

**FM Move Application**  
**KTJN (FM)**  
Channel 292A – 106.3 MHz  
2.85 kW ERP – 146 m HAAT  
Mercedes, Texas  
January 2002

**EXHIBIT #22A**

**§73.315 Compliance Utilizing §73.313(e)**

From the desired KTJN site, the required 70 dBu contour does not cover the city of license, Mercedes, Texas. However, in this particular case we find that a supplemental method of depicting city grade coverage as noted in §76.313(e) of the Commission's Rules would be appropriate.

Mercedes, Texas completely falls in an arc between 270° and 285° from the proposed site. Utilizing the Commission's 50/50 curves, all radials fall short of covering Mercedes. We alternatively have determined the location of the 70 dBu contour using the Longley-Rice prediction method. This methodology purchased from V-Soft Communications in a program called LR Study was used to produce this Technical Note 101 study. In this particular situation, coverage calculations for the 70 dBu contour have been made in a point-to-point mode (mean occurrence drop-off). The following table is a comparison of the standard of the standard FCC method of calculating the 70 dBu and the Longley-Rice method. In all cases, the Longley-Rice method exceeds the FCC method greater than 10%. Part of this exhibit is a graphic depiction of the city grade coverage of Mercedes, Texas, indicating coverage of 100% of the city.

Based on this supplemental depiction, we find that the city of Mercedes, Texas is served by the city grade of the proposed KTJN facility in compliance with §73.315 of the Commission's Rules.

<b>Radial (Bearing)</b>	<b>Location of 70 dBu FCC Method (km)</b>	<b>Location of 70 dBu Longley-Rice Method (km)</b>	<b>Percent Change</b>	<b>Gain (km)</b>
270	16.1	27.5	70.8	11.4
271	16.1	27.5	70.8	11.4
272	16.1	27.5	70.8	11.4
273	16.1	27.5	70.8	11.4
274	16.1	27.7	72.0	11.6
275	16.1	29.0	80.1	12.9
276	16.1	31.7	96.9	15.6
277	16.1	29.7	84.5	13.6
278	16.1	29.1	80.7	13.0
279	16.1	28.8	78.9	12.7
280	16.1	28.3	75.8	12.2
281	16.1	27.6	71.4	11.5
282	16.1	29.7	84.5	13.6
283	16.1	27.5	70.8	11.4
284	16.1	27.5	70.8	11.4
285	16.1	27.5	70.8	11.4