

DELAWDER COMMUNICATIONS, INC.

P.O. Box 1095
Ashburn, Virginia 20146-1095
(703) 299-9222

ENGINEERING REPORT

K210DF, Proposed for Angleton, TX, to Channel 201

ENGINEERING STATEMENT

In BPFT-20171114ABF (dismissed on November 28, 2017), the Applicant proposes a channel change for its FM translator at Lake Jackson, TX (K210DF) to FM channel **201**. By this amendment, a slight pattern change is made in order to rectify the reason for dismissal (contour overlap with KQUE). To the extent deemed necessary by the FCC, Applicant respectfully requests a waiver of the Commission's translator processing rules to allow for the grant of this channel displacement application to a non-adjacent channel 201.

The displacement from channel 207 (as proposed by the since dismissed application BPFT-20170808AAW of K210DF) was attempted recently for a move to FM channel 200 that is not being allowed by the FCC for an FM translator. The displacement from channel 207 was deemed necessary due to interference that is being received from co-channel station KSBJ(FM), Humble, TX, 207C1, *as predicted to be caused by the recently-granted application BPED-20170824ABA*. Attached as Figure EE1 is a map showing that the predicted 40 dBu F50,10 interference contour of KSBJ(FM) has significant and increased overlap with the then-proposed channel 207D site.

The proposal to channel 207D (per BPFT-20170808AAW) was made out of necessity due to co-channel interference that is being received by K210DF from KQVI-FM, Cedar Lake, TX 210C3. The 40 dBu F50,10 interference contour of KQVI-FM is shown on Figure EE1.

Figure EE2 is a preclusion study tabulation that demonstrates the unavailability of channels 202 through 220. (Note that the study was conducted around the nearby site that was proposed for channel 207. The study is deemed valid for the currently-proposed channel 201 site.) Thus, channel 201 is proposed. (Note that the non-reserved-band channels cannot be proposed for this Non-fill-in FM translator with the Applicant owning both the translator and the primary station.)

The only channel 6 station within 150 kilometers of the proposed site is the pending LMS application 0000013791 (for KIPS-LD, Beaumont, TX; facility ID 128836). Figure EE3 demonstrates non-contour overlap between the proposed 44 dBu F50,10

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contour of the translator and the proposed 43 dBu F50,90 contour of the proposed channel 6 facility.

All required FM protections are met by contour non-overlap pursuant to Section 74.1204, with the exception of protection to KUHF, Houston 204C. KUHF is protected, as discussed below.

PROTECTION TO KUHF

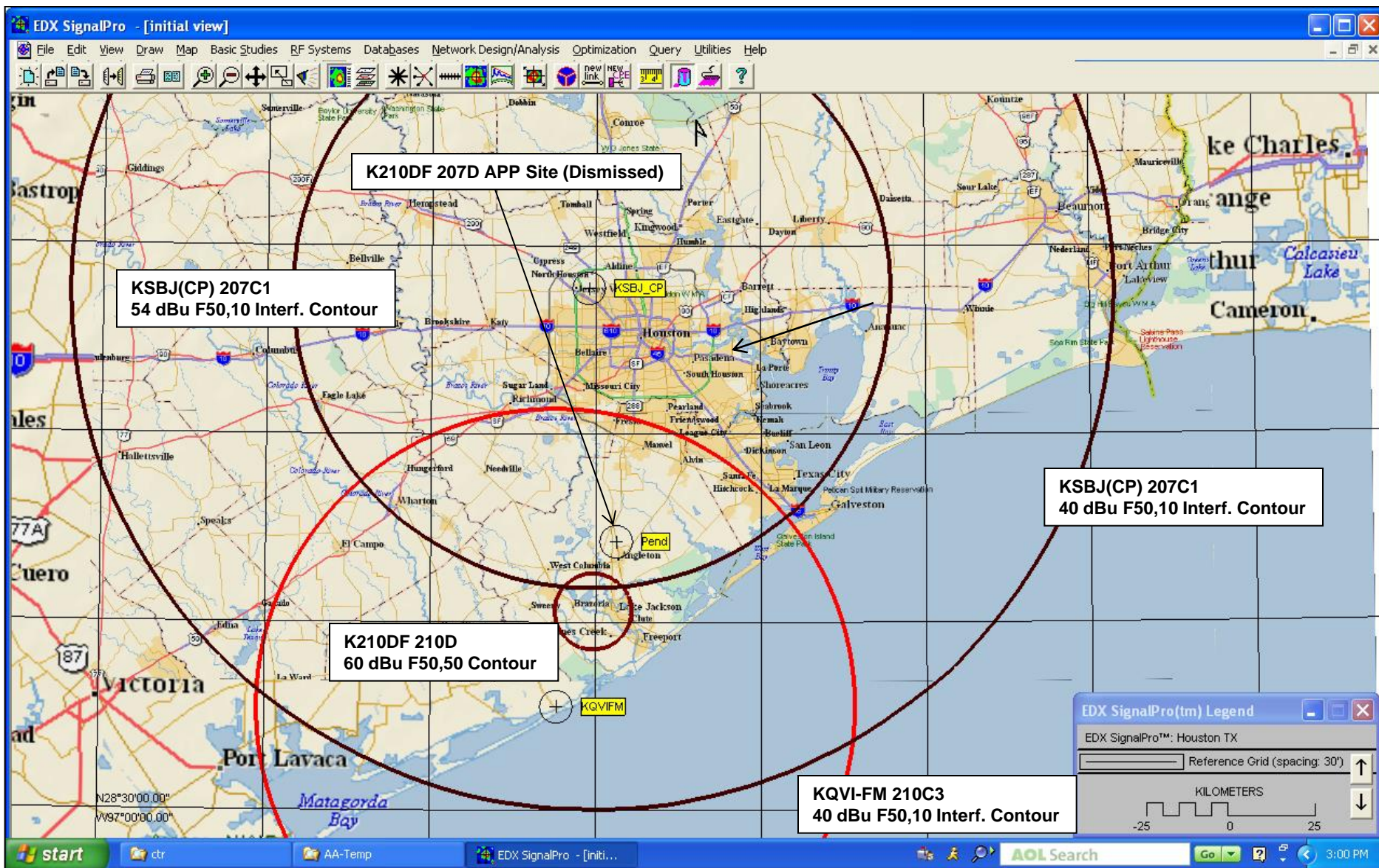
KUHF (38 kilometers at 359 degrees True bearing from the 201D site) is a third adjacent-channel station to the proposed channel 201D facility. The 60 dBu F50,50 service contour for KUHF extends well beyond the 201D transmitter site. Using the well-established *Living Way Ministries* Methodology, no actual interference to any population is predicted to exist to KUHF.

Note that a rule waiver of Section 74.1204 for this second/third adjacent-channel protection using the well-established *Living Way Ministries* Methodology is respectfully requested if such a rule waiver is deemed necessary for protection to any station.

The F50,50 signal strength from KUHF at the proposed 201D transmitter site is greater than 81 dBu (the “desired” signal). The second/third adjacent-channel protection of Section 74.1204 is an undesired-to-desired (“U/D”) dB signal strength ratio of 40:1. Therefore, predicted interference to KUHF from the proposed 201D facility is a signal of greater than or equal to 121 dBu.

The 121 dBu signal based on a free space field determination is predicted to extend out to 100 meters from the proposed 201D transmit antenna (and 70 meters from the base of the tower). As shown by the attached aerial photograph, *there is no population located within 70 meters of the base of the tower*. Therefore, pursuant to Section 74.1204(d) of the FCC Rules, KUHF is adequately protected by the proposed facility.

FIGURE EE1—MAP SHOWING UNAVAILABILITY OF 207 & 210



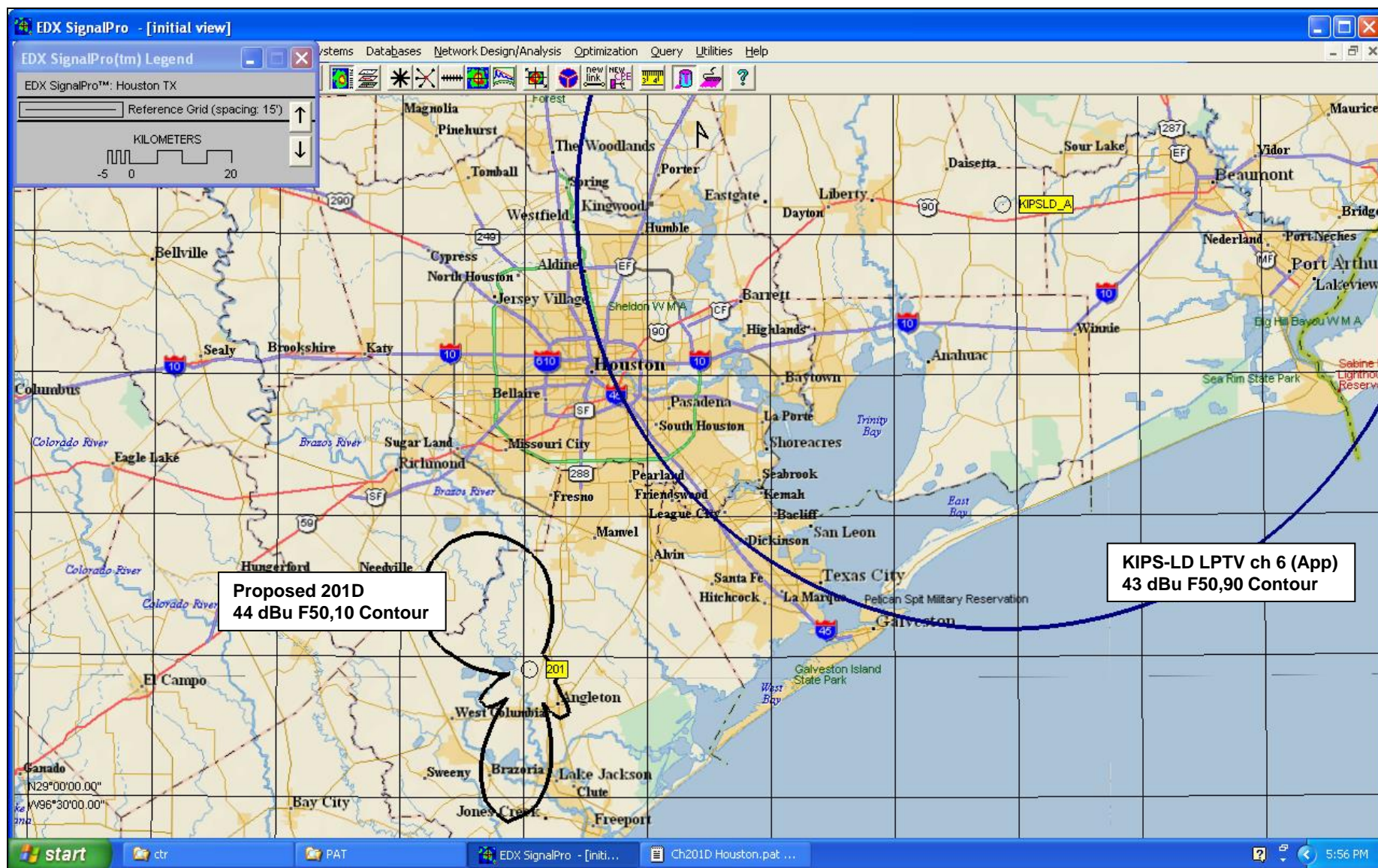
SECTION 73.207 CHANNEL PRECLUSION STUDY**PROJECT: K210DF, ANGLETON, TX, (APPLICATION FOR 207D)****STUDY COORDINATES: N 29-12-51.0; W 95-26-20.0 (N D-M-S; W D-M-S)**

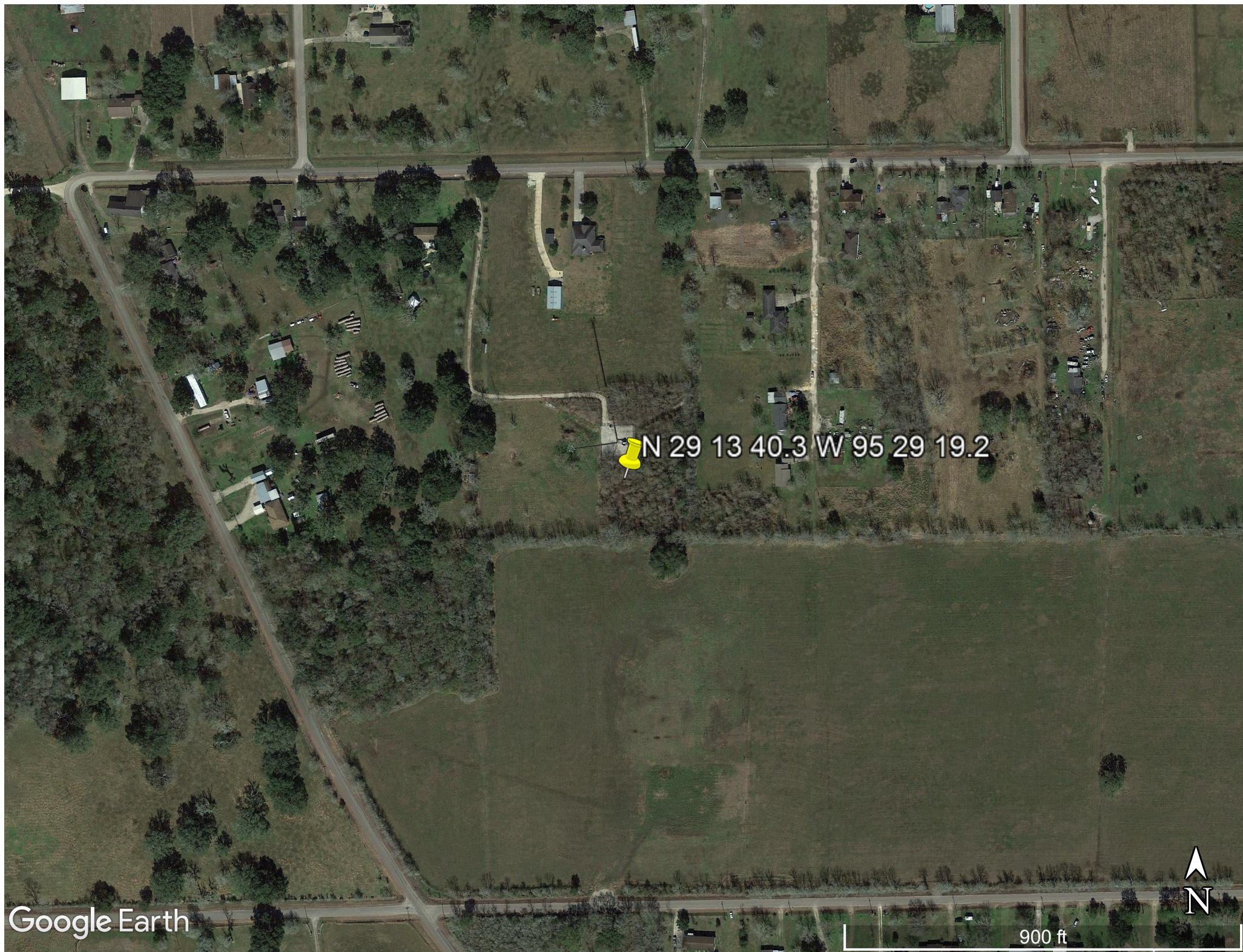
Call Docket	Channel FacilityID	Class Service	Frequency ERP	Status DA?	City HAAT	State RCAMSL	Country RCAGL	File Number Azimuth
Latitude	Longitude			ASRN	Dist (km)	Dist (mi)		
Licensee/Permittee								
PRECLUDES CHANNEL 202:								
KAFR	202 C1	FM	88.3 MHz	LIC	CONROE		TX US	BLED-
20030602BUP	-		81300		100. kW		135. m	216. m
N 30 27 52.00	W 95 30 20.00		1235884		138.74 km		86.21 mi	357.37°
FAMILY ASSOCIATION								
PRECLUDES CHANNELS 203, 204 & 205:								
KUHF	204 C	FM	88.7 MHz	LIC	HOUSTON		TX US	BLED-
19990810KA	-		69150		100. kW		524. m	544. m
N 29 34 27.00	W 95 29 37.00		1040815		40.25 km		25.01 mi	352.47°
UNIVERSITY OF HOUSTON SYSTEM								
PRECLUDES CHANNELS 206, 207 & 208:								
KSBJ	207 C1	FM	89.3 MHz	CP	HUMBLE		TX US	BPED-
20170824ABA	-		35590		87. kW		159.6 m	189.6 m
N 29 53 15.30	W 95 31 22.50		1048161		75.09 km		46.66 mi	353.83°
EDUCATIONAL FOUNDATION								
PRECLUDES CHANNELS 207, 208 & 209:								
KZBJ	208 C2	FM	89.5 MHz	LIC	BAY CITY		TX US	BLED-
20050624AAV	-		91535		35. kW DA		146. m	163. m
N 29 8 58.00	W 95 59 14.00		1244117		53.82 km		33.44 mi	262.43°
EDUCATIONAL FOUNDATION, INC.								
PRECLUDES CHANNELS 208, 209 & 210:								
KACC	209 A	FM	89.7 MHz	LIC	ALVIN		TX US	BLED-
19931110KA	-		1205		5.6 kW		101. m	109. m
N 29 24 1.00	W 95 12 13.00		-		30.79 km		19.13 mi	47.73°
COMMUNITY COLLEGE								
PRECLUDES CHANNEL 210:								
KQVI-FM	210 C3	FM	89.9 MHz	LIC	CEDAR LAKE		TX US	BLED-
20101220ACB	-		174444		10. kW		61. m	60. m
N 28 46 34.00	W 95 37 14.70		-		51.68 km		32.11 mi	200.00°
CRISTIANO DE VIDA ETERNA								
PRECLUDES CHANNELS 210, 211 & 212:								
KPFT	211 C1	FM	90.1 MHz	LIC	HOUSTON		TX US	BLED-
20070209ABQ	-		51244		100. kW		205. m	232. m
N 29 53 15.00	W 95 31 22.00		1048161		75.07 km		46.65 mi	353.84°
FOUNDATION, INC.								

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Call Docket	Channel FacilityID	Class Service	Frequency ERP	Status DA?	City HAAT	State RCAMSL	Country RCAGL	File Number Azimuth
Latitude	Longitude			ASRN	Dist (km)	Dist (mi)		
Licensee/Permittee								
PRECLUDES CHANNELS 212, 213 & 214:								
KJIC	213	C2 FM	90.5 MHz	LIC	SANTA FE		TX US	BMLED-
20161221AAF	-		12972		36. kW DA	174. m	181. m	175. m
N 29 17 43.00	W 95 15 22.00		1237457		19.91 km	12.37 mi	63.00°	
COMMUNITY RADIO, INC.								
PRECLUDES CHANNELS 215, 216 & 217:								
KYBJ	216	C3 FM	91.1 MHz	LIC	LAKE JACKSON		TX US	BLED-
20111227AAU	-		18555		17.5 kW DA	86.9 m	86.9 m	86. m
N 29 0 40.00	W 95 18 34.00		1209743		25.79 km	16.03 mi	150.85°	KSBJ
EDUCATIONAL FOUNDATION								
PRECLUDES CHANNEL 217:								
KPVU	217	C2 FM	91.3 MHz	LIC	PRAIRIE VIEW		TX US	BLED-
20090722AAV	-		53347		31. kW DA	128.4 m	198.6 m	123. m
N 30 5 21.00	W 95 59 46.00		1056336		110.98 km	68.96 mi	331.18°	PRAIRIE
VIEW A & M UNIVERSITY								
PRECLUDES CHANNEL 218:								
K218EJ	218	D FX	91.5 MHz	CP	TEXAS CITY		TX US	BPFT-
20170814ABK	-		20799		0.092 kW DA	0. m	162. m	160. m
N 29 24 43.00	W 94 57 8.00		1001973		52.11 km	32.38 mi	64.89°	ALELUYA
BROADCASTING NETWORK								
PRECLUDES CHANNELS 218, 219 & 220:								
KXNG	219	C2 FM	91.7 MHz	LIC	HOUSTON		TX US	BLED-
19910614KD	-		72685		50. kW	150. m	175. m	153. m
N 30 3 54.00	W 95 16 10.00		-		95.73 km	59.48 mi	9.78°	KSBJ
EDUCATIONAL FOUNDATION, INC.								
PRECLUDES CHANNEL 220:								
KROI	221	C1 FM	92.1 MHz	LIC	SEABROOK		TX US	BLH-
20050912AAL	-		35565		22. kW	526. m	537.4 m	530.4 m
N 29 17 56.00	W 95 14 11.00		1048576		21.81 km	13.55 mi	64.33°	RADIO
ONE LICENSES, LLC								

FIGURE EE3—Map Showing Channel 6 Protection to KIPS-LD (0000013791)





Google Earth



900 ft