

**KSIX, CORPUS CHRISTI, TX****EXHIBIT 11 - NARRATIVE****ENGINEERING STATEMENT**

Withers Family Texas Holdings, LP (“Withers”) is licensee of KSIX(AM), Corpus Christi, Texas (BL-20020717ABV, FCC ID Number 13964). By the instant application, Withers proposes to relocate KSIX to a new site, as detailed below. This move serves the public interest, because it will free up needed capital for station operation and debt repayment, while having essentially no impact on station coverage, as shown in the attached engineering exhibits.

The licensed KSIX coordinates are 27-48-09 NL and 97-27-14 WL (NAD 27). The proposed coordinates are 27-47-39 NL and 97-27-30 WL (NAD 27). The new coordinates are calculated to be 1.02 kilometers distant from the licensed coordinates, at 205.4 degrees true.

Exhibits 11.1 – 11.4 contain the site plat, site map, vertical sketch and aerial photo with blanketing contour. The new site is physically smaller than the old site, having the dimensions shown, which are adequate to install the tower and a ground system of approximately 78 electrical degrees in average length. In combination with the existing tower of 78.7 electrical degrees, this facility is predicted by Figure 8 in the Rules to be capable of producing an inverse distance field at one kilometer of 289.12 mV/m/kW, thus MEETING the requirements of 47 CFR §73.189 (2) (i). The population predicted to reside within the blanketing (1000 mV/m) contour of this proposal is zero persons (2000 Census, Block Data). The Withers proposal thus MEETS the requirements of 47 CFR §73.24 (g).

Exhibit 12 is a comparison of the licensed to proposed day contour distances. Exhibits 12.1 and 12.2 contain similar comparisons of the day and night community coverage, respectively. The Withers proposal would continue to encompass 100 percent of the population and area of the community of license within the 5 mV/m contour. At night, the licensed facility currently encompasses 58.8 percent of the community population (47.0 percent of the area) within the effective nighttime interference free contour (18.98 mV/m). The proposed site is predicted to encompass 60.6 percent of the population (48.2 percent of the area) within the interference free contour for the new coordinates, 18.97 mV/m (all figures based on the 2000 Census, Block Data). Thus the Withers proposal MEETS the requirements of 47 CFR §73.24 (i) in part, but, due to growth of the community over several years, does NOT meet the requirements regarding nighttime coverage now, and would not in the future regardless of where the new site were located. However, the Withers proposal does not further degrade the area of effective nighttime coverage, and in fact slightly improves it. Exhibits 12.3 and 12.4 illustrate the calculations by which the nighttime interference free contour values were determined.

Exhibit 15 contains the day interference study list. Due to the very small changes in overlap predicted to be caused by the Withers proposal, software calculations of the predicted populations residing within the contour overlap areas were substituted for the usual contour overlap maps (Exhibit 15.1). It can be seen that in every case but one, the population residing in the predicted interference areas is predicted to decrease or remain the same if the proposal were adopted. The exception is an 86-person increase in population in the received interference area relative to station KSOX. These calculations were based upon population data from the 2000 Census, Block Data, and considering all signals at licensed or permitted power.

Exhibit 16 is a complete study of the nighttime limits to non-domestic signals on the channel predicted to result from the Withers proposal, and a fragment of the same study relative to the licensed site, the fragment containing limits presented to two Mexican permits which are not protected by the current, licensed facility. This exhibit shows that the limits to these two permits would be significantly LOWER were the instant proposal to be granted, and that all other signals would be protected in accordance with 47 CFR §73.182 and the relevant international Agreements. Exhibit 16.1 illustrates the protection calculations to the two Mexican permits with the licensed facility, and then the proposed, considered. Note that the lower limit afforded by the proposal slightly reduces the signal value of the required protection to one of the permits, but not the other.

The above exhibits show that the Withers proposal would have only a very small negative impact, that being a very slight increase in received interference from one other assignment, and should be GRANTED.

Withers affirms that the KSIX studio location will continue to meet the requirements of 47 CFR §73.1125, and that protective fencing will be maintained at a minimum of 2 meters from the base of the proposed tower, as required by OET Bulletin 65 (Edition 97-01). Withers further affirms that transmission will be suspended as necessary to protect workers from RF exposure in excess of the limits contained in the cited regulation and in 47 CFR §1.1310. No other environmental impact is known to exist from this proposal.

The above and attached information is true and correct as to my knowledge and belief.

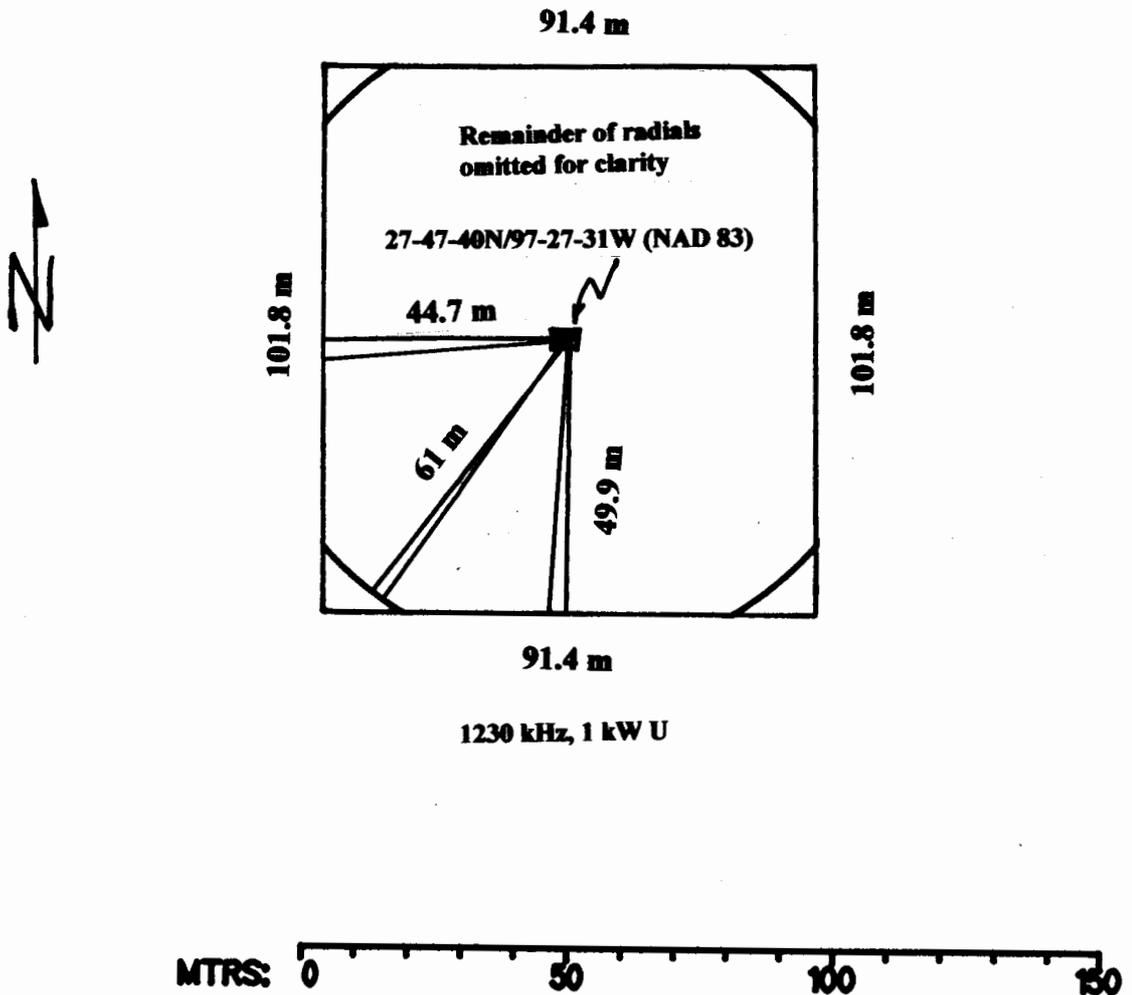
June 3, 2005

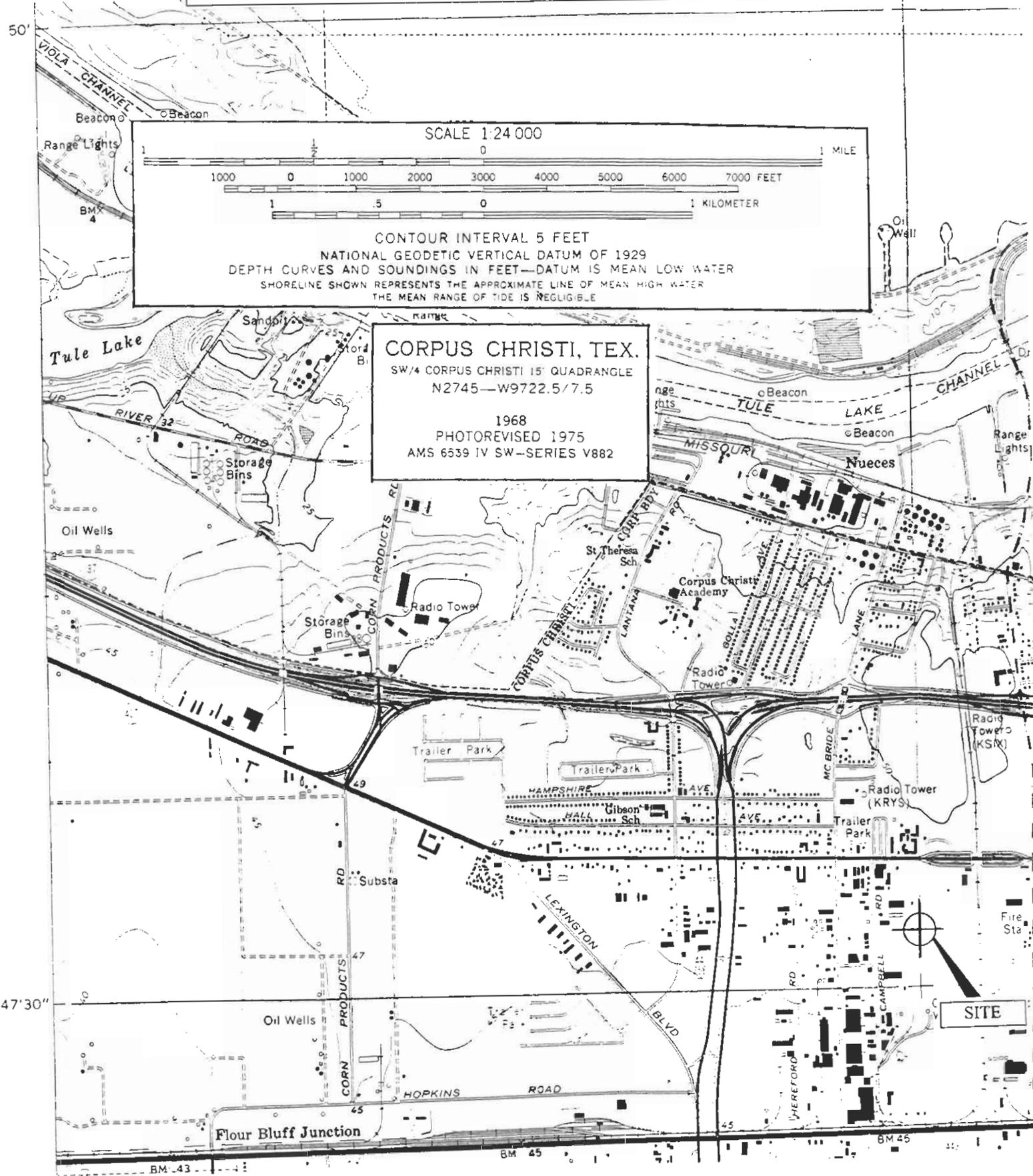
  
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Gary O. Keener

**GROUND SYSTEM**

120 90-degree radials of #10 bare copper wire buried 16 - 20 cm deep, except where foreshortened at property boundaries. Wires to be soldered to tower ground ring. An additional 120 short radials, 15 m in length, to be interspersed with longer radials.

**Average radial length 52.9 m  
(78 electrical degrees)**





SCALE 1:24 000

1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 .5 0 1 KILOMETER

CONTOUR INTERVAL 5 FEET

NATIONAL GEODETIC VERTICAL DATUM OF 1929

DEPTH CURVES AND SOUNDINGS IN FEET—DATUM IS MEAN LOW WATER

SHORELINE SHOWN REPRESENTS THE APPROXIMATE LINE OF MEAN HIGH WATER

THE MEAN RANGE OF TIDE IS NEGLIGIBLE

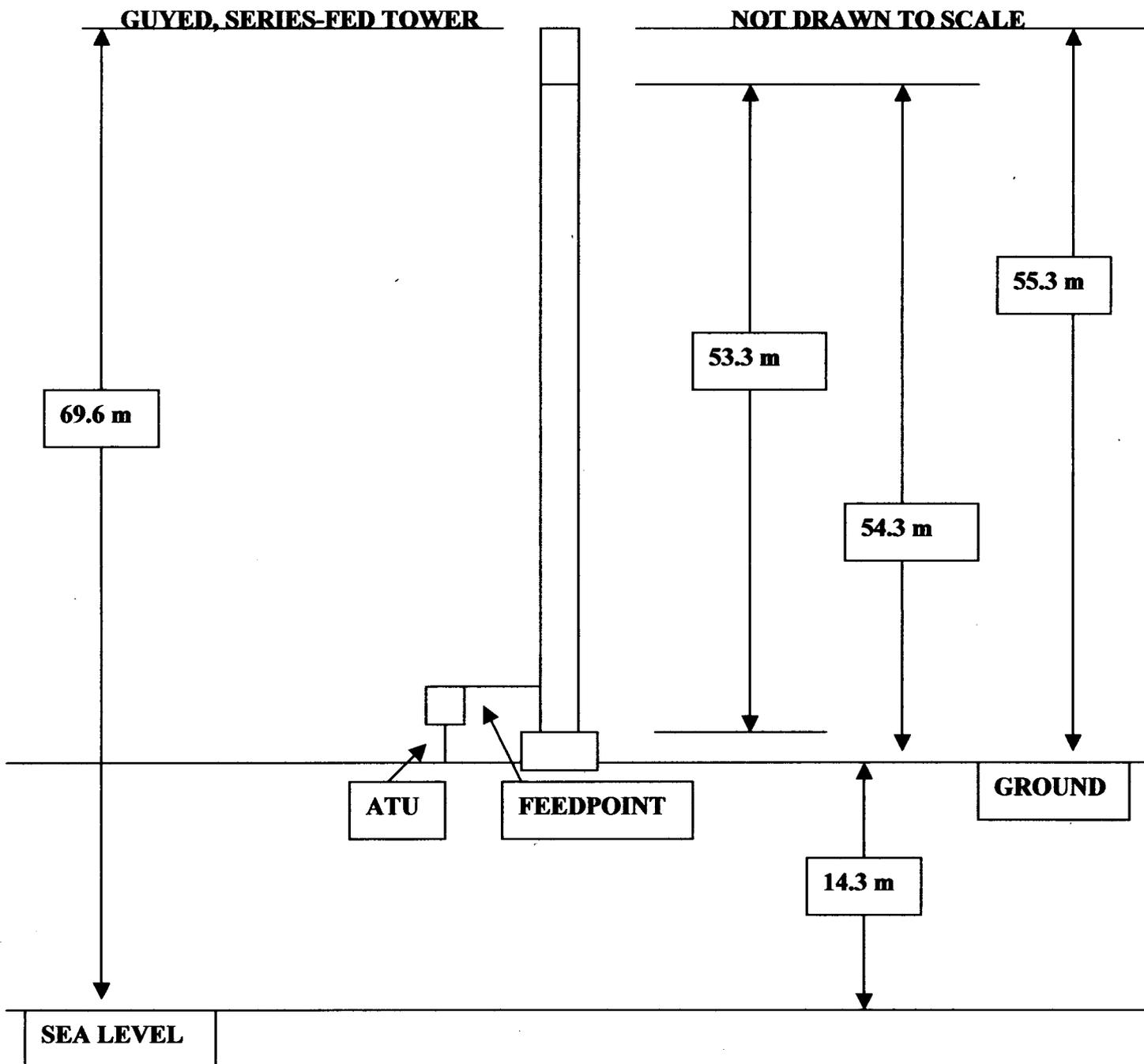
**CORPUS CHRISTI, TEX.**  
 SW/4 CORPUS CHRISTI 15' QUADRANGLE  
 N2745—W9722.5/7.5

1968  
 PHOTOREVISED 1975  
 AMS 6539 IV SW-SERIES V882

**SITE**



**TOWER 1 OF 1**



AERIAL PHOTO/BLANKETING CONTOUR

