

<b>EXHIBIT 28</b> <b>Section III Engineering</b> <b>KOAI (FM) Ch 262</b>
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Infinity KOAI - FM, Inc. (here-in Infinity), the licensee of KOAI (FM), proposes to relocate the transmitting antenna location of KOAI (FM). The Licensee proposes to use an omni directional antenna, 30 kW average radiated power at 474 Meters HAAT, Coordinates NAD 27 -32-32- 35.5 N, 096-57-32.0 W.

The proposed transmitter site is short-spaced to KRVF (FM), Ch 295C3 and a Rule Making Petition RB-bg-50, Groesbeck, TX.

KRVF (FM) is third channel adjacent to KOAI (FM). The proposed KOAI (FM) Site will be 73.44 kilometers from the site authorized for KRVF (FM). This is 2.6 Kilometers short of the spacing minimum of 76 Kilometers.

KRVF (FM) is operating pending grant of license application file number BPH-20020930ABW covering Construction Permit BLH-20030113ACP.

Since the proposed site is short spaced to KRVF (FM) under C.F.R. 47 §73.207, Infinity requests that this application be processed under C.F.R. 47 §73.215. The proposed site meets the spacing and contour overlap criteria in §73.215. The minimum spacing is 70 km and KOAI (FM) will be 73.44km.

The KOAI (FM) contour does not overlap the protected KRVF (FM) contour as a directional antenna is proposed. The contour overlap criteria will be met as illustrated in Contour Diagram #1

Since the proposed KOAI (FM) site is also short spaced to RM bg-50 under C.F.R. 47 §73.207, Infinity also requests that this application also be processed under C.F.R. 47 §73.215 with respect to the Rulemaking RM bg-50. The proposed KOAI (FM) site meets the spacing and contour overlap criteria in §73.215. The minimum spacing is

133 km and KOAI (FM) will be 128.5 km. The spacing is within the §73.215 minimum and there is not any contour overlap.

Spacing studies 1, 2 and 3 show the 73.207, 73.215 spacing of KRVF (FM) and the proposed Rulemaking RM bg-50 and any other potentially affected existing Stations, Allocations or Construction Permits

### Spacing Study 1, Section 73.207

Callsign	St.	City	Freq	Chnl.	ERP	ARN	Cls.	Status	Dst.	Sep	Clr
KESS-FM	TX	LEWISVILLE	107.9	300	5000	BXPH20011128ABB	A	CP	31.86	75	-43.1
	TX	GROESBECK	107.7	299	0	RMbg-50	A	APP	128.5	133	-4.5
KRVF	TX	KERENS	106.9	295	21500	BLH20030113ACP	C3	LIC	73.44	76	-2.6
KRVF	TX	TERRELL	106.9	295	0		C3	USE	73.44	76	-2.6
	TX	HAMILTON	107.7	299	0	RMvmm6	A	APP	133.3	133	0.3
KDXX	TX	BENBROOK	107.1	296	74000	BLH20020719AAZ	C1	LIC	82.05	82	0
KDXX	TX	BENBROOK	107.1	296	0	RM9492	C1	USE	81.61	82	-0.4
KRVF	TX	KERENS	106.9	295	0	RM9492	C3	USE	75.15	76	-0.8
	TX	WOODSON	107.5	298	0	RM10178	A	APP	204.7	200	4.7
KESS-FM*	TX	LEWISVILLE	107.9	300	0	FM ALLOTMENT	C1	USE	86.87	82	4.9
KESS-FM	TX	LEWISVILLE	107.9	300	100000	BLH20020128AAR	C1	LIC	87.64	82	5.6
KESS-FM	TX	LEWISVILLE	107.9	300	100000	BPH20021101AAU	C1	CP	87.64	82	5.6
	TX	SAVOY	107.3	297	0	RM10173	A	APP	140.1	133	7.1
	OK	WAPANUCKA	107.5	298	0	RM10201	A	APP	208.7	200	8.7
KISX	TX	WHITEHOUSE	107.3	297	0		C2	USE	168	158	9.9
KISX	TX	WHITEHOUSE	107.3	297	50000	BLH19890308KA	C2	LIC	168	158	9.9
	TX	HAMILTON	107.7	299	0	RM10004	A	APP	144.5	133	11.5
KMEO	TX	FLOWER MOUND	96.7	244	3100	BPH19980826IB	C	CP	55.17	41	14.2
KPLT-FM	TX	PARIS	107.7	299	35000	BLH19890127KB	C2	LIC	178.5	158	20.5
	TX	SEYMOUR	107.5	298	0	RMbh-3*	C2	APP	247.1	224	23.1

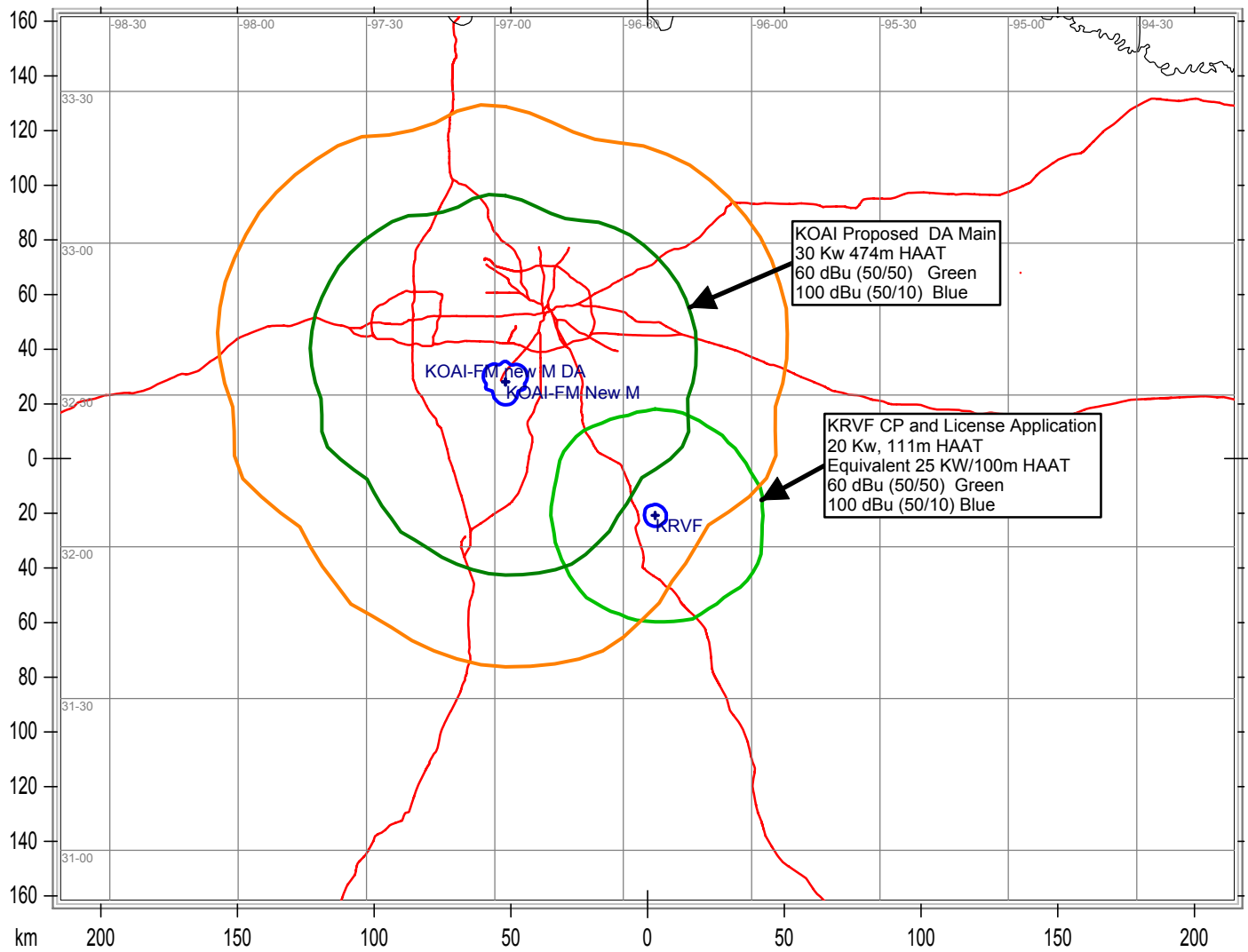
### Spacing Study 2, Section 73.215 Spacing

Callsign	St.	City	Freq	Chnl.	ERP	ARN	Cls.	Status	Dst.	Sep	Clr
KRVF	TX	KERENS	106.9	295	20000	BPH20020930ABW	C3	CP	73.44	70	3.4
KRVF	TX	TERRELL	106.9	295	0		C3	USE	73.44	70	3.4
KDXX	TX	BENBROOK	107.1	296	0	RM9492	C1	USE	81.61	76	5.6
KRVF	TX	KERENS	106.9	295	0	RM9492	C3	USE	75.15	70	5.2
KRVF	TX	TERRELL	107.1	296	3300	BLH19950630KF	A	LIC	75.8	69	6.8
KDXX	TX	BENBROOK	107.1	296	74000	BPH20000919ABQ	C1	CP	82.05	76	6
KESS-FM*	TX	LEWISVILLE	107.9	300	0	FM ALLOTMENT	C1	USE	86.87	76	10.9
KESS-FM	TX	LEWISVILLE	107.9	300	100000	BLH20020128AAR	C1	LIC	87.64	76	11.6
KESS-FM	TX	LEWISVILLE	107.9	300	100000	BPH20021101AAU	C1	CP	87.64	76	11.6
KMEO	TX	FLOWER MOUND	96.7	244	3100	BPH19980826IB	C	CP	55.17	41	14.2
	TX	GROESBECK	107.7	299	0	RMbg-50	A	APP	128.49	111	17.5
KRVA-FM	TX	MCKINNEY	106.9	295	3900	BLH19960724KC	A	LIC	86.72	69	17.7
KISX	TX	WHITEHOUSE	107.3	297	50000	BLH19890308KA	C2	LIC	167.95	144	23.9
KISX	TX	WHITEHOUSE	107.3	297	0		C2	USE	167.95	144	23.9
	TX	WOODSON	107.5	298	0	RM10178	A	APP	204.7	178	26.7
	TX	SAVOY	107.3	297	0	RM10173	A	APP	140.06	111	29.1
	OK	WAPANUCKA	107.5	298	0	RM10201	A	APP	208.71	178	30.7
	TX	HAMILTON	107.7	299	0	RM10004	A	APP	144.52	111	33.5
KPLT-FM	TX	PARIS	107.7	299	35000	BLH19890127KB	C2	LIC	178.54	144	34.5
	TX	SEYMOUR	107.5	298	0	RMbh-3*	C2	APP	247.07	211	36.1

### Spacing Study 3, Contour Overlap

Call Sign	St.	City	Freq	Chnl.	ERP	ARN	Cls.	Status	Dst.	Sep	Clr
Call Sign	State	City	Freq	Channel	ERP_w	ARN	Class	Status	Distance	Sep	Clr
KESS-FM	TX	LEWISVILLE	107.9	300	6000	BXPH20011128ABB	A	CP	31.86	75	-17.12 dB
	TX	GROESBECK	107.7	299	6000	RMbg-50	A	APP	128.5	133	-2.95 dB
KDXX	TX	BENBROOK	107.1	296	100000	RM9492	C1	USE	81.61	82	-0.06 dB
KDXX	TX	BENBROOK	107.1	296	74000	BLH20020719AAZ	C1	LIC	82.05	82	0.73 dB
	TX	WOODSON	107.5	298	6000	RM10178	A	APP	204.7	200	1.93 dB
KESS-FM*	TX	LEWISVILLE	107.9	300	100000	FM ALLOTMENT	C1	USE	86.87	82	2.36 dB
KESS-FM	TX	LEWISVILLE	107.9	300	100000	BPH20021101AAU	C1	CP	87.64	82	2.45 dB
KESS-FM	TX	LEWISVILLE	107.9	300	100000	BLH20020128AAR	C1	LIC	87.64	82	2.45 dB
KRVF	TX	KERENS	106.9	295	25000	BLH20030113ACP	C3	LIC	73.44	76	2.79 dB
KRVF	TX	TERRELL	106.9	295	25000		C3	USE	73.44	76	2.79 dB
	TX	HAMILTON	107.7	299	6000	RMvmm6	A	APP	133.3	133	3.13 dB
KRVF	TX	KERENS	106.9	295	25000	RM9492	C3	USE	75.15	76	3.99 dB
KISX	TX	WHITEHOUSE	107.3	297	50000		C2	USE	168	158	4.54 dB
KISX	TX	WHITEHOUSE	107.3	297	50000	BLH19890308KA	C2	LIC	168	158	4.54 dB
	TX	SAVOY	107.3	297	6000	RM10173	A	APP	140.1	133	5.16 dB
KPLT-FM	TX	PARIS	107.7	299	50000	BLH19890127KB	C2	LIC	178.5	158	5.40 dB
	TX	HAMILTON	107.7	299	6000	RM10004	A	APP	144.5	133	5.81 dB
	TX	SEYMOUR	107.5	298	50000	RMbh-3*	C2	APP	247.1	224	5.92 dB
	TX	SAVOY	107.3	297	6000	RM10173	A	APP	140.1	133	5.16 dB
	TX	SEYMOUR	107.5	298	50000	RMbh-3*	C2	APP	247.1	224	5.92 dB
	OK	WAPANUCKA	107.5	298	6000	RM10201	A	APP	208.7	200	6.76 dB
KPLT-FM	TX	PARIS	107.7	299	50000		C2	USE	188.1	158	8.41 dB
KPLT-FM	TX	PARIS	107.7	299	50000	BMPH20030703ABK	C2	CP MOD	196.6	158	10.32 dB

## KOAI-FM Dallas, Diagram #1, Contour Study



State Borders

Highways

Lat/Lon Grid