

## ENGINEERING STATEMENT

Primera Iglesia Evangelica de Apostoles y Profetas ("Licensee") proposes this minor modification to K291CE to specify a change in antenna location antenna height above ground (AGL) but no change in ERP. A form 350 application for license to cover construction authorized under BMPFT-20140506AAL as completed was filed on July 17,2014 and given FCC file number: BLFT-20140717ACK. That application withstanding, the current proposal is a minor change for K291CE (formerly K294BH).

Note: K291CE proposes fill in status as it serve that purpose for station KGLK-HD3 at Lake Jackson, Texas. All of the proposed 60 dBu of K291CE lies within the 60 dBu (50/50) contour of KGLK HD3.

K291CE proposes use of an omni-directional two bay (Jampro JLCP-2) antenna. KHCB-FM (FCC ID: 27703)(Channel: 289C) at Houston, Texas and KOVE-FM (FCC ID: 19091) (Channel 293C) at Galveston, Texas are both second adjacent-channels to the proposed facilities of K291CE. The 60 dBu F50,50 service contours of both KHCB and KOVE extend well beyond the proposed K291CE transmitter site. The applicant proposes to utilize the well-established *Living Way Ministries* ("LWM") Methodology to show no actual interference will result to any population. No objectionable interference is predicted to exist to either KHCB-FM or KOVE-FM. The applicant respectfully seeks a waiver of Section 74.1204 of the rules for this second and third adjacent-channel protection showing.

### KHCB-FM

The facilities of KHCB-FM are located 1.1 km distant from the proposed K291CE facilities on a bearing from the proposed facility of 53.1° T. The F50,50 signal strength from KHCB-FM at the proposed K291CE transmitter site is 125.46 dBu. Using the 40:1 signal ratio in LWM methodology and the Section 74.1204 undesired-to-desired ratio the protected signal necessary at the proposed K291CE site is 165.46 dBu. With the proposed non-directional power of 0.157 kW, (250 watts), the proposed intersection of the two signals will occur 32.942 feet (<0.10 km) from the proposed K291CE antenna well above ground. Therefore, no prohibited interference will occur from the proposed K291CE operation.

### KOVE-FM

The facilities of KOVE-FM are located 48.6 km distant from the proposed K291CE facilities on a bearing of 127.2° T. The 60/60 signal strength from KOVE-FM at the proposed K291CE transmitter site is 78.062 dBu. Using the 40:1 signal ratio in LWM methodology and the Section 74.1204 undesired-to-desired ratio the protected signal necessary at the K291CE is 118.062 dBu. With the proposed non-directional power of 0.250 kW, (250 watts), the proposed intersection of the two signals will occur 57.898 feet (<0.20 km) from the proposed K291CE antenna well above ground. Therefore, no prohibited interference will occur from the proposed K291CE operation.

The interfering signal level will not reach any point at ground level or at 2 meters above ground level. With the proposed K291CE radiation centerline at 457 meters AGL, the clearance is at least 40 meters. Therefore, KOVE-FM and KHCB-FM are adequately protected by the proposed facility. The result is that, pursuant to Section 74.1204(d) of the FCC Rules, KHCB-FM and KOVE-F are adequately protected by the proposed facilities of K291CE.

## **PROTECTION TO KTTX-FM and KIOC**

### KTTX and KIOC

There are two full power allocation worthy of study in the instant application: KTTX (FCC ID: 67301) (Channel: 291C2) at Brenham, Texas and KIOC (FCC ID: 33060)(Channel 291C0) at Orange, Texas. As a co-channel operations, the 60 dBu (50/50) contours of KTTX and KIOC require protection from the proposed 40 dBu (50/10) contour of the proposed K291CE operation. As shown in Exhibit: EE-1, the proposed 40 dBu contour of K291CE does not violate the protected contour of either KTTX or KIOC.

### Proposed LPFM Facilities

Only one proposed LPFM facility is near enough to the proposed K291CE facility to warrant study. That proposed facility is: BNPL - 20131114ACX (FCC ID: 194591) at Houston, Texas. The proposed facilities of K291CE are located 33.57 km on a bearing of 219.4° T from the 194591 proposed facilities which places the proposed facilities as fully spaced to the proposed 194591 per Section 73.807(a)(1) of the rules.

### **HD3 FILL IN STATUS**

#### Fill In Status for HD3 Service of KLTN

K291CE fills the requirements as a fill in service as it proposes to rebroadcast the HD3 signal of KLTN (FCC ID: 65310) at Houston, Texas. All of the proposed K291CE contour lies well within the KLTN's 60 dbu contour.