

Exhibit 24 - Statement A  
**NATURE OF THE PROPOSAL**

prepared for

**Liberman Broadcasting of Houston License Corp**

KQQK(FM) Beaumont, Texas

Facility ID 19087

Ch. 300C 90 kW 596 m

*Liberman Broadcasting of Houston License Corp.* (“*Liberman*”) is the licensee of KQQK(FM), Ch. 300C, Beaumont, Texas. KQQK is currently licensed to operate with an effective radiated power (“ERP”) of 100 kW at an antenna height above average terrain (“HAAT”) of 551 meters with a directional antenna. *Liberman* seeks to relocate KQQK to a new site (4.25 km distant). Under the instant proposal, KQQK will operate with an ERP of 90 kW and an antenna HAAT of 596 meters, with a non-directional antenna.

*Liberman* is also licensee of KTJM (Ch.253C, Port Arthur, TX). In a separate application (non-contingent), *Liberman* will propose to relocate KTJM to the site proposed herein for KQQK. A “common” antenna system is proposed for KQQK and KTJM.

A “*Notice of Proposed Construction or Alteration*” has been submitted to the FAA for the new tower structure. Upon receipt of a “*Determination of No Hazard*” the structure will be registered with the FCC.

The principal community of Beaumont is encompassed by the proposed KQQK 70 dB $\mu$  coverage contour. The attached **Exhibit 24 - Figure 1** supplies a coverage contour map for the proposed KQQK facility.

The proposed KQQK facility meets the minimum distance separation requirements of Section 73.207 of the Commission’s Rules with respect to all other stations, allotments, and proposals, as contained within the Commission’s CDBS database except with respect to KIXS(FM) (Ch. 300 C1, Victoria, TX) and KRKA(FM) (Ch. 300C1, Erath, LA). An allocation spacing summary table is provided as **Exhibit 24 - Table 1**.

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Regarding the proposed short-spacings to KIXS and KRKA, processing under Section 73.215 of the Commission's Rules is requested.<sup>1</sup> Attached as **Exhibit 24 - Figure 2** is a depiction of the pertinent protected and interfering contours for the proposed KQQK and the licensed KIXS facilities. KIXS is licensed under §73.215, therefore the licensed KIXS facility contours are employed (rather than the class maximum facility). A detail view of the KIXS protected contour is supplied on the smaller scale map of **Exhibit 24 - Figure 2A**, which demonstrates that no prohibited contour overlap would exist. Similarly, **Exhibit 24 - Figure 3** depicts the lack of prohibited contour overlap between the proposed KQQK and the licensed KRKA facility (also a §73.215 grant).

The proposed KQQK site is located over 320 km from the U.S. - Mexican and U.S. - Canadian borders, so no international coordination is required. The nearest FCC monitoring station is 433.3 km distant at Kingsville, TX. This exceeds by a great margin the threshold minimum distance specified in §73.1030(c)(3) that would suggest consideration of the monitoring station. There are no AM broadcast stations within 3.2 km (2 miles) of the proposed site, according to information extracted from the Commission's engineering database.

It is thus believed that the facility proposed herein satisfies all of the pertinent Commission Rules and Policies now in effect regarding allocation matters.

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<sup>1</sup>The licensed KQQK facility is also short-spaced to these two stations as well as to KTBQ(FM) (Ch. 299C2, Nacogdoches, TX). The site proposed herein is fully-spaced to KTBQ.

**EXHIBIT 24 - FIGURE 1**  
**PROPOSED COVERAGE CONTOURS**

prepared April 2004  
**Liberan Broadcasting**  
**of Houston License Corp.**  
 KQQK(FM) Beaumont, Texas  
 Facility ID 19087  
 Ch. 300C 90 kW 596 m

**Cavell, Mertz & Davis, Inc.**  
 Manassas, Virginia

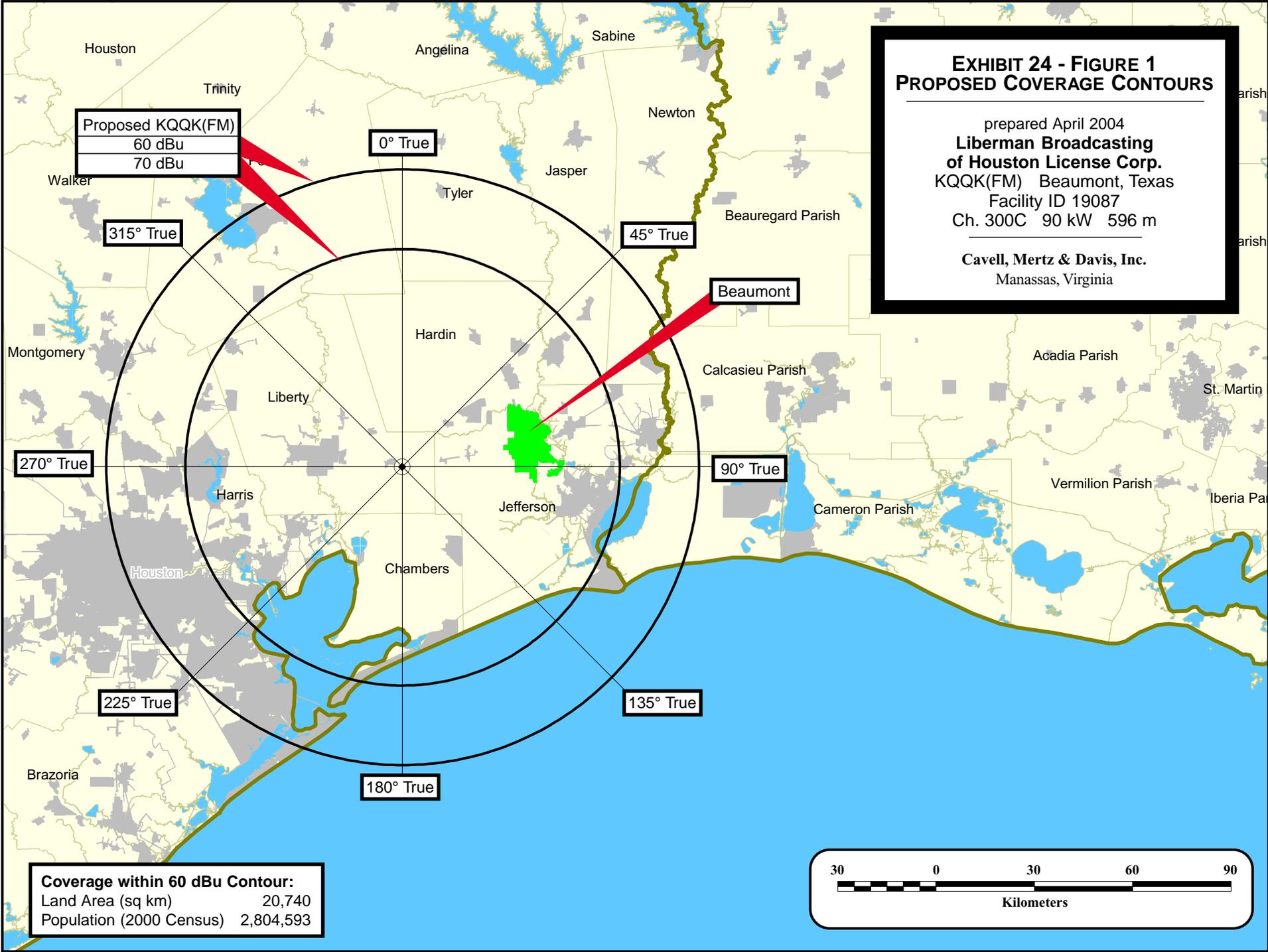


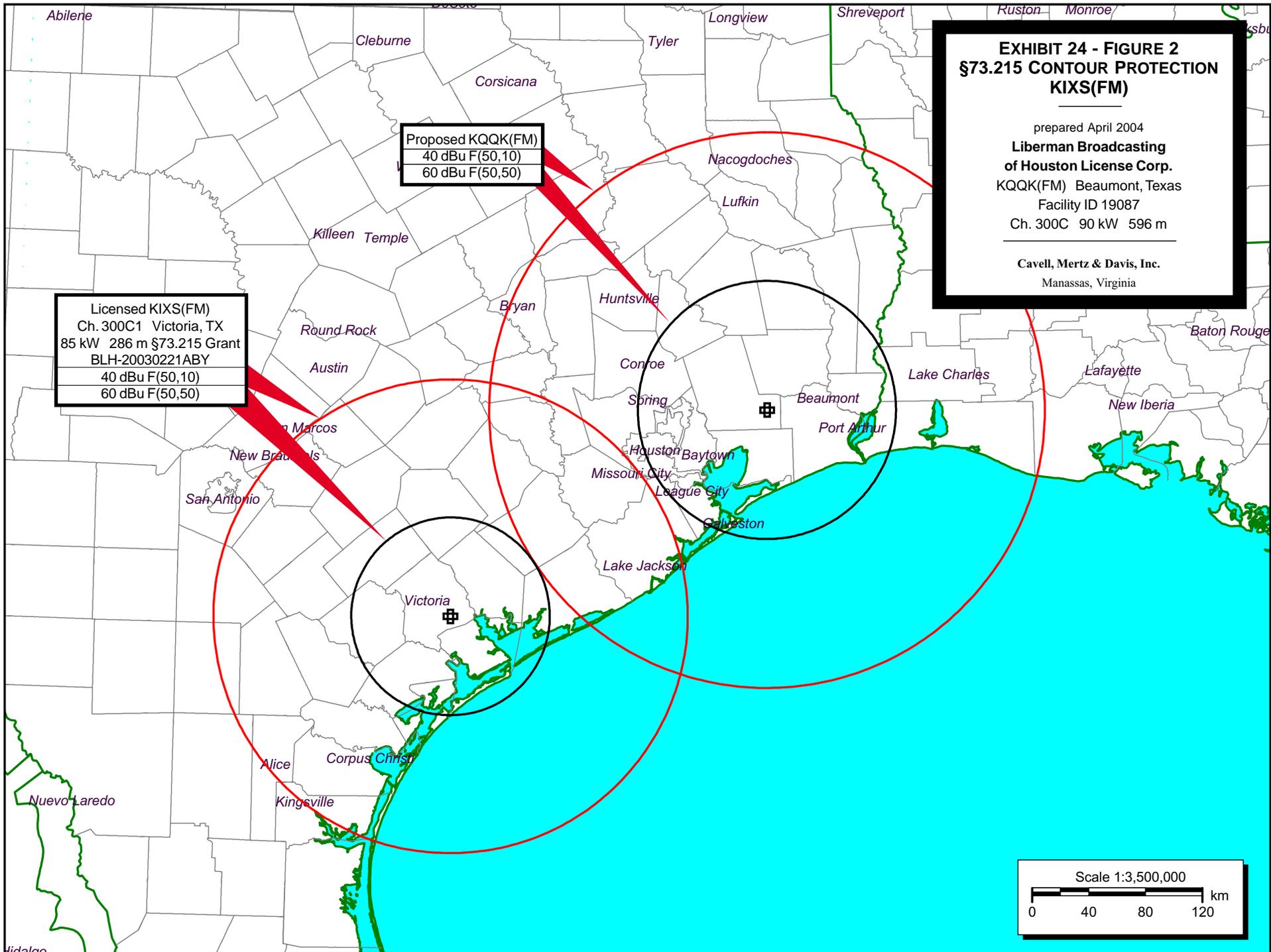
Exhibit 24 - Table 1  
**ALLOCATION SPACING SUMMARY**

prepared for  
**Liberman Broadcasting of Houston License Corp**  
**KQQK(FM) Beaumont, Texas**  
**Facility ID 19087**  
**Ch. 300C 90 kW 596 m**

REFERENCE						DISPLAY DATES
30 01 01 N			CLASS = C			DATA 04-10-04
94 32 47 W			Current Spacings			SEARCH 04-14-04
----- Channel 300 - 107.9 MHz -----						

Call	Channel	Location	Dist	Azi	FCC	Margin		
KQQK	LIC	300C	Beaumont	TX	4.25	26.0	290.0	-285.75
KIXS	LIC	300C1	Victoria	TX	265.47	237.3	270.0	-4.53 *
KRKA	LIC	300C1	Erath	LA	267.70	84.9	270.0	-2.30 *
KLDE	LIC	298C	Lake Jackson	TX	104.55	219.4	105.0	-0.45 **
KTBQ	LIC	299C2	Nacogdoches	TX	188.01	355.9	188.0	0.01
RADD	ADD	300A	Tennessee Colony	TX	229.19	328.7	226.0	3.19
RADD	ADD	300A	Tennessee Colony	TX	236.76	330.1	226.0	10.76
KJAS	CP	297C3	Jasper	TX	118.91	26.4	96.0	22.91
KJAS	LIC	297A	Jasper	TX	118.91	26.4	95.0	23.91
KTHT	LIC	246C	Cleveland	TX	73.17	322.0	48.0	25.17
KVMAFM	CP	300C2	Oil City	LA	284.45	14.9	249.0	35.45
KJMH	LIC	298C2	Lake Arthur	LA	155.56	82.0	105.0	50.56
RADD	ADD	297C3	Bedias	TX	158.89	302.4	96.0	62.89
KDOS	LIC	300A	Robinson	TX	300.57	304.2	226.0	74.57

\* 73.215 processing requested to KIXS and KRKA  
 \*\* Spacing criteria met when rounded to nearest kilometer, per §73.208.



Wharton



El Campo



Bay City

**EXHIBIT 24 - FIGURE 2A**  
**§73.215 CONTOUR PROTECTION**  
**KIXS(FM) - DETAIL**

prepared April 2004  
**Liberian Broadcasting**  
**of Houston License Corp.**  
 KQQK(FM) Beaumont, Texas  
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**Cavell, Mertz & Davis, Inc.**  
 Manassas, Virginia

Licensed KIXS(FM)  
60 dBu F(50,50)

Proposed KQQK(FM)  
40 dBu F(50,10)

