

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In re: Application of:	)	
	)	File No. BMP-20130426ABP
DAIJ MEDIA, LLC	)	Facility ID 14228
Station KRCM(AM), Shenandoah, TX	)	

For Minor Changes to a Construction Permit

To: The Secretary  
Forward to: Chief, Audio Division, Media Bureau

**Informal Objection**

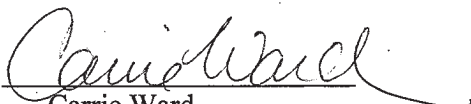
Entercom Austin License, LLC (“**Licensee**”) licensee of station KJCE(AM), Rollingwood, TX (Facility ID No. 1243) (“**KJCE**”), respectfully submits an Informal Objection to Daij Media, LLC’s (“**Daij**”) application to Modify a Construction Permit (FCC File No. BMP-20130426ABP) (the “**Application**”). The Construction Permit (FCC File No. BP-20120110AEV (as amended)) (the “**CP**”) authorizes a new transmitter and a power increase for KRCM(AM), Shenandoah, TX (“**KRCM**”) (*See* enclosed Engineering Statement from Hatfield & Dawson Consulting Engineers (the “**Hatfield Statement**”) at pg. 1).

Section 73.37(a) of the Commission’s rules state, “...no application will be accepted for a change of the facilities of an existing station if the proposed change would involve such overlap where there is not already such overlap between the stations involved.” KRCM operates on 1380 kHz, a channel first adjacent to KJCE (which operates on 1370 kHz). As stated in the Hatfield Statement, the instant Application and the underlying application Daij filed to seek approval for the CP, Daij submitted extensive ground conductivity data to demonstrate no impermissible overlap with any other station in its application to seek the CP (*Id.* at pg. 1). While Licensee cannot independently verify the conductivity data that Daij submitted for the proposed operation

of KRCM since the data was based on a temporary test transmitter, Licensee engaged a consultant to independently verify the conductivity data for KJCE by performing field strength measurements on KJCE (*Id.* at pgs. 5-8). These measurements demonstrate that the ground conductivity to the east of KJCE to be *two times* of what Daij has submitted to the Commission and results in a significant overlap area of 375 km<sup>2</sup> between the 0.25 mV/m contour of KRCM and the protected 0.5 mV/m service contour of KJCE (*Id.* at pg. 1).

The Hatfield Statement includes map showing the overlap between KRCM and KJCE based on measured conductivity data (*Id.* at pg. 2). The data used to calculate the location of the KJCE contours is included in the Hatfield Statement and the KRCM contours are based on the data Daij previously submitted to the Commission (*Id.* at pgs. 1-2). This overlap showing demonstrates a prohibited contour overlap between KRCM and KJCE, which violates Section 73.37(a) of the Commission's rules and will likely cause interference with KJCE (*Id.*). Accordingly, Licensee respectfully requests that the Commission dismiss the Application and revoke the CP

Respectfully submitted,

By:   
Carrie Ward  
Associate Counsel  
Entercom Communications Corp.  
401 City Avenue, Suite 809  
Bala Cynwyd, PA 19004  
(610) 660-5610

May 16, 2013

Enclosure

cc: Christopher D. Imlay, Booth, Freret, Imlay & Tepper, P.C.  
Dan J. Alpert, Esquire  
Daij Media, LLC

**CERTIFICATE OF SERVICE**

I, Janet Trainor, an assistant at Entercom Communications Corp., do hereby certify that on May 16, 2013 that a true copy of Entercom Austin License, LLC's Informal Objection to Application of Daij Media, LLC was sent via United States First Class Mail, postage prepaid, to the following:

Christopher Imlay, Esquire  
Booth, Freret, Imlay & Tepper, P.C.  
14356 Cape May Road  
Silver Spring, MD 20904 – 6011

Dan J. Alpert, Esquire  
Law Offices of Dan J. Alpert  
2120 North 21<sup>st</sup> Road  
Arlington, VA 22201

Daij Media, LLC  
1600 Pasadena Blvd.  
Pasadena, TX 77502

  
Janet Trainor

BENJAMIN F. DAWSON III, PE  
THOMAS M. ECKELS, PE  
STEPHEN S. LOCKWOOD, PE  
DAVID J. PINION, PE  
ERIK C. SWANSON, PE

THOMAS S. GORTON, PE  
MICHAEL H. MEHIGAN, PE

HATFIELD & DAWSON  
CONSULTING ELECTRICAL ENGINEERS  
9500 GREENWOOD AVE. N.  
SEATTLE, WASHINGTON 98103

TELEPHONE (206) 783-9151  
FACSIMILE (206) 789-9834  
E-MAIL [hatdaw@hatdaw.com](mailto:hatdaw@hatdaw.com)

JAMES B. HATFIELD, PE  
CONSULTANT

MAURY L. HATFIELD, PE  
(1942-2009)  
PAUL W. LEONARD, PE  
(1925-2011)

## ENGINEERING STATEMENT

In Support of an

INFORMAL OBJECTION

to an Application to

Modify a Construction Permit (BMP-20130426ABP)  
Dated April 29, 2013

KRCM-AM  
Shenandoah, TX

Entercom Austin License, LLC

May 2013

This Engineering Statement has been prepared on behalf of Entercom Austin License, LLC, licensee of Class B AM station KJCE Rollingwood, TX in support of an Informal Objection to an Application to Modify a Construction Permit (File No. BMP-20130426ABP) by Daij Media, LLC. The Construction Permit (File No. BP-20120110AEV) authorizes a new transmitter site and power increase for KRCM-AM, Shenandoah, TX. KRCM operates on 1380 kHz, a channel first-adjacent to KJCE.

**Proposal will Cause Prohibited Contour Overlap Between KJCE and KRCM**

In both the previous and instant applications, Daij makes use of extensive ground conductivity data in an attempt to demonstrate that the proposed operation of KRCM will not cause prohibited contour overlap with any other station. While Entercom can not verify the conductivity data used for the proposed operation of KRCM, as it was based on a temporary test transmitter, we can and have investigated the validity of Daij's measurements of KJCE, and have found them to be lacking. On average, Entercom's measurements demonstrate ground conductivity to the east of KJCE to be double that shown in Daij's data, resulting in an overlap area of 375 km<sup>2</sup> between the proposed 0.25 mV/m contour of KRCM and the protected 0.5 mV/m service contour of KJCE.

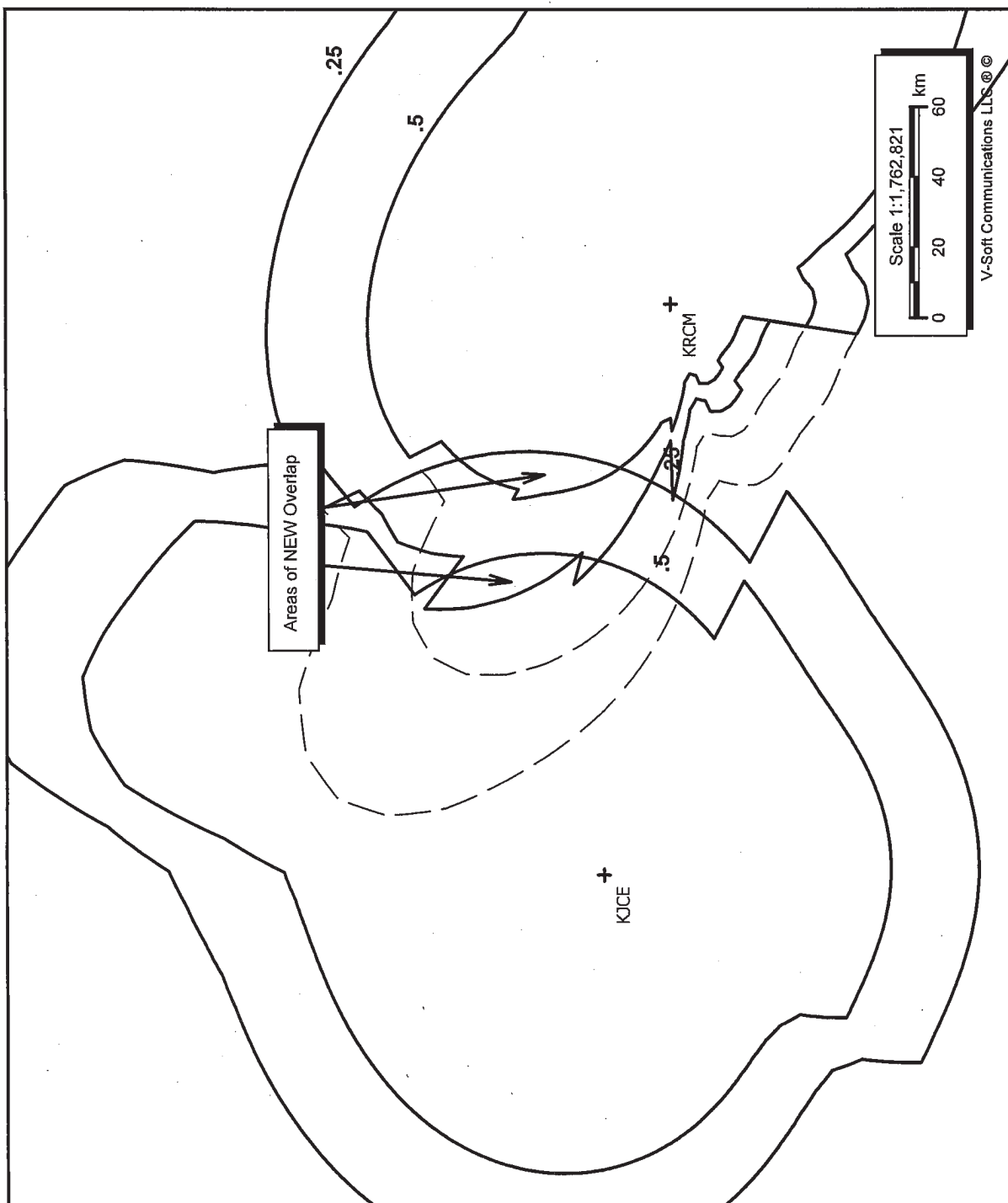
In this Informal Objection, Entercom supplies its own overlap showing, based on measured ground conductivity data. The data used to calculate the location of the KJCE contours is included in this report. The KRCM contours are based on data previously submitted by Daij. This overlap showing demonstrates that contrary to Daij's assertions, the facilities authorized in the construction permit would result in significant new contour overlap between KJCE and KRCM in violation of §73.37(a) of the Commission's rules. The KRCM application to modify a construction permit must therefore be dismissed and the construction permit rescinded.

Hatfield & Dawson Consulting Engineers

KRCM

Freq: 1380 kHz  
Class: D  
Latitude: 30-07-40 N  
Longitude: 095-57-35 W  
Power: 22 kW  
RMS: 1447 mV/m @1km  
# Towers: 3  
# Augs: 0

Overlap Showing  
KRCM (Proposed)  
KJCE (Licensed)



# **Tabulation of Ground Conductivity Data**

KJCE

Latitude: 30-18-15 N

Longitude: 097-38-51 W

Conductivity Database Used: M3 (USA)

Ground Conductivity Data:									
Region conductivity in mS/m followed by distance in km									
Azimuth	to the end of region. E - map data; M - measurement data.								
0.0	15.0E	10.2	30.0E	27.6	8.0E	93.8	15.0E	352.3	30.0E 541.4
	15.0E	557.6	30.0E	988.9	15.0E	1145.0	30.0E	1211.1	15.0E 1300.0
5.0	15.0E	10.5	30.0E	50.5	8.0E	90.2	15.0E	353.8	30.0E 544.8
	15.0E	600.6	8.0E	631.4	30.0E	1034.7	15.0E	1158.9	30.0E 1207.7
10.0	15.0E	1300.0							
	15.0E	10.9	30.0E	88.4	15.0E	340.7	30.0E	390.8	15.0E 581.3
15.0	8.0E	693.3	30.0E	1222.4	15.0E	1300.0			
	15.0E	11.4	30.0E	126.0	15.0E	239.3	30.0E	262.9	15.0E 263.2
20.0	30.0E	385.7	15.0E	759.5	30.0E	779.6	15.0E	1300.0	
	15.0E	12.0	30.0E	147.2	15.0E	227.4	30.0E	398.3	15.0E 640.3
25.0	8.0E	823.4	15.0E	1300.0					
	15.0E	12.8	30.0E	142.5	15.0E	226.8	30.0E	433.8	15.0E 622.7
30.0	8.0E	1045.6	15.0E	1300.0					
	15.0E	13.9	30.0E	134.0	15.0E	227.9	30.0E	455.3	4.0E 495.1
35.0	15.0E	669.4	8.0E	1300.0					
	15.0E	15.2	30.0E	128.0	15.0E	233.1	30.0E	242.0	8.0E 404.3
40.0	4.0E	518.4	15.0E	656.8	4.0E	692.4	8.0E	1091.7	15.0E 1300.0
	15.0E	17.5	30.0E	123.3	15.0E	168.2	4.0E	242.9	8.0E 437.4
45.0	4.0E	716.3	8.0E	1300.0					
	15.0E	22.9	30.0E	118.5	15.0E	120.0	4.0E	256.3	8.0E 466.7
50.0	4.0E	743.2	8.0E	1069.2	4.0E	1117.9	8.0E	1300.0	
	15.0E	33.3	30.0E	83.9	15.0E	117.8	4.0E	275.9	8.0E 482.5
55.0	4.0E	735.9	8.0E	981.0	4.0E	1300.0			
	30.0M	40.0	10.0M	160.0	4.0E	302.7	8.0E	441.9	15.0E 526.1
60.0	4.0E	686.5	8.0E	952.0	4.0E	1300.0			
	30.0M	40.0	10.0M	160.0	4.0E	340.1	8.0E	441.8	15.0E 510.1
65.0	4.0E	615.9	8.0E	910.0	2.0E	955.1	4.0E	1210.4	2.0E 1300.0
	30.0M	40.0	10.0M	160.0	4.0E	358.8	8.0E	438.8	15.0E 496.0
70.0	4.0E	569.6	8.0E	832.3	2.0E	1022.1	4.0E	1071.3	2.0E 1199.1
	4.0E	1300.0							
75.0	30.0M	40.0	10.0M	160.0	4.0E	260.3	8.0E	436.2	15.0E 487.2
	4.0E	551.6	8.0E	789.5	2.0E	1031.6	4.0E	1134.3	2.0E 1300.0
80.0	30.0M	40.0	10.0M	160.0	4.0E	253.2	8.0E	432.7	15.0E 484.8
	8.0E	502.2	4.0E	540.8	8.0E	716.8	4.0E	848.0	2.0E 1005.4
85.0	8.0E	1063.4	4.0E	1101.7	8.0E	1130.2	4.0E	1300.0	
	15.0M	55.0	10.0M	130.0	4.0E	249.8	8.0E	434.6	15.0E 492.6
90.0	8.0E	681.0	4.0E	806.4	2.0E	956.0	8.0E	1104.5	4.0E 1300.0
	15.0M	55.0	10.0M	130.0	15.0E	132.0	4.0E	248.3	8.0E 447.9
	15.0E	520.0	8.0E	642.7	4.0E	775.1	2.0E	922.5	5000.0E 926.7
	2.0E	931.1	1.0E	1177.0	4.0E	1225.1	2.0E	1300.0	
	15.0M	55.0	10.0M	130.0	15.0E	140.7	4.0E	248.7	8.0E 470.6
	30.0E	473.8	8.0E	631.8	15.0E	696.6	5000.0E	740.1	15.0E 752.2
	5000.0E	756.1	2.0E	764.4	5000.0E	784.5	15.0E	790.6	5000.0E 1188.5
	1.0E	1207.9	5000.0E	1300.0					

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95.0	15.0M	55.0	10.0M	130.0	15.0E	153.2	4.0E	169.1	15.0E	250.2
	30.0E	416.5	5000.0E	425.7	30.0E	513.6	15.0E	541.9	5000.0E	558.2
	15.0E	569.8	5000.0E	584.2	15.0E	720.7	5000.0E	737.3	15.0E	748.9
	5000.0E	753.2	15.0E	787.8	5000.0E	1300.0				
100.0	10.0M	115.0	15.0E	255.1	30.0E	368.4	5000.0E	1300.0		
105.0	10.0M	115.0	15.0E	226.2	30.0E	265.7	5000.0E	271.5	30.0E	272.1
	5000.0E	292.2	30.0E	305.9	5000.0E	316.0	30.0E	319.8	5000.0E	1300.0
110.0	10.0M	115.0	15.0E	224.9	30.0E	284.0	5000.0E	294.7	30.0E	298.3
	5000.0E	1300.0								
115.0	10.0M	115.0	15.0E	234.5	30.0E	280.1	5000.0E	1300.0		
120.0	15.0E	254.8	30.0E	274.2	5000.0E	1300.0				
125.0	15.0E	127.1	30.0E	143.3	15.0E	259.2	30.0E	270.7	5000.0E	1300.0
130.0	15.0E	127.7	30.0E	262.6	5000.0E	1300.0				
135.0	15.0E	129.2	30.0E	248.3	5000.0E	1300.0				
140.0	15.0E	131.8	30.0E	241.5	5000.0E	1274.8	6.0E	1300.0		
145.0	15.0E	135.6	30.0E	224.4	5000.0E	1300.0				
150.0	15.0E	140.7	30.0E	205.0	5000.0E	212.1	30.0E	215.4	5000.0E	231.4
	30.0E	239.7	5000.0E	1300.0						
155.0	15.0E	146.0	30.0E	240.4	5000.0E	1300.0				
160.0	15.0E	152.0	30.0E	245.1	5000.0E	1300.0				
165.0	15.0E	160.6	30.0E	249.6	5000.0E	1300.0				
170.0	15.0E	171.5	30.0E	251.3	5000.0E	253.5	30.0E	275.0	5000.0E	1300.0
175.0	15.0E	185.6	30.0E	271.0	5000.0E	278.9	30.0E	320.3	5000.0E	471.0
	30.0E	478.6	5000.0E	480.6	30.0E	486.3	20.0E	517.9	5000.0E	1130.6
	5.0E	1290.7	4.0E	1300.0						
180.0	15.0E	208.0	30.0E	327.3	5000.0E	333.8	30.0E	335.0	5000.0E	337.0
	30.0E	476.8	20.0E	546.7	5000.0E	933.1	2.0E	1006.4	5.0E	1145.7
	4.0E	1300.0								
185.0	15.0E	241.8	30.0E	398.0	15.0E	419.8	30.0E	475.5	20.0E	557.6
	5.0E	701.5	2.0E	910.2	5.0E	1067.1	4.0E	1154.8	3.0E	1264.8
	4.0E	1300.0								
190.0	15.0E	293.0	30.0E	339.8	15.0E	461.1	20.0E	581.4	5.0E	587.3
	3.0E	915.3	1.5E	917.1	4.0E	1163.7	2.0E	1188.5	4.0E	1300.0
195.0	15.0E	453.3	20.0E	491.2	3.0E	728.2	1.5E	866.4	4.0E	1144.7
	2.0E	1218.4	4.0E	1300.0						
200.0	15.0E	443.4	3.0E	622.1	1.5E	835.5	4.0E	1130.2	2.0E	1281.2
	4.0E	1300.0								
205.0	15.0E	411.0	3.0E	576.4	1.5E	829.8	4.0E	1212.4	2.0E	1300.0
210.0	15.0E	361.8	3.0E	557.2	1.5E	761.5	4.0E	1020.4	2.0E	1061.8
	4.0E	1250.3	2.0E	1300.0						
215.0	15.0E	39.8	8.0E	79.7	15.0E	330.8	8.0E	354.6	3.0E	540.6
	1.5E	727.1	4.0E	989.1	2.0E	1087.8	4.0E	1264.6	2.0E	1300.0
220.0	15.0E	28.0	8.0E	101.8	15.0E	291.9	8.0E	344.1	3.0E	523.3
	1.5E	690.5	4.0E	971.5	2.0E	1092.8	4.0E	1098.3	3.0E	1147.4
	4.0E	1237.3	5000.0E	1300.0						
225.0	15.0E	21.7	8.0E	117.0	15.0E	268.8	8.0E	338.4	3.0E	505.6
	1.5E	649.9	4.0E	954.4	2.0E	1079.8	3.0E	1147.3	4.0E	1180.5
	5000.0E	1300.0								
230.0	15.0E	17.8	8.0E	134.8	15.0E	254.3	8.0E	339.0	3.0E	486.3
	1.5E	643.2	4.0E	943.0	2.0E	1048.3	4.0E	1174.7	5000.0E	1300.0
235.0	15.0E	15.2	8.0E	160.3	15.0E	243.1	8.0E	329.4	3.0E	472.4
	1.5E	659.0	4.0E	934.7	2.0E	1006.7	4.0E	1167.5	5000.0E	1300.0
240.0	15.0E	13.4	8.0E	189.9	15.0E	229.9	8.0E	325.8	3.0E	464.6
	1.5E	686.4	4.0E	928.7	2.0E	1010.6	4.0E	1187.5	5000.0E	1300.0
245.0	15.0E	12.0	8.0E	322.8	3.0E	463.7	1.5E	684.2	4.0E	927.6
	2.0E	1055.6	4.0E	1202.4	5000.0E	1300.0				
250.0	15.0E	11.0	8.0E	326.8	3.0E	473.0	1.5E	668.9	4.0E	930.1
	2.0E	1085.6	4.0E	1252.6	5000.0E	1300.0				

Hatfield & Dawson Consulting Engineers



255.0	15.0E 10.2	8.0E 341.3	3.0E 495.2	1.5E 696.5	4.0E 939.3
	2.0E 1089.7	4.0E 1252.0	5000.0E 1300.0		
260.0	15.0E 9.5	8.0E 364.8	3.0E 509.2	8.0E 603.3	1.5E 718.4
	4.0E 962.3	2.0E 1092.5	4.0E 1295.4	5000.0E 1300.0	
265.0	15.0E 9.1	8.0E 451.1	3.0E 452.0	8.0E 663.4	1.5E 725.0
	4.0E 998.4	2.0E 1127.3	4.0E 1300.0		
270.0	15.0E 8.8	8.0E 677.8	1.5E 724.8	4.0E 1043.8	2.0E 1154.3
	4.0E 1300.0				
275.0	15.0E 8.6	8.0E 704.6	1.5E 718.4	4.0E 1069.3	2.0E 1111.8
	4.0E 1300.0				
280.0	15.0E 8.6	8.0E 791.4	4.0E 1022.0	8.0E 1300.0	
285.0	15.0E 8.6	8.0E 833.9	4.0E 1047.1	8.0E 1231.3	15.0E 1300.0
290.0	15.0E 8.7	8.0E 782.4	4.0E 1167.1	8.0E 1300.0	
295.0	15.0E 8.8	8.0E 411.9	15.0E 467.9	8.0E 751.7	4.0E 951.2
	15.0E 1015.9	8.0E 1078.9	4.0E 1230.7	15.0E 1297.0	8.0E 1300.0
300.0	15.0E 9.0	8.0E 389.8	15.0E 739.8	8.0E 848.7	15.0E 1048.1
	8.0E 1239.9	15.0E 1279.8	8.0E 1300.0		
305.0	15.0E 9.3	8.0E 362.1	15.0E 774.5	8.0E 863.5	15.0E 1206.7
	8.0E 1300.0				
310.0	15.0E 9.7	8.0E 355.0	15.0E 849.9	8.0E 874.0	15.0E 912.9
	2.0E 970.4	4.0E 1300.0			
315.0	15.0E 10.2	8.0E 369.4	15.0E 398.8	30.0E 461.5	15.0E 624.2
	30.0E 666.1	15.0E 948.2	2.0E 1247.7	4.0E 1300.0	
320.0	15.0E 10.9	8.0E 196.3	15.0E 299.5	8.0E 372.9	30.0E 459.8
	15.0E 561.7	30.0E 695.1	15.0E 969.7	2.0E 1078.4	4.0E 1162.2
	2.0E 1300.0				
325.0	15.0E 10.6	30.0E 11.5	8.0E 166.7	15.0E 319.0	8.0E 361.4
	30.0E 480.0	15.0E 518.9	30.0E 726.0	15.0E 1162.2	8.0E 1274.3
	2.0E 1300.0				
330.0	15.0E 10.3	30.0E 12.3	8.0E 146.6	15.0E 321.5	8.0E 348.3
	30.0E 775.7	15.0E 1264.8	8.0E 1300.0		
335.0	15.0E 10.1	30.0E 13.3	8.0E 131.6	15.0E 326.3	30.0E 543.0
	15.0E 643.8	30.0E 826.0	15.0E 1215.3	8.0E 1300.0	
340.0	15.0E 9.9	30.0E 14.6	8.0E 120.3	15.0E 333.4	30.0E 482.5
	15.0E 648.1	30.0E 848.9	15.0E 1250.4	8.0E 1300.0	
345.0	15.0E 9.9	30.0E 16.4	8.0E 111.5	15.0E 343.5	30.0E 444.2
	15.0E 749.0	30.0E 1032.1	15.0E 1258.3	4.0E 1300.0	
350.0	15.0E 9.9	30.0E 18.8	8.0E 104.6	15.0E 355.3	30.0E 434.7
	15.0E 664.2	30.0E 1260.7	4.0E 1300.0		
355.0	15.0E 10.0	30.0E 22.3	8.0E 98.5	15.0E 354.9	30.0E 513.1
	15.0E 577.7	30.0E 1280.7	4.0E 1300.0		

Hatfield & Dawson Consulting Engineers

**Statement of George A. Schank**

**George August Schank, being first duly sworn, and upon his oath, deposes and states:**

**That he is a qualified and competent broadcast engineer. He has worked in the broadcasting industry for over 48 years. He is certified as a Professional Broadcast Engineer by the Society of Broadcast Engineers, member number 8031. He has held a General (formerly First Class) Class Radiotelephone Operator license since August 1968; and currently holds permanently issued license number PG-9-10461.**

**That his qualifications are a matter of record with the Federal Communications Commission.**

**That he has constructed, set up, proved and maintained numerous AM directional antenna systems for various clients and companies; and, he is experienced in the design and construction concepts of same. He has designed, constructed and maintained numerous FM and television broadcast facilities.**

**That, during the period May 6 through May 12, 2013, he was retained to perform field strength measurements on KJCE-AM, Rollingwood (Austin), Texas.**

**That measurements were personally made, by him, using a Potomac Instruments FIM-41 field strength meter, serial number 1264, calibrated 17 March 2004; and checked against another meter prior to making the measurements covered by this filing.**

**That measurements were made during fair weather; and during a period of two hours after local sunrise to two hours prior to local sunset.**

**That measurements were made in areas determined to be clear of electromagnetic interference from local sources.**

**And, that all measurements were truly and correctly recorded.**

**Subscribed and sworn to this 15<sup>th</sup> day of May, 2013.**



**George A. Schank**

# 65 degree radial

Distance (km)	reading	time	date	description
3	300	9:52	8-May	woodchip yard
2.7	275	9:57	8-May	corner of Fairbridge in trailer park
2.6	285	10:00	8-May	180 Fairbridge in trailer park
2.2	343	10:06	8-May	Mirawood @ Fairbridge
2	352	10:09	8-May	418 Fairbloom in trailer park
1.2	650	10:34	8-May	off end of Breezy Hill St. in clearing
1.1	720	10:28	8-May	on Point North St.
4.6	142	10:53	8-May	skeet range road
5.4	122	10:57	8-May	Lindell Rd.
8.1	66	11:03	8-May	Blue Bluff Rd.
9.5	78	11:11	8-May	Lexington @ W. Parsons in Manor
11.4	68	11:19	8-May	FM 973 just S. of SH 290
14.2	35	16:40	11-May	Bois D'Arc @ cobblestone driveway
18.7	30.9	16:50	11-May	14415 FM 1000 @ mailbox
26.8	30.8	17:18	11-May	S. side of Lund-CarlsonRd. in front of church
30.4	21.2	17:27	11-May	MOR 3180 CR 460
33.6	19	17:34	11-May	MOR CR 484 @ curve sign
37.5	14.5	17:45	11-May	MOR on CR 467 @ gated driveway
40.2	10	17:51	11-May	NW corner of int. FM 619 & CR466
42.1	9.9	8:15	12-May	MOR CR 474 in front of white house
44.5	9.2	8:19	12-May	MOR @ farm gate
48.6	6.2	8:23	12-May	W. side of rd. opp 16181 FM 112
52.2	4.5	8:43	12-May	MOR opp large fence post in front of garden
63.1	2.62	9:37	12-May	MOR CR 313 opp double fence posts
67.9	1.92	9:46	12-May	E. side of Hwy 77 @ CR 313 next to cemetery sign
70.3	1.75	9:53	12-May	MOR @ large mailbox in front of red house
73	1.38	10:15	12-May	MOR in front of 5658 FM 908
83.1	0.79	10:45	12-May	at corner on the end of CR 328
89.3	0.58	10:59	12-May	in driveway @ RR crossing 5858 Hwy 36
104	0.335	11:25	12-May	in front of church at edge of FM 2000
114	0.38	12:00	12-May	W. side of rd. at RR crossing in Mumford
120	0.4	12:12	12-May	in driveway to oilwell
123	0.33	12:18	12-May	on Sadberry Rd. @ SH 6
127	0.31	12:30	12-May	W. side of Jackrabbit Rd. @ gate
130	0.34	12:38	12-May	N. side of OSR @ curve sign
135	0.33	12:47	12-May	in driveway 7506 Dick Elliott Rd.
139	0.28	12:55	12-May	MOR FM 974 at Edge mile sign
149	0.168	13:14	12-May	FM 974 in gated entrance to Lyne Ranch
156	0.15	13:25	12-May	on gravel rd. at cattle guard off FM 2865
162	0.135	13:34	12-May	on Hwy 39 in North Zulch just N. of Bundic Rd.

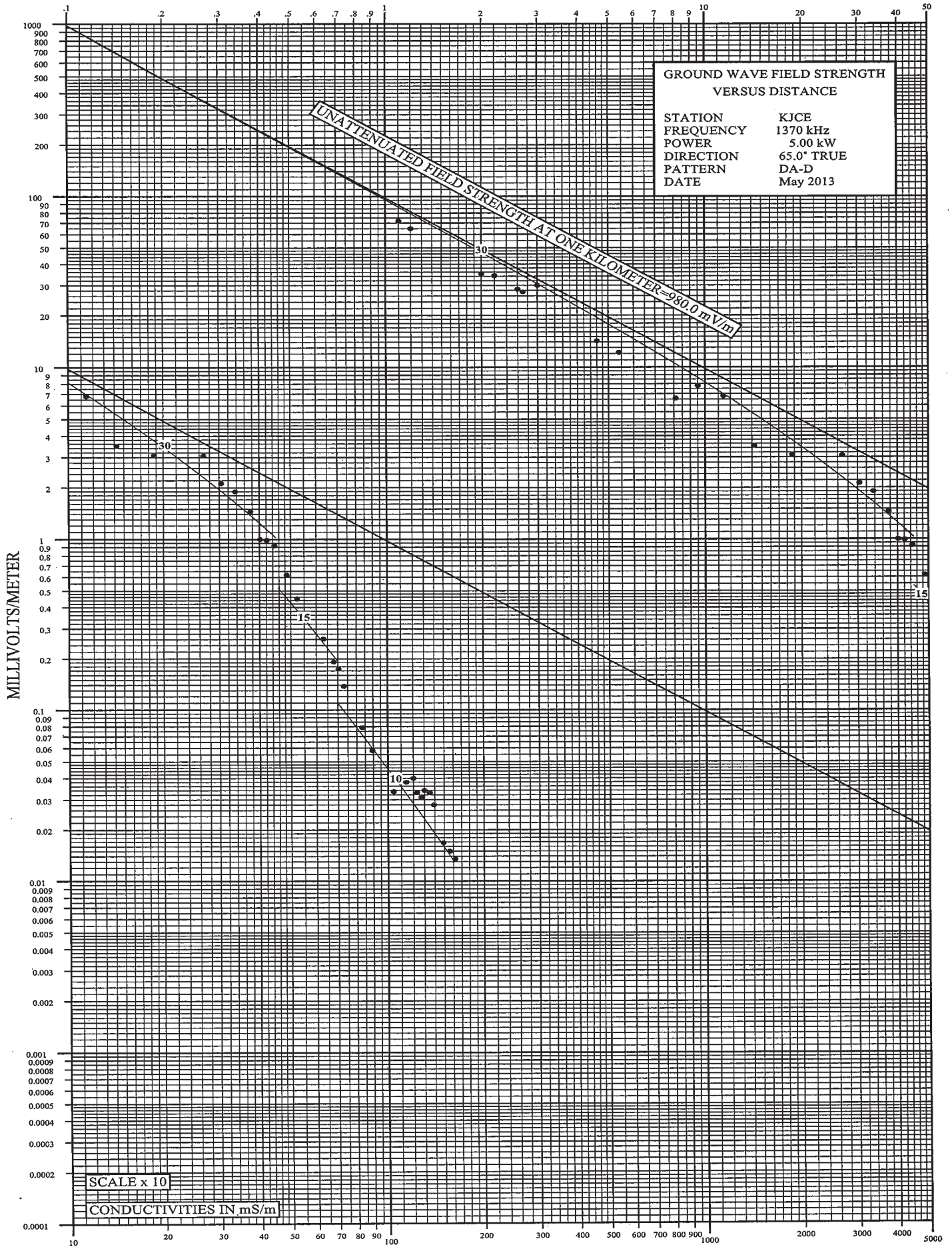
# 85 degree radial

Distance (km)	reading	time	date	description
	2.8	180	9:31	8-May 8008 Decker Dr.
	2.7	210	9:33	8-May 8404 Larical St.
	2.5	310	9:45	8-May office entrance @ Eagles Landing apts
	2.4	332	9:37	8-May behind bldg 2 @ Eagles Landing apts
830 m		740	9:12	8-May 7301 Ritchie st.
618 m		1000	9:16	8-May 7217 Colony Park
	5.4	117	12:24	8-May at corner on Bloor Rd
	8	70	12:59	8-May FM 973
	10.6	49	13:20	8-May Blake Manor Rd. opp. water tower
	12.8	45	8:20	11-May driveway at SE corner of Boy's camp
	16.1	30.7	8:40	11-May Jones Rd.
	19.3	20.1	8:46	11-May middle of three-way int. Littig @ Edwards
	22.8	17.8	8:54	11-May Monkey Rd.
	26.5	13.7	9:00	11-May 1331 FM 1704
	27.8	15	9:36	11-May 222 Hwy 95
	29.6	10.5	9:41	11-May S. side of Hwy 290 @ gate
	31.2	8	9:50	11-May 1354 Old McDade Rd.
	32.4	5.4	9:57	11-May on Pump Sta. Rd. @ Market
	34.4	5.4	10:04	11-May E. of FM 696 @ Three Oaks Mine gate
	39.1	4.6	10:20	11-May Lexington Rd @ corner
	41.8	3.45	11:05	11-May Knobbs Rd. @ double fence posts
	55.4	1.35	12:19	11-May FM 1624 @ red ranch gate
	64.5	0.85	12:38	11-May SE corner of int. Hwy 77 @ FM 3403
	67.5	0.73	12:43	11-May S. side of FM 3403 @ white mailbox opp. red gate
	74.2	0.78	12:52	11-May NW side of Hwy 21 @ pipeline marker
	78	0.9	12:58	11-May FM 141 @ CR 428 W. side of rd.
	91.3	0.53	13:22	11-May S. side of rd @ culvert next to lone tree
	93.7	0.5	13:28	11-May mailbox in front of meat market
	103	0.355	13:39	11-May 871 FM 60
	105	0.405	13:43	11-May Lyons Post Office parking lot
	110	0.33	13:51	11-May CR 422 in driveway to pipe gate
	114	0.22	14:13	11-May 5326 FM 1361 in driveway
	118	0.275	14:24	11-May MOR opp double fence posts near driveway
	125	0.19	14:36	11-May entrance to oilwell @ Triangle B Farms
	128	0.16	14:46	11-May end of rd @ red farm house

# 105 degree radial

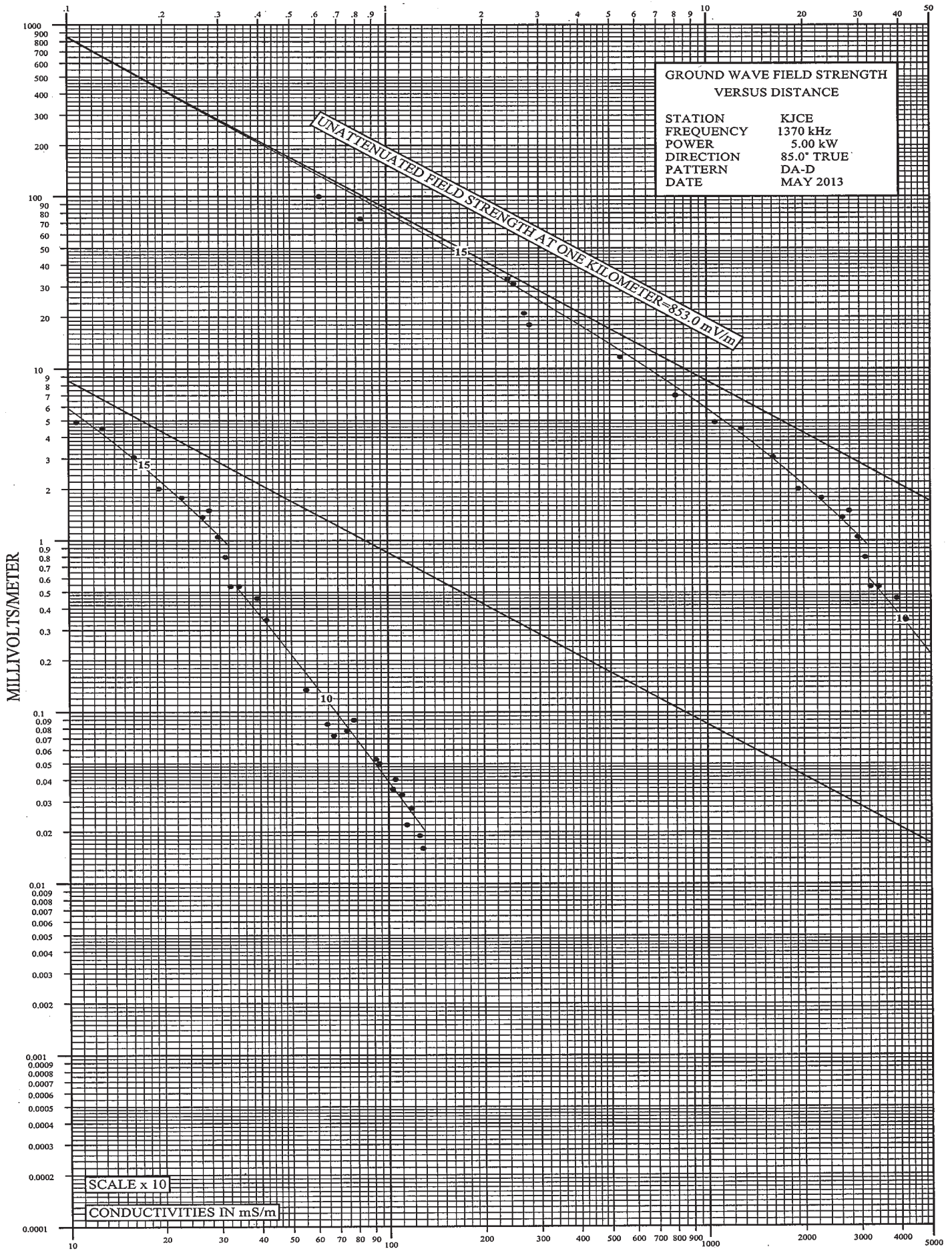
Distance (km)	reading	time	date	description
	2.7	184	8:34	8-May fairgrounds
	2.6	200	8:38	fairgrounds
	2.5	194	8:42	fairgrounds
	2.4	227	8:45	Valleyfield St.
	2.2	240	8:50	Meadow Bend St.
	2	260	8:54	Valleyfield St.
989 m		500	9:00	Colony Loop @ Ritchie St.
793 m		640	9:04	7013 Albany in middle of street
624 m		760	9:07	Townsbrough @ Hillcroft
	6.8	60	8:23	on N. side of FM 973
	7.05	56	8:19	S. bound entrance feeder to toll rd.
	7.3	70	8:16	Gilbert Rd.
	10.6	33	17:22	Taylor Rd.
	12.4	26.9	17:22	8501 Manor - Burleson Rd.
	14.1	24.3	17:22	Brown Cemetery Rd.
	18.4	11.5	17:22	Dry Creek Rd.
	20.4	10.5	17:22	Upper Elgin River Rd
	22.7	9.8	17:22	FM 1704 @ West of Woody Ln.
	24.8	6.6	17:22	Lower Elgin Rd.
	33	2.3	15:40	Hwy 95 @ Camp Swift
	36	2.1	15:45	465 FM 1441
	48.4	0.78	16:02	2125 SH 21
	54.7	1.1	16:18	2195 FM 2104
	68.8	0.74	16:39	FM 448 @ pipeline station
	72.4	0.76	16:50	N. driveway @ 2267 US Hwy 77
	85	0.4	17:09	FM 1291
	89.9	0.46	17:22	Schoenst Rd. @ gate
	95.4	0.31	17:30	Antique Show barn on SH 237
	97.9	0.272	17:43	on Hackemack Rd.@ FM 1457
	106	0.21	17:57	FM 389
	112	0.16	18:09	Schoenau Rd.

# KILOMETERS FROM ANTENNA

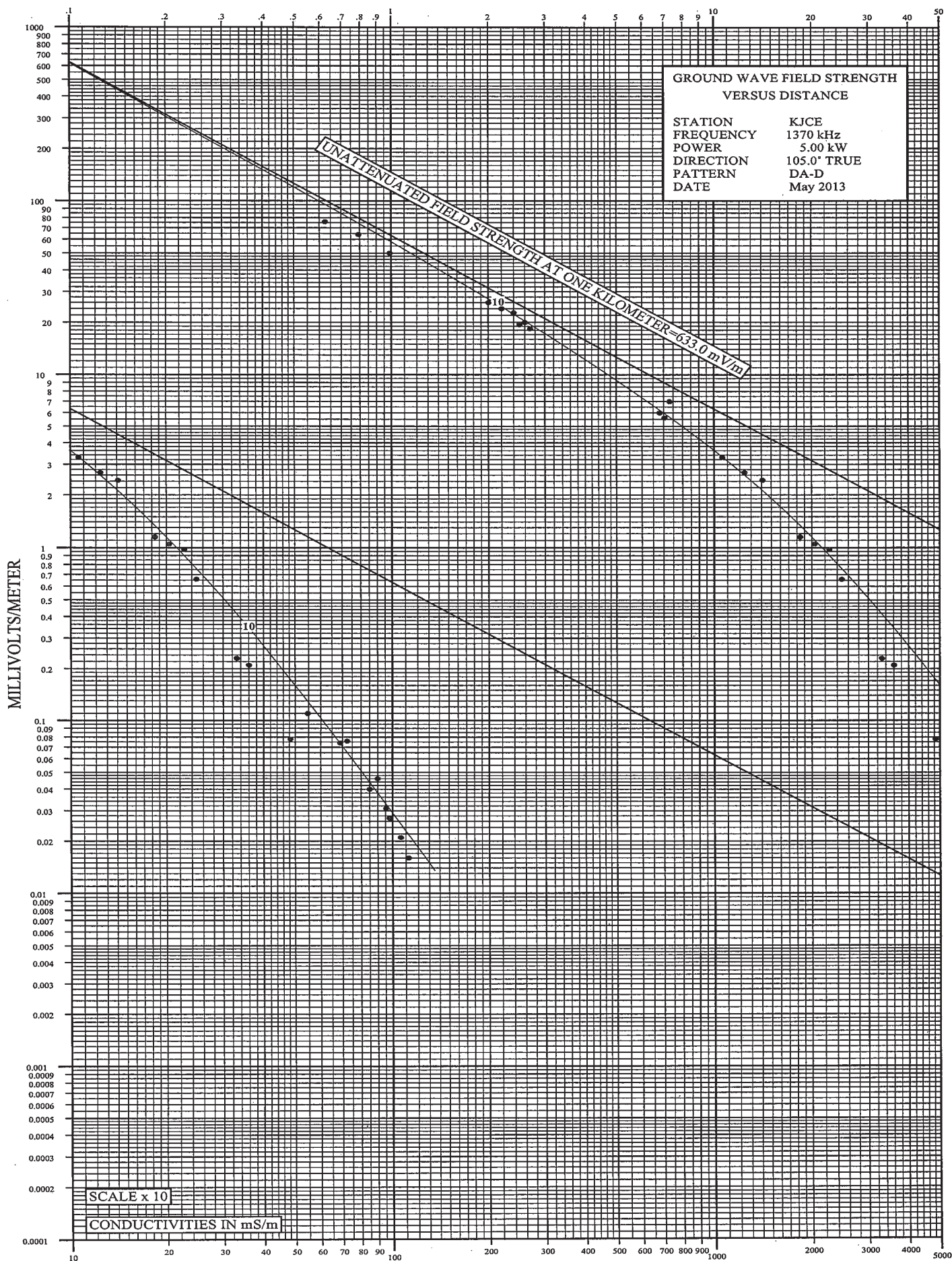




# KILOMETERS FROM ANTENNA



# KILOMETERS FROM ANTENNA





### Statement of Engineer

This Engineering Statement, relative to an Informal Objection to an Application to Modify a Construction Permit (File No. MBP0426ABP) for a new transmitter site and power increase for KRCM, Shenandoah, TX has been prepared by the undersigned. All representations contained herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am an engineer in the firm of Hatfield and Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and Oregon.

May 15, 2013



Thomas S. Gorton P.E.

Hatfield & Dawson Consulting Engineers