

Fort Bend Broadcasting Company
1110 West William Cannon Drive
Austin, Texas 78745

Comments and Counterproposal
MB Docket 04-215

July 2004

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Austin, Texas 78745

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MB Docket 04-215

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Engineering Statement

This firm has been retained by Fort Bend Broadcasting Company, ("FBB), licensee of Radio Station KULF(FM), (Facility ID 40775), Brenham, Texas to prepare this Engineering Statement in support of its Comments and Counterproposal in this proceeding. In this proposal FBB is requesting the upgrade of FM Channel 231C2 at Brenham, Texas, (Facility ID 40775), and reassignment of the upgraded channel to Bellville, Texas. This proposal is in conflict with the Commission's Notice of Proposed Rulemaking to assign FM Channel 252A at Matagorda, Texas and FBB is seeking the alternate assignment of FM Channel 235A to that community, as an alternate equivalent channel, in these Comments and Counterproposal.

Discussion

The allotment of FM Channel 231C1 to Brenham, Texas and the change in its city of license to Bellville, Texas involves changes in the FM Table of Allotments that are fully consistent with the Commission's Rules. As in shown in Exhibit E-1, the upgraded FM Channel 231C1 at Bellville, Texas can be made provided that a) Radio Station KQXY(FM) Beaumont, Texas (Facility ID 48918), operating on FM Channel 231C1 is replaced by an alternate equivalent channel, b) Radio Station KAJI(FM), Point Comfort, Texas, (Facility ID 6022), operating on FM Channel 231C3, is replaced with an alternate channel, and c) Radio Station KNVR(FM), Cameron, Texas, (Facility ID 84381), was replaced¹ with an alternate operating channel.

As is more fully documented below, each of these conflicts can be resolved by appropriate changes in the FM Table of Allotments in full compliance with the Commission's Rules.

KULF(FM), Bellville, Texas. The assignment of FM Channel 231C1 can be made to Bellville, Texas, (US Atlas co-ordinates N29-57-10, W96-15-24), at allotment reference co-ordinates N30-08-31, W96-25-00). This allotment site is 26 km northwest of Bellville, Texas and a transmitter operating from the allotment reference co-ordinates will comply fully with Section 73.207 of the Commission's

¹ KNVR(FM), Cameron, Texas has a Construction Permit for operation on FM Channel 286C3. See File No. BPH-19981202IA and that Construction Permit deleted the presently assigned FM Channel 232A at Cameron, Texas.

Rules as well as with the city grade illumination requirements using both uniform earth and actual terrain.

The community of Bellville, Texas (population 3,794 persons²), is located in Austin County, (population 23,590 persons), and is the county seat of Austin County. The proposed assignment of FM Channel 231C1 to the community would be the first FM service to that community.³ Clearly Bellville, Texas qualifies as a community for FM allotment purposes and is deserving of a first local FM service, (or possibly a first local service). Exhibit E-1 is a channel study conducted from the proposed allotment co-ordinates for KULF(FM) at Bellville, Texas which shows that the allotment can fully comply with the Commission's minimum mileage separation requirements with the exception of a short spacing to a) KQXY(FM), Beaumont, Texas, b) KAJI(FM), Point Comfort, Texas and c) KNVR(FM), Cameron, Texas⁴.

The Conflict With Beaumont, Texas

KQXY(FM), Beaumont, Texas. This facility is short spaced to the proposed allotment of FM Channel 231C1 at Bellville, Texas and this conflict can be removed by relocating that facility to FM Channel 283C1. Exhibit E-2 is an FM Channel Study conducted from the presently licensed site of KQXY(FM) which shows that the use of FM Channel 283C1 at its licensed site fully complies with the mileage separation requirements of Section 73.207 of the Rules with the exception of a short spacing to Radio Station KKMV(FM), (Facility ID 62239). It is proposed that the operating channel of KKMV(FM) be changed to FM Channel 231C1.

An application to change sites at KQXY(FM), (FCC File No. BPH-20031119AAE), is presently pending before the Commission and if KQXY(FM) were relocated to FM Channel 283C1, the application site would satisfy the Commission's minimum mileage separation requirements at the site specified in the pending application. Exhibit E-3 is an FM channel study with the co-ordinates specified in the pending application which demonstrates that the proposed channel change to FM Channel 283C1 fully satisfies the Commission's minimum mileage separation requirements if KKMV(FM), Orange, Texas were changed.

KKMV(FM), Orange, Texas. It is proposed that the operating channel of Radio Station KKMV(FM), Orange, Texas be changed to FM Channel 231C1 to remove the conflict with the proposed assignment of FM Channel 283C1 to replace the present facilities of KQXY(FM) at Beaumont, Texas. Attached as Exhibit E-4 is a channel study which demonstrates that the assignment of FM Channel 231C1 can be made at the presently licensed site of KKMV(FM).

² All population figures taken from the 2000 US Census.

³ Bellville, Texas is also served by daytime only Radio Station KNUZ(AM), (Facility ID 48653), however, that facility is proposed to be relocated to Katy, Texas. See File No. BMPJ-20040128AHL.

⁴ FM Channel 232A has been deleted from the FM Table of Allotments. See FCC File No. BPH-19981202IA.

The Conflict With Point Comfort, Texas

In order to eliminate the conflict between the proposed FM Channel 231C1 at Bellville, Texas and the presently assigned FM Channel 231C3 at Point Comfort, Texas it is necessary that the Point Comfort facility be replaced with an operating⁵ channel. In order to replace the existing channel at Point Comfort, Texas with an operating facility, it is necessary to move a number of existing facilities, all of which have consented⁶ to the required relocations.

Point Comfort, Texas. It is proposed that FM Channel 284C2 presently assigned to Ganado, Texas (Facility ID 27619), be assigned to Point Comfort, Texas to replace FM Channel 231C3 that is being removed from Point Comfort, Texas and that the license of Radio Station KAJI(FM) be modified to specify Point Comfort, Texas as its community of license.

The assignment of FM Channel 284C2 can be made to Point Comfort, Texas, (US Atlas co-ordinates N28-40-46, W96-33-35), at allotment reference co-ordinates N28-51-19, W96-47-21). This allotment site is 27.4 km northwest of Point Comfort, Texas, and a transmitter operating from the allotment reference co-ordinates will comply fully with Section 73.207 of the Commission's Rules as well as with the city grade illumination requirements using both uniform earth and actual terrain. Attached as Exhibit E-5 is an FM Channel Study conducted from the allotment site reference co-ordinates which demonstrates that the proposed allotment satisfies the requirements of Section 73.207 of the Commission's Rules.

Ganado, Texas. It is proposed that FM Channel 241C3 presently assigned to Edna, Texas (Facility ID 27226), be assigned to Ganado, Texas⁷ and that the operating authority of Radio Station KZAM(FM) be amended accordingly. This channel will replace FM Channel 284C2 that is being moved to Point Comfort, Texas at a new transmitter site operating on FM Channel 241C3 at Ganado, Texas.

The assignment of FM Channel 241C3 can be made to Ganado, Texas, (US Atlas co-ordinates N29-02-24, W96-30-48), at allotment reference co-ordinates N29-07-55, W96-26-07). This allotment site is 12.7 km northeast of Ganado, Texas and a transmitter operating from the allotment reference co-ordinates will comply fully with Section 73.207 of the Commission's Rules as well as with the city grade illumination requirements using both uniform earth and actual terrain. Attached as Exhibit E-6 is an FM Channel Study conducted from the allotment site reference co-ordinates which demonstrates that the proposed

⁵ See Memorandum Opinion and Order, FCC 04-140 released June 16, 2004.

⁶ All of the Point Comfort, Texas conflict resolution relocations are voluntary. Only the two Beaumont/Orange, Texas channel changes are involuntary in accordance with the Commission's policy of allowing only 2 involuntary moves in a Rulemaking proceeding.

⁷ The licensee of Radio Station KGUL(FM) has consented to the proposed move.

allotment satisfies the requirements of Section 73.207 of the Commission's Rules.

Edna, Texas. It is proposed that FM Channel 259C2 that is presently assigned to Palacios, Texas, (Facility ID 77693), be reassigned to Edna, Texas on FM Channel 259C3 to replace the aural service removed from Edna, Texas and that the operating authority of Radio Station KGUL(FM) be amended accordingly.

The assignment of FM Channel 259C3 can be made to Edna, Texas, (US Atlas co-ordinates N28-58-41, W96-38-45), at allotment reference co-ordinates N28-52-06, W96-30-01). This allotment site is 18.7 km southeast of Edna, Texas and a transmitter operating from the allotment reference co-ordinates will comply fully with Section 73.207 of the Commission's Rules as well as with the city grade illumination requirements using both uniform earth and actual terrain. Attached as Exhibit E-7 is an FM Channel Study conducted from the allotment site reference co-ordinates which demonstrates that the proposed allotment satisfies the requirements of Section 73.207 of the Commission's Rules.

The proposed assignment of FM Channel 259C3 is short spaced to the present transmitter site of KTXM(FM), (Facility ID 77834), Hallettsville, Texas. That licensee has agreed to relocate its transmitter site at Hallettsville to a site at least 10.8 km west northwest of its present site in order to accommodate the assignment of FM Channel 259C3 to Edna, Texas. This relocation of KTXM(FM) provides coverage of white area northwest of Hallettsville, Texas⁸ as is shown in Exhibit E-16.

Palacios, Texas. It is proposed that the presently assigned FM Channel 252A at Columbus, Texas, (Facility ID 70706), be assigned to Palacios, Texas on FM Channel 252C3 as a replacement aural service since FM Channel 259C2 is being removed from Palacios, Texas. It is requested that the operating authority of KROY(FM) at Palacios, Texas be amended accordingly.

The assignment of FM Channel 252C3 can be made to Palacios, Texas, (US Atlas co-ordinates N28-42-27, W96-13-02), at allotment reference co-ordinates N28-50-56, W96-06-03. This allotment site is 19.4 km north of Palacios, Texas and a transmitter operating from the allotment reference co-ordinates will comply fully with Section 73.207 of the Commission's Rules as well

⁸ This white area was identified in a proposal to allot FM Channel 223C3 to Schulenburg, Texas in MB Docket 02-248. That proposal has been withdrawn since the Commission published a decision in Pacific Broadcasting of Missouri, Inc. on June 16, 2004 prohibiting the use of a vacant backfill channel in all pending rulemaking proceedings. The proposal to provide service to this white area did not comply with the Commission's new processing rule contained in the Pacific Broadcasting of Missouri, Inc. proceeding as the proponent in that proceeding sought the use of vacant backfill channel at New Ulm, Texas in contravention with the new policy. To the best of this proponent's knowledge this is the first proposal filed under the new policy prohibiting the use of vacant backfill channels.

as with the city grade illumination requirements using both uniform earth and actual terrain. Attached as Exhibit E-8 is an FM Channel Study conducted from the allotment site reference co-ordinates which demonstrates that the proposed allotment satisfies the requirements of Section 73.207 of the Commission's Rules.

The proposed allotment of FM Channel 252C3 at Palacios, Texas is in conflict with the published proposal to assign FM Channel 252A to the community of Matagorda, Texas. As is shown below, this conflict can be resolved by the substitution of FM Channel 235A, an alternate equivalent channel, to Matagorda, Texas should the petitioner for the new channel at Matagorda, Texas submit data to support its conclusion that Matagorda, Texas possesses the attributes of a community for FM allotment purposes.

Columbus, Texas. Since the only operating channel at Columbus was removed, it is proposed that the present license at Columbus, Texas, (Facility ID 70706), be modified to specify operation on FM Channel 283A at a new transmitter site at Columbus, Texas. Radio Station KULM-FM that is presently licensed to the community is a short-spaced grandfathered Class A assignment and its replacement with a fully spaced Class A assignment on FM Channel 283A will eliminate interference and further "clean up" the FM Table of Allotments by eliminating the short spacing.

The assignment of FM Channel 283A can be made to Columbus, Texas, (US Atlas co-ordinates N29-42-22, W96-32-21), at allotment reference co-ordinates N29-46-02, W96-27-45). This allotment site is 10 km northeast of Columbus, Texas and a transmitter operating from the allotment reference co-ordinates will comply fully with Section 73.207 of the Commission's Rules as well as with the city grade illumination requirements using both uniform earth and actual terrain. Attached as Exhibit E-9 is an FM Channel Study conducted from the allotment site reference co-ordinates which demonstrates that the proposed allotment satisfies the requirements of Section 73.207 of the Commission's Rules.

Matagorda, Texas. The Commission has proposed the allotment of FM Channel 252A to the community of Matagorda, Texas and has asked that proponent to provide community data sufficient to establish that Matagorda, Texas qualifies as a community for allotment purposes. Assuming the proponent meets that burden, FBB proposes that the Commission assign FM Channel 235A to Matagorda, Texas as an alternate equivalent channel.

The assignment of FM Channel 235A can be made to Matagorda, Texas, (US Atlas co-ordinates N28-41-26, W95-58-02) with allotment reference co-ordinates at the center city reference, N28-41-26, 95-58-02. Attached as Exhibit E-10 is a channel study which demonstrates that the proposed assignment of FM Channel 235A fully complies with the minimum mileage separation requirements of the Rules. Since the reference co-ordinates are at the city reference co-ordinates, it is clear that the proposed assignment fully complies with the required city grade coverage of the community of license.

Area/Population Gain/Loss Study

Call Sign	Facility ID	Present	Proposed
		Area(sq. km)/Population	Area(sq. km)/Population
KAJI(FM)	6022	2,907/87,469	2,473/21,297
KULM(FM)	70706	1,988/19,493	4,394/38,838
KROY(FM)	77693	6,289/40,218	6,281/66,972
KGUL(FM)	27226	4,821/37,225	4,797/41,709
KZAM(FM)	27619	8,139/123,190	8,541/125,065
KULF(FM)	40775	2,621/42,255	16,446/399,310
	Total	26,766/349,850	42,932/693,191

Increase in Coverage Area = 160.4%
Increase in Population Coverage = 198.1%

From the above table it is clear that the proposed realignment of FM services proposed in these Comments and Counterproposal result in a substantial increase in population served by the respective FM stations. The net result is that an additional 343,341 persons will be offered additional FM services in Southeast Texas with no community losing any service.

With the realignment as contained in this proposal, several transmitter site relocations and changes in assigned channels is required. As a result of this realignment, there are some areas and populations that will not receive FM services from the stations involved and an analysis of each of the proposed channel changes has been conducted.

Beaumont and Orange, Texas. The changes proposed for KKMV(FM), Orange, Texas and for Radio Station KQXY(FM), Beaumont, Texas do not involve any loss or gain area since the channel swap proposed is an equivalent channel change at the existing transmitter sites. No further study is required.

Brenham and Bellville, Texas. The upgrade of KULF(FM) to FM Channel 231C1 and the modification of its license to specify its community of license at Bellville, Texas does not result in any loss area. The present coverage area contains 2621 square kilometers containing 42,255 persons. The proposed coverage area wholly contains the present coverage area and the proposed operation at Bellville, Texas encloses 16,447 square kilometers and a population of 399,310 persons. The coverage area is increased 627.7 percent and the population coverage is increased 945 percent. Since there is no loss area in the Brenham/Bellville portion of the proposal, no further study is required.

Cameron, Texas. The facility at Cameron, Texas is presently licensed on FM Channel 232A, however, that facility has a Construction Permit for an upgrade to FM Channel 286C3, (independent of this proceeding), and FM Channel 232A⁹ has been deleted. That licensee has indicated that it will promptly pursue operation on FM Channel 286C3 as authorized consistent with these Comments and Counterproposal. Consequently, no further study is required for Cameron, Texas.

Point Comfort, Texas. The community of Point Comfort, Texas is presently served by Radio Station KAJI(FM) operating on FM Channel 231C3 and it is proposed that this facility be relocated to FM Channel 284C2 and that the license for KAJI(FM) be amended accordingly. The proposed channel change requires a different transmitter site, thereby creating a gain and loss area that requires examination.

Exhibit E-11 is a gain/loss map which shows that the 1 mv/m contour of the proposed FM Channel 284C2 at Point Comfort, Texas fully encloses the present 1 mv/m contour of KAJI(FM) and no loss area is created by the proposed substitution. No further examination is necessary.

Ganado, Texas. This community is presently served by Radio Station KZAM(FM) licensed on FM Channel 284C2. This channel is to be replaced by FM Channel 241C3 at Ganado, Texas at a different transmitter site, thereby creating both a loss and a gain area which requires examination. It is proposed that the operating authority of KZAM(FM) be amended to specify operation on FM Channel 241C3 at a different transmitter site at Ganado, Texas.

Exhibit E-12 is a Gain/Loss map which shows the area that would lose service as well as the area that would gain service. The loss area is well served by other facilities as is shown on the attached Exhibit 12, and the gain area includes a second aural service to an area of 324 sq. km containing a population of 52 persons as well as providing a 3rd aural service to an area of 65 sq. km containing a population of 120 persons.

Edna, Texas. This community is presently served by Radio Station KGUL(FM) operating on FM Channel 241C3 and it proposed that service to the community continue by assigning FM Channel 259C3 and amending the license of KGUL(FM) to specify operation on Channel 259C3. A new allotment site for FM Channel 259C3 is required which results in a loss area as well as a gain area.

Exhibit E-13 is a Gain/loss map showing the area that would lose service as well as the area that would gain service. The loss area is well served by other aural facilities as can be seen from the map showing the gain and loss area along with other aural services that provide service to the loss area.

⁹ See FCC File No. BPH-19961118MB.

Palacios, Texas. This community is presently served by Radio Station KROY(FM) operating on FM Channel 259C2 and it proposed that service to the community continue by assigning FM Channel 252C3 and amending the license of KROY(FM) to specify operation on Channel 252C3. A new allotment site for FM Channel 252C3 is required which results in a loss area as well as a gain area.

Exhibit E-14 is a Gain/loss map showing the area that would lose service as well as the area that would gain service. The loss area is predominately over water or over uninhabited marsh areas and a number of other aural services exist to serve the small land area that would not receive service from KROY(FM) if it were operating on FM Channel 252C3.

Columbus, Texas. This community is presently served by Radio Station KULM(FM) operating on FM Channel 259A¹⁰ and it proposed that service to the community continue by assigning FM Channel 283A and amending the license of KULM(FM) to specify operation on Channel 283A. A new allotment site for FM Channel 283A is required which results in a loss area as well as a gain area.

Exhibit E-15 is a Gain/loss map showing the area that would lose service as well as the area that would gain service. The loss area results from the relocation of the transmitter site of KULM(FM) to a site slightly northeast of Columbus, Texas. Other than a slight loss of service offset by a slight increase service, the assignment of FM Channel 283A to Columbus, Texas is functionally equivalent to the presently assigned FM Channel 252A which is being moved to Palacios, Texas and upgraded from FM Channel 252A to FM Channel 252C3.

Hallettsville, Texas. This community is presently served by Radio Station KTXM(FM) operating on FM Channel 260A and that licensee has agreed to relocate the transmitter site for KTXM(FM) to a new site that is fully spaced to the proposed assignment of FM Channel 259C3 at Edna, Texas. For the purposes of evaluating the gain-loss area, a sample transmitter site was chosen at N29-32-03, W97 02 54, which is fully spaced to the proposed allotment of FM 259C2 at Edna, Texas. The sample transmitter site at Hallettsville, Texas will provide coverage to a wide area that does not receive service from any aural facility.

Exhibit E-16 is a Gain/loss map showing the area that would lose service as well as the area that would gain service. The loss area is largely covered by other aural services, however, it should be noted that a substantial coverage area that is presently unserved will then receive service from KTXM(FM) at its relocated site. See Exhibit E-16 where the population and area is documented.

¹⁰ The present FM Channel 252A is a short spaced grandfathered Class A allotment.

In view of the foregoing, it is respectfully requested that the Commission initiate a rulemaking proceeding seeking to implement the following changes in the FM Table of Allotments.

TABLE OF PROPOSED CHANGES

Community	Present	Proposed
Bellville, Texas	-----	231C1 ¹¹
Brenham, Texas	231C2, 291C2	291C2 ¹²
Ganado, Texas	284C2	241C3
Edna, Texas	241C3	259C3 ¹³
Point Comfort	231C3	284C2
Palacios, Texas	259C2	252C3
Columbus, Texas	252A	283A
Cameron, Texas	232A ¹⁴ , 280C2 ¹⁵	280C2, 286C3
Beaumont, Texas	231C1 ¹⁶ , 236C, 248C 273C2, 300C	236C, 248C, 273C2, 283C1, 300C
Orange, Texas	283C1, 291C	231C1, 291C
Matagorda, Texas	252A ¹⁷	235A ¹⁸

¹¹ Bellville, Texas is also served by daytime only Radio Station KNUZ(AM), (Facility ID 48653), however, that facility is proposed to be relocated to Katy, Texas. See File No. BMPJ-20040128AHL.

¹² Brenham, Texas is also served by Radio Station KWHI(AM) which operates full time on 1280 khz, Facility ID 67300, and licensed to Tom S. Whitehead, Inc.

¹³ Requires site relocation for Hallettsville, KTXM(FM) which will pick up "white area" northwest of Hallettsville, Texas.

¹⁴ This Channel has been deleted. See FCC File No. BPH-19981202IA.

¹⁵ Deletion of this Channel has been proposed. See MB Docket 03-149.

¹⁶ This facility has an application pending, File No. BPH-20031119AAE and the proposed substitution of 283C1 will satisfy the Commission's Rules at both the licensed site and the pending application site. See Exhibit E-4.

¹⁷ Proposed in this Rulemaking and is in conflict with the proposed assignment of FM Channel 252A at Palacios, Texas.

¹⁸ FM Channel 235A is fully an alternate equivalent channel as it can be assigned without a site restriction at the US Atlas listed city co-ordinates for Matagorda, Texas as was the case for FM Channel 252A as was originally proposed in this proceeding.

The public interest benefits of this proposal are profound. The total number of persons receiving additional aural services is increased by nearly 350,000 persons, Bellville, Texas receives a first full time local service, a substantial population receives additional 3rd and 2nd aural services. A substantial area northwest of Hallettsville, Texas receives a first reception service as white area is being covered by this proposal. The proposal does not deprive any community of an aural service nor does it require that Matagorda, Texas be deprived of a service should the Commission determine that the community is qualified for an FM Allotment. In addition, the channel change proposed at Columbus, Texas provides a fully spaced channel to replace a grandfathered short spaced facility at that community.

The foregoing statement was prepared by the undersigned personally and those statements are true and correct to the best of my knowledge. My qualifications are a matter of record before the Commission.

The undersigned understands that the foregoing statement is to be filed with the Federal Communications Commission and consents to its use for that purpose.

Dated this first day of August 2004.

Respectfully,



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July 2004

Bellville, Texas
FM Channel 231C1
N30-08-31 W96-25-00

Exhibit E-1

CallSign	State	City	Frequency	Channel	ERP	Class	Status	Distance (km)	Separation	Clearance
KULF	TX	BREHAM	94.1	231	6400	C3	LIC	0	211	-211.0
KULF	TX	BREHAM	94.1	231	0	C2	RSV	28.74	224	-195.3
KULF	TX	BREHAM	94.1	231	50000	C2	APP	28.74	224	-195.3
KAJI	TX	POINT COMFORT	94.1	231	25000	C3	CP	154.68	211	-56.3 ¹⁹
KAJI	TX	POINT COMFORT	94.1	231	25000	C3	LIC	154.84	211	-56.2
	TX	FLATONIA	94.3	232	0	A	DEL	96.42	133	-36.6 ²⁰
	TX	FLATONIA	94.3	232	0	A	ADD	96.42	133	-36.6
KHTZ	TX	CAMERON	94.3	232	1250	A	LIC	98.85	133	-34.2 ²¹
	TX	SHINER	94.3	232	0	A	DEL	110.64	133	-22.4 ²²
	TX	SHINER	94.3	232	0	A	ADD	110.64	133	-22.4
KQXY-FM	TX	BEAUMONT	94.1	231	100000	C1	LIC	232.9	245	-12.1 ²³
KQXY-FM	TX	BEAUMONT	94.1	231	0	C1	APP	219.55	245	-25.5 ²⁴
KLNO	TX	FORT WORTH	94.1	231	100000	C	LIC	271.56	270	1.6
KLNO	TX	FORT WORTH	94.1	231	44000	C	CP	271.17	270	1.2
KTZB-FM	TX	HOUSTON	94.5	233	95000	C	LIC	107.74	105	2.7

All Distances in Kilometers

¹⁹ This Channel is proposed to be moved to FM Channel 283A at Columbus, Texas.

²⁰ This allotment proposal has been dismissed. See MB Docket 00-148.

²¹ This channel has been deleted. See FCC File No. BPH-199812021A.

²² This channel proposal has been dismissed. See MB Docket 01-105.

²³ Proposed to be moved to FM Channel 283C1.

²⁴ Proposed to be moved to FM Channel 283C1.

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Radio Station KQXY(FM)
 File No. BLH-19800619AE
 Beaumont, Texas
 FM Channel 283C1
 N30-06-56 W94-00-00

Exhibit E-2

CallSign	State	City	Frequency	Channel	ERP	Class	Status	Distance (km)	Separation	Clearance
KKMY	TX	ORANGE	104.5	283	100000	C1	LIC	15.18	245	-229.8 ²⁵
KZWA	LA	MOSS BLUFF	104.9	285	25000	C3	LIC	90.96	76	15.0
KEZP	LA	BUNKIE	104.3	282	0	C2	RSV	179	158	21.0
	LA	ROSEFINE	104.1	281	0	A	ADD	109.69	75	34.7
	TX	LOVELADY	104.3	282	0	C3	APP	181.39	144	37.4
	TX	NEW ULM	104.5	283	0	A	ADD	240.86	200	40.9
KNEK-FM	LA	WASHINGTON	104.7	284	25000	C3	LIC	184.63	144	40.6
KEZP	LA	BUNKIE	104.3	282	18000	C3	LIC	190.67	144	46.7
KYKS	TX	LUFKIN	105.1	286	100000	C	LIC	152.09	105	47.1

All Distances in Kilometers

²⁵ Proposed to FM Channel 231C1.

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Radio Station KQXY(FM)
 File No. BPH-20031119AAE
 Beaumont, Texas
 FM Channel 283C1
 N30-20-15 W94-08-49

Exhibit E-3

CallSign	State	City	Frequency	Channel	ERP	Class	Status	Distance (km)	Separation	Clearance
KKMY	TX	ORANGE	104.5	283	100000	C1	LIC	36.77	245	-208.2 ²⁶
	TX	LOVELADY	104.3	282	0	C3	APP	155.01	144	11.0
KYKS	TX	LUFKIN	105.1	286	100000	C	LIC	123.9	105	18.9
	TX	LUFKIN	105.1	286	0	C	DEL	123.9	105	18.9
	TX	LUFKIN	105.1	286	0	C	DEL	123.9	105	18.9
KZWA	LA	MOSS BLUFF	104.9	285	25000	C3	LIC	97.74	76	21.7
	LA	MOSS BLUFF	104.9	285	0	C3	USE	97.2	76	21.2
KEZP	LA	BUNKIE	104.3	282	0	C2	RSV	181.66	158	23.7
	LA	ROSEFINE	104.1	281	0	A	ADD	101.01	75	26.0
KYKS	TX	LUFKIN	105.1	286	0	C	USE	132.55	105	27.5
	TX	LUFKIN	105.1	286	0	C0	ADD	123.9	94	29.9
	TX	LUFKIN	105.1	286	0	C0	ADD	123.9	94	29.9

All Distances in Kilometers

²⁶ Proposed to FM Channel 231C1.

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Radio Station KKMV(FM)
 File No. BMLH-19980721KC
 Orange, Texas
 FM Channel 231C1
 N30-08-07 W93-50-39

Exhibit E-4

CallSign	State	City	Frequency	Channel	ERP	Class	Status	Distance (km)	Separation	Clearance
KQXY-FM	TX	BEAUMONT	94.1	231	100000	C1	LIC	15.18	245	-229.8 ²⁷
KQXY-FM	TX	BEAUMONT	94.1	231	100000	C1	APP	36.77	245	-208.2
	LA	HODGE	94.1	231	0	C2	APP	236.79	224	12.8
KULF	TX	BREHAM	94.1	231	50000	C2	APP	241.62	224	17.6
KULF	TX	BREHAM	94.1	231	0	C2	RSV	241.62	224	17.6
KULF	TX	BREHAM	94.1	231	0	C2	RSV	241.62	224	17.6
KULF	TX	BREHAM	94.1	231	50000	C2	APP	241.62	224	17.6
KULF	TX	BREHAM	94.1	231	50000	C2	APP	241.62	224	17.6

All Distances in Kilometers

²⁷ Proposed to be changed to FM Channel 231C1.

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Radio Station KAJI(FM)
 Point Comfort, Texas
 FM Channel 284C2
 N28-51-19, W96-47-21

Exhibit E-5

CallSign	State	City	Frequency	Channel	ERP	Class	Status	Distance (km)	Separation	Clearance
KZAM	TX	GANADO	104.7	284	50000	C2	LIC	7.98	190	-182.0
	TX	VICTORIA	104.7	284	0	C3	ADD	16.94	177	-160.1
KZAM	TX	GANADO	104.7	284	0	C2	USE	31.52	190	-158.5
KAJI	TX	POINT COMFORT	94.1	231	25000	C3	LIC	12.25	17	-4.7 ²⁸
881027MK	TX	GREGORY	104.5	283	0	C3	USE	117.39	117	0.4
KPUS	TX	GREGORY	104.5	283	14000	C3	LIC	117.39	117	0.4
KMAT	TX	SEADRIFT	105.1	286	40000	C2	CP	57.82	58	-0.2
KMAT	TX	SEADRIFT	105.1	286	25000	C3	LIC	57.82	56	1.8
KBUK	TX	LA GRANGE	104.9	285	4300	A	LIC	114.1	106	8.1
KZEP-FM	TX	SAN ANTONIO	104.5	283	100000	C1	LIC	176.46	158	18.5

All Distances in Kilometers

²⁸ Proposed to be moved to Edna, Texas.

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Radio Station KZAM(FM)
 Ganado, Texas
 FM Channel 241C3
 N29-07-55 W96-26-07

Exhibit E-6

CallSign	State	City	Frequency	Channel	ERP	Class	Status	Distance (km)	Separation	Clearance
KGUL	TX	EDNA	96.1	241	13000	C3	LIC	3.91	153	-149.1
	TX	GARWOOD	96.1	241	0	A	ADD	22.37	142	-119.6
KHMC	TX	GOLIAD	95.9	240	50000	C2	APP	79.64	117	-37.4 ²⁹
KHMC	TX	GOLIAD	95.9	240	0	C2	RSV	90.29	117	-26.7
	TX	SHINER	96.3	242	0	A	ADD	89.3	89	0.3
KHMC	TX	GOLIAD	95.9	240	25000	C3	LIC	99.11	99	0.1
	TX	FLATONIA	96.3	242	0	A	ADD	92.61	89	3.6
	TX	COLLEGE STATION	96.1	241	0	C2	ADD	180.18	177	3.2
KHMX	TX	HOUSTON	96.5	243	97000	C	LIC	102.45	96	6.5

All Distances in Kilometers

²⁹ This application was filed and placed in a queue behind the proceedings in MB Docket 99-331. The proponent in that proceeding has dismissed its petition and this application no longer complies with the Commission's Rules and does not need to be protected.

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Radio Station KGUL(FM)
 Edna, Texas
 FM Channel 259C3
 N28-52-06 W96-30-01

Exhibit E-7

CallSign	State	City	Frequency	Channel	ERP	Class	Status	Distance (km)	Separation	Clearance
	TX	BAY CITY	99.7	259	0	C2	ADD	34.66	177	-142.3 ³⁰
KROY	TX	PALACIOS	99.7	259	50000	C2	LIC	42.78	177	-134.2
	TX	PALACIOS	99.7	259	0	C2	DEL	42.78	177	-134.2
KTXM	TX	HALLETTSVILLE	99.9	260	3400	A	LIC	78.24	89	-10.8 ³¹
KTXM	TX	HALLETTSVILLE	99.9	260	950	A	APP	78.24	89	-10.8
KISS-FM	TX	SAN ANTONIO	99.5	258	100000	C	LIC	177.59	176	1.6
KISS-FM	TX	SAN ANTONIO	99.5	258	100000	C	CP	177.59	176	1.6
KISS-FM	TX	SAN ANTONIO	99.5	258	0	C	USE	177.59	176	1.6
KSAB	TX	ROBSTOWN	99.9	260	0	C1	USE	159.8	144	15.8

All Distances in Kilometers

³⁰ Proposed in MB Docket 99-331. That proposal has been withdrawn.

³¹ The licensee of KTXM(FM) has agreed to relocate its transmitter site to accommodate this proposal.

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Radio Station KROY(FM)
 Palacios, Texas
 FM Channel 252C3
 N28-50-56 W96-06-03

Exhibit E-8

CallSign	State	City	Frequency	Channel	ERP	Class	Status	Distance (km)	Separation	Clearance
	TX	MATAGORDA	98.3	252	0	A	ADD	21.91	142	-120.1 ³²
	TX	SHERIDAN	98.3	252	0	C3	ADD	79.7	153	-73.3 ³³
KULM-FM	TX	COLUMBUS	98.3	252	6000	A	LIC	104.99	142	-37.0 ³⁴
	TX	COLUMBUS	98.3	252	0	A	DEL	104.99	142	-37.0
KLHB	TX	ODEM	98.3	252	50000	C2	LIC	176.85	177	-0.1
KLHB	TX	ODEM	98.3	252	50000	C2	LIC	176.85	177	-0.1
KBXX	TX	HOUSTON	97.9	250	95000	C	LIC	98.98	96	3.0
KTXN-FM	TX	VICTORIA	98.7	254	100000	C1	LIC	93.93	76	17.9
KTJM	TX	PORT ARTHUR	98.5	253	100000	C	APP	198.78	176	22.8
KTJM	TX	PORT ARTHUR	98.5	253	100000	C	LIC	202.69	176	26.7

All Distances in Kilometers

³² Proposed to be moved FM Channel 235A in these Comments and Counterproposal

³³ This Proposal has been withdrawn. See MB Docket 99-331.

³⁴ This channel is being moved to Palacios, Texas as a replacement channel at that community

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Radio Station KULM(FM)
 Columbus, Texas
 FM Channel 283A
 N29-46-02 W 96-27-45

Exhibit E-9

CallSign	State	City	Frequency	Channel	ERP	Class	Status	Distance (km)	Separation	Clearance
	TX	NEW ULM	104.5	283	0	A	ADD	0	115	-115.0 ³⁵
	TX	GANADO	104.7	284	0	C2	DEL	98.16	106	-7.8 ³⁶
KZAM	TX	GANADO	104.7	284	50000	C2	LIC	98.16	106	-7.8
KZEP-FM	TX	SAN ANTONIO	104.5	283	100000	C1	LIC	199.7	200	-0.3
KRBE	TX	HOUSTON	104.1	281	48900	C	LIC	94.72	95	-0.3
KKYS	TX	BRYAN	104.7	284	0	C2	USE	106.64	106	0.6
KRBE	TX	HOUSTON	104.1	281	95000	C	LIC	94.61	95	-0.4
KKYS	TX	BRYAN	104.7	284	50000	C2	LIC	105.58	106	-0.4
KRBE	TX	HOUSTON	104.1	281	7400	C	LIC	94.61	95	-0.4
KZEP-FM	TX	SAN ANTONIO	104.5	283	50000	C1	CP	201.23	200	1.2
KOYT	TX	TAYLOR	104.3	282	48000	C2	LIC	114.16	106	8.2
KBUK	TX	LA GRANGE	104.9	285	4300	A	LIC	41.05	31	10.1

All Distances in Kilometers

³⁵ This proposal has been withdrawn. See MB Docket 02-248.

³⁶ This channel is being moved to Point Comfort, Texas as a part of this proposal.

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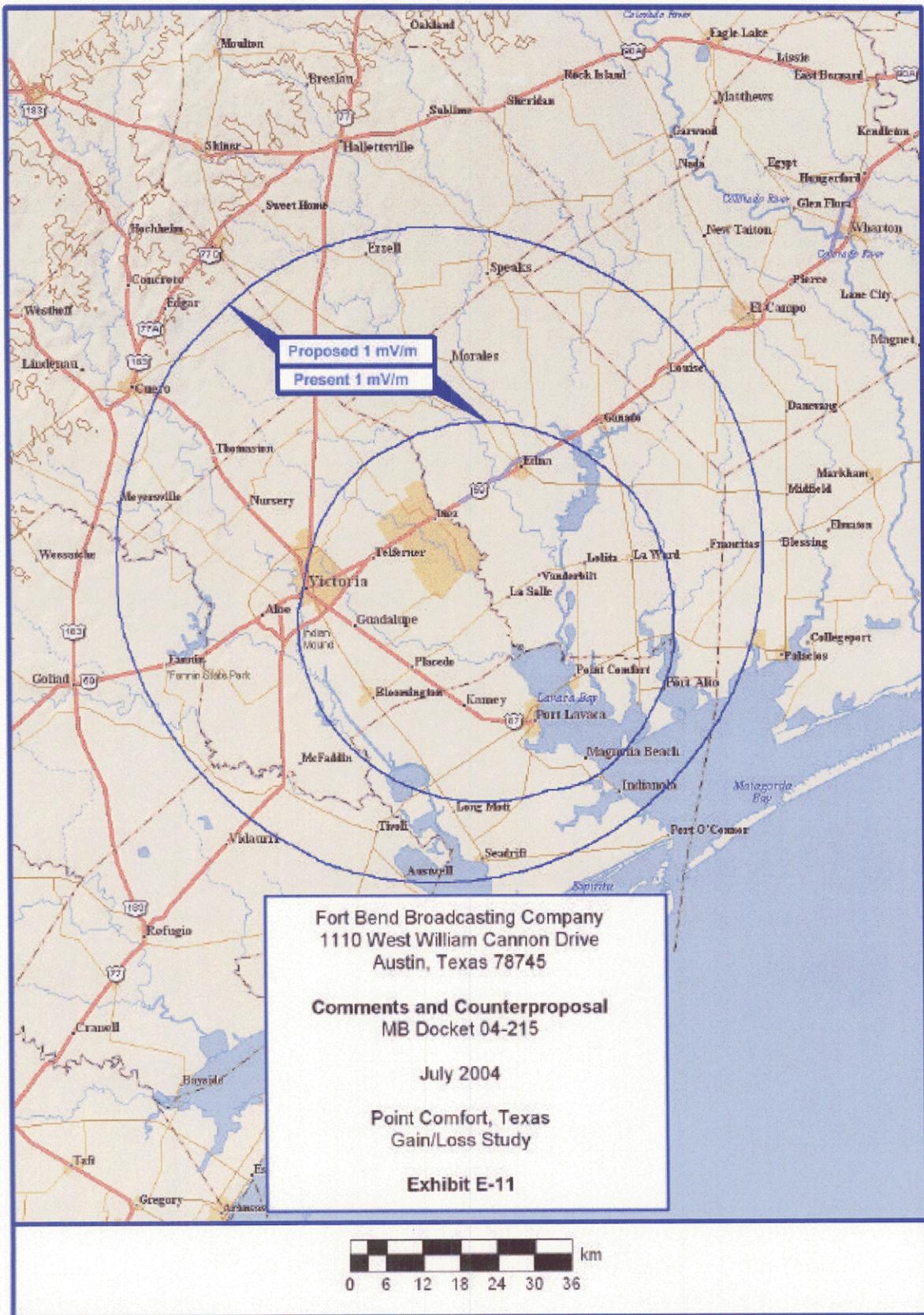
New Allocation
Matagorda, Texas
FM Channel 235A
N28-41-26 W95-58-02

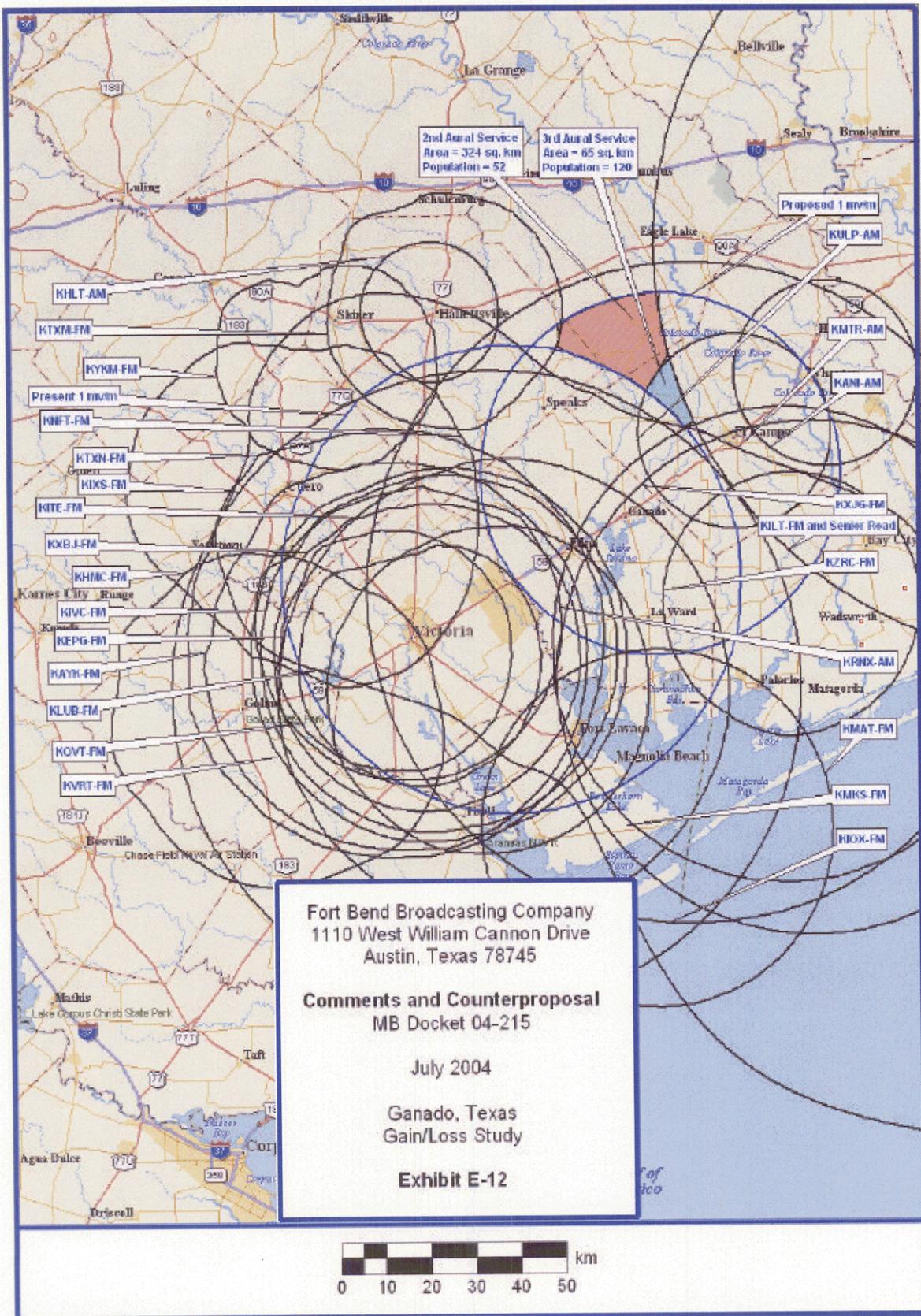
Exhibit E-10

CallSign	State	City	Frequency	Channel	ERP	Class	Status	Distance (km)	Separation	Clearance
	TX	GANADO	94.9	235	0	C2	ADD	79.82	166	-86.2 ³⁷
	TX	VICTORIA	95.1	236	0	C3	DEL	95.7	89	6.7
KVIC	TX	VICTORIA	95.1	236	13000	C3	LIC	95.7	89	6.7
KTBZ-FM	TX	HOUSTON	94.5	233	95000	C	LIC	107.76	95	12.8
KTBZ-FM	TX	HOUSTON	94.5	233	78000	C	LIC	131.99	95	37.0

All Distances in Kilometers

³⁷ This proposal has been withdrawn. See MB Docket 02-248.





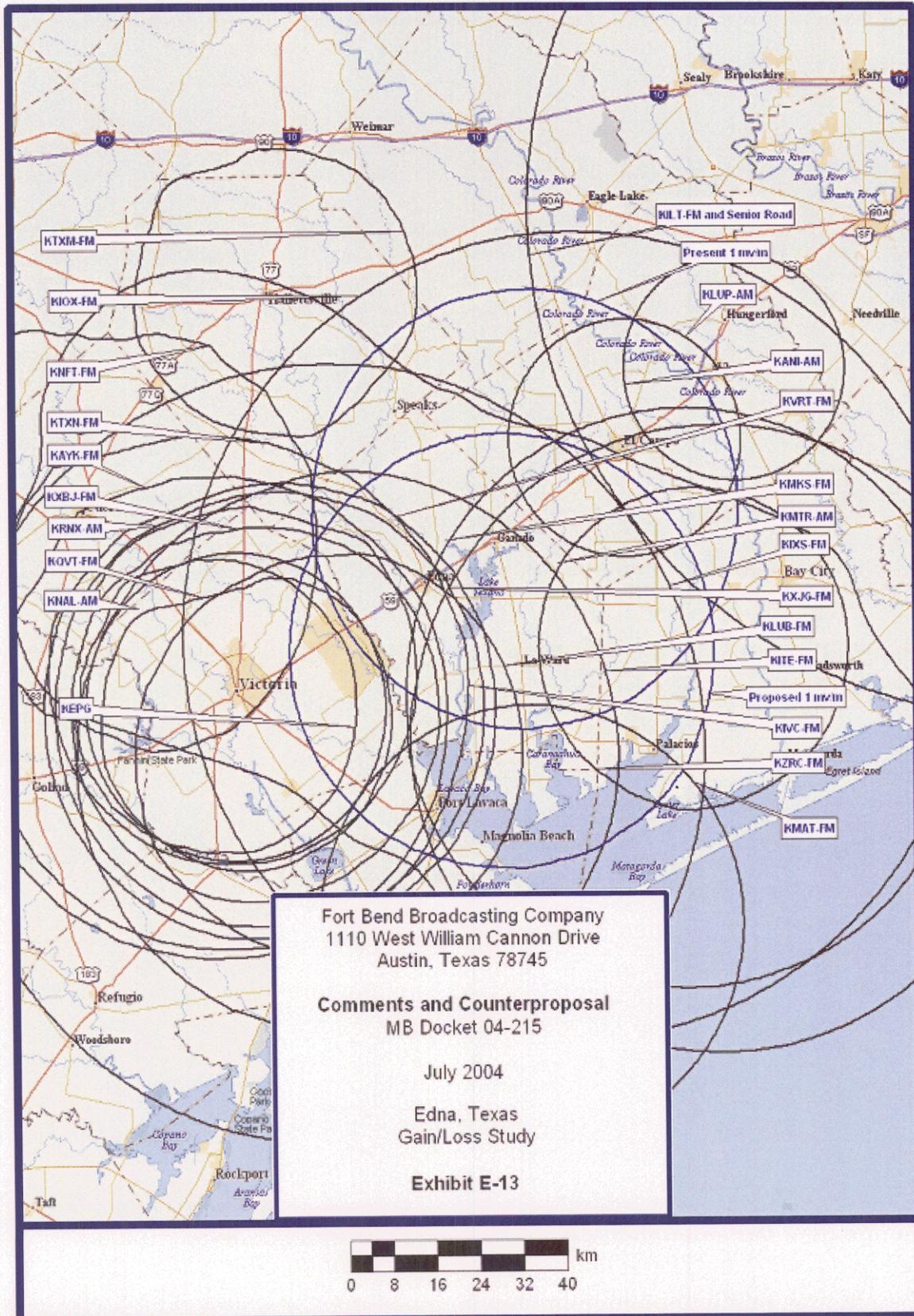
Fort Bend Broadcasting Company
 1110 West William Cannon Drive
 Austin, Texas 78745

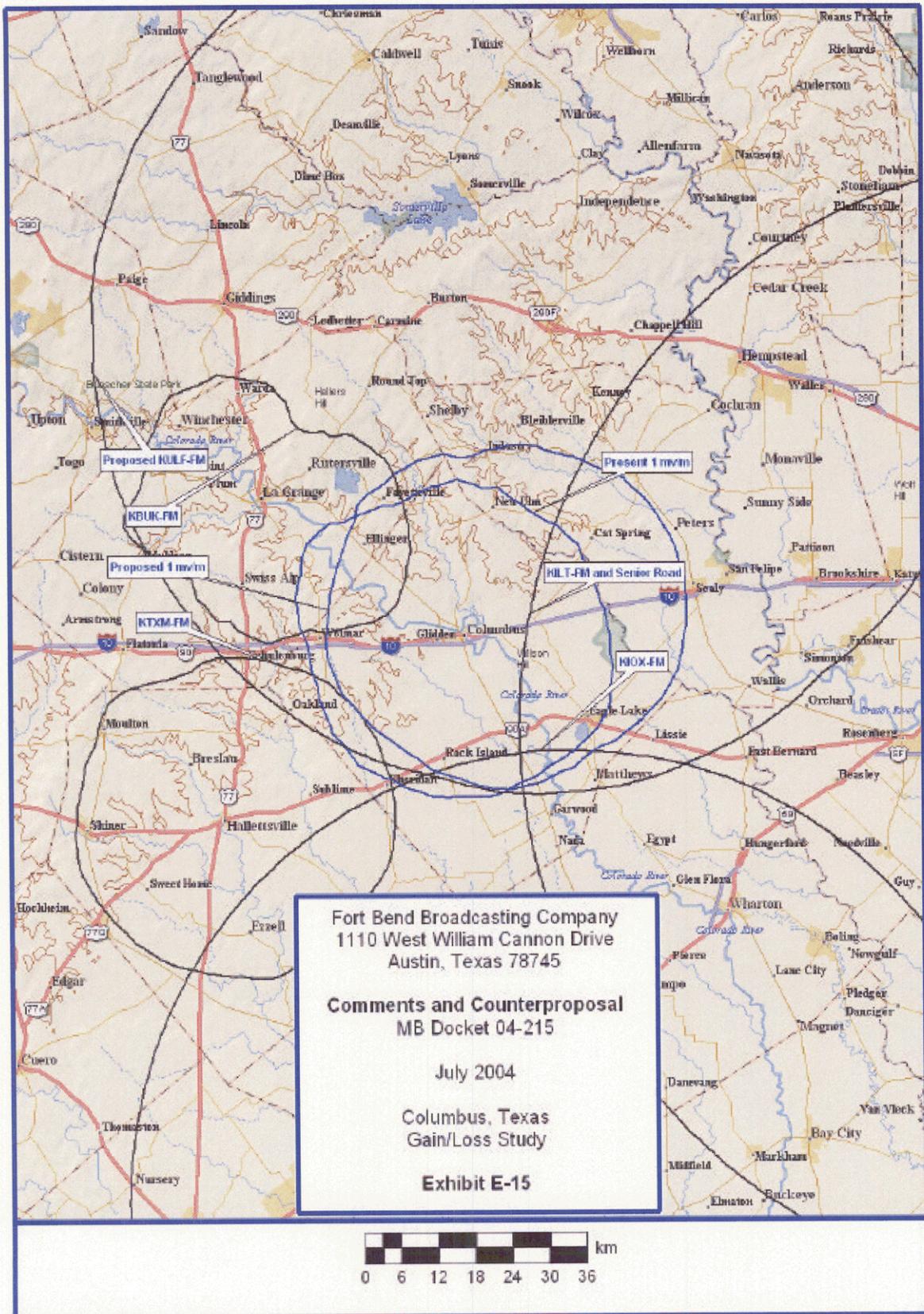
Comments and Counterproposal
 MB Docket 04-215

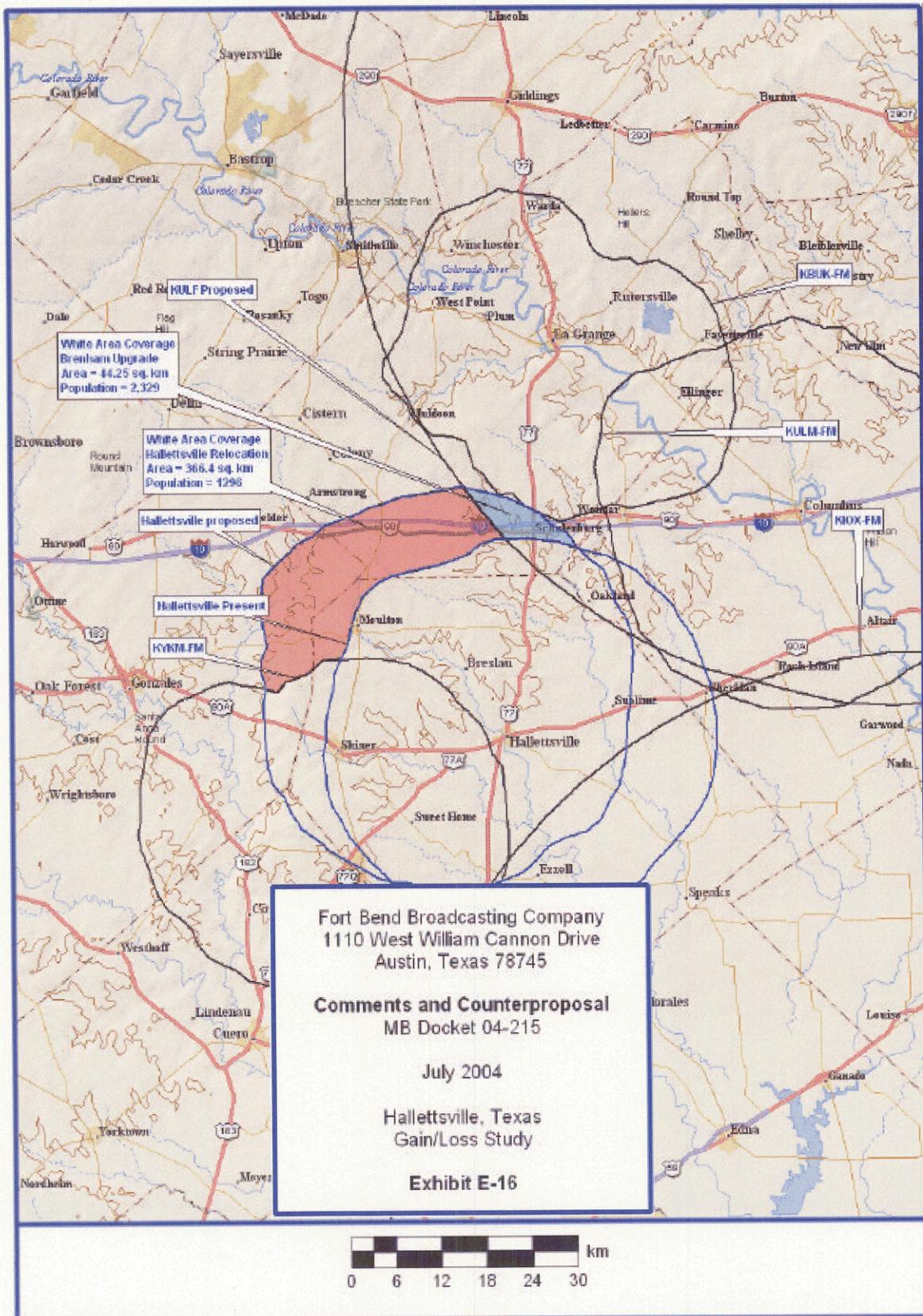
July 2004

Ganado, Texas
 Gain/Loss Study

Exhibit E-12







CERTIFICATE OF SERVICE

I, Robert J. Buenzle, do hereby certify that copies of the foregoing Comments and Counterproposal have been served by United States mail, postage prepaid this 2nd day of August, 2004, upon the following:

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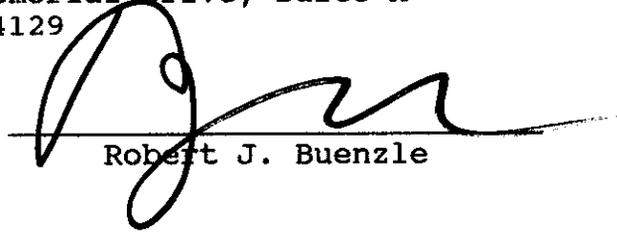
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Robert J. Buenzle