

Technical Statement
and
Exhibits
in support of a
Minor Modification
to
Construction Permit
BNPED-20071018AAH
on
Channel 210
at
Snyder, TX

Introduction

This is a minor modification to the facility represented by Construction Permit BNPED-20071018AAH by Western Texas College (the Applicant).

Basis of Calculations

All exhibits accompanying the application were prepared using FCC 30-arc-second terrain data except where noted. All population measurements were made using the most recent census block data available from the United States Bureau of the Census unless noted otherwise. That data is from the 2000 Census.

Technical Parameters

The proposed facility's 60 dBu contour encompasses 5,570.7 square kilometers. The U.S. population within the proposed facility's 60 dBu contour is estimated to be 26,776 persons.

Antenna Location

It is proposed to locate the proposed facility on an existing tower uniquely located by the NAD-27 coordinates of North Latitude 32 degrees 45 minutes 47 seconds, West Longitude 100 degrees 55 minutes 8 seconds. The tower possesses an Antenna Structure Registration Number of #1202272. The applicant has obtained reasonable assurance from the tower owner that the site is available for the proposed facility.

Technical Facilities

The applicant proposes at this time to utilize a five-bay, non-directional, circularly-polarized antenna. The FM antenna system will be side-mounted on the existing tower such that the radiation centerline is 110 meters above ground level (859 meters above mean sea level). The overall height of the tower is 137 meters above ground level.

A type-approved transmitter of adequate power for the required transmitter power output (TPO) will be installed at the time of construction. The appropriate TPO will be determined at license application filing to achieve an effective radiated power of 19 kilowatts taking into consideration the losses in transmission line, transmission system losses and the power gain of the antenna system.

Blanketing and Intermodulation Interference

There are no known commercial or government receiving stations or cable head-end facilities located within the blanketing contour. In the event that blanketing or intermodulation interference, including RITOE, occurs with any facilities or to radio receivers in use prior to grant of their application, the applicant will accept the responsibility to alleviate any interference resulting from the proposal as required by Section 73.318 of the FCC Rules.

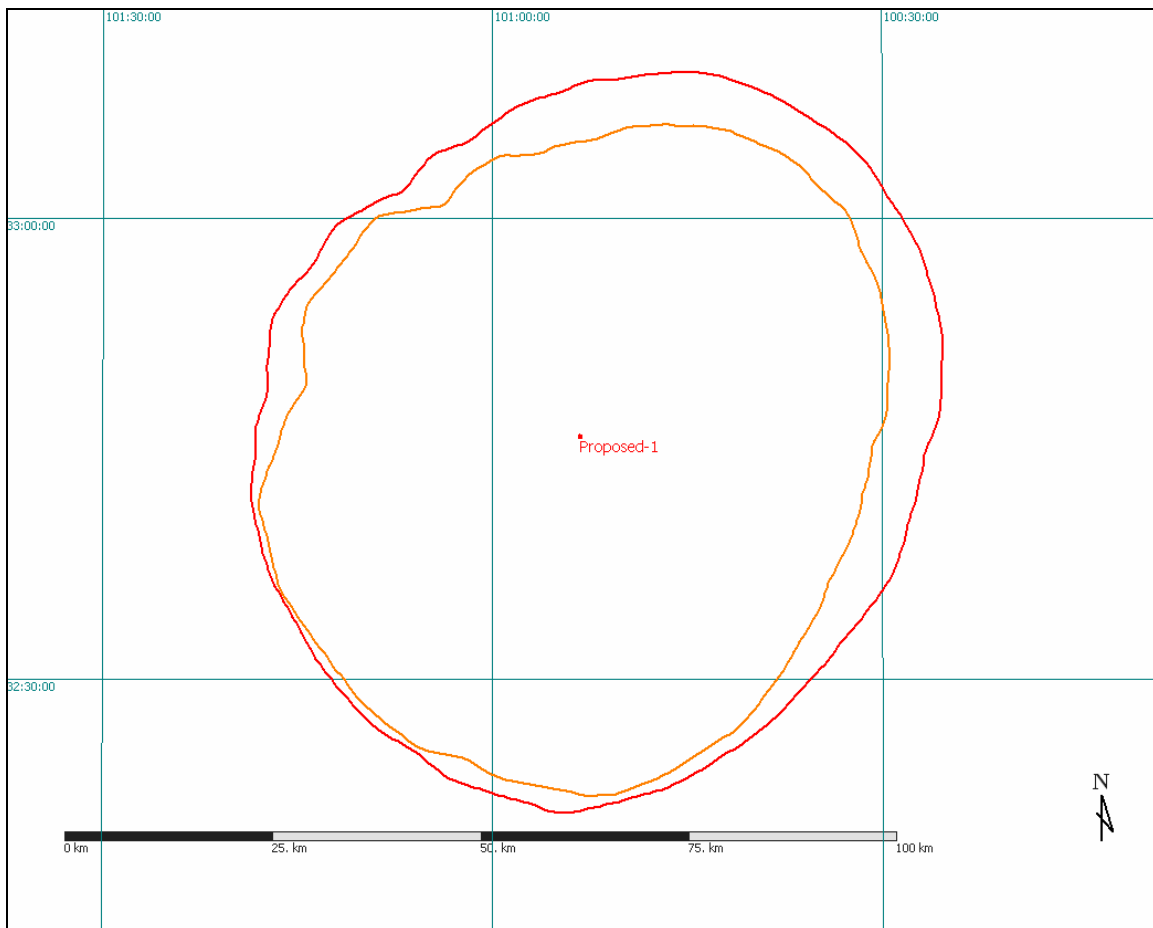
Fair Distribution Analysis

The underlying construction permit proposed providing a first noncommercial educational aural service to at least 10 percent of the people residing within the station's 60 dBu contour and a minimum of 2,000 people.

Specifically, the Applicant proposed providing a first NCE service to 24,342 persons. Those persons represented 100% of the population within the 60 dBu contour of the station. As demonstrated below, the currently authorized 60 dBu contour (orange) is completely contained by the proposed 60 dBu contour (red) within the instant application.

Furthermore, the additional area was completely unserved by a noncommercial aural service on the snapshot date at the end of the 2007 window. The 2000 Census indicates 434 persons reside in the additional area served by the instant proposal. The 2010 estimate for the additional area is 345 persons.

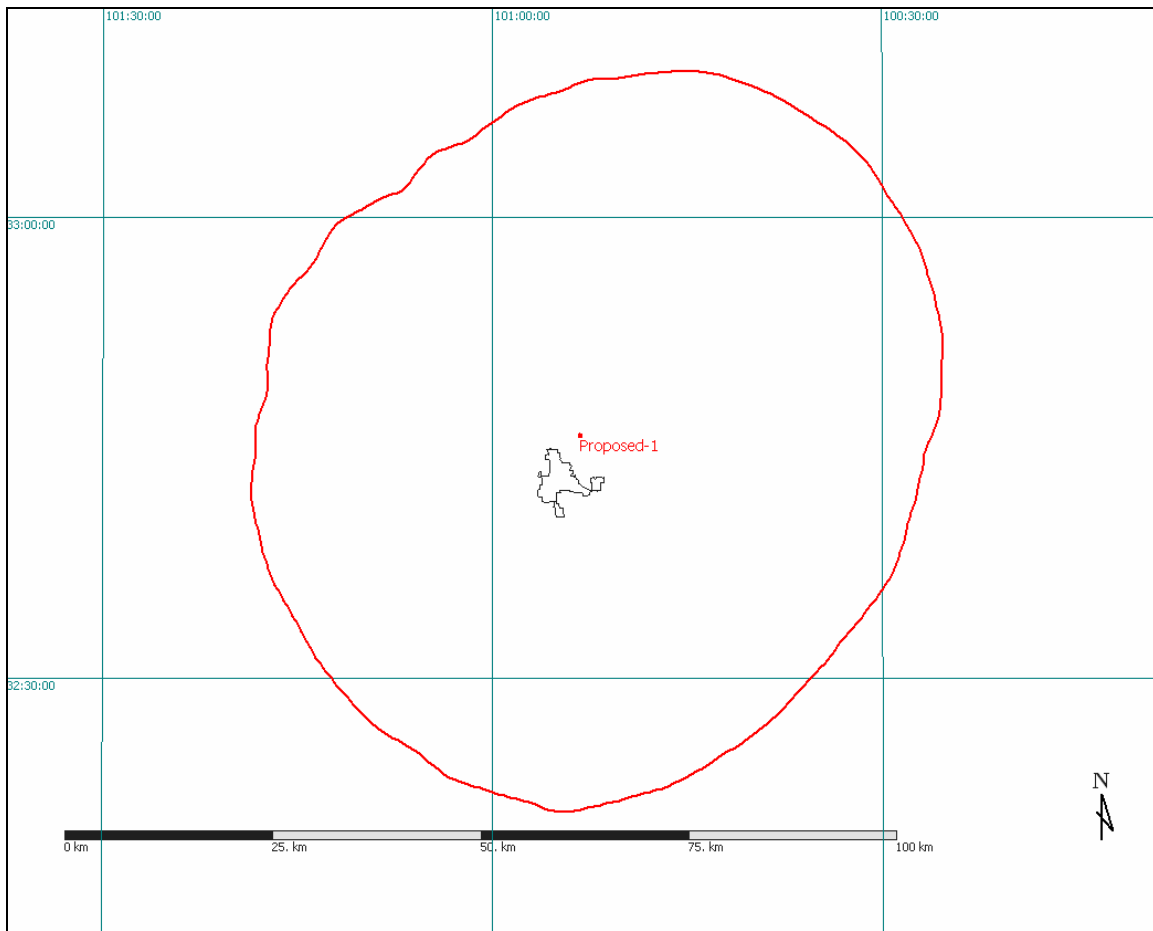
Therefore, the proposed modification will not downgrade service to the area on which the Section 307(b) preference was based.



Community Coverage

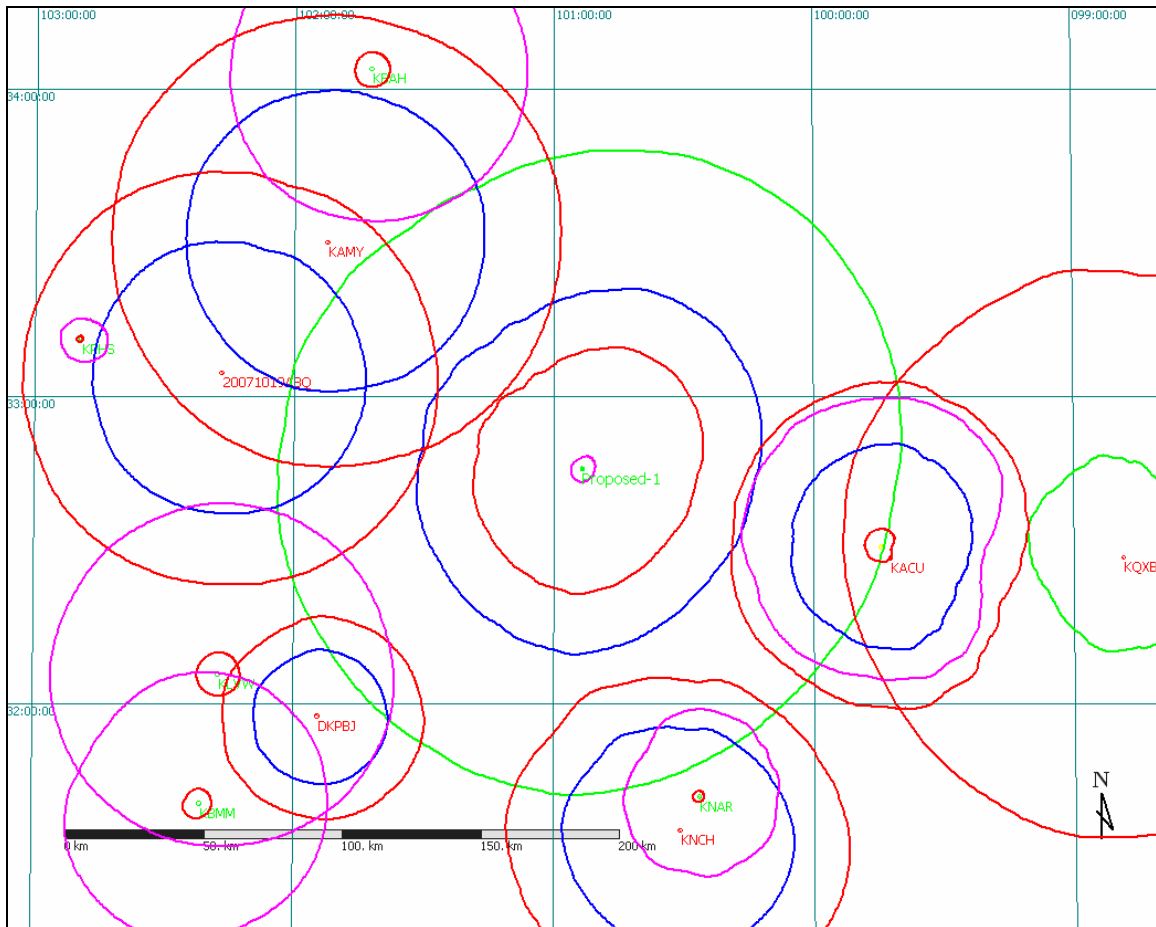
The proposed facility is subject to 47 C.F.R. 73.515 because the instant application requests a channel in the reserved band. 47 C.F.R. 73.515 requires that a minimum field strength of 1 mV/m (60 dBu) be provided to at least 50 percent of the community of license or reach 50 percent of the population within the community.

The instant application identifies Snyder, TX as the community of license. As demonstrated in the following illustration, that community lies entirely within the 60 dBu contour of the proposed facility. Therefore, the instant application complies with 47 C.F.R. 73.515.



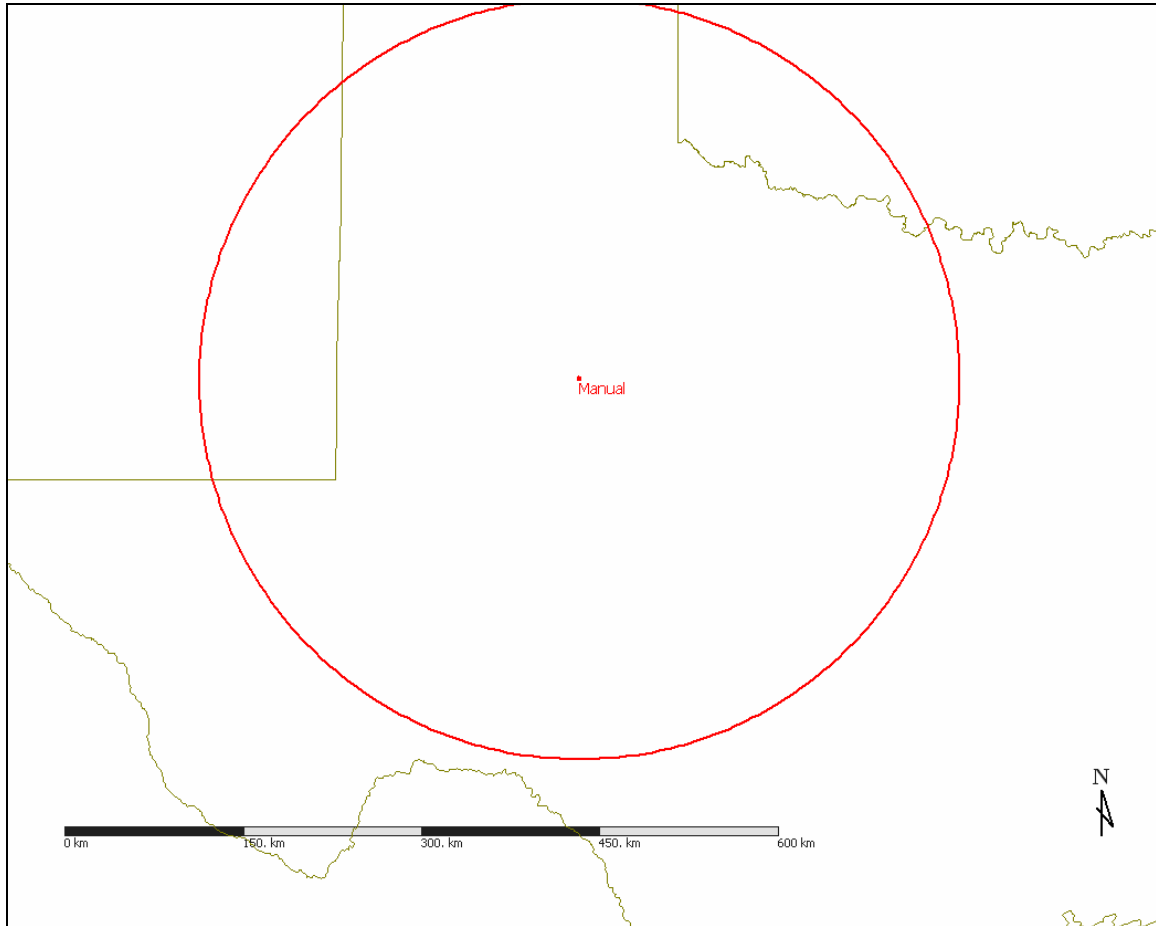
Contour Overlap Requirements

The following contour study demonstrates that the proposed facility complies with the provisions of 47 C.F.R. 73.509 in regards to each potentially affected station, allotment, and application.



International Borders

The proposed station is not located within 320 kilometers of the Mexican border.



Environmental Protection Act

Operation of this facility will not have a significant environmental impact. To the best knowledge of the Applicant:

1. The existing structure is not located in an officially designated wilderness area or wildlife preserve, nor does it threaten the existence or habitat of endangered species.
2. The proposed changes will not affect districts, sites, buildings, structures or objects significant in American history, architecture, engineering or culture that are listed in the National Register of Historic Places, or eligible for listing.
3. The site is not located in a flood plain. Nothing is proposed that would require significant changes in surface features such as wetland fill, deforestation or water diversion.
4. The structure is marked in accordance with FAA requirements.

Electromagnetic Exposure Limits

The proposed facility will not result in human exposure to radiofrequency (RF) radiation in excess of safety standards specified in Section 1.1307(b). Effective October 15, 1997, the FCC adopted revised guidelines and procedures for evaluating the environmental effects of RF emissions. These revised guidelines incorporate two tiers of exposure limits based on whether exposure occurs in a "controlled" (occupational) situation or an "uncontrolled" (general population) situation. Based on the methods published in OET Bulletin No. 65 (entitled "Evaluating Compliance with FCC-Specified Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields"), the predicted power density value produced by the proposed facility will be well below the established ANSI guideline limits.

Verification of compliance with FCC-specified guidelines for human exposure to RF radiation was determined utilizing the equations and graphs set forth in OET Bulletin No. 65. The bulletin prescribes that the fraction of the recommended limit incurred within each frequency interval should be determined and that the sum of all fractional contributions should not exceed 100%.

The proposed facility will operate with a radiation centerline at 110 meters above ground level (AGL) and an ERP of 19 kW on Channel 210 operating with circular polarization. The Applicant intends to use a five-bay "Rototiller" type antenna. The antenna will employ full-wave spacing.

Utilizing FMModel it was determined that the highest value of power density occurs at 36 meters from the base of the tower which is 13.06 $\mu\text{W}/\text{cm}^2$ or 6.53% of the 200 $\mu\text{W}/\text{cm}^2$ MPE limit for uncontrolled/general exposures. It is 1.3% of the MPE for occupational/controlled areas.

Since the proposed power density is less than 100 percent of the ANSI guideline, the proposed facility complies with FCC requirements regarding radiofrequency

radiation. In addition, the base of the tower will be fenced and warning signs will be posted at appropriate intervals to preclude casual access.

Furthermore, the applicant will ensure protection to station personnel working in the vicinity of their antenna. Access to the antenna supporting tower base will be restricted to authorized personnel only. The applicant for the proposed station will reduce power or cease operation, when appropriate and deemed necessary, during times of service or maintenance of the transmitting system or when work is being performed on the tower to avoid potentially harmful exposure to station personnel or workers. The applicant will initiate joint procedures with common users to be followed during times of service or maintenance of the transmission systems when necessary to avoid potentially harmful exposure to personnel.