

**KSIX, CORPUS CHRISTI, TX****EXHIBIT 11 - NARRATIVE****ENGINEERING STATEMENT**

Withers Family Texas Holdings, LP (“Withers”) is licensee of KSIX(AM), Corpus Christi, Texas (BL-20020717ABV, FCC ID Number 13964). Withers holds a current permit to move KSIX to a new site (BP-20050613AEP), but finds that the site proposed in this permit will not be available. Withers accordingly proposes to collocate KSIX with KEYS(AM) (FCC ID number 39715). Withers proposes to utilize the northeast tower in the KEYS array (tower 4 in the current engineering database, labeled tower 2 in the original license). The ASRN of this tower is 1053363. Note that the value given for the overall height of this tower in the ASR database is incorrect. The value in the instant application is correct, and a correction will be supplied to both the FAA and ASR databases. This move serves the public interest, because it will free up needed capital for station operation and debt repayment, while having essentially no impact on station coverage, as shown in the attached engineering exhibits.

The licensed KSIX coordinates are 27-48-09 NL and 97-27-14 WL (NAD 27). The proposed coordinates are 27-47-01 NL and 97-27-30 WL (NAD 27). The new coordinates are calculated to be 2.14 kilometers distant from the licensed coordinates, at 191.8 degrees true. The nearest AM radio stations are KCCT (FCC ID number 54646) and KKTIX (FCC ID number 55166). KCCT is 2.5 km from the licensed KSIX site. KKTIX is 0.8 km distant. The instant proposal is 2.7 km from KCCT and 1.9 km from KKTIX. Thus the Withers proposal will not cause any new or additional intermodulation problems to other stations.

Exhibits 11.1 – 11.4 contain the site plat, site map, vertical sketch and aerial photo with blanketing contour. Tower 4 in the KEYS array is 277 feet (84.5 meters) tall, less base and appurtenances. The electrical height of this radiator is 124.7 degrees at 1230 kHz. In combination with the existing KEYS ground system, this facility is predicted by Figure 8 in the Rules to be capable of producing an inverse distance field at one kilometer of 327.814 mV/m/kW, thus meeting the requirements of 47 CFR §73.189 (2) (i). The population predicted to reside within the blanketing (1000 mV/m) contour of this proposal is zero persons (2000 Census, Block Data). The Withers proposal thus meets the requirements of 47 CFR §73.24 (g).

Exhibit 12 is a comparison of the licensed to proposed day contour distances. Exhibits 12.1 and 12.2 contain similar comparisons of the day and night community coverage, respectively. The Withers proposal would continue to encompass 100 percent of the population and area of the community of license within the 5 mV/m contour. At night, the licensed facility currently encompasses 58.8 percent of the community population (47.0 percent of the area) within the effective nighttime interference free contour (18.98 mV/m). The proposed site is predicted to encompass 63.5 percent of the population (49.1 percent of the area) within the interference free contour for the new coordinates, 18.95 mV/m (all figures based on the 2000 Census, Block Data). Thus the Withers proposal meets the requirements of 47 CFR §73.24 (i) in part, but, due to growth of the community over several years, does not meet the requirements regarding nighttime coverage now, and would not in the future regardless of where the new site were located. However, the Withers proposal does not further degrade the area of effective nighttime coverage, and in fact slightly improves it. Exhibits 12.3

and 12.4 illustrate the calculations by which the nighttime interference free contour values were determined.

Exhibit 15 contains the day interference study list. Due to the very small changes in overlap predicted to be caused by the Withers proposal, software calculations of the predicted populations residing within the contour overlap areas were substituted for the usual contour overlap maps (Exhibit 15.1). It can be seen that in every case but one, the population residing in the predicted interference areas is predicted to decrease or remain the same if the proposal were granted. The exception is an apparent 90,629-person increase in population in the given interference area relative to station KSLO. These calculations were based upon population data from the 2000 Census, block data, utilizing M3 conductivity data, and considering all signals at licensed or permitted power. In the case of KSLO, the apparent overlap of both the licensed and proposed KSIX interfering contours over land is due to limitations in the M3 equivalent method in cases where a long salt-water path exists. In this case, the distance is on the order of 600 km. Repeated measurements of the interfering contours in these cases have established that they never extend as far inland as indicated by the software. Withers respectfully requests a waiver of 47 CFR §73.37(a) in this regard.

Exhibit 16 is a complete study of the nighttime limits to non-domestic signals on the channel predicted to result from the Withers proposal, and a fragment of the same study relative to the licensed site, the fragment containing limits presented to two Mexican permits which are not protected by the current, licensed facility. This exhibit shows that the limits to these two permits would be significantly lower were the instant proposal to be granted, and that all other signals would be protected in accordance with 47 CFR §73.182 and the relevant international Agreements. Exhibit 16.1 illustrates the protection calculations to the two Mexican permits with the licensed facility, and then the proposed, considered. Note that the lower limit afforded by the proposal slightly reduces the signal value of the required protection to one of the permits, but not the other.

Withers affirms that the KSIX studio location will continue to meet the requirements of 47 CFR §73.1125, and that protective fencing will be maintained at a minimum of 2 meters from the base of the proposed tower, as required by OET Bulletin 65 (Edition 97-01). Withers further affirms that, in cooperation with KEYS, transmission will be suspended as necessary to protect workers from RF exposure in excess of the limits contained in the cited regulation and in 47 CFR §1.1310. No other environmental impact is known to exist from this proposal.

The above and attached information is true and correct as to my knowledge and belief.

June 10, 2006



Gary O. Keener

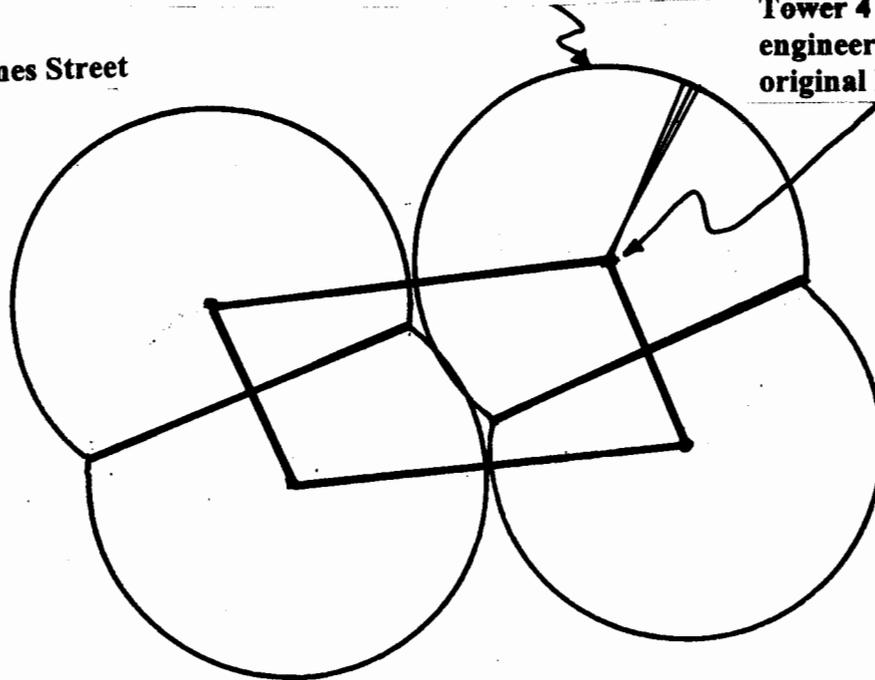
**Existing ground system of 120 65.2 m  
copper wires (96.3 electrical degrees)  
Except where foreshortened and bonded  
to adjacent radial pattern.**

**27-47-02/92-27-31 (NAD 83)**

**Tower 4 of KEYS array in current  
engineering database (tower 2 in  
original license)**

**Agnes Street**

**Flato Road**



**Remainder of radials  
omitted for clarity**

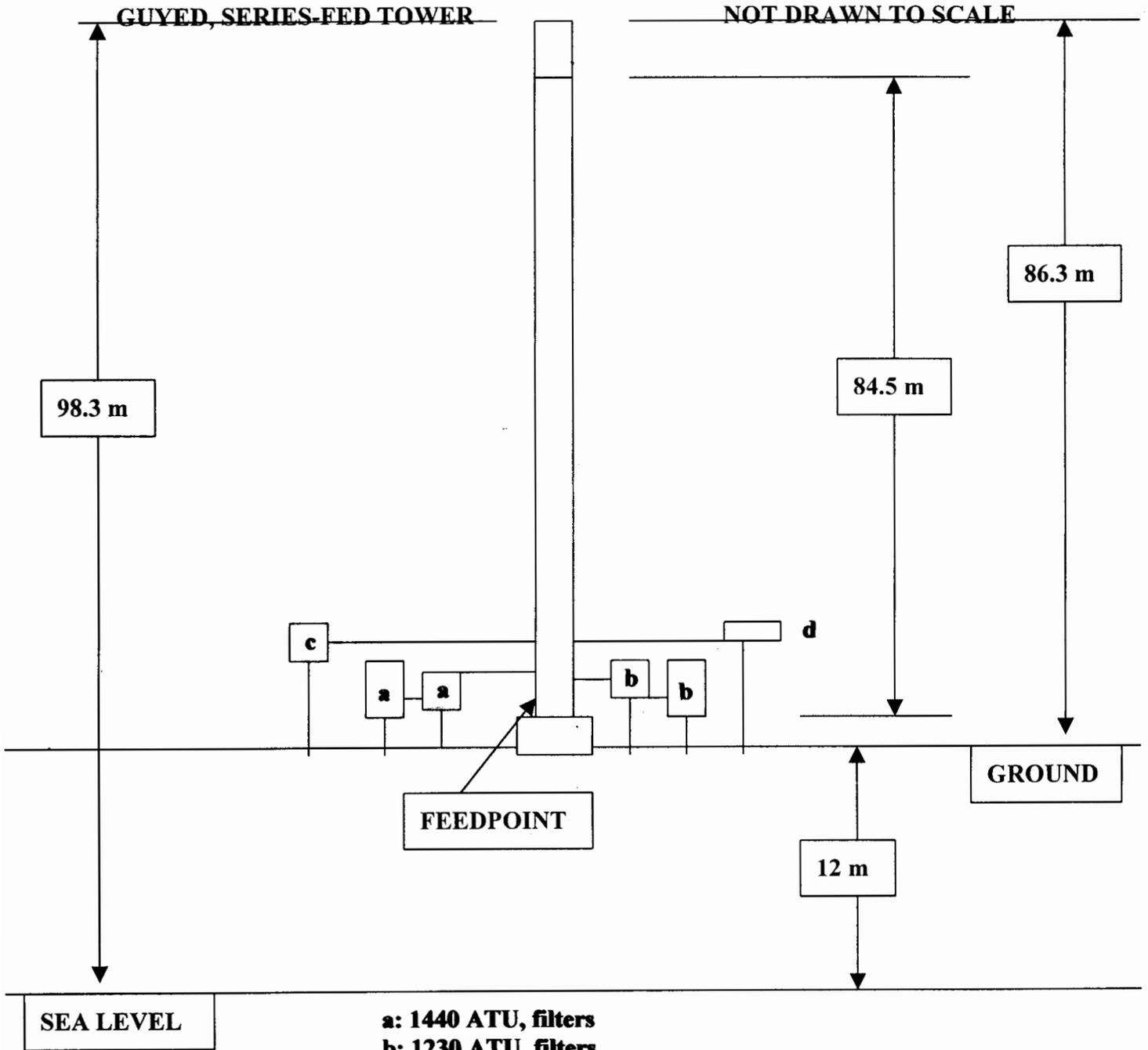


**MTRS: 0 50 100 150**



VERTICAL SKETCH

TOWER 4 OF KEYS ARRAY



- a: 1440 ATU, filters
- b: 1230 ATU, filters
- c: isocoils for sample line
- d: tower lighting choke

AERIAL PHOTO/BLANKETING CONTOUR

