

FEDERAL COMMUNICATIONS COMMISSION
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TECHNICAL PROCESSING GROUP
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APR 14 2010

Janice Hollan
JHT Ventures, Inc.
12054 Mighty Oak, #A
Houston, Texas 77088

In re: JHT Ventures, Inc. (JHT)
KULF(AM), Bellville, Texas
Facility Identification Number: 48653
BP-20091207ACW


Dear Ms. Hollan:

This refers to the above-captioned minor change application as amended on January 22, 2010, for radio station KULF(AM), Bellville, Texas, to increase operating power and to relocate the transmitter site.

A preliminary study of the amended application reveals that the proposed 0.25 mV/m and 0.5 mV/m daytime groundwave contours would respectively increase the prohibit overlap to the 0.25 mV/m and 0.5 mV/m daytime groundwave contours of first-adjacent station KDRY(AM), Alamo Heights, Texas, in violation of Section 73.37 of the Commission's rules.

Accordingly, the subject application will be withheld for thirty (30) days from the date of this letter in order to provide JHT a final opportunity to file a curative electronic amendment. Inasmuch as, the applicant will not be afforded another opportunity to amend, JHT must carefully review the entire application for any defects. Failure to file a curative amendment by **May 14, 2010**, will result in dismissal of the application pursuant to Section 73.3568 of the Commission's Rules.

Sincerely,



Son Nguyen,
Supervisory Engineer
Audio Division
Media Bureau

cc: Robert Morrow
Cara Ebert Cameron
Charles W. Staples

AMENDED ENGINEERING STATEMENT

JHT Ventures, Incorporated

Licensee: 1090 kHz at Bellville, Texas

Seeks: Change Transmitter Site and Make Changes
In Antenna System, Power
(BP-20091207ACW)

April, 2010

General Engineering Statement

This engineering statement was prepared on behalf of JHT Ventures, Inc. ("JHT"), licensee of AM station KULF (1090 kHz, .250 kW, ND-D, Bellville, Texas) (FCC ID: 48653) ("KULF") which and pertains to amendments to its currently pending application BP-20091207ACW. On April 14, 2010, Commission staff supervisory engineer Son Nguyen notified JHT by letter that a preliminary engineering review of the application indicated the proposed KULF antenna system/pattern would result in prohibited overlap to station KDRY (AM) (FCC ID: 47666) at Alamo Heights, Texas ("KDRY"). The attached amendment addresses Mr. Nguyen's letter of April 14, 2010.

Please Note that no changes are proposed in the January, 2010 proposed KULF antenna system. As provided below, the attached amendment deals with the distance to contours of KDRY in order to establish more accurately, the amount of proposed overlap between KULF and KDRY versus the amount of licensed and existing overlap between the two stations.

Overlap Generated/Received Between KULF and KDRY

As licensed, and using FCC Figure M-3 to determine contours, a large amount of grandfathered overlap exists between the KULF 0.50 mV/m and 0.25 mV/m contours and the corresponding contours of KDRY. The attached amendment establishes that as proposed (as amended January, 2010), the KULF pattern does not result in increased overlap beyond the grandfathered licensed overlap but instead, reduces the overlap between the stations' respective contours by between 17 and 30 percent.

In order to determine distance to contours, a total of 46 readings along radial bearing 110.0° True were taken on KDRY on Thursday, April 15, 2010 to a distance of 183.11 km. The data was tabulated and graphed to determine ground conductivity along the radial and the resulting conductivity was utilized to determine distance to pertinent contours along radials 100.0° T, 105.0° T, 110.0° T, 115.0° T and 120.0° T. Data/graphs and conductivity for KDRY are attached as: Exhibit: KDRY, Pages: 1-5. (Note: GPS geographic location as well as cell phone photographic depictions of each point along the measured radial are available upon request).

The resulting protected KDRY contours were compared to both the licensed and proposed protected KULF contours. The results are shown on four attached maps upon which the various relative contours are depicted and the amount of grandfathered and proposed overlap between the two stations is shaded. A graphic tabulation of the licensed/proposed overlap is also attached which indicates the various protection to the two stations' pertinent contours is improved by between 17+ and 30+ percent.

Readings on KDRY were taken between the hours of 0846 and 1743 on Thursday, April 15, 2010 using a Potomac Instruments model FIM-41 field strength meter (Serial Number: 1702) with a most recent calibration date of 11 April 2007. Prior to gathering the data on KDRY, the accuracy of meter 1702 was checked against that of Potomac Instruments model FIM-21 meter: 1256 with a most recent calibration date of 23 June, 2007 and Potomac Instruments model FIM-21 meter: 1167 with a most recent calibration date of 10 September, 2007 (Note: copies of calibration certificates attached). It was also checked against Potomac Instruments model FIM-41 meter serial number: 178. All four meters were found to agree with each other to within +/- 1.0 %; therefore, the readings tabulated using meter 1702 were considered to be accurate.

Proposed Operation

The station's previously licensed tower has been dismantled and the site is no longer available for use by JHT as the station's new licensee; therefore, with this application, JHT proposes to make changes in the Station's antenna locations, antenna system and power. NO changes are requested regarding the community of license.

The instant application seeks to relocate the Station's antenna site to approximately 14.1 km east of the licensed site on a bearing of 95.1° T. It proposes to install a two-tower directional antenna system with a nominal power of 1.0 kW using the same antenna constants both during Daytime and Critical Hours operation. Both Daytime and Critical Hours operations provide 5 mV/m contour service to 100% of the community of license, Bellville, Texas. No nighttime operation of the Station is proposed in the instant application.

The proposed operation provides adequate Critical Hours protection to both Class I-B station KAAY (1090 kHz, 50 kW, U, DA-N) at Little Rock, Arkansas (FCC ID: 33253) and WBAL (1090 kHz, 50 kW, U, DA-N) at Baltimore, Maryland (FCC ID: 65679). In addition, as proposed, the Station's pattern reduces previously licensed overlap to first adjacent stations KRLD (1080 kHz, 50 kW, ND-D) at Dallas, Texas (FCC ID: 58820) and KDRY (1100 kHz, 11 kW, ND-D) at Alamo Heights, Texas (FCC ID: 47666). Various exhibits are contained in Section III, Question: 10 (a) and (c) regarding these exhibits.

Proposed Transmitter Site / Antennas

JHT proposes to relocate the Station's antenna system to the address 43704 Harpers Church Road, Bellville, Texas 77418. The site is in rural Waller County, 3.29 km (2.04 miles) west of the intersection McKenzie Road and Harpers Church Road, on the south side of Harpers Church Road. The site is 14.04 km (8.7 miles) east of the center (courthouse square) of the Community of License, Bellville, Texas. The geographic co-ordinates of the center of the array are:

N 29° – 56' – 05"
W 96° – 06' – 47"

A two tower directional antenna system is proposed for the site utilizing series fed antennas 71.70' (180.0 feet) in height. A TOWAIR search was conducted at the appropriate FCC website. The search indicates the proposed antennas do not require FAA registration; therefore, no registration is included in this application. A copy of the TOWAIR determination is included in Section III, Question 10 (a).

Field Strength Readings Used In Determining Station Contours

In his letter of January 15, 2010, Mr. Nguyen stated a number of radials previously filed on SFTA Station KY5XND presented an insufficient number of readings within 3 km of the site and were disallowed to determine contour distances. Radials along bearings 120 degrees, 140 degrees, and 160 degrees were not among the list disallowed by Commission staff and are utilized to determine contours along those three radials. Field strength distances for the Station's proposed facilities were determined in part, utilizing field strength readings from FCC approved SFTA site KY5XND. The test site was sought by Matthew Provenzano, licensee of AM station KYND at Cypress, Texas on behalf of KYND and granted by Commission staff on February 18, 2009 (a copy of the authorization letter is attached in the Exhibit: 1090 kHz Exhibit which is contained in Section III, Question: 10 (a)). The test site was originally intended to establish conductivity from the site for KYND and readings were taken on the station between February 23, 2009 and April 15, 2009. Under direction of this office, the test site was established on behalf of Mr. Provenzano and readings taken every 20 degrees throughout the compass. The test antenna was located at the permitted site which is 0.067 km north northeast the proposed center of the Station's array. Readings and determined conductivity are; therefore, useful in determining contours for the proposed Station's contours and were used for that purpose in the instant application.

In its informal objection, Business Radio Houston ("BRH"), offered different analysis for readings taken originally presented by JHT along radials bearing 120.0° T and 140.0° T from the test site. With this amendment, JHT utilizes the BRH analysis as the basis for determining the 5 mV/m contour of the proposed KULF facilities versus the measured 5 mV/m of KTEK.

Though KYND has yet to make use of the readings presented in the instant application, the data are used in the instant application with the express permission of KYND's licensee, Matthew Provenzano. KYND will also make use of the data in a future application to co-locate at the proposed site along with the Station on 1090 kHz (formerly KNUZ).

Readings Submitted by Business Radio Houston on KTEK

JHT accepts and makes use of the conductivity along the affected radials on KTEK as presented by Business Radio Houston ("BizRadio"), licensee of station KTEK at Alvin, Texas. The readings presented in this amendment uses those readings in lieu of the readings previously presented by JHT in determining the contour distances for KTEK. The KTEK exhibit presented in Exhibit 16 of Form 301 reflects this change.

Interference Reduction to First Adjacent Station KRLD, Dallas, TexasKRLD

As proposed in the instant application, the 1 kW directional facilities of KULF reduce grandfathered Daytime overlap to first adjacent stations KRLD (1080 kHz, 50 kW, ND-D), Dallas, Texas (FCC ID: 59820) and KDRY (1100 kHz, 11.0 kW, ND-D), Alamo Heights, Texas (FCC ID: 47666). With regards KRLD, there is no currently licensed overlap of the .5 mV/m contours of the two stations and none is proposed in the instant application. However, there is overlap between the 0.25 mV/m contour of KRLD and the presently licensed .5 mV/m contour of KNUZ as well as overlap of the KNUZ 9.25 mV/m and the 0.50 mV/m of KRLD. The instant application proposes a reduced amount of overlap between the .25 mV/m of KRLD and 1090 as shown in the exhibit below:

Licensed KRLD .5 mV/m vs KULF .25 mV/m

KRLD 0.25 mV/m Overlap with Licensed 1090 kHz 0.50 mV/m	-	834.40 sq km	10,593 persons*
KRLD 0.25 mV/m Overlap with Proposed 1090 kHz 0.50 mV/m	-	0 sq km	0 persons*

Overall Reduction in Overlap = 834.4 sq km = 100.0%

Licensed KRLD .25 mV/m vs KULF .5 mV/m

KRLD 0.50 mV/m Overlap with Licensed 1090 kHz 0.25 mV/m	-	116.03 sq km	532 persons*
KULF kHz Proposed 0.25 mV/m Overlap with KRLD .5 mV/m	-	0.00 sq km	0 persons*

Overall Reduction in Overlap = 115.23 sq km = 100.0 %

The improvements in grandfathered overlap amount to 100% in the case of the overlap between the Daytime 0.25 mV/m of KRLD and the proposed 0.50 mV/m of 1090 kHz. In the case of the overlap between the proposed KULF 0.25 mV/m and the 0.5 mV/m of KRLD, the currently licensed overlap is completely eliminated; therefore, the improvement is 100%. Graphical Evidence of the above is contained in attached Exhibit: 16 in answer to Section III Question 10 (b) of form 301.

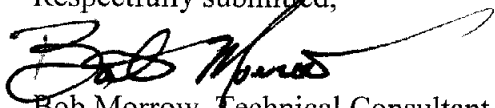
In sum, the previously licensed or "grandfathered" overlap between KRLD, KDRY respectively and KULF in Bellville is dramatically reduced by the instant proposal while providing improved service to the listening area of the 1090 kHz allocation. Maps indicating the improved overlap situation between KULF and KDRY are contained as part of Exhibit: 16 in Section III, Question 10 (c) of form 301.

Expedited Consideration

JHT, both with this filing and under separate cover, respectfully asks for Expedited Consideration of this application. The Station has either been silent or operating under STA with a very limited facilities for a number of years. The Station's previously licensed transmitter site is not available to JHT. Indeed, tower, transmitter building, and all related equipment was long ago removed by the landlord of the previous licensee. The recent history of the license of the Station is replete with examples of the community's frustration that the station has been in a limited condition or off the air altogether.

JHT stands ready to construct the facilities requested in this application as soon as they are granted and to return the Station to the air at the earliest possible date. Beyond the Commission's construction permit, no additional state or local authorizations are required and the antennas do not require FAA notification or registration with the Commission. Therefore, construction of the requested facilities can commence as soon as a construction permit is granted.

Respectfully submitted,


Bob Morrow, Technical Consultant
JHT Ventures, Inc.

Date: April 19, 2010

POTOMAC INSTRUMENTS, inc.
Silver Spring, Maryland

CERTIFICATE OF CALIBRATION

Field Intensity Meter Type FIM-41

Serial Number 1702

This instrument was calibrated in an induction field of 220.0 millivolts per meter. At each measurement frequency the measured field was recorded and a correction factor K was computed; the indicated field must be multiplied by K to obtain the true field.

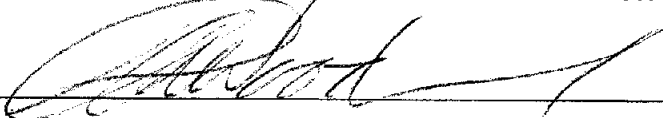
<u>kHz</u>	<u>K</u>	<u>kHz</u>	<u>K</u>	<u>MHz</u>	<u>K</u>	<u>MHz</u>	<u>K</u>
540	1.000	1100	1.000	1.6	1.000	3.5	1.000
600	1.000	1200	1.000	1.9	1.000	3.8	0.991
700	0.995	1300	1.000	2.2	1.000	4.1	1.000
800	0.995	1400	1.000	2.5	1.000	4.4	1.009
900	1.000	1500	0.995	2.8	0.995	4.7	1.005
1000	1.000	1600	1.000	3.2	1.000	5.0	1.000

The calibrating field is maintained equal to the National Institute of Standards and Technology (NIST) standard field within an accuracy of 1.0 percent. NIST states that the absolute accuracy of its field is "believed to be within 3.0 percent."

The error at points on the meter scale other than the calibration point is less than 3.0 percent. The attenuator ratios are correct within 2.0 percent. These accuracies apply for battery voltages that are indicated by the instrument's battery check circuit to be useable.

NEXT RECOMMENDED CALIBRATION DATE: APRIL 2009

Calibrated by



Date: 11 April 2007

STATE OF MARYLAND

Personally appeared before on 11 April 2007, David L. Woodward, who testified under oath that the above calibration was made either by himself or under his direction and that the statements in the above certificate are true to the best of his knowledge and belief.



Notary Public

ALBERT E. BABENDREIER
NOTARY PUBLIC STATE OF MARYLAND
Montgomery County
My Commission Expires June 1, 2009

POTOMAC INSTRUMENTS, INC

SILVER SPRING, MARYLAND

CERTIFICATE OF CALIBRATION

Field Intensity Meter Type FIM-21 Serial No. 1256

This instrument was calibrated in an induction field of 220.0 millivolts per meter. At each measurement frequency the measured field was recorded and a correction factor K was computed: the indicated field must be multiplied by K to obtain the true field.

<u>KHz</u>	<u>K</u>	<u>MHz</u>	<u>K</u>	<u>KHz</u>	<u>K</u>	<u>MHz</u>	<u>K</u>
540	1.000	1.6		1100	0.995	3.5	
600	1.000	1.9		1200	1.000	3.8	
700	1.000	2.2		1300	1.000	4.1	
800	1.000	2.5		1400	1.000	4.4	
900	1.000	2.8		1500	1.000	4.7	
1000	1.000	3.2		1600	1.000	5.0	

Single Frequency of KHz only, K

The calibrating field is maintained equal to the National Bureau of Standards standard field within an accuracy of 1.0 per cent. NBS states that the absolute accuracy of its field is "believed to be within 3.0 percent."

The error at points on the meter scale other than the calibration point is less than 3.0 per cent. The attenuator ratios are correct within 2.0 per cent. These accuracies apply for battery voltages that are indicated by the instrument's battery check circuit to be useable. NEXT RECOMMENDED CALIBRATION DATE:

JUNE 2007

Calibrated by EDC Moore Date 23 JUNE 2005

STATE OF MARYLAND

Personally appeared before me this 24TH day of JUNE 05, EARL C. MOORE, who testified under oath that the above calibration was made either by himself or under his direction and that the statements in the above certificate are true to the best of his knowledge and belief.

Albert E. Babendreier
Notary Public
ALBERT E. BABENDREIER
NOTARY PUBLIC STATE OF MARYLAND
Montgomery County
My Commission Expires June 1, 2009

POTOMAC INSTRUMENTS, inc.
Silver Spring, Maryland

CERTIFICATE OF CALIBRATION

Field Intensity Meter Type FIM-21

Serial Number 1167

This instrument was calibrated in an induction field of 220.0 millivolts per meter. At each measurement frequency the measured field was recorded and a correction factor K was computed; the indicated field must be multiplied by K to obtain the true field.

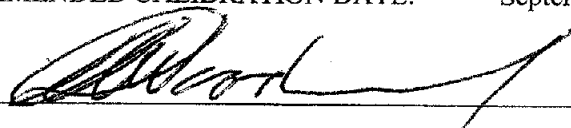
<u>kHz</u>	<u>K</u>	<u>kHz</u>	<u>K</u>
540	1.000	1100	1.000
600	1.000	1200	1.000
700	1.000	1300	1.000
800	1.000	1400	1.000
900	1.000	1500	1.000
1000	1.000	1600	1.000

The calibrating field is maintained equal to the National Institute of Standards and Technology (NIST) standard field within an accuracy of 1.0 percent. NIST states that the absolute accuracy of its field is "believed to be within 3.0 percent."

The error at points on the meter scale other than the calibration point is less than 3.0 percent. The attenuator ratios are correct within 2.0 percent. These accuracies apply for battery voltages that are indicated by the instrument's battery check circuit to be useable.

NEXT RECOMMENDED CALIBRATION DATE: September 2009

Calibrated by

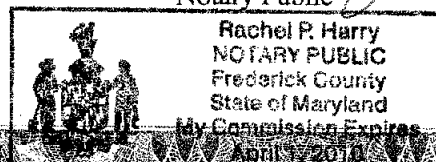


Date 10 September 2007

STATE OF MARYLAND

Personally appeared before on 10 September 2007, David L. Woodward, who testified under oath that the above calibration was made either by himself or under his direction and that the statements in the above certificate are true to the best of his knowledge and belief.


Notary Public



JHT Ventures, Inc.
 KULF (AM), 1090 kHz, Bellville, Texas
 Seeks: Make minor changes to licensed facilities

Exhibit: KDRY, Page: 1

Measured Field Strength Data
 KDRY (AM), 1100 kHz, 11.0 kW, ND-D, Alamo Heights, Texas
 Measurements for 110.0 degrees.

Note: See weather data on Page: 2

Point Number	Distance (km)	(mi)	Field (mV/m)	Notes	Date	Time
-----	-----	-----	-----	-----	-----	-----
1	1.05	0.65	840.000		4/15/2010	1742
2	1.26	0.78	740.000		4/15/2010	1731
3	1.50	0.93	635.000		4/15/2010	1719
4	2.05	1.27	460.000		4/15/2010	1706
5	2.29	1.42	395.000		4/15/2010	1657
6	2.77	1.72	340.000		4/15/2010	1645
7	3.20	1.99	232.000		4/15/2010	1638
8	3.62	2.25	186.000		4/15/2010	1630
9	4.00	2.49	191.000		4/15/2010	1624
10	6.00	3.73	128.000		4/15/2010	1614
11	7.70	4.78	117.000		4/15/2010	1602
12	8.98	5.58	88.000		4/15/2010	1554
13	10.01	6.22	57.000		4/15/2010	1547
14	13.82	8.59	43.000		4/15/2010	1531
15	16.41	10.20	38.000		4/15/2010	1520
16	19.23	11.95	30.000		4/15/2010	1514
17	23.42	14.55	18.000		4/15/2010	1504
18	28.24	17.55	13.000		4/15/2010	1453
19	34.20	21.25	11.000		4/15/2010	1443
20	37.46	23.28	9.200		4/15/2010	1437
21	40.93	25.43	8.800		4/15/2010	1425
22	43.14	26.81	10.000		4/15/2010	1418
23	50.58	31.43	2.800		4/15/2010	1350
24	58.58	36.40	2.400		4/15/2010	1333
25	67.36	41.86	2.600		4/15/2010	1323
26	73.13	45.44	1.400		4/15/2010	1311
27	79.85	49.62	1.500		4/15/2010	1301
28	85.58	53.18	1.500		4/15/2010	1252
29	88.98	55.29	1.000		4/15/2010	1229
30	101.38	62.99	0.940		4/15/2010	1158
31	106.29	66.05	0.570		4/15/2010	1148
32	113.45	70.49	0.530		4/15/2010	1130
33	116.64	72.48	0.600		4/15/2010	1121
34	118.83	73.84	0.460		4/15/2010	1115
35	123.11	76.50	0.330		4/15/2010	1104
36	127.81	79.42	0.480		4/15/2010	1051
37	135.47	84.18	0.410		4/15/2010	1042
38	141.55	87.96	0.310		4/15/2010	1036
39	147.21	91.47	0.260		4/15/2010	1018
40	151.70	94.26	0.270		4/15/2010	1007

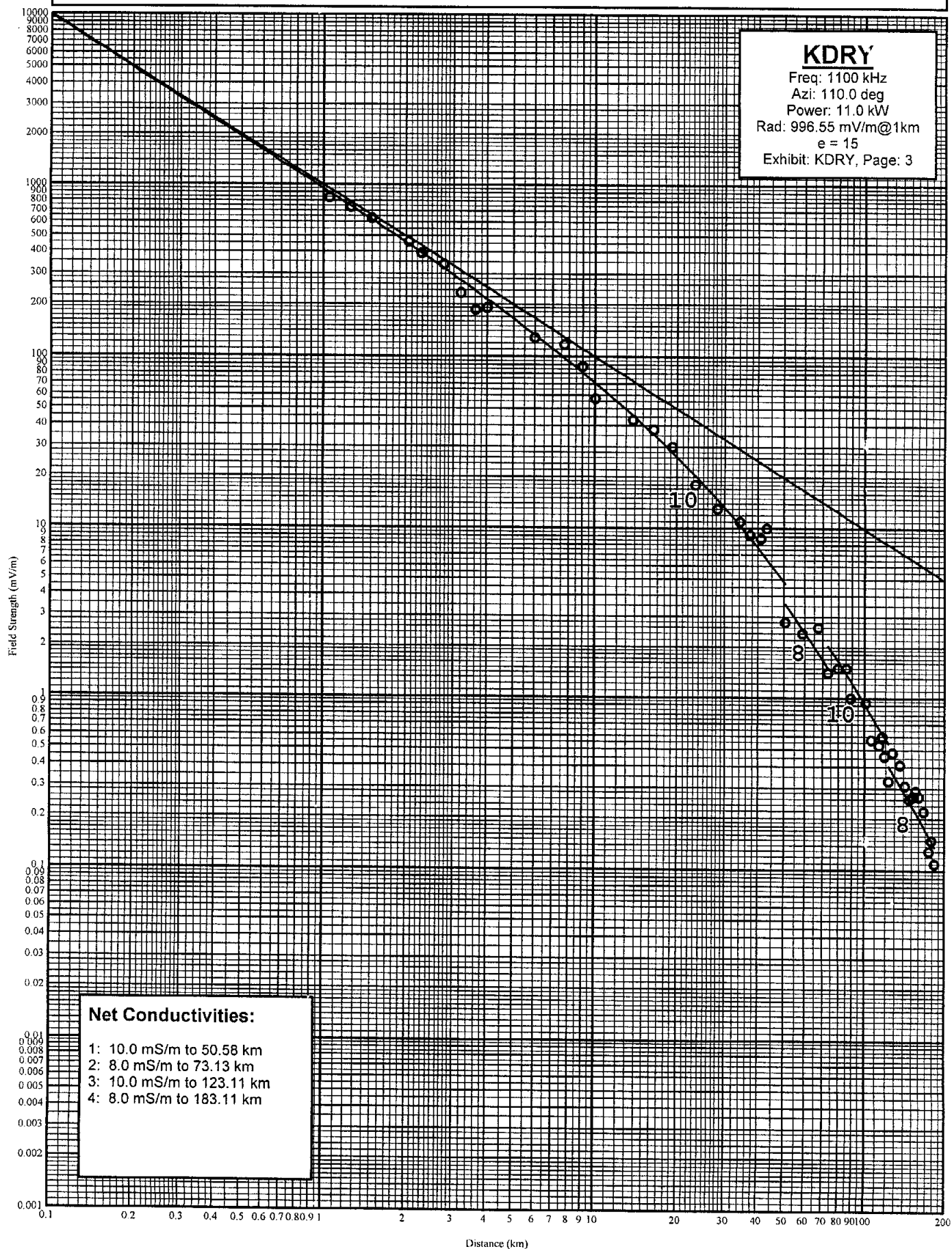
Page: 2 KDRY Measured Data

41	155.20	96.44	0.290	4/15/2010	0958
42	160.02	99.43	0.270	4/15/2010	0942
43	167.07	103.81	0.220	4/15/2010	0910
44	174.58	108.48	0.130	4/15/2010	0901
45	178.44	110.88	0.150	4/15/2010	0855
46	183.11	113.78	0.110	4/15/2010	0846

Note: Weather Conditions - Overcast with periods of light to moderate rainfall during the day. Temps. - 67° F at 0900 to 71° F at 1600.

KDRY AM Measured Field Strength

Shown With Matching Conductivity Curves
KDRY (AM), 1100 kHz, 11.0 kW, ND-D, Alamo Heights, Texas



JHT Ventures, Inc.
 KULF (AM), 1090 kHz, Bellville, Texas
 Seeks: Make minor changes to licensed facilities

Exhibit: KDRY, Page: 4

GROUND CONDUCTIVITY REPORT
 KDRY (AM), 1100 kHz, 11.0 kW, ND-D
 Alamo Heights, Texas
 Including Measured Data Along Radial Bearing 110.0° T

Lat : 29-33-28.0 N
 Lon : 98-22-32.0 W
 Radius : 200.0

* Includes measured conductivity data

0 deg:	3.77,	15.0	200.19,	8.0				
5 deg:	3.77,	15.0	200.04,	8.0				
10 deg:	3.86,	15.0	196.73,	8.0	199.61,	15.0		
15 deg:	3.86,	15.0	193.88,	8.0	199.66,	15.0		
20 deg:	4.12,	15.0	191.67,	8.0	200.32,	15.0		
25 deg:	4.12,	15.0	190.73,	8.0	199.97,	15.0		
30 deg:	4.12,	15.0	142.86,	8.0	143.66,	30.0	144.86,	8.0
	199.70,	30.0						
35 deg:	4.51,	15.0	108.85,	8.0	113.26,	15.0	199.73,	30.0
40 deg:	6.22,	15.0	7.45,	8.0	8.17,	15.0	76.83,	8.0
	77.54,	15.0	79.99,	8.0	127.21,	15.0	199.83,	30.0
45 deg:	6.22,	15.0	6.78,	8.0	10.45,	15.0	60.93,	8.0
	200.46,	15.0						
50 deg:	11.03,	15.0	11.63,	8.0	12.85,	15.0	39.60,	8.0
	40.19,	15.0	43.23,	8.0	200.12,	15.0		
55 deg:	15.95,	15.0	16.61,	8.0	17.80,	15.0	18.47,	8.0
	20.84,	15.0	21.51,	8.0	22.04,	15.0	23.36,	8.0
23.89,	15.0							
	28.78,	8.0	199.56,	15.0				
60 deg:	199.98,	15.0						
65 deg:	200.50,	15.0						
70 deg:	200.33,	15.0						
75 deg:	200.21,	15.0						
80 deg:	200.02,	15.0						
85 deg:	200.40,	15.0						
90 deg:	199.94,	15.0						
95 deg:	200.23,	15.0						
100 deg:	50.58,	10.0*	73.13,	8.0*	123.11,	10.0*	183.11,	10.0*
	200.29,	15.0						
105 deg:	50.58,	10.0*	73.13,	8.0*	123.11,	10.0*	183.11,	10.0*
	200.44,	15.0						
110 deg:	50.58,	10.0*	73.13,	8.0*	123.11,	10.0*	183.11,	10.0*
	200.36,	30.0						

115 deg:	50.58,	10.0*	73.13,	8.0*	123.11,	10.0*	183.11,	10.0*
	199.94,	30.0						
120 deg:	50.58,	10.0*	73.13,	8.0*	123.11,	10.0*	183.11,	10.0*
	195.40,	30.0	199.84,	5000.0				
125 deg:	132.88,	15.0	199.81,	30.0				
130 deg:	132.85,	15.0	195.82,	30.0	200.11,	5000.0		
135 deg:	132.63,	15.0	200.10,	30.0				
140 deg:	134.64,	15.0	199.69,	30.0				
145 deg:	137.63,	15.0	200.26,	30.0				
150 deg:	143.15,	15.0	199.55,	30.0				
155 deg:	150.13,	15.0	199.91,	30.0				
160 deg:	159.59,	15.0	199.76,	30.0				
165 deg:	172.60,	15.0	200.25,	30.0				
170 deg:	188.99,	15.0	200.22,	30.0				
175 deg:	199.87,	15.0						
180 deg:	200.06,	15.0						
185 deg:	199.86,	15.0						
190 deg:	200.21,	15.0						
195 deg:	200.22,	15.0						
200 deg:	200.00,	15.0						
205 deg:	199.86,	15.0						
210 deg:	199.50,	15.0						
215 deg:	200.20,	15.0						
220 deg:	182.86,	15.0	199.62,	8.0				
225 deg:	166.84,	15.0	200.02,	8.0				
230 deg:	157.83,	15.0	200.03,	8.0				
235 deg:	150.61,	15.0	199.72,	8.0				
240 deg:	146.22,	15.0	199.74,	8.0				
245 deg:	142.22,	15.0	199.85,	8.0				
250 deg:	138.60,	15.0	200.26,	8.0				
255 deg:	134.57,	15.0	200.34,	8.0				
260 deg:	123.76,	15.0	200.18,	8.0				
265 deg:	21.78,	15.0	25.88,	8.0	28.29,	15.0	200.12,	8.0
270 deg:	16.87,	15.0	199.84,	8.0				
275 deg:	11.27,	15.0	200.30,	8.0				
280 deg:	8.23,	15.0	199.91,	8.0				
285 deg:	5.91,	15.0	200.11,	8.0				
290 deg:	5.91,	15.0	200.23,	8.0				
295 deg:	6.27,	15.0	200.40,	8.0				
300 deg:	4.89,	15.0	199.88,	8.0				
305 deg:	4.89,	15.0	199.48,	8.0				
310 deg:	4.26,	15.0	200.04,	8.0				
315 deg:	3.70,	15.0	200.38,	8.0				
320 deg:	3.70,	15.0	199.76,	8.0				
325 deg:	3.24,	15.0	200.13,	8.0				
330 deg:	3.24,	15.0	199.65,	8.0				
335 deg:	3.24,	15.0	199.92,	8.0				
340 deg:	2.94,	15.0	200.28,	8.0				
345 deg:	2.94,	15.0	199.63,	8.0				
350 deg:	2.94,	15.0	199.59,	8.0				
355 deg:	3.77,	15.0	200.03,	8.0				

JHT Ventures, Inc., Licensee:
Radio Station KULF (AM)1090 kHz, Bellville, Texas
Seeks: Make Changes in Antenna
Location, Antenna System
BP-20091207ACW

Tabulation of Grandfathered Overlap
Improvements Between Proposed KULF (AM)
and KDRY (AM) at Alamo Heights, Texas

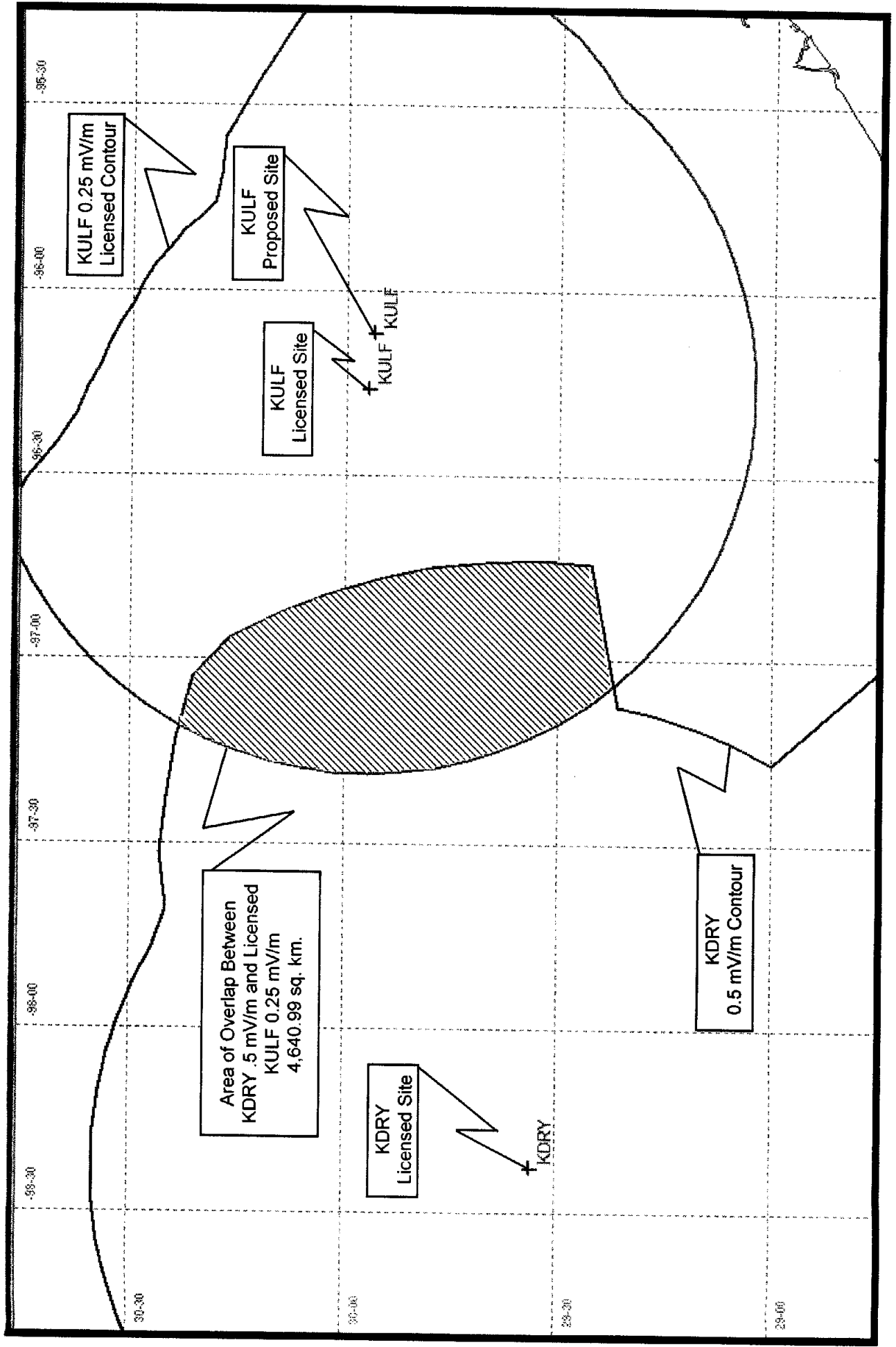
<u>Grandfathered Licensed Overlap</u>		
	Area of Overlap	Population Within*
Licensed KDRY 0.50 mV/m Contour to Licensed KULF 0.25 mV/m Contour	4,640.99 sq. km	54,984
Licensed KDRY 0.25 mV/m Contour to Licensed KULF 0.50 mV/m Contour	6,980.82 sq. km	75,428

<u>Proposed Overlap Improvement</u>		
	Area of Overlap	Population Within*
Licensed KDRY 0.50 mV/m Contour to Proposed KULF 0.25 mV/m Contour	3,216.46 sq. km	37,666
Licensed KDRY 0.25 mV/m Contour to Proposed KULF 0.50 mV/m Contour	5,788.42 sq. km	53,229

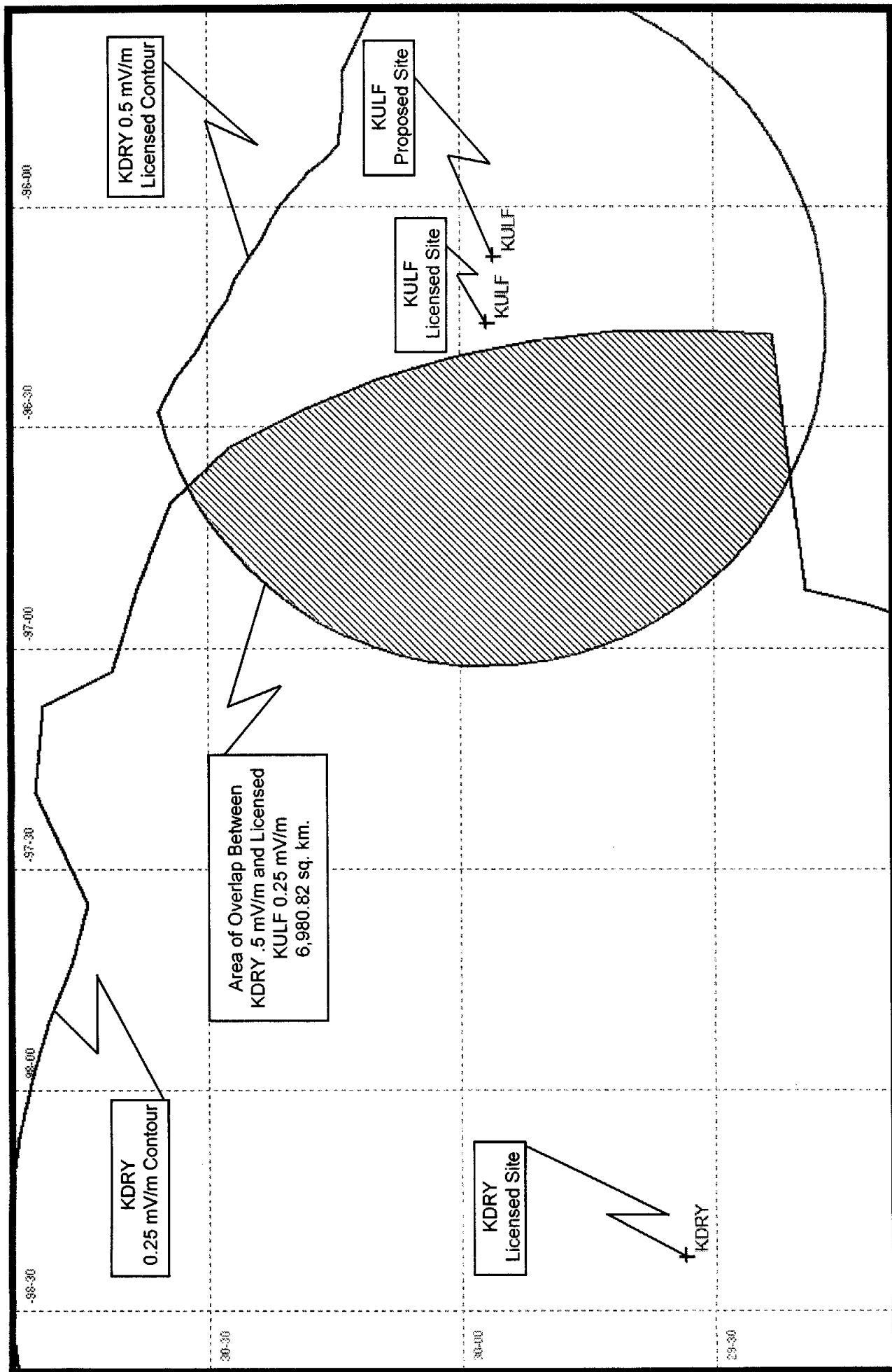
* Source: 2000 U.S. Census

Licensed KDRY .50 mV/m to Licensed KULF .25 mV/m	4,640.99 sq. km	
Licensed KDRY .50 mV/m to Proposed KULF .25 mV/m	<u>3,216.46 sq. km</u>	
Improvement	1,424.53 sq. km	30.69%
Licensed KDRY .25 mV/m to Licensed KULF .50 mV/m	6,980.82 sq. km	
Licensed KDRY .25 mV/m to Proposed KULF .50 mV/m	<u>5,788.42 sq. km</u>	
Improvement	1,192.40 sq. km	17.32%

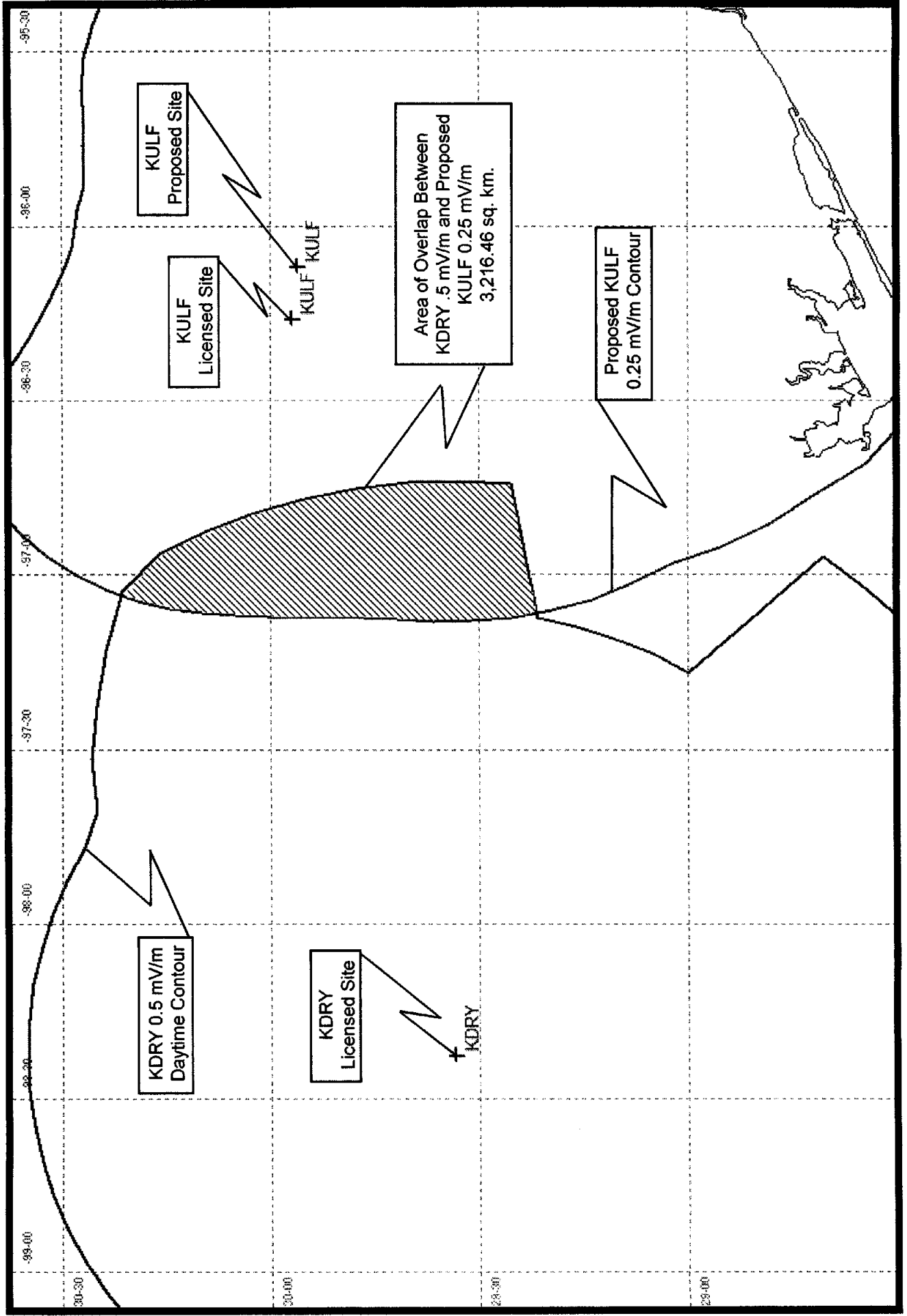
Map Indicating Licensed Interference Between Licensed KDRY 0.5 mV/m Daytime Contour
(With Field Strength Readings) and Licensed KULF 0.25 mV/m Daytime Contour



Map Indicating Licensed Interference Between Licensed KDRY 0.25 mV/m Daytime Contour
(With Field Strength Readings) and Licensed KULF 0.5 mV/m Daytime Contour



Map Indicating Reduced Interference Between Licensed KDRY 0.50 mV/m Daytime Contour
(With Field Strength Readings) and Proposed KULF 0.25 mV/m Daytime Contour



Map Indicating Reduced Interference Between Licensed KDRY 0.25 mV/m Daytime Contour
(With Field Strength Readings) and Proposed KULF 0.5 mV/m Daytime Contour

