

ENGINEERING STATEMENT  
IN SUPPORT OF  
APPLICATION FOR CONSTRUCTION PERMIT  
KIXS  
VICTORIA, TEXAS  
CHANNEL 300C1    FACILITY I.D. 25584  
100 KILO-WATTS    154 METERS HAAT  
  
PROCESSING UNDER §73.215 REQUESTED

This instant application is being filed on behalf of GAP Broadcasting Victoria License, LLC, licensee of the above referenced FM facility and is requesting a reduction in licensed<sup>1</sup> HAAT from 286 meters to 154 meters and a corresponding increase in ERP from its licensed 85 kW to 100 kW for its main transmitting antenna.

KIXS is currently licensed under §73.215, due to an existing short spacing with KQQK<sup>2</sup> licensed to Beaumont, TX.

Figure 1 attached is a separation study for KIXS at its present location and shows it to be fully spaced to all facilities either existing or proposed, with the exception of KQQK.

Figure 2 shows the protected 60 dbu f(50/50) and interfering 40dbu f(50/10) contours of both KIXS and Co-Channel KQQK. For the purpose of this analysis, KQQK has been normalized to a full Class C, (100kW at a HAAT of 600 meters). These contours were generated using software entitled Comstudy 2.2 provided by RadioSoft Inc. The contours were calculated at 5 degree increments over an arc of 360 degrees using a 30 second terrain database.

The predicted 60 dbu contour of this proposal extends to a distance of 59 Km while the 60dbu contour of a normalized class C2 (50kW at 150 meters HAAT) would only extend to a distance of 52 Km, therefore this proposal is in compliance with §73.211(3) and qualifies KIXS to keep its current C1 classification.

Figure 3 is a vertical sketch of the proposed antenna and supporting structure.

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<sup>1</sup> See BLH-20030221ABY

<sup>2</sup> Facility I.D. 19087

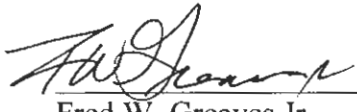
## Environmental Considerations

This proposal is simply to lower an existing antenna on an existing tower. The only environmental consideration therefore is that of human exposure to non-ionizing radiation (RFR). The proposed antenna is an ERI 10 bay full wave spaced roto-tiller type mounted at the 150 meter (AGL) of the tower. Using the Commission's "FM Model" program, the power density 2 meters above ground level at the base of the tower calculates to be  $9.15 \mu\text{w}/\text{cm}^2$  or 0.91 percent of the MPE of  $1000 \mu\text{w}/\text{cm}^2$  as stated in OET Bulletin 65 Edition 97-01 for controlled environments.

The maximum power density of  $15.69 \mu\text{w}/\text{cm}^2$  was found 36 meters from the base of the tower. This is only 7.8 percent of the MPE of  $200 \mu\text{w}/\text{cm}^2$  for general population/uncontrolled areas.

The base of the tower is fenced and locked, with strategically displayed signs warning of potential RFR hazards. The applicant will either reduce power or cease transmission completely in order to accommodate workers while on the tower.

The undersigned has prepared all exhibits in this report and believes them to be true and accurate to the best of his knowledge.

 Date: 8/17/08  
Fred W. Greaves Jr.  
321 Kormit Dr.  
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KIXS VICTORIA, TX. SEPARATION STUDY  
 ComStudy 2.2 search of channel 300 (107.9 MHz Class C1) at 28-42-24.0 N, 96-50-06.0 W.

CALL	CITY	ST CHN CL	DIST	SEP	BRNG	CLEARANCE	
KQQK	BEAUMONT	TX 300 C	265.47	270.00	56.1	-4.5	SHORT
KFAN-FM	JOHNSON CITY	TX 300 C3	240.63	211.00	313.9	29.6	CLEAR
KXTM	BENAVIDES	TX 299 C3	178.12	144.00	232.5	34.1	CLEAR
KXTM (CP)	BENAVIDES	TX 299 C3	178.12	144.00	232.5	34.1	CLEAR
KJKE	INGLESIDE	TX 297 C3	100.35	76.00	202.0	24.4	CLEAR

FIGURE 1

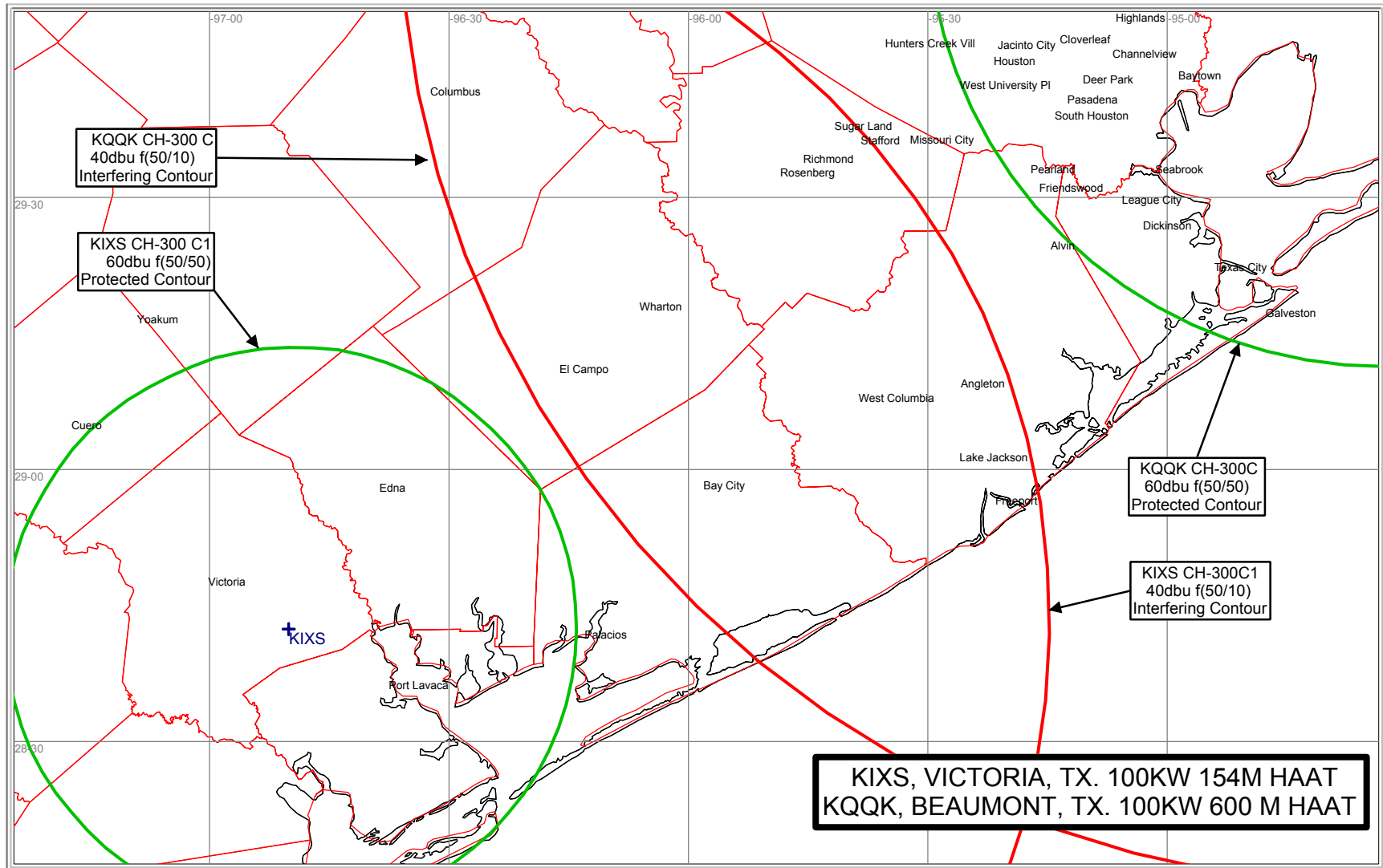
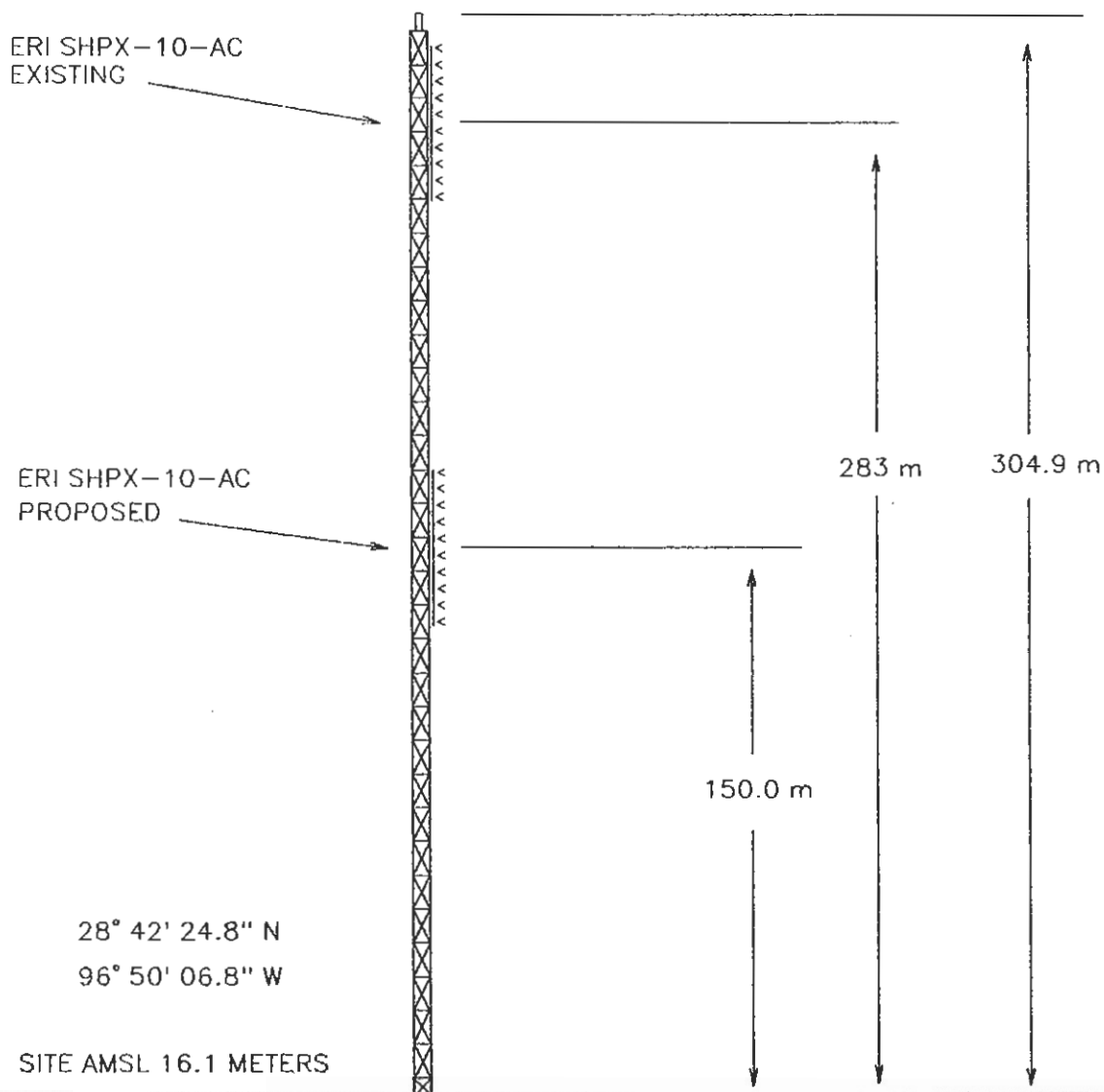


FIGURE 2

NOT DRAWN TO SCALE

Figure 3

GAP Broadcasting Victoria License, LLC



PROPOSED ANTENNA  
AND  
SUPPORTING STRUCTURE  
ASRN 1234098

KIXS CH-300 C1, VICTORIA, TEXAS