

**Goldman Engineering Management  
Auburn, CA**

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**MINOR MODIFICATION APPLICATION**  
**K259CT (BLFT-20151216AAB) Prescott, AR**  
**To Bonham, TX**

January, 2016

**TECHNICAL STATEMENT**

This technical statement and attached exhibits have been prepared on behalf of Vision Media Group, Inc. (“KFYN”), proposed Assignee of translator station K259CT, Facility identifier 79287. The applicant proposes to modify the license of BLFT-20151216AAB to change tower location, height, power, and frequency to license as a fill-in translator for AM station KFYN (1420kHz, Class D). Facility ID #6347 in compliance with 47 CFR 74.1201(g). The translator community of license will change to Bonham, TX. The proposed operation is compliant with the “AM Revitalization” Order pursuant to DA 15-142 Released October 23, 2015. As a class D station, KFYN is eligible to apply in the first modification window opening January 29, 2016. In accordance with the AMR Order, translator station WK259CT will change frequency from channel 259D (99.7MHz) to 239D (95.7MHz) and will be relocated 165 miles from the currently permitted site to the proposed tower site which is well within the maximum allowable 250 miles.

**Facilities Proposed**

Location (NAD27)	33° 33’ 15.6” N Latitude, 96° 13’ 24” W Longitude
Channel	239D (95.7MHz)
Tower Overall AGL Height-	98m
Tower ASR	1218550 (Exhibit C)
Proposed Antenna	ERI LPX-1E
Antenna AGL Height-	96m
Site AMSL Height-	192m
COR AMSL Height	288m
ERP	250w Non-Directional

1511 Radcliffe Way, Auburn CA 95603  
(214) 395-5067

## Interference Study

ComStudy 2.2 search of channel 239 (95.7 MHz Class D) at 33-33-15.6.0 N, 96-13-24.0 W.

CALL	CITY	ST CHN CL	DIST	SEP	BRNG	CLEARANCE
KHYI	HOWE	TX 237 C2	53.35	0.00	260.0	0.28 dB Exhibit A
KITX	HUGO	OK 238 C2	80.67	0.00	59.9	2.94 dB Exhibit A
KZRC	BENNINGTON	OK 241 A	37.75	0.00	10.1	4.85 dB
KYNC-LP	SACHSE	TX 239 LP100	62.81	24.00	192.7	5.89 dB
KKAJ-FM	DAVIS	OK 239 C2	113.59	0.00	325.7	6.67 dB
KUTD-LP	RICHARDSON	TX 239 LP100	78.75	24.00	218.3	11.01 dB
KSCH	SULPHUR SPRINGS	TX 240 A	72.95	0.00	127.7	14.75 dB
KSCS	FORT WORTH	TX 242 C	127.72	0.00	213.0	15.84 dB
KKAD-LP	DALLAS	TX 239 LP100	100.67	24.00	212.3	16.59 dB
KTTR-LP	QUINLAN	TX 238 LP100	71.24	13.00	172.6	21.99 dB
KWSK-LP	CASON	TX 239 LP100	137.97	24.00	112.5	23.38 dB
KFWR	JACKSBORO	TX 240 C0	174.77	0.00	252.5	24.57 dB
K240DS	GARLAND	TX 240 D	84.99	0.00	201.9	24.68 dB
K239CC	BURLESON	TX 239 D	146.48	0.00	222.5	24.79 dB
KWSK-LP	CASON	TX 239 LP100	143.24	24.00	112.2	24.42 dB
KITX	HUGO	OK 238 C2	80.58	0.00	59.9	25.30 dB
K239CB	TYLER	TX 239 D	158.15	0.00	145.7	25.23 dB
K239CB	TYLER	TX 239 D	158.29	0.00	145.6	25.38 dB
NEW	TERRELL	TX 238 LP100	90.58	13.00	183.2	27.81 dB
KFCE-LP	WILLS POINT	TX 238 LP100	95.89	13.00	167.9	29.02 dB
K242BC	PARIS	TX 242 D	62.79	0.00	81.6	30.29 dB

### COMPLIANCE, 74.1201(g), 74.1233(a)(1), and 74.1204(a)

Exhibit A demonstrates compliance with 74.1204(a). There are no impermissible contour overlaps to any other facilities. The only close relationship is second adjacent KHYI (237C2).

Exhibit B demonstrates compliance with 74.1201(g) governing the use of a translator as a fill-in for an AM station. The 60dBu contour of the proposed WK259CT will be completely contained within the 2mV/m contour of KFYN(AM) and is within 25 miles of the KFYN transmitter.

Due to the special nature of this AMR Order, 74.1233(a)(1) does not apply.

### **Environmental Exhibit**

The proposed WK259CT facility as proposed on channel 239D will utilize a non-directional antenna located on an existing tower (ASR 1218550) owned by KFYN. The ASR for the tower is attached as Exhibit C. The RF density near the tower was calculated using the proposed ERI LPX-1E antenna at 250 watts horizontal and vertical.

Using the FCC program “FM Model for Windows”, it was calculated that the proposed antenna contributes approximately  $0.42 \mu\text{W}/\text{cm}^2$  or 0.21% of the total allowable  $200 \mu\text{W}/\text{cm}^2$ . There are no other non-excluded facilities on the tower.

Because the RF level is under 5% of the allowable public exposure level the proposed operation is considered fully compliant and is categorically excluded from further environmental review under §1.1306 of the FCC rules and regulations.

Respectfully Submitted



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EXHIBIT A- 74.1204(a) Compliance (contour Overlaps)

K259CT PROP 239D, 74.1204(a) Compliance

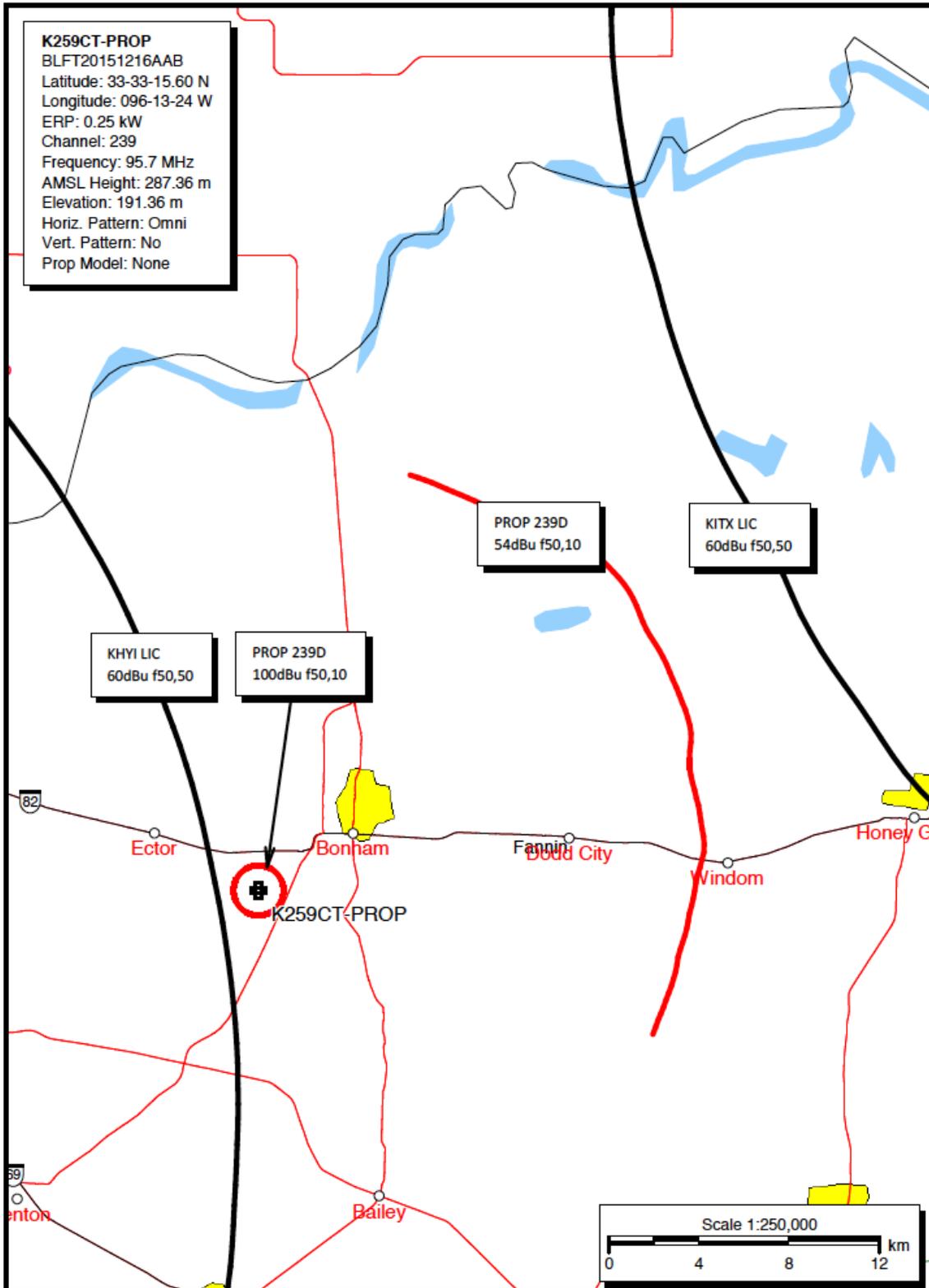
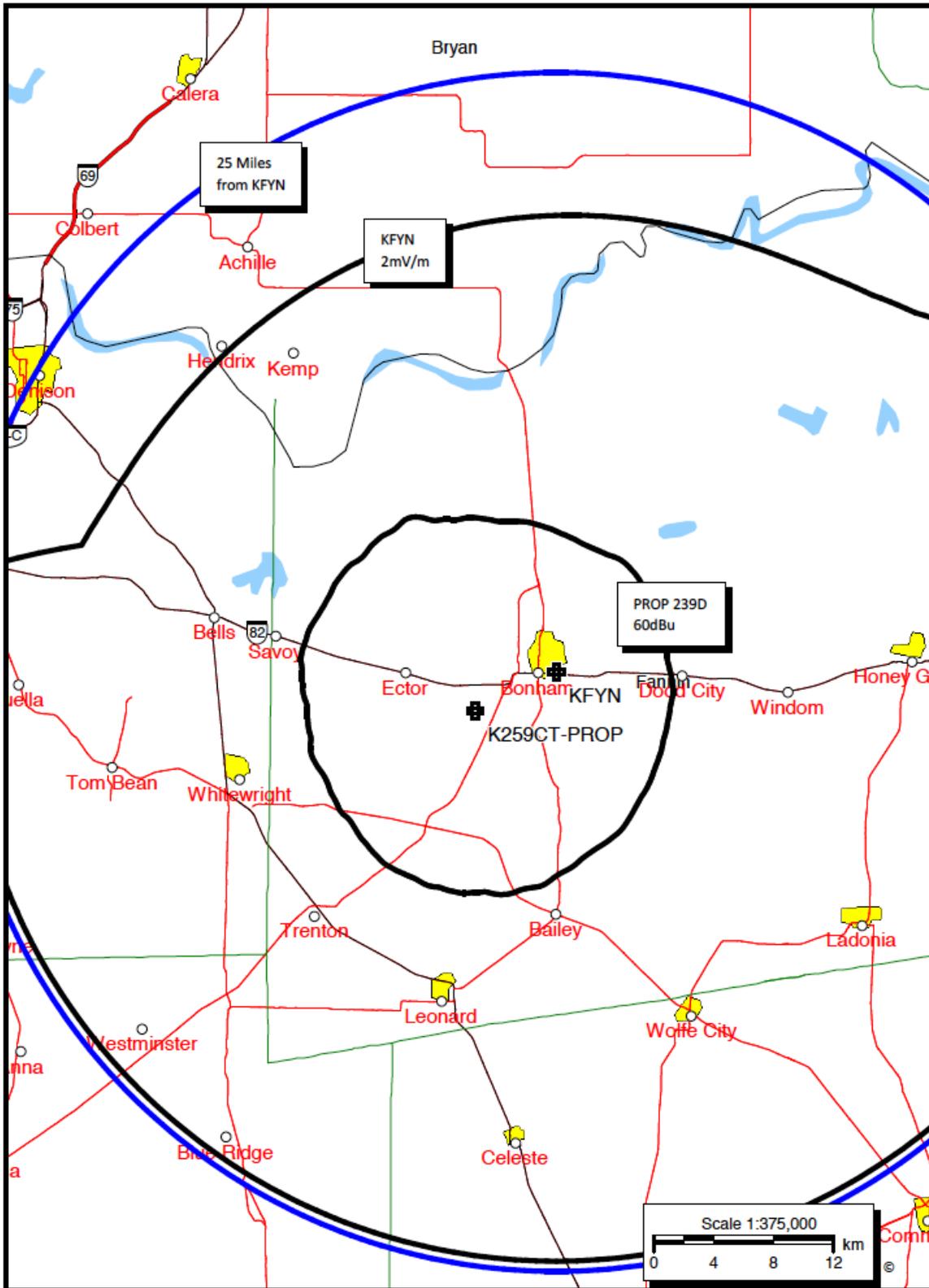


EXHIBIT B- 74.1201(g) Compliance to KFYN (AM Fill-in)

K259CT PROP 239D, 74.1201(g) Compliance



# EXHIBIT C- ANTENNA STRUCTURE REGISTRATION

## Registration 1218550

 [Map Registration](#)

### Registration Detail

Reg Number	1218550	Status	Granted
File Number	A0984523		Constructed
EMI	No		Dismantled
NEPA	No		

### Antenna Structure

Structure Type TOWER - Free standing or Guyed Structure used for Commu

#### Location (in NAD83 Coordinates)

Lat/Long	33-33-16.0 N 096-13-25.0 W	Address	1.5 miles southwest of Bonham, Texas
City, State	Bonham , TX		
Zip	75418	County	FANNIN
Center of AM Array		Position of Tower in Array	

#### Heights (meters)

Elevation of Site Above Mean Sea Level	192.1	Overall Height Above Ground (AGL)	98.2
Overall Height Above Mean Sea Level	290.3	Overall Height Above Ground w/o Appurtenances	98.2

#### Painting and Lighting Specifications

FCC Paragraphs 1, 3, 11, 21

#### FAA Notification

FAA Study	97-ASW-0570-OE	FAA Issue Date	05/01/1997
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#### Owner & Contact Information

FRN	0007834039	Owner Entity Type	Corporation
Assignor FRN	0006140065	Assignor ID	L00281468

#### Owner

Vision Media Group, Inc.  
Attention To: Creta L. Carter II  
801 S. Armstrong Ave.  
Denison , TX 75020

P: (903)815-0030  
F:  
E: notguiltybis@yahoo.com

#### Contact

Carter , Creta L II  
Attention To: Creta L. Carter II  
801 S. Armstrong Ave.  
Denison , TX 75020

P: (903)815-0030  
F:  
E: notguiltybis@yahoo.com

#### Last Action Status

Status	Granted	Received	12/08/2015
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(ASR 1218550 Cont'd)

Purpose	Change Owner	Entered	12/08/2015
Mode	Interactive		

**Related Applications**

12/08/2015	A0984523 - Change Owner (OC)
10/17/2000	A0144984 - New (NE)

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**Comments**

**Comments**

None

▫

**History**

**Date**

**Event**

12/09/2015	Registration Printed
12/09/2015	Change of Ownership Letter Sent
12/08/2015	Change of Ownership Received

All History (6)

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**Automated Letters**

12/09/2015	Authorization, Reference
12/09/2015	Ownership Change, Reference 890519
10/22/2001	Construction Reminder, Reference 163951

All letters (4)

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