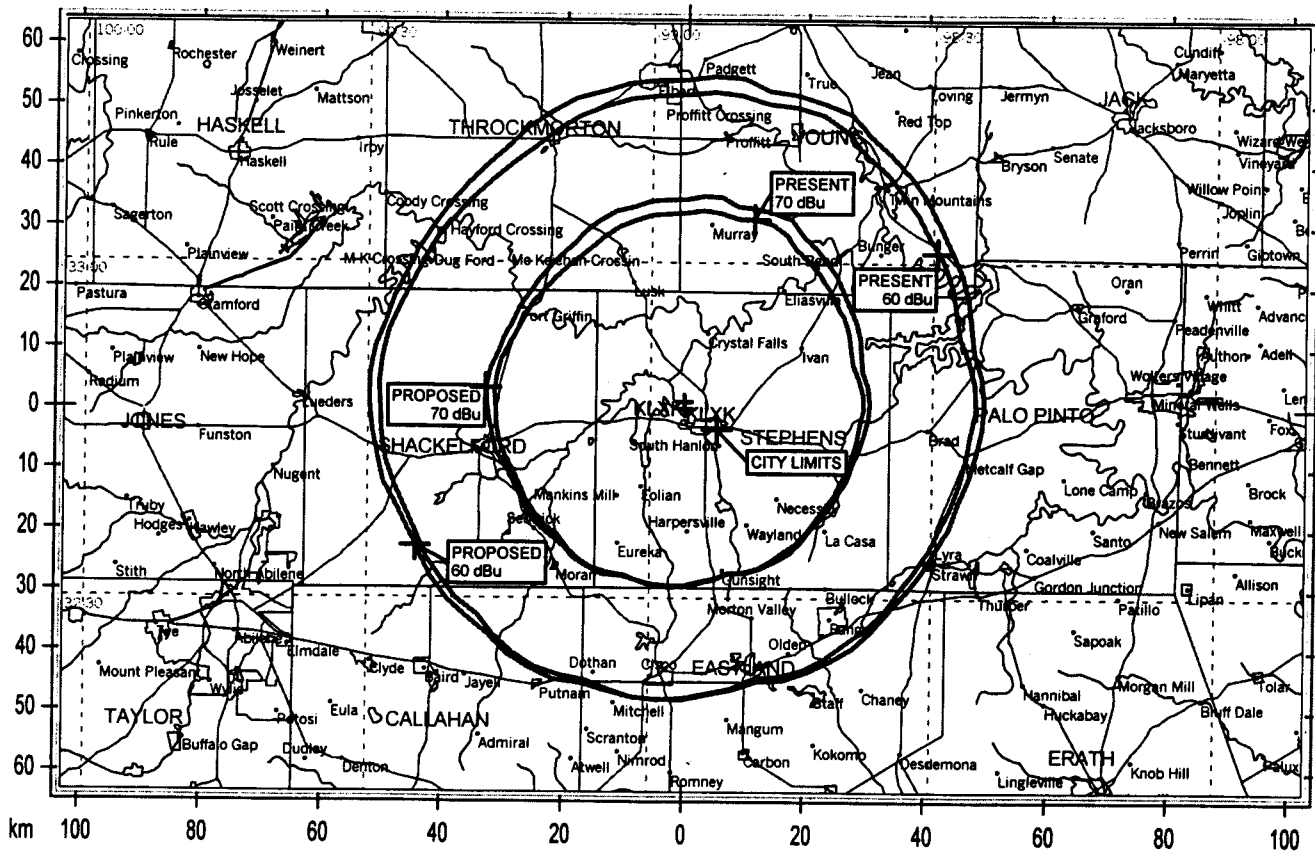
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EXHIBIT E1-3
MAP SHOWING PROPOSED LOCATION
RADIO STATION KLXK
CHANNEL 228C2, 50.0 KW ERP, 140 MTRS AAT
BRECKENRIDGE, TEXAS



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EXHIBIT E1-4
MAP SHOWING PRESENT & PROPOSED SERVICE CONTOURS
RADIO STATION KLXX
CHANNEL 228C2, 50.0 KW ERP, 140 MTRS AAT
BRECKENRIDGE, TEXAS
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EXHIBIT E1-5

TABULATION OF DISTANCES TO PROPOSED SERVICE CONTOURS

RADIO STATION KLXX

CHANNEL 228C2, 50.0 KW ERP, 140 MTRS AAT

BRECKENRIDGE, TEXAS

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DISTANCES TO CONTOURS (Kilometers):

Frequency: 93.5000 MHz

Coordinates: N 32 47 32 W 98 56 24

F(50,50) Curves Number of Contours: 2

AZ (degs)	HAAT (m)	ERP (kW)	CONTOUR 60.0	LEVELS (dBu): 70.0	AZ (degs)	HAAT (m)	ERP (kW)	CONTOUR 60.0	LEVELS (dBu): 70.0
.0	158	50.0000	53.3	33.5	180.0	127	50.0000	48.9	30.1
5.0	164	50.0000	53.9	34.1	185.0	129	50.0000	49.2	30.3
10.0	165	50.0000	54.0	34.2	190.0	130	50.0000	49.4	30.5
15.0	159	50.0000	53.3	33.6	195.0	130	50.0000	49.3	30.4
20.0	163	50.0000	53.8	34.0	200.0	130	50.0000	49.5	30.5
25.0	167	50.0000	54.3	34.4	205.0	138	50.0000	50.5	31.2
30.0	170	50.0000	54.5	34.7	210.0	140	50.0000	50.9	31.5
35.0	161	50.0000	53.6	33.8	215.0	140	50.0000	50.8	31.5
40.0	156	50.0000	53.0	33.3	220.0	136	50.0000	50.2	31.0
45.0	155	50.0000	52.8	33.1	225.0	136	50.0000	50.3	31.1
50.0	151	50.0000	52.3	32.7	230.0	140	50.0000	50.8	31.5
55.0	146	50.0000	51.6	32.1	235.0	140	50.0000	50.8	31.5
60.0	139	50.0000	50.7	31.4	240.0	137	50.0000	50.3	31.1
65.0	136	50.0000	50.2	31.0	245.0	136	50.0000	50.3	31.1
70.0	132	50.0000	49.7	30.6	250.0	138	50.0000	50.5	31.3
75.0	127	50.0000	48.9	30.1	255.0	146	50.0000	51.6	32.1
80.0	124	50.0000	48.5	29.8	260.0	146	50.0000	51.7	32.2
85.0	127	50.0000	48.9	30.1	265.0	146	50.0000	51.6	32.1
90.0	129	50.0000	49.3	30.4	270.0	148	50.0000	52.0	32.4
95.0	127	50.0000	49.0	30.2	275.0	148	50.0000	52.0	32.4
100.0	126	50.0000	48.8	30.0	280.0	147	50.0000	51.8	32.3
105.0	125	50.0000	48.6	29.9	285.0	143	50.0000	51.2	31.8
110.0	125	50.0000	48.6	29.9	290.0	141	50.0000	50.9	31.6
115.0	125	50.0000	48.6	29.9	295.0	139	50.0000	50.7	31.4
120.0	124	50.0000	48.6	29.9	300.0	139	50.0000	50.6	31.4
125.0	124	50.0000	48.6	29.9	305.0	138	50.0000	50.5	31.3
130.0	123	50.0000	48.3	29.7	310.0	137	50.0000	50.5	31.2
135.0	124	50.0000	48.5	29.8	315.0	139	50.0000	50.6	31.3
140.0	127	50.0000	49.0	30.2	320.0	140	50.0000	50.8	31.5
145.0	130	50.0000	49.4	30.5	325.0	142	50.0000	51.1	31.7
150.0	129	50.0000	49.2	30.3	330.0	146	50.0000	51.7	32.2
155.0	127	50.0000	49.0	30.2	335.0	152	50.0000	52.5	32.9
160.0	125	50.0000	48.7	29.9	340.0	156	50.0000	53.0	33.3
165.0	119	50.0000	47.8	29.3	345.0	156	50.0000	52.9	33.2
170.0	123	50.0000	48.3	29.7	350.0	158	50.0000	53.2	33.5
175.0	123	50.0000	48.4	29.8	355.0	159	50.0000	53.3	33.6

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EXHIBIT E1-6

TABULATION OF DISTANCES TO PRESENT SERVICE CONTOURS

RADIO STATION KLXK

CHANNEL 228C2, 50.0 KW ERP, 140 MTRS AAT

BRECKENRIDGE, TEXAS

=====

DISTANCES TO CONTOURS (Kilometers):

Frequency: 93.5000 MHz

Coordinates: N 32 46 55 W 98 56 22

F(50,50) Curves Number of Contours: 2

AZ (degs)	HAAT (m)	ERP (kW)	CONTOUR LEVELS (dBu):	
			60.0	70.0
.0	150	50.0000	52.2	32.6
5.0	154	50.0000	52.7	33.0
10.0	152	50.0000	52.5	32.8
15.0	152	50.0000	52.4	32.8
20.0	158	50.0000	53.2	33.5
25.0	161	50.0000	53.6	33.8
30.0	156	50.0000	52.9	33.2
35.0	146	50.0000	51.7	32.2
40.0	145	50.0000	51.5	32.0
45.0	141	50.0000	51.0	31.7
50.0	137	50.0000	50.5	31.2
55.0	131	50.0000	49.6	30.6
60.0	127	50.0000	49.0	30.2
65.0	123	50.0000	48.4	29.8
70.0	119	50.0000	47.8	29.3
75.0	115	50.0000	47.2	28.9
80.0	118	50.0000	47.7	29.2
85.0	121	50.0000	48.1	29.5
90.0	119	50.0000	47.9	29.4
95.0	116	50.0000	47.4	29.1
100.0	117	50.0000	47.5	29.1
105.0	115	50.0000	47.3	29.0
110.0	114	50.0000	47.1	28.9
115.0	115	50.0000	47.2	28.9
120.0	115	50.0000	47.2	28.9
125.0	114	50.0000	47.0	28.8
130.0	113	50.0000	46.9	28.7
135.0	114	50.0000	47.1	28.9
140.0	117	50.0000	47.6	29.2
145.0	116	50.0000	47.4	29.1
150.0	117	50.0000	47.6	29.2
155.0	117	50.0000	47.6	29.2
160.0	113	50.0000	47.0	28.7
165.0	109	50.0000	46.3	28.3
170.0	114	50.0000	47.1	28.8
175.0	115	50.0000	47.3	29.0

AZ (degs)	HAAT (m)	ERP (kW)	CONTOUR LEVELS (dBu):	
			60.0	70.0
180.0	119	50.0000	47.8	29.3
185.0	121	50.0000	48.1	29.5
190.0	123	50.0000	48.3	29.7
195.0	121	50.0000	48.2	29.6
200.0	121	50.0000	48.1	29.5
205.0	124	50.0000	48.6	29.9
210.0	129	50.0000	49.3	30.4
215.0	130	50.0000	49.4	30.5
220.0	127	50.0000	49.0	30.2
225.0	124	50.0000	48.5	29.8
230.0	126	50.0000	48.8	30.1
235.0	129	50.0000	49.3	30.4
240.0	129	50.0000	49.3	30.4
245.0	128	50.0000	49.1	30.2
250.0	127	50.0000	49.0	30.2
255.0	130	50.0000	49.4	30.4
260.0	137	50.0000	50.4	31.2
265.0	137	50.0000	50.4	31.2
270.0	137	50.0000	50.4	31.2
275.0	140	50.0000	50.8	31.5
280.0	140	50.0000	50.9	31.6
285.0	139	50.0000	50.7	31.4
290.0	136	50.0000	50.3	31.1
295.0	134	50.0000	50.0	30.9
300.0	133	50.0000	49.8	30.8
305.0	133	50.0000	49.9	30.8
310.0	132	50.0000	49.7	30.7
315.0	131	50.0000	49.6	30.6
320.0	132	50.0000	49.7	30.6
325.0	132	50.0000	49.7	30.7
330.0	134	50.0000	49.9	30.8
335.0	139	50.0000	50.7	31.4
340.0	144	50.0000	51.4	31.9
345.0	146	50.0000	51.7	32.2
350.0	148	50.0000	51.9	32.4
355.0	149	50.0000	52.0	32.5