

<b>EXHIBIT 28</b> <b>Section III Engineering</b> <b>KLLI (FM) Ch 262</b>
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Infinity Broadcasting Corporation of Dallas. (here-in Infinity), the licensee of KLLI(FM), proposes to move the transmitting antenna location of KLLI(FM). The Licensee proposes to use an omni directional antenna, 100 kW average radiated power at 430 meters antenna radiation center height above ground, Coordinates NAD 27 32-32- 35.5 N, 096-57-32.0 W.

The proposed transmitter site is short-spaced to KUSJ-FM, Ch 288C2 and a vacant allocation in Meridian, TX Ch 285A.

KUSJ-FM is co-channel to KLLI(FM). The proposed KLLI (FM) Site will be 183.3 kilometers from the site authorized for KUSJ-FM. This is 4.7 Kilometers less the spacing minimum of 188 Kilometers. However, it is beyond the minimum spacing for 73.215 processing and the contours do not overlap.

The Meridian TX Allocation is 2<sup>nd</sup> adjacent to KLLI (FM). The proposed KLLI (FM) Site will be 92.55 kilometers from the site authorized for the Allocation. This is 2.4 Kilometers less the spacing minimum of 95 Kilometers. However, it is beyond the minimum spacing for 73.215 processing and the contours do not overlap.

Because the proposed site is short spaced to KUSJ-FM and the Meridian, TX Allocation under C.F.R. 47 §73.207, the applicant requests that this application be processed under C.F.R. 47 §73.215 as the proposed site does meet the spacing and contour overlap criteria in 73.215 for both KUSJ-FM and the Meridian, TX Allocation.

Spacing studies 1, 2 and 3 show the 73.207, 73.215 spacings and contour overlap of any potentially affected existing Stations, Allocations or Construction Permits

## Spacing Study #1 Section 73.207

Callsign	ST	ARN	City	Chnl.	ERP	Cls.	Status	Dst.	Sep	Clr
KUSJ	TX		HARKER HEIGHTS	288	0	C2	USE	183.27	188	-4.7
	TX	RM10121	ROSEBUD	286	0	A	APP	160.69	165	-4.3
KUSJ	TX	BLH19990323KB	HARKER HEIGHTS	288	33000	C2	LIC	184.04	188	-4
	TX	RM10120	MERIDIAN	285	0	A	APP	92.55	95	-2.4
	TX		MERIDIAN	285	0	A	APP	92.55	95	-2.4
KDDQ	OK	BLH20010410ACY	COMANCHE	287	6000	A	LIC	227.96	226	2
KDDQ	OK	BLH20010410ACY	COMANCHE	287	6000	A	LIC	227.96	226	2
KYKS	TX		LUFKIN	286	0	C	USE	242.62	241	1.6
KDDQ*	OK	FM ALLOTMENT	COMANCHE	287	0	A	USE	229.76	226	3.8
KRNB	TX	BLH19990413KD	DECATUR	289	100000	C	LIC	109.41	105	4.4
KRNB	TX		DECATUR	289	0	C	USE	109.15	105	4.1
KRNB	TX	BLH19990922AAZ	DECATUR	289	93000	C	LIC	109.41	105	4.4
KYCX-FM	TX		MEXIA	285	0	A	USE	101.44	95	6.4
KYCX-FM	TX	BLH19830907AN	MEXIA	285	2100	A	LIC	101.44	95	6.4
	TX	RMspm79*	PILOT POINT	285	0	C1	APP	112.8	105	7.8
	OK	RMbg-94*	PILOT VIEW	285	0	C1	APP	112.8	105	7.8
KTCY	TX	BLH19991109ACA	PILOT POINT	285	15700	C1	LIC	112.8	105	7.8
KHTZ	TX		CAMERON	286	0	C3	USE	187.46	176	11.5
KYKS	TX	BLH19900827KA	LUFKIN	286	100000	C	LIC	254.51	241	13.5
	TX	RMbg-94*	PILOT POINT	285	0	C0	APP	120.83	105	15.8
	TX	RMspm79*	PILOT POINT	285	0	C0	APP	120.83	105	15.8
KTCY	TX		PILOT POINT	285	0	C1	USE	126.23	105	21.2
NEW	TX	BNPFT20030310BIA	MANSFIELD	233	10	D	APP	22.42	0	22.4
	TX	RM10120	HICO	285	0	A	APP	118.72	95	23.7
KEZB	TX	BLH19990804KD	HEMPSTEAD	287	9200	C3	LIC	263.45	237	26.4
KEZB	TX	BPH20030501AAL	HEMPSTEAD	287	25000	C3	APP	264.77	237	27.8
KHTZ	TX	BPH19981202IA	CAMERON	286	22000	C3	APP	204.44	176	28.4
KEZB	TX		HEMPSTEAD	287	0	C3	USE	266.16	237	29.2

## Spacing Study #2 Section 73.215

Callsign	St	ARN	City	Chnl.	ERP	Cls.	Status	Dst.	Sep	Clr
	TX	RM10120	MERIDIAN	285	0	A	APP	92.55	89	3.6
	TX		MERIDIAN	285	0	A	APP	92.55	89	3.6
KUSJ	TX		HARKER HEIGHTS	288	0	C2	USE	183.27	176	7.3
KUSJ	TX	BLH19990323KB	HARKER HEIGHTS	288	33000	C2	LIC	184.04	176	8
KRNB	TX	BLH19990413KD	DECATUR	289	100000	C	LIC	109.41	99	10.4
KRNB	TX		DECATUR	289	0	C	USE	109.15	99	10.1
KRNB	TX	BLH19990922AAZ	DECATUR	289	93000	C	LIC	109.41	99	10.4
KYCX-FM	TX		MEXIA	285	0	A	USE	101.44	89	12.4
KYCX-FM	TX	BLH19830907AN	MEXIA	285	2100	A	LIC	101.44	89	12.4
	TX	RMspm79*	PILOT POINT	285	0	C1	APP	112.8	99	13.8
KTCY	TX	BLH19991109ACA	PILOT POINT	285	15700	C1	LIC	112.8	99	13.8
	OK	RMbg-94*	PILOT VIEW	285	0	C1	APP	112.8	99	13.8
	TX	RM10121	ROSEBUD	286	0	A	APP	160.69	142	18.7
	TX	RMspm79*	PILOT POINT	285	0	C0	APP	120.83	99	21.8
	TX	RMbg-94*	PILOT POINT	285	0	C0	APP	120.83	99	21.8
NEW	TX	BNPFT20030310BIA	MANSFIELD	233	10	D	APP	22.42	0	22.4
KHTZ	TX		CAMERON	286	0	C3	USE	187.46	165	22.5
KDDQ	OK	BLH20010410ACY	COMANCHE	287	6000	A	LIC	227.96	203	25
KDDQ	OK	BLH20010410ACY	COMANCHE	287	6000	A	LIC	227.96	203	25
KDDQ*	OK	FM ALLOTMENT	COMANCHE	287	0	A	USE	229.76	203	26.8
KTCY	TX		PILOT POINT	285	0	C1	USE	126.23	99	27.2
	TX	RM10120	HICO	285	0	A	APP	118.72	89	29.7
KYKS	TX		LUFKIN	286	0	C	USE	242.62	209	33.6
KEZB	TX	BLH19990804KD	HEMPSTEAD	287	9200	C3	LIC	263.45	226	37.4
KEZB	TX	BPH20030501AAL	HEMPSTEAD	287	25000	C3	APP	264.77	226	38.8
KHTZ	TX	BPH19981202IA	CAMERON	286	22000	C3	APP	204.44	165	39.4

### Spacing Study #3 Contour Overlap

Callsign	St	ARN	City	Chnl.	ERP	Cls.	Status	Dst.	Sep	Clr
	TX		MERIDIAN	285	6000	A	APP	92.55	95	1.70 dB
KDDQ*	OK	FM ALLOTMENT	COMANCHE	287	6000	A	USE	229.76	226	1.60 dB
	TX	RM10120	MERIDIAN	285	6000	A	APP	92.55	95	1.70 dB
	TX	RM10121	ROSEBUD	286	6000	A	APP	160.69	165	2.16 dB
KUSJ	TX		HARKER HEIGHTS	288	50000	C2	USE	183.27	188	2.17 dB
KRNB	TX		DECATUR	289	100000	C	USE	109.15	105	2.19 dB
KRNB	TX	BLH19990922AAZ	DECATUR	289	93000	C	LIC	109.41	105	2.60 dB
KDDQ	OK	BLH20010410ACY	COMANCHE	287	6000	A	LIC	227.96	226	2.77 dB
KDDQ	OK	BLH20010410ACY	COMANCHE	287	6000	A	LIC	227.96	226	2.77 dB
KYCX-FM	TX	BLH19830907AN	MEXIA	285	6000	A	LIC	101.44	95	5.92 dB
KHTZ	TX		CAMERON	286	25000	C3	USE	187.46	176	5.81 dB
KYKS	TX		LUFKIN	286	100000	C	USE	242.62	241	5.47 dB
KYCX-FM	TX		MEXIA	285	6000	A	USE	101.44	95	5.92 dB
KEZB	TX	BPH20030501AAL	HEMPSTEAD	287	25000	C3	APP	264.77	237	6.18 dB
KEZB	TX		HEMPSTEAD	287	25000	C3	USE	266.16	237	6.42 dB
KEZB	TX	BLH19990804KD	HEMPSTEAD	287	25000	C3	LIC	263.45	237	6.17 dB
	TX	RMspm79*	PILOT POINT	285	100000	C1	APP	112.8	105	7.69 dB
	OK	RMbg-94*	PILOT VIEW	285	100000	C1	APP	112.8	105	7.69 dB
KTCY	TX	BLH19991109ACA	PILOT POINT	285	15700	C1	LIC	112.8	105	8.96 dB
KYKS	TX	BLH19900827KA	LUFKIN	286	100000	C	LIC	254.51	241	8.14 dB
KHTZ	TX	BPH19981202IA	CAMERON	286	22000	C3	APP	204.44	176	9.57 dB
	TX	RMspm79*	PILOT POINT	285	100000	C0	APP	120.83	105	10.24 dB
	TX	RMbg-94*	PILOT POINT	285	100000	C0	APP	120.83	105	10.24 dB
	TX	RM10120	HICO	285	6000	A	APP	118.72	95	11.89 dB
KEAN-FM	TX		ABILENE	286	100000	C1	USE	249.67	209	11.22 dB
KEAN-FM	TX	BXPH20020523AAA	ABILENE	286	100000	C1	CP	249.64	209	11.21 dB
KEAN-FM	TX	BLH20010730ABR	ABILENE	286	100000	C1	LIC	249.64	209	11.21 dB
KTCY	TX		PILOT POINT	285	100000	C1	USE	126.23	105	12.53 dB
KNCB-FM	LA	BLH20020910AAE	VIVIAN	287	3200	A	LIC	289.36	226	12.41 dB
KNCB-FM	LA		VIVIAN	287	6000	A	USE	286.93	226	12.07 dB
	TX	RM10122	THRALL	286	6000	A	APP	211.18	165	13.08 dB
	TX	RM9675	THORNDAL	286	6000	A	APP	215.06	165	13.85 dB
KKFC	OK		COALGATE	288	25000	C3	USE	243.52	176	16.71 dB