

Engineering Narrative

The Counterproposal proposes to upgrade stations KFWR, Mineral Wells, Texas, from channel 240C1 to channel 240C, KYBE, Frederick, Oklahoma, from channel 240A to channel 239C3, and add three new allotments as first service to communities in Texas and Oklahoma. These changes will result in a net gain in service to approximately 645,000 people.

To achieve these gains, the following changes are required: (1) station KKAJ, Ardmore, Oklahoma, must downgrade from channel 239C1 to channel 238A, and change its city of license to Springer, Oklahoma, as that city's first local service; (2) the vacant allotment at Rule, Texas, must be modified from channel 239C2 to channel 288C2 with new allotment coordinates; (3) station KJKB, Jacksboro, Texas, must be modified from channel 238A to channel 248A; (4) the vacant allotment at Knox City, Texas, must be modified from channel 291A to channel 293A; (5) the vacant allotment at Crowell, Texas, must be modified from channel 293C3 to channel 248C3, with new allotment coordinates; (6) the vacant allotment at Wellington, Texas, must be modified from channel 249A to Channel 237A, with new allotment coordinates; and (7) the vacant allotment at Archer City, Texas, must be modified from channel 248C2 to channel 299C2, with new allotment coordinates. These changes permit the addition of first local service at Rochester, Texas, on channel 239A, and at Megargel, Texas, on channel 249A.

A spacing study has been performed for each allotment change. A gain/loss study and a study of other stations serving the loss area has been performed on all licensed stations. The studies conclude that the changes detailed in the following table can be made in compliance with the FCC's rules and policies.

Table 1: Proposed Change Table

Community of License	Current Channel/Class		Current Reference Point		Distance from Community Reference Point-kM	
	Current	Proposed	Current	Proposed	Current	Proposed
Mineral Wells, TX	240C1	240C	32N39'50" by 98w9'47"	33n2'25" by 98w8'19"	16.7	25.9
Ardmore, OK	239C1	238A	34n9'42" by 97w9'11"		1.6	
Springer, OK		238A		34n21'56" by 97w11'28"		7.2
Rule, TX	239C2	288C2	33n13'1" by 99w45'45"	33n10'29" by 99w49'26"	12.7	6.6
Knox City, TX	291A	293A	33n25'55" by 99w47'43"	33n25'55" by 99w47'43"	2.7	2.7
Crowell, TX	293C3	248C3	34n1'11" by 99w49'53"	34n0'48" by 99w44'34"	10.7	3.6
Wellington, TX	248A	237A	34n56'51" by 100w19'10"	34n57'56" by 100w16'8"	14	13.2
Frederick, OK	240A	239C3	34n23'30" by 99w1'51"	34n23'16" by 99w11'33"	1.2	16
Frederick, OK-App Ref. Point	240C3	239C3	34n28'2" by 98w56'14"	34n23'16" by 99w11'33"	11.2	16
Frederick, OK-App TX Site	240C3	239C3	34n18'15.9" by 99w4'42.3"	34n23'16" by 99w11'33"	11.2	16
Jacksboro, TX	238A	248A	33n19'43" by 98w16'46"	33n19'43" by 98w16'46"	16.7	16.7
Archer City, TX	248C2	299C2	33n35'36" by 98w37'31"	33n32'30" by 98w46'30"	0	15.1
Megargel, TX		249A		33n27'32" by 99w2'24"		10.8
Rochester, TX		239A		33n13'32" by 99w58'50"		15.4

These changes would result in a revised table of allotments as follows:

Table 2: Proposed Table of Allotments

Table of Allotments			
State	Community	Present	Proposed
TX	Archer City	248C2	299C2
OK	Ardmore	[212C3], [216A], 239C1, 253C3	[212C3], [216A], 253C3
TX	Crowell	293C3	248C3
OK	Frederick	[218C1], 240A	218C1, 239C3
TX	Jacksboro	238A	248A
TX	Knox City	291A, 297A	293A, 297A
TX	Megargel		249A
TX	Mineral Wells	240C1	240C
TX	Rochester		239A
TX	Rule	239C2	288C2
OK	Springer		238A
TX	Wellington	248A, 253C3	237A, 253C3

[Channel] are reserved channel NCE and not allotted facilities. These are shown here for reference.

The following gains and losses in areas and populations served will result from the changes:

Table 3: Gain and Loss Table

Callsign or Description	Report Number	FCC FAC-ID	Community of License	Gain		Loss		Net Gain	
				Population	Area Sq. kM	Population	Area Sq. kM	Population	Area Sq. kM
KFWR	1	31062	Mineral Wells, TX	715,927	12,602.0	33,583	2,549.0	682,344	10,053.0
KKAJ-FM	2	11181	Springer, OK	90	19.4	84,058	7,603.2	-83,968	-7,583.8
Allotment	3		Rule, TX	3,171	773.5	994	773.5	2,177	0.0
Allotment	4		Knox City, TX	0	0.0	0	0.0	0	0.0
New-Counterproposal	5		Crowell, TX	991	643.2	175	643.2	816	0.0
Allotment	6		Wellington, TX	1,479	286.8	64	286.8	1,415	0.0
KYBE Existing A *	7	67311	Frederick, OK	41,309	2,862.7	0	7.6	41,309	2,855.1
KJKB	8	855	Jacksboro, TX	0	0.0	0	0.0	0	0.0
Forfeited CP	9	79024	Archer City, TX	8,298	1,566.3	22,234	1,566.3	-13,936	0.0
Add Allotment	10		Megargel, TX	6,881	2,516.0	0	0.0	6,881	2,516.0
Add Allotment	11		Rochester, TX	8,015	2,516.0	0	0.0	8,015	2,516.0
				Totals					
				786,161	23,785.9	141,108	13,429.6	645,053	10,356.3
Totals for Counterproposal using KYBE's Pending Application Reference Coordinates for the Gain Loss Study									
KYBE *	7	67311	Frederick, OK	34,341	1,913.2	8,935	1,913.2	25,406	0.0
Pending Application Reference Point				Totals					
				759,762	17,318.0	42,582	4,749.0	717,180	12,569.0
Totals for Counterproposal using KYBE's Pending Application Transmitter Site for the Gain Loss Study									
KYBE *	7	67311	Frederick, OK	28,503	2,189.5	252	176.5	28,251	2,013.0
Pending Application Transmitter Site				Totals					
				753,924	17,594.3	33,899	3,012.3	720,025	14,582.0

* KYBE, Frederick, Oklahoma, has a pending application for a one-step upgrade to channel 240C3 (See, File No. BPH-20051114AJM). Separate gain/loss studies have been completed for KYBE using (1) the existing Class A facility, (2) the proposed upgrade reference point, and the (3) the proposed upgrade transmitter site.

Table 4: Area and Population Count Summary

Community	Report Number	Proposed Population	Proposed Area Sq. km	Existing Population	Existing Area Sq. km	Intersection Population	Intersection Area Sq. km
Mineral Wells, TX	1	1,121,269	26,475.0	438,925	16,422.0	405,342	13,873.0
Ardmore [Springer], OK	2	49,113	2,516.0	133,081	10,099.8	49,023	2,496.6
Rule, TX	3	22,803	8,560.3	20,626	8,560.3	19,632	7,786.8
Knox City, TX	4	5,284	2,516.0	5,284	2,516.0	5,284	2,516.0
Crowell, TX	5	6,908	4,802.9	6,092	4,802.9	5,917	4,159.7
Wellington, TX	6	4,556	2,516.0	3,141	2,516.0	3,077	2,229.2
Frederick, OK-Existing 204A	7	49,212	4,802.9	7,903	1,947.8	7,903	1,940.2
Frederick, OK-App Ref. Point	7	49,212	4,802.9	23,806	4,802.9	14,871	2,889.7
Frederick, OK-App TX Site	7	49,212	4,802.9	20,961	2,789.9	20,709	2,613.4
Jacksboro, TX	8	8,202	2,536.0	8,202	2,536.0	8,202	2,536.0
Archer City, TX	9	127,544	8,560.3	141,480	8,560.3	119,246	6,994.0
Megargel, TX	10	6,881	2,516.0				
Rochester, TX	11	8,015	2,516.0				

Methodology

Spacing Studies

Standard methodology was used to complete the spacing studies. Current FM allotment, application and licensed facilities records were downloaded from CDBS on March 10, 2006. The distance to each of these records from the proposed reference point were calculated in accordance with the procedures in Section 73.208(c) of the Commission's rules. These distances were compared to the required distances prescribed in Section 73.207(1) of the rules, and the results of this comparison were tabulated in the traditional manner. Where further research or analysis was required to resolve apparent short-spacings, that information is noted in bold type. These studies are reported as Study (#) where # is the local report number as shown in the table entitled Population and Area Gain and Loss Summary (above).

Gain Loss Studies

The gain/loss were preformed utilizing EDX Signal 8.0 with the 2000 Census data formatted and provided by EDX.

Gain and Loss areas were determined by comparing the 60 dBu protected service contours of the existing and proposed facilities. For existing facilities, the study utilized licensed height and power. For the proposed allotments, maximum height and power was used for all classes of stations except Class C and Class C0. For Class C stations, actual height and power were used. For Class C0 station, 100 kW at 449 meters was assumed. Terrain was not considered to be a factor in any calculation so that the resulting contour is a circle in all cases.

Utilizing the demographic counting feature of EDX Signal 8.0, which is a centroid based system, the population for each facility or allotment was determined as well as the population for the area where the existing and proposed allotments or facilities overlap. Subtracting the population in the overlap area from the population for each existing station or allotment and each proposed station or allotment yielded the population gain and loss totals. The gain and loss areas were calculated in a similar manner. The results of these studies are shown in figures labeled Figure (#)GL where # is the local report number as shown in the table entitled Population and Area Gain and Loss Summary (above).

Remaining Service Studies

With respect to each loss area identified in the above manner, the number of remaining services was studied to determine whether the area would remain well served (i.e., whether all portions of the area would continue to be served by at least five fulltime stations). For FM stations, the required level of service used in the study was 60 dBu or greater. For AM stations, the coverage was determined utilizing the FCC's Groundwave Equivalent Distance Method and the FCC's M3 Conductivity data and the station's authorized parameters, as listed in CDBS, to calculate the distance to the 0.5 mV/m contour of the station, except that in urban areas (communities with populations of 2500 or more) the 2 mV/m contour was used.

In order to show graphically that service by five stations will remain throughout the loss area, a master list of all stations serving any portion of the area was prepared. From the master list, stations were identified which, collectively, provide service to the entire loss area. These stations were grouped together. No station was included in more than one group. A set of five or more maps was then prepared for each loss area depicting the contours of the stations in each group. The minimum remaining service to any point within the loss area is determined by the number of these maps. For some loss areas, it was possible to show five remaining services covering the entire loss area on a single map.

A table of the additional stations serving portions of the loss area, but not included in any of the coverage maps, is also provided.

Certification

This engineering exhibit was prepared by the undersigned acting as a technical consultant for LKCM Radio Group, LP. The studies and conclusions are true and correct to the best of my knowledge and belief.

March 13, 2006

A handwritten signature in black ink that reads "Steve Campbell". The signature is written in a cursive, flowing style.

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KFWR Mineral Wells, TX

Exhibit E, Study 1
Proposed Channel 240C, Mineral Wells, TX Allotment Study
******* FM Channel Spacing Study from CDBS *******

CDBS Database Date Mar 10, 2006

Use pre-1989 Class A Spacings: NO

All distances are in km, all bearings are in degrees referenced to true North.

Proposed Coordinates: 33°N 2' 25'' X 98°W 8' 19''

Proposed Channel: 240C [95.9 MHz]

CH	Call	CDBS#	State-City	Status	Vector	Req.	Result	
240C1	KFWR	610546	TX-MINERAL WELLS	FM-LIC	41.8<183.1°		Instant Allotment Study	
240C1	KFWR	291709	TX-MINERAL WELLS	FA-USE	43.2<187.6°		Instant Allotment Study	
KFWR is the target station of this proposed allotment point.								
240C3	KYBE	1115269	OK-FREDERICK	FM-APP	165.1<328.5°	237.0	-71.9	Short
240C3	KYBE	1115860	OK-FREDERICK	FA-APP	174.7<335.3°	237.0	-62.3	Short
240A	KYBE	292069	OK-FREDERICK	FA-USE	171.2<331.5°	226.0	-54.8	Short
240A	KYBE	282293	OK-FREDERICK	FM-LIC	171.2<331.5°	226.0	-54.8	Short
---Instant Counterproposal of MB Docket 06-11---Alternate Channel and Reference Point								
239C3	KYBE	Proposed	OK-FREDERICK	From Altered Allot	178.6<327.3°	176	2.6	Close

238A	KJKB	292851	TX-JACKSBORO	FA-USE	32.5<353.0°	95.0	-62.5	Short
238A	KJKB	994162	TX-JACKSBORO	FM-LIC	34.6<337.8°	95.0	-60.4	Short
---Instant Counterproposal of MB Docket 06-11---Alternate Channel and Reference Point								
248A	KJKB	Proposed	TX-JACKSBORO		34.6<337.82°	0		Clear

239C1	KKAJ-FM	1095103	OK-ARDMORE	FM-LIC	147.2<36.7°	209.0	-61.8	Short
239C1	---	431148	OK-ARDMORE	FA-RSV	147.2<36.7°	209.0	-61.8	Short
239C1	KKAJ-FM	293879	OK-ARDMORE	FA-USE	154.4<35.9°	209.0	-54.6	Short
---Instant Counterproposal of MB Docket 06-11---Alternate Channel, Class and Reference Point								
238A	KKAJ-FM	Proposed	OK-Springer		171.3<30.5°	95.0	76.3	Clear

239C1	---	578372	OK-HEALDTON	FR-ADD	154.4<35.9°	209.0	-54.6	Short
239C1	---	578263	OK-HEALDTON	FR-ADD	154.4<35.9°	209.0	-54.6	Short
The proposed rule making for Healdton, OK was dismissed. [DA-031533, May 8, 2003]								
239C2	---	573219	TX-RULE	FA-VAC	152.8<277.8°	188.0	-35.2	Short
---Instant Counterproposal of MB Docket 06-11---Alternate Channel and Reference Point								
288C2	---	Proposed	TX-Rule		158.0<275.9°	0		Clear

240A	KCKL	292079	TX-MALAKOFF	FA-USE	226.1<115.5°	226.0	0.1	Close
240A	KCKL	177833	TX-MALAKOFF	FM-LIC	226.1<115.5°	226.0	0.1	Close
241C2	KNCE	292516	TX-WINTERS	FA-USE	188.1<241.2°	188.0	0.1	Close
241C2	KNCE	656750	TX-WINTERS	FM-LIC	188.1<241.2°	188.0	0.1	Close
239C2	KBGO	300311	TX-WACO	FA-USE	190.7<147.1°	188.0	2.7	Close
239C2	KBGO	271073	TX-WACO	FM-LIC	191.1<152.2°	188.0	3.1	Close
241A	---	666150	TX-EVANT	FR-ADD	174.2<179.2°	165.0	9.2	Clear
241A	---	1051136	TX-EVANT	FR-ADD	174.2<179.2°	165.0	9.2	Clear
240A	KSCH	292084	TX-SULPHUR SPRINGS	FA-USE	237.0<86.3°	226.0	11	Clear
240A	KSCH	157391	TX-SULPHUR SPRINGS	FM-LIC	237.0<86.3°	226.0	11	Clear

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238A	---	662829	TX-CARBON	FA-VAC	107.1<217.2°	95.0	12.1	Clear
242C	KSCS	292209	TX-FORT WORTH	FA-USE	119.9<114.5°	105.0	14.9	Clear
242C	KSCS	148538	TX-FORT WORTH	FM-LIC	120.7<114.4°	105.0	15.7	Clear
240A	---	428384	TX-BURNET	FA-VAC	243.1<183.5°	226.0	17.1	Clear
240A	---	1051138	TX-BURNET	FR-ADD	245.0<183.7°	226.0	19	Clear
240A	---	666151	TX-BURNET	FR-ADD	245.0<183.7°	226.0	19	Clear
237C3	NEW	1116430	TX-MERIDIAN	FM-APP	115.1<165.6°	96.0	19.1	Clear

---Instant Counterproposal of MB Docket 06-11-----Other proposals that are part of this Counterproposal

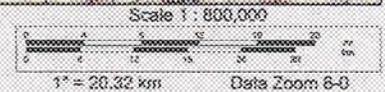
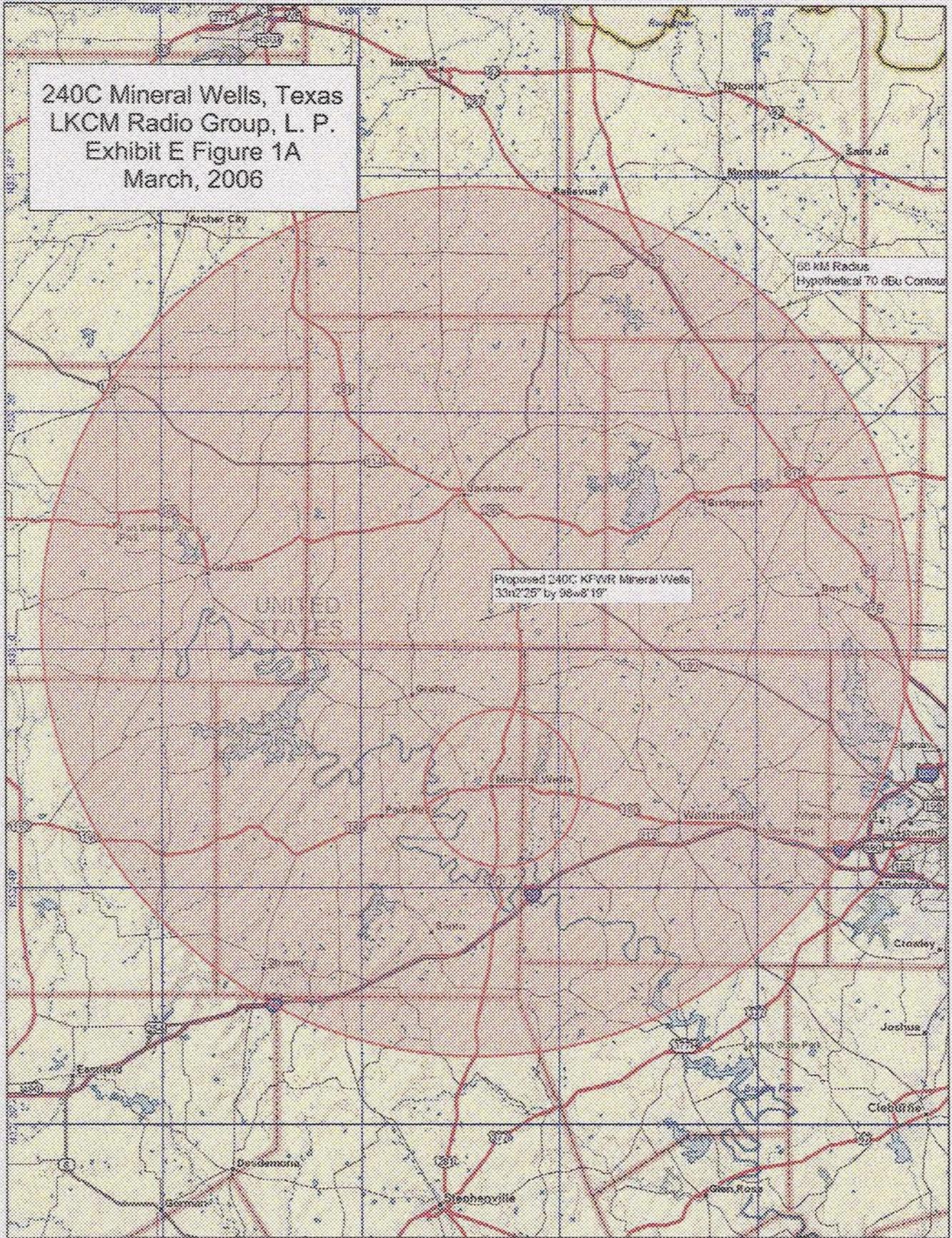
239A	New	Proposed	TX-ROCHESTER		173.1<277.4°	165.0	8.1	Clear
237A	---	Proposed	TX-WELLINGTON		290.4<318.1°	95.0	195.4	Clear

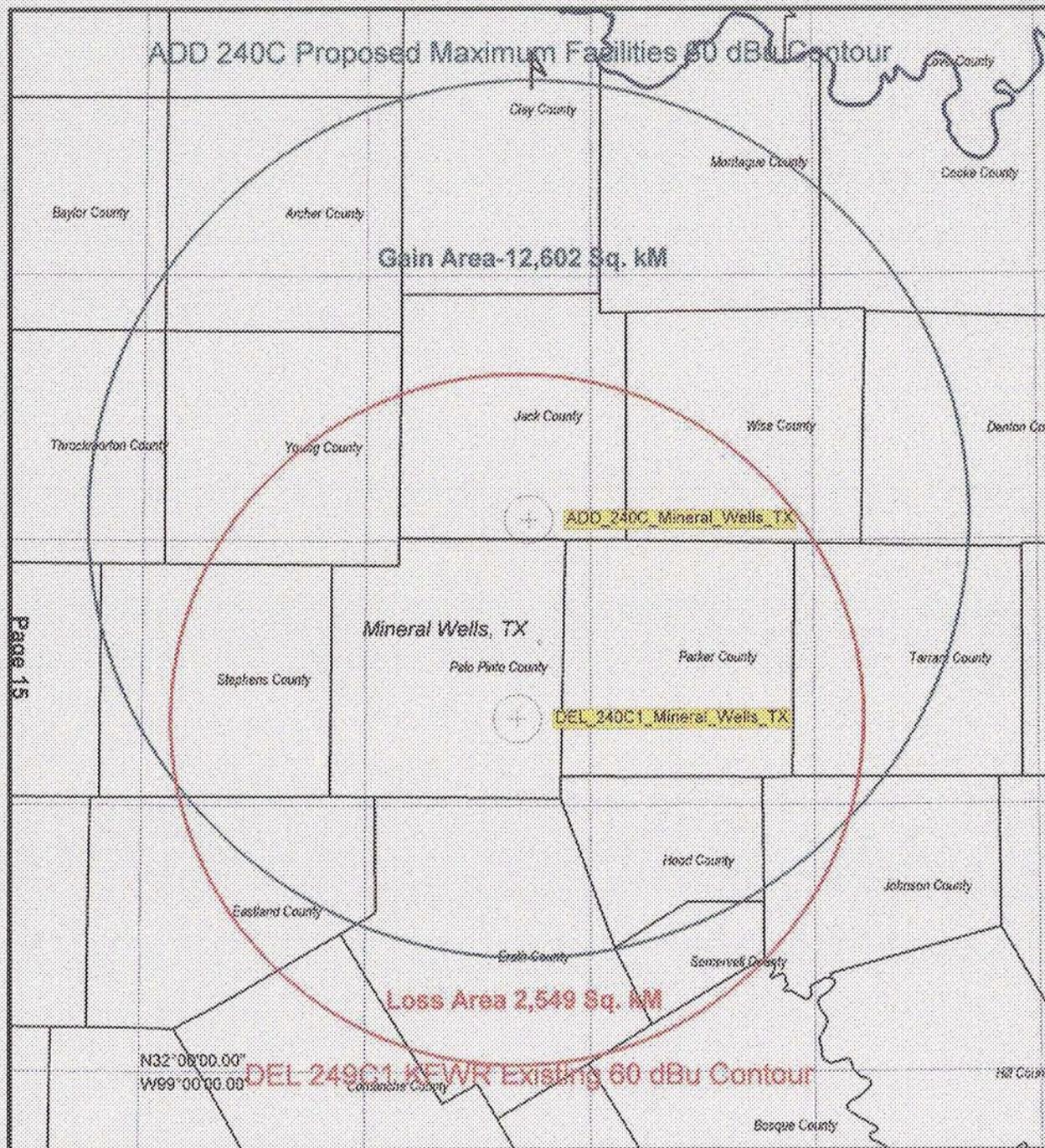
***** End of Channel 240C Spacing Study *****

240C Mineral Wells, Texas
LKCM Radio Group, L. P.
Exhibit E Figure 1A
March, 2006

66 KM Radius
Hypothetical 70 dBu Contour

Proposed 240C KFVR Mineral Wells
33m225° by 96m8'15"





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<p>SIGNAL™: KFWR_MineralWellsTX_GainLoss</p> <p>Prop. model: FCC-FCC Time: 50.0% Loc.: 50.0% Prediction Confidence Margin: 0.0dB Climate: Continental Temperate Land use (clutter): none Atmospheric Abs.: none K Factor: 1.333 RX Antenna - Type: OMNI Height: 2.0 m AGL Gain: -3.15 dBd</p>	
<p>Field strength at remote  = 60.0 dBuV/m Display threshold level: -120.0 dBmW</p> <p>Field strength at remote  = 60.0 dBuV/m Display threshold level: -120.0 dBmW</p>	
<p>Sites</p> <p>Site: ADD_240C_Mineral_Wells_TX N33°02'25.00" W98°08'19.00" 0.0 m ADD Tx.Ht.AGL: 600.0 m Total ERPd: 100.00 kW Model: 1 omni-horizontal/0.0° 95.9000 MHz Model: 1 omni-horizontal/0.0° 95.9000 MHz</p> <p>Site: DEL_240C1_Mineral_Wells_TX N32°39'50.00" W98°09'47.00" 0.0 m DEL Tx.Ht.AGL: 329.0 m Total ERPd: 80.00 kW Model: 1 omni-horizontal/0.0° 95.9000 MHz Model: 1 omni-horizontal/0.0° 95.9000 MHz</p> <p>Reference Grid (spacing: 30')</p>	
<p>Notes</p> <p>Gain Population=715,927 Loss Population = 33,583 Proposed facilities are maximum Class C</p>	
<p>KILOMETERS</p> 	
<p>ENTRONICS </p> <p>Broadcast Engineering</p>	
<p>Mineral Wells, Texas Gain Loss Study</p>	
<p>Exhibit E Figure 1GL</p>	<p>March 2006</p>

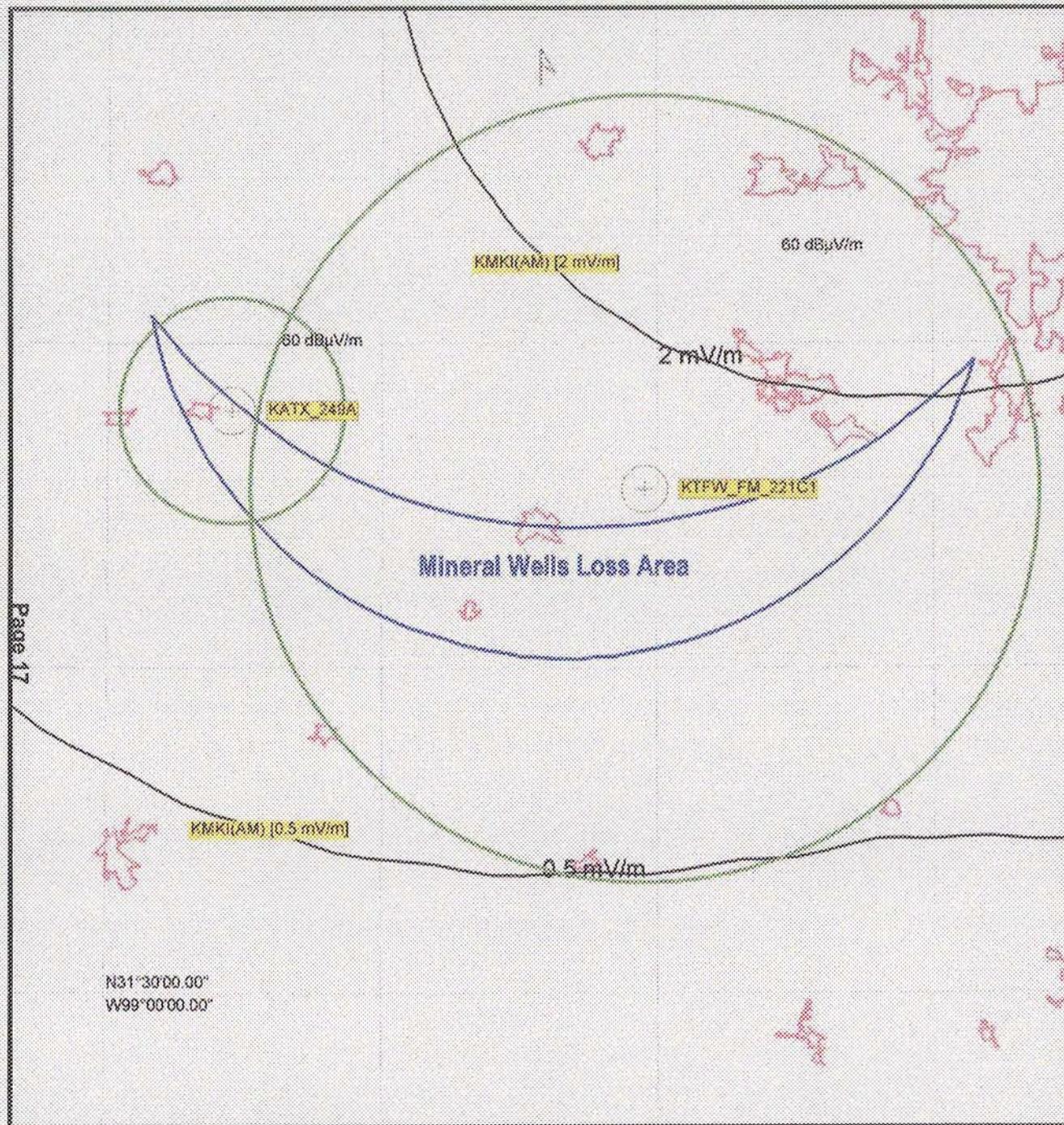
**Exhibit E Table 1R
 KFWR Mineral Wells, Texas Remaining Service**

Proponents propose to change the class and location of operating station KFWR, Mineral Wells, TX. Exhibit E, Figure 1GL, depicts the loss area that will be created by the change.

All or part of the Mineral Wells loss area will continue to be served by the following stations:

Exhibit E Figures 1R1-5 consist of maps depicting the remaining stations serving the loss area. Each map depicts the contours of a unique group of stations, which collectively serve 100 percent of the loss area. No station is represented on more than one map. Therefore, the five maps, collectively, demonstrate that the entire loss area will continue to be well served by at least five other fulltime stations. Most of the Mineral Wells loss area will be served by many more than five stations after the changes to KFWR.

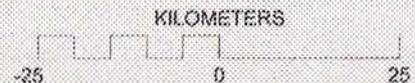
Mineral Wells Loss Area			
Remaining FM		Remaining FM	
KATX	KLNO	KBEC	KNIT
KBFB	KLTY	KBWD	KRLD
KBRQ	KLUV-FM	KCLE	KROO
KCBI	KNON	KCOM	KRVA
KCUB-FM*	KOXE	KDFT	KRZI
KDMX	KPLX	KFCD	KTCK
KEAN-FM	KPSM	KFLC	KWKC
KEGL	KQXS	KFXR	KXLY
KEQX*	KSCS	KHFX	KYYW
KERA	KTCU	KHVN	KZEE
KEYJ	KTFW-FM	KLBJ	KZMP
KFGL	KVTT	KLIF	WBAP
KJCR	KYOX	KMKI	
KJJK	WRR	KMNY	
Total FM-28		Total AM-23	
* Stations under construction and have filed FCC 302			



SIGNAL™: MineralWellsRFM
 Prop. model: FCC-FCC
 Time: 50.0% Loc.: 50.0%
 Prediction Confidence Margin: 0.0dB
 Climate: Continental Temperate
 Land use (clutter): none
 Atmospheric Abs.: none
 K Factor: 1.333
 RX Antenna - Type: OMNI
 Height: 2.0 m AGL Gain: -2.15 dBd

Field strength at remote
 = 60.0 dBuV/m
 Display threshold level: -120.0 dBmW

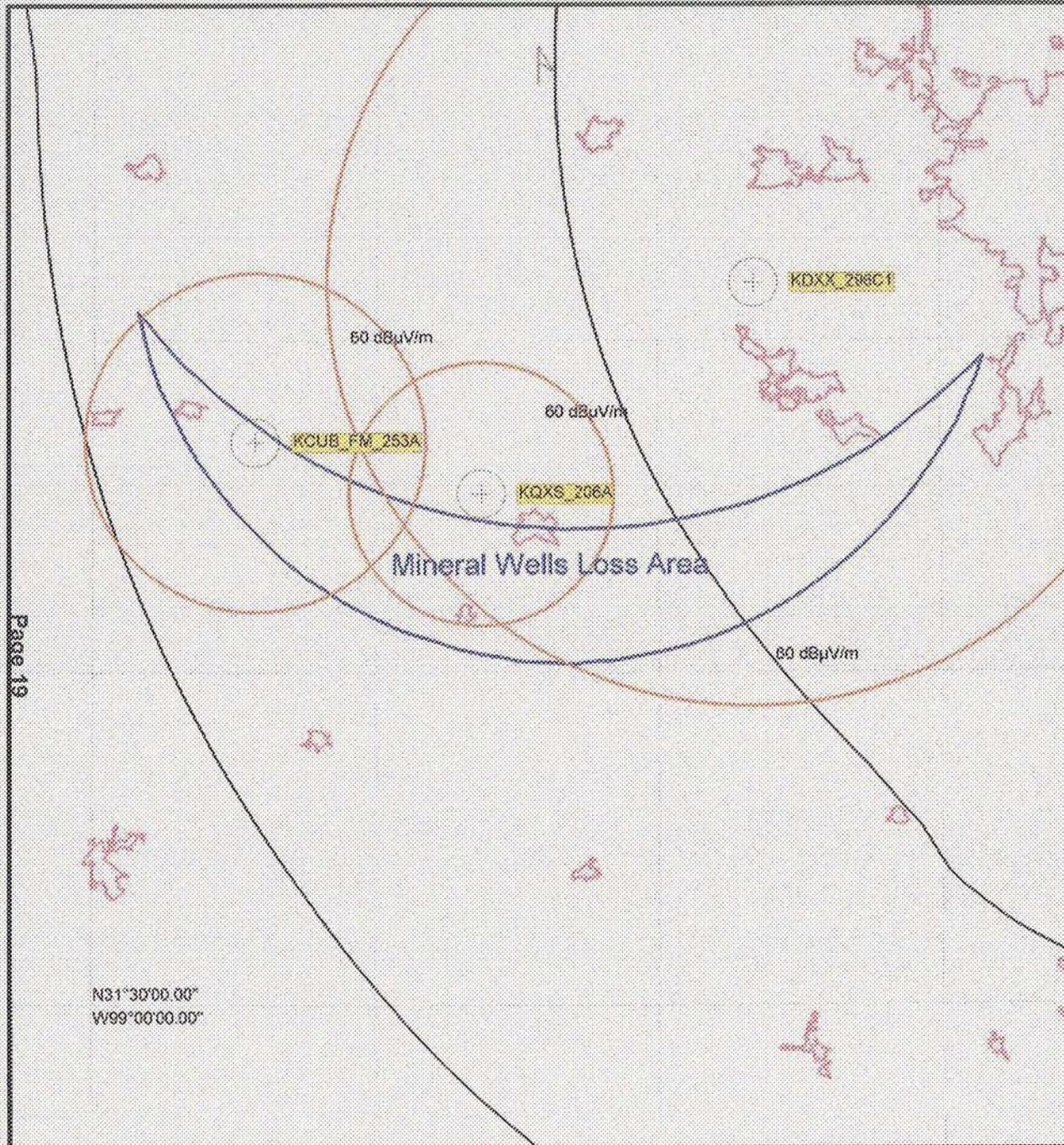
- KMKI(AM)
- Reference Grid (spacing: 30')
- Mineral Wells Loss Area
- Urban Area



LKCM Radio Group L. P.
 Mineral Wells Loss Area Remaining #1
 Exhibit E Figure 1R1 March 2006

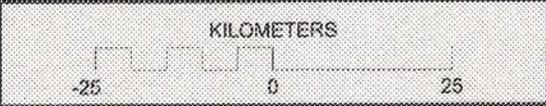
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N31°30'00.00"
 W99°00'00.00"



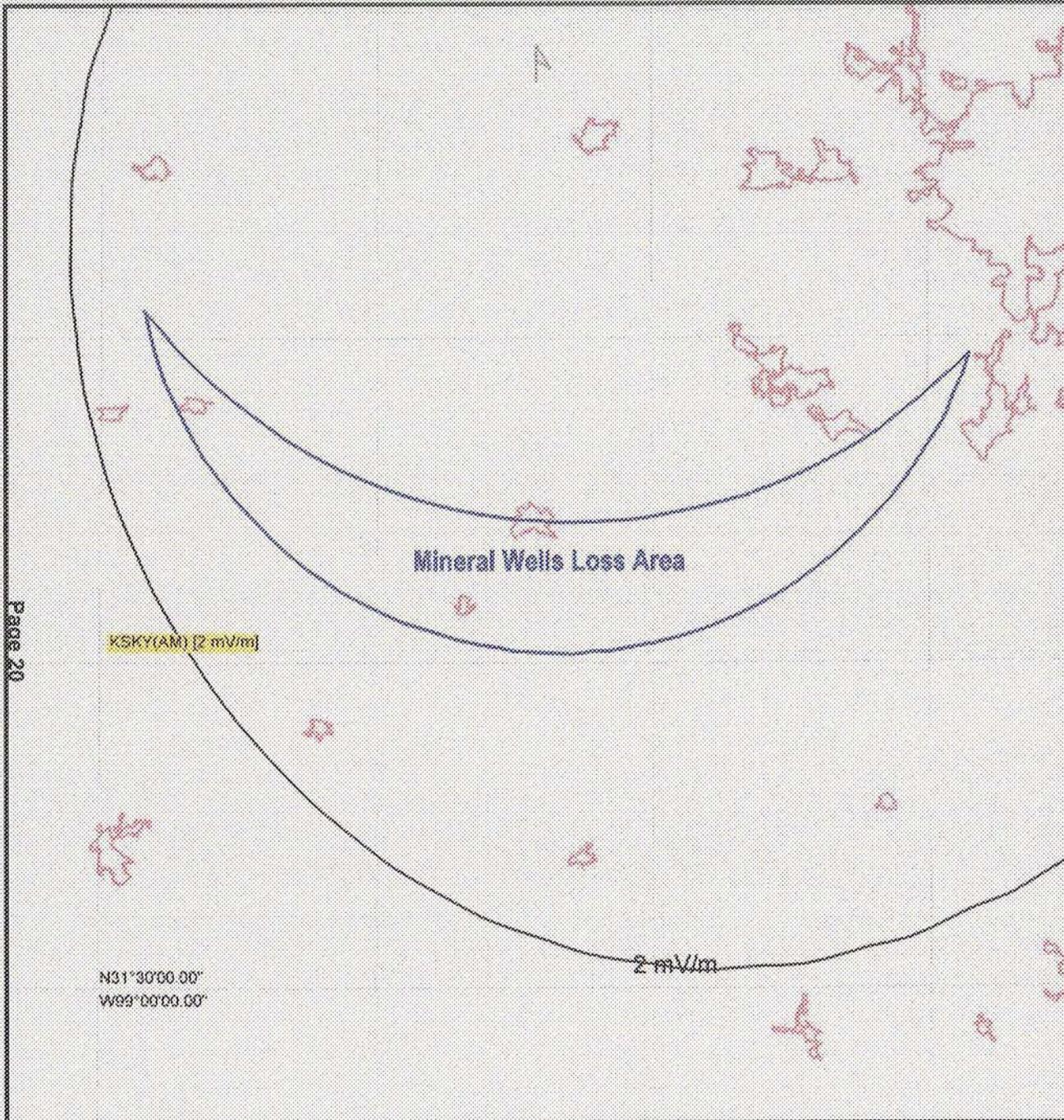
SIGNAL™: MineralWellsRFM
 Prop. model: FCC-FCC
 Time: 50.0% Loc.: 50.0%
 Prediction Confidence Margin: 0.0dB
 Climate: Continental Temperate
 Land use (clutter): none
 Atmospheric Abs.: none
 K Factor: 1.333
 RX Antenna - Type: OMNI
 Height: 2.0 m AGL Gain: -2.15 dBd

- Reference Grid (spacing: 30')
- Mineral Wells Loss Area
- Urban Area
- KRLD(AM)



LKCM Radio Group L. P.
 Mineral Wells Loss Area Remaining #3
 Exhibit E Figure 1R3 March 2006

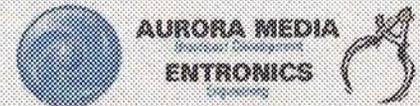
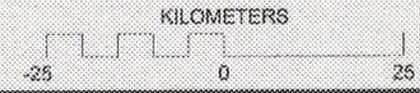
N31°30'00.00"
 W99°00'00.00"



SIGNAL™: MineralWellsRFM

Prop. model: FCC-FCC
 Time: 50.0% Loc.: 50.0%
 Prediction Confidence Margin: 0.0dB
 Climate: Continental Temperate
 Land use (clutter): none
 Atmospheric Abs.: none
 K Factor: 1.333
 RX Antenna - Type: OMNI
 Height: 2.0 m AGL Gain: -2.15 dBd

-  Reference Grid (spacing: 30')
-  Mineral Wells Loss Area
-  Urban Area
-  KSKY(AM)

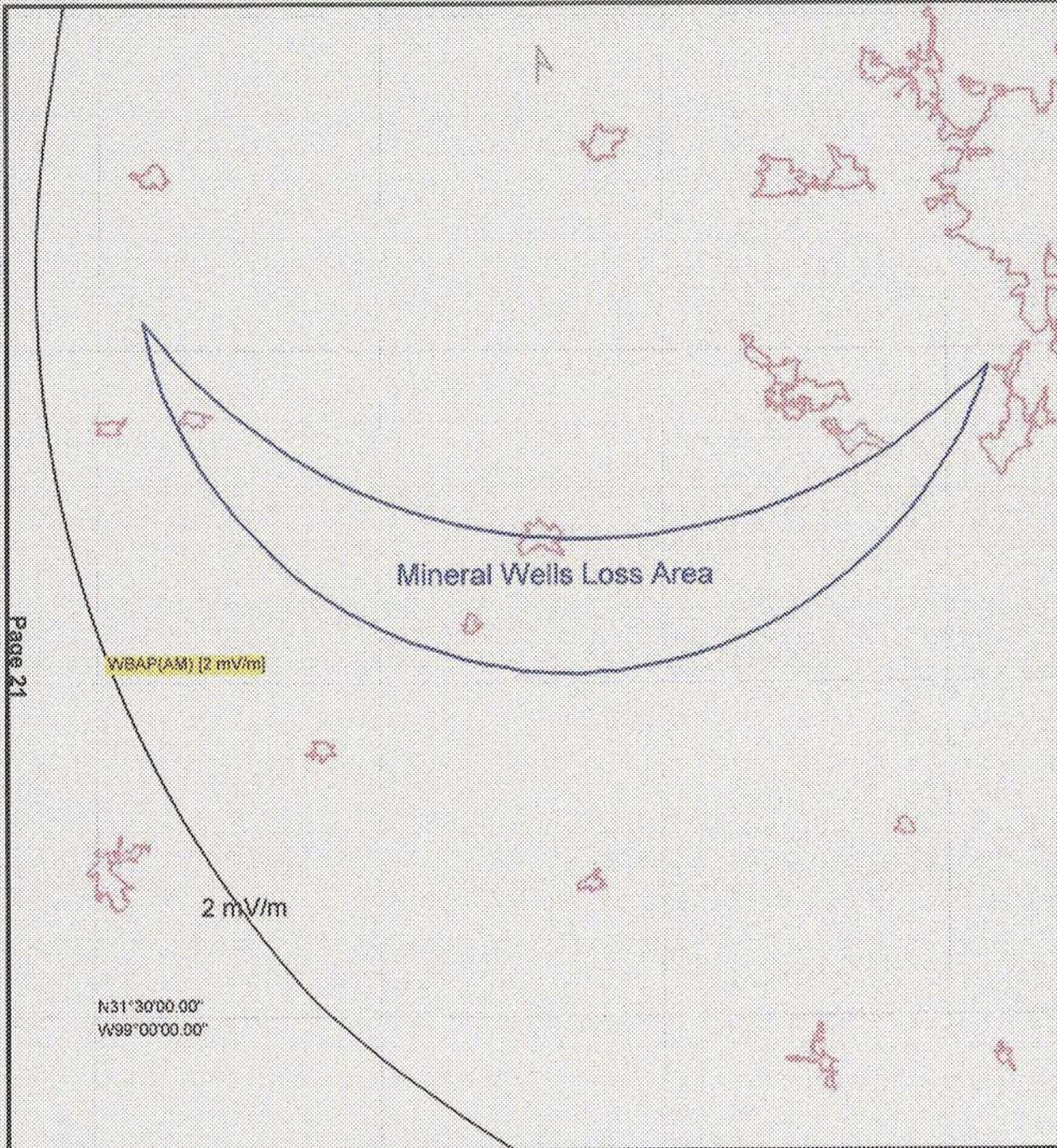


LKCM Radio Group L. P.
 Mineral Wells Loss Area Remaining #4
 Exhibit E Figure 1R4 March 2006

N31°30'00.00"
 W99°00'00.00"

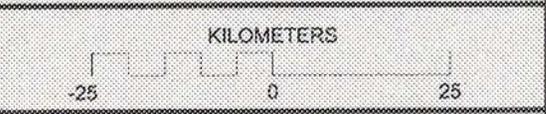
2 mV/m

KSKY(AM) [2 mV/m]



SIGNAL™: MineralWellsRFM
 Prop. model: FCC-FCC
 Time: 50.0% Loc.: 50.0%
 Prediction Confidence Margin: 0.0dB
 Climate: Continental Temperate
 Land use (clutter): none
 Atmospheric Abs.: none
 K Factor: 1.333
 RX Antenna - Type: OMNI
 Height: 2.0 m AGL Gain: -2.15 dBd

-  Reference Grid (spacing: 30')
-  Mineral Wells Loss Area
-  Urban Area
-  WBAP(AM)



LKCM Radio Group L. P.
 Mineral Wells Loss Area Remaining #5
 Exhibit E Figure 1R5 March 2006

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N31°30'00.00"
 W99°00'00.00"

KKAJ, Springer, Oklahoma

Exhibit E, Study 2
Proposed KKAJ, Springer, Oklahoma Allotment Study
 ***** **FM Channel Spacing Study from CDBS** *****

CDBS Database Date Mar 10, 2006

Use pre-1989 Class A Spacings: NO

All distances are in kM, all bearings are in degrees referenced to true North.

Proposed Coordinates: 34°N 21' 56'' X 97°W 11' 28''

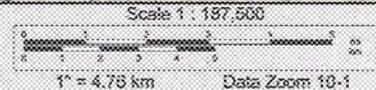
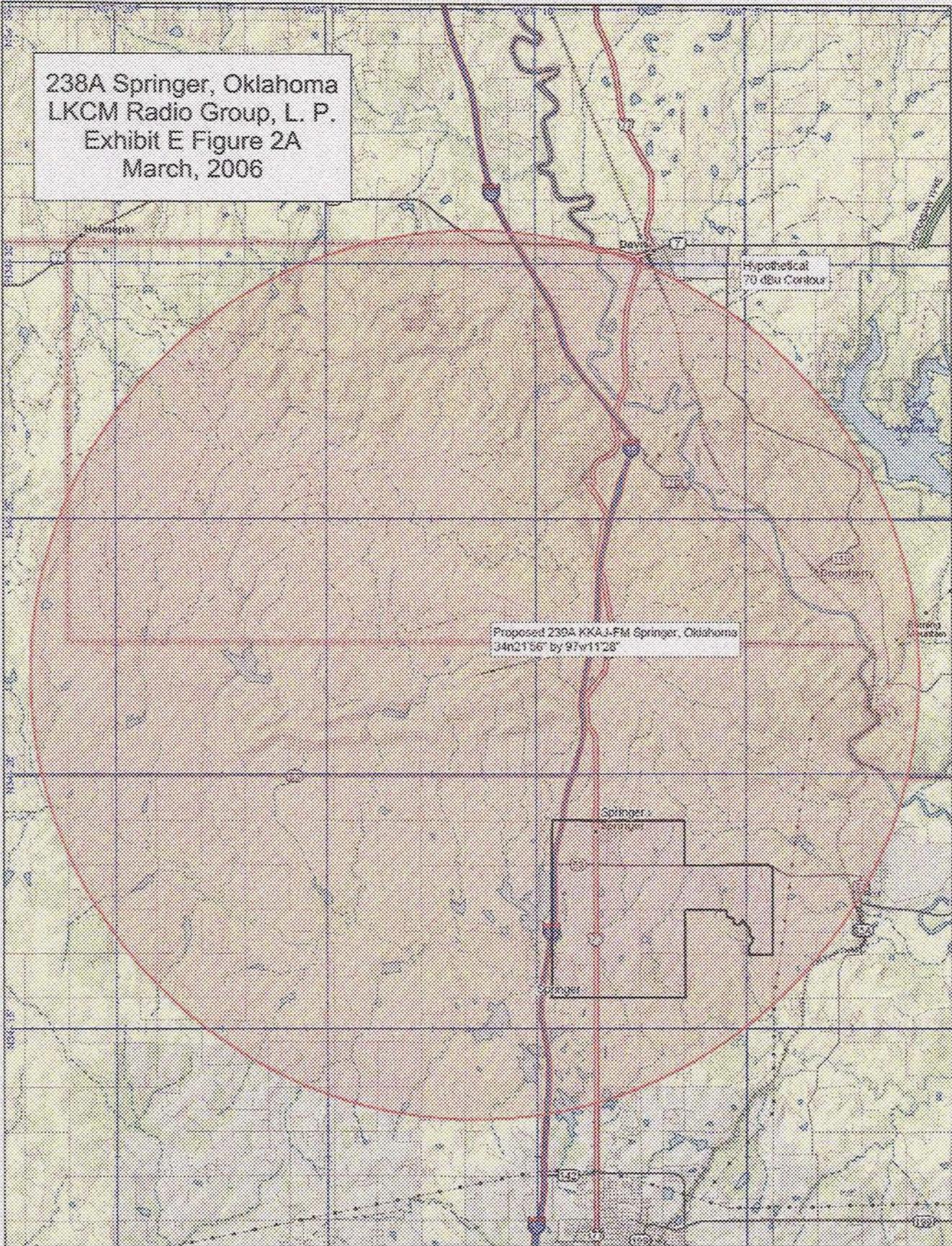
Proposed Channel: 238A [95.5 MHz]

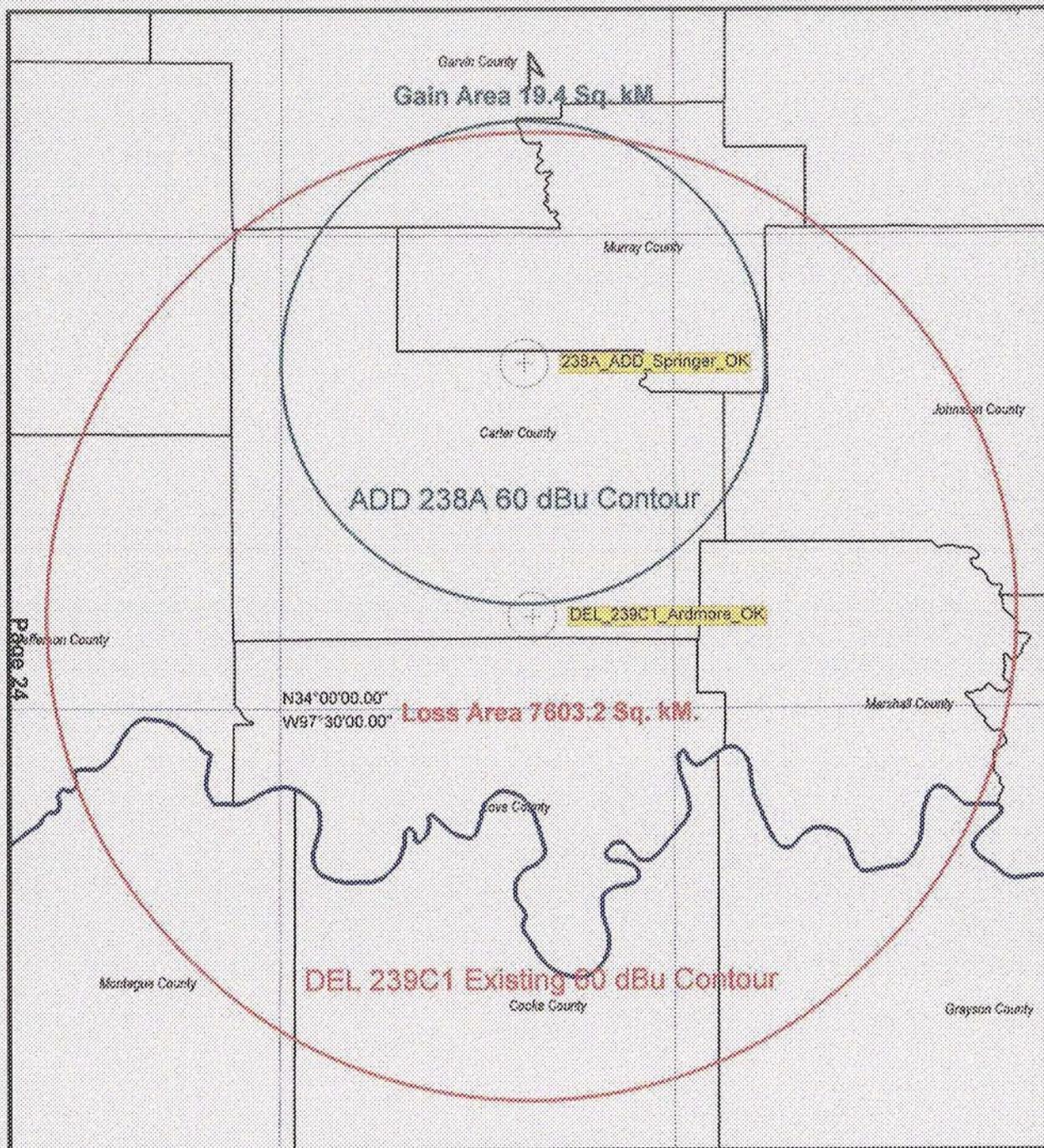
CH	Call	CDBS#	State-City	Status	Vector	Req.	Result	
239C1	KKAJ-FM	293879	OK-ARDMORE	FA-USE	22.9<171.2°	133.0	-110.1	Short
239C1	---	431148	OK-ARDMORE	FA-RSV	29.6<178.3°	133.0	-103.4	Short
239C1	KKAJ-FM	1095103	OK-ARDMORE	FM-LIC	29.7<178.3°	133.0	-103.3	Short
-----Instant Counterproposal of MB Docket 06-11----- Alternate Channel, Class and Reference Point								
238A	KKAJ-FM	Proposed	OK-Springer		0			Instant Allotment Study

239C1	---	578263	OK-HEALDTON	FR-ADD	22.9<171.2°	133.0	-110.1	Short
239C1	---	578372	OK-HEALDTON	FR-ADD	22.9<171.2°	133.0	-110.1	Short
The proposed rule making for Healdton, OK was dismissed. [DA-031533, May 8, 2003]								
237C2	KHYI	289544	TX-HOWE	FA-USE	101.1<158.2°	106.0	-4.9	Short
237C2	KHYI	630995	TX-HOWE	FM-LIC	106.1<159.4°	106.0	0.1	Close
Proposal is fully spaced to the KHYI Licensed Site.								
238C	KWEN	93556	OK-TULSA	FM-LIC	226.1<25.7°	226.0	0.1	Close
238C	KWEN	1061768	OK-TULSA	FM-CP	226.1<25.7°	226.0	0.1	Close
238C	KWEN	291888	OK-TULSA	FA-USE	226.1<25.7°	226.0	0.1	Close
238C2	KITX	292429	OK-HUGO	FA-USE	166.5<107.0°	166.0	0.5	Close
238C2	KITX	132570	OK-HUGO	FM-LIC	166.6<107.0°	166.0	0.6	Close
-----Instant Counterproposal of MB Docket 06-11----- Other proposals that are part of this Counterproposal								
239C3	KYBE	Proposed	OK-FREDERICK		184.1<271.3°	89.0	95.1	Clear
240C	KFWR	Proposed	TX-MINERAL WELLS		171.2<211.0°	95.0	76.2	Clear
239A	New	Proposed	TX-ROCHESTER		287.6<244.6°	72.0	215.6	Clear
237A	---	Proposed	TX-WELLINGTON		289.9<284.2°	72.0	217.9	Clear

***** **End of Channel 238A Spacing Study** *****

238A Springer, Oklahoma
LKCM Radio Group, L. P.
Exhibit E Figure 2A
March, 2006





SIGNAL™: Ardmore_Oklahoma_GainLoss	
Prop. model: FCC-FCC Time: 50.0% Loc.: 50.0% Prediction Confidence Margin: 0.0dB Climate: Continental Temperate Land use (clutter): none Atmospheric Abs.: none K Factor: 1.333 RX Antenna - Type: OMNI Height: 2.0 m AGL Gain: -2.15 dBd	
Field strength at remote  = 60.0 dBuV/m Display threshold level: -120.0 dBmW Field strength at remote  = 60.0 dBuV/m Display threshold level: -120.0 dBmW	
Sites Site: 238A_ADD_Springer_OK N34°21'56.00" W97°11'25.00" 0.0 m ADD Tx.Ht.AGL: 100.0 m Total ERPd: 6.00 kW Model: 1 omni-horizontal/0.0° 95.5000 MHz Model: 1 omni-horizontal/0.0° 95.5000 MHz Site: DEL_239C1_Ardmore_OK N34°06'53.00" W97°10'54.00" 0.0 m DEL Tx.Ht.AGL: 137.0 m Total ERPd: 100.00 kW Model: 1 omni-horizontal/0.0° 95.7000 MHz Model: 1 omni-horizontal/0.0° 95.7000 MHz	
 Reference Grid (spacing: 30')	
Notes Loss Area Population 84,058 Gain Area Population 90	
KILOMETERS 	
	
Springer (Ardmore), Oklahoma Gain Loss Study	
Exhibit E Figure 2GL	March 2006

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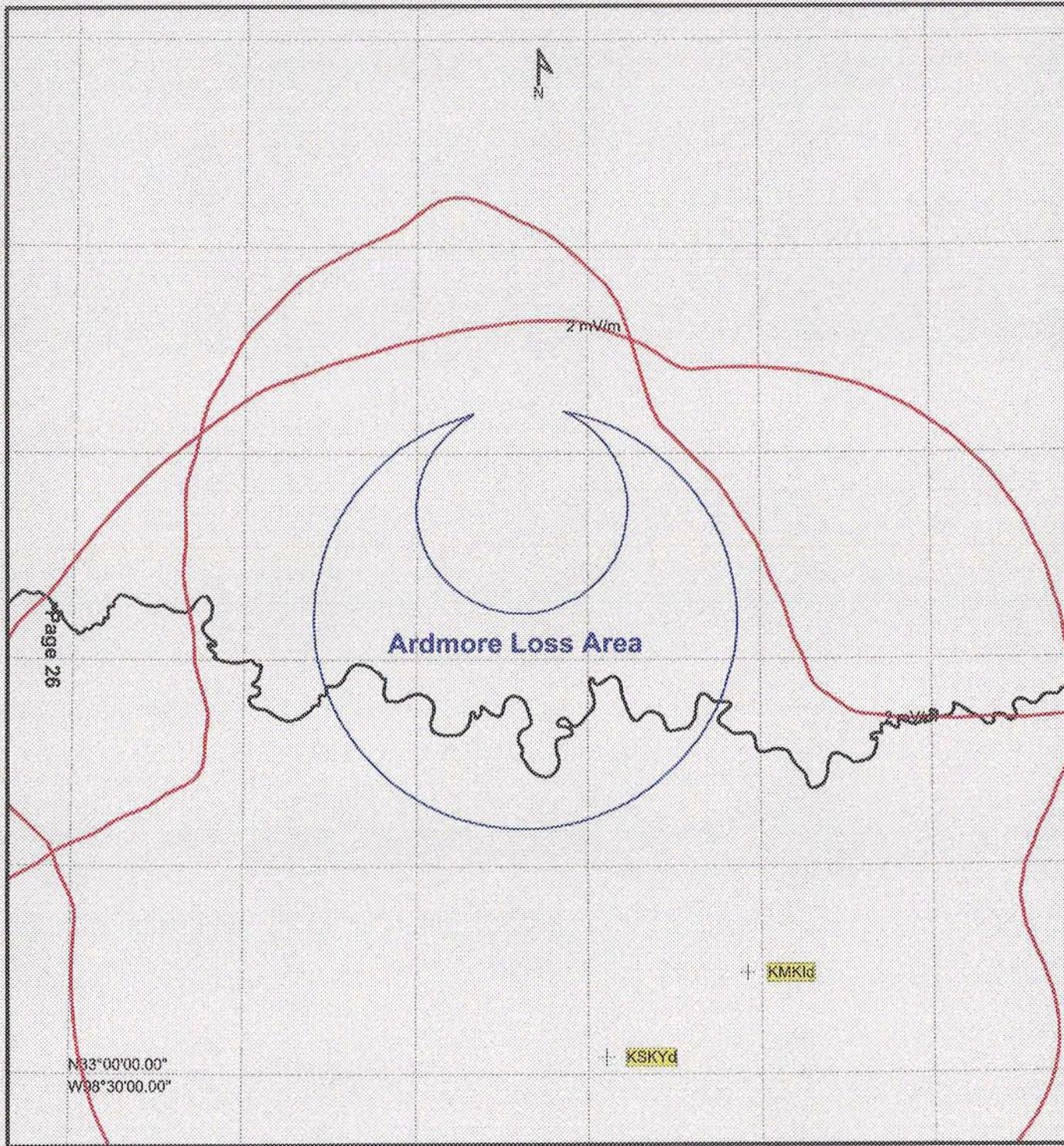
Exhibit E Table 2R
Proposed KKAJ, Ardmore (Springer), Oklahoma Remaining Services

The Proponent proposes to change the class, channel and location of operating station KKAJ-FM, Ardmore, OK. As shown in Exhibit E Figure 2GL, this creates a loss area that will be served by one fewer signal. Parts of this Loss Area will continue to be served by the listed stations:

Exhibit E Figures 2R1-5 consist of maps depicting the remaining stations serving the loss area. Figure 2R1 depicts two AM station with 100 percent coverage of the Loss area. Figures 2R2-5 depicts the contours of a unique group of stations, which collectively serve 100 percent of the loss area. No station is represented on more than one map. Therefore, the five maps, collectively, demonstrate that the entire loss area will continue to be well served by at least 6 other fulltime stations. Most of the area will be served by many more than 6 stations after the proposed changes to KKAJ-FM.

Ardmore Loss Area

Remaining FM		Remaining AM	
KACO	KPFC	KADA	KPSN
KADA-FM	KQPD	KDFT	KQCV
KAYC	KRNB	KFAF	KREF
KDDQ	KSOC	KFAQ	KRLD
KDKR	KTCY	KFCD	KRVA
KESN	KTDK	KFXR	KSKY
KESS	KTRX	KFYN	KTBB
KFXI	KTYS	KGFF	KTCK
KFZO	KVRK	KGVL	KTOK
KHYI	KWRD	KHVN	KVLH
KICM	KYKC	KKDA	KVSO
KIXO	KXMP-FM	KKGM	KWFS
KKFC	KZZA	KKRX	KXCA
KLAK		KLIF	KXEB
KLBC		KMAD	WBAP
KLCU		KMKI	WKY
KMAD		KMNY	WWLS
KMKT		KNIT	
KNOR		KNTX	
KNTU		KOKC	
Total FM	31	Total AM	37



AMW™: SpringerOK_RAM.am
 Prop. method: Groundwave equivalent distance
 Ground conduct. map type: US M3
 Skywave departure angle method: FCC angle range
 Percent time for skywave field: 10%

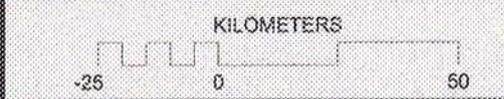
----- Ardmore Loss Area

Sites

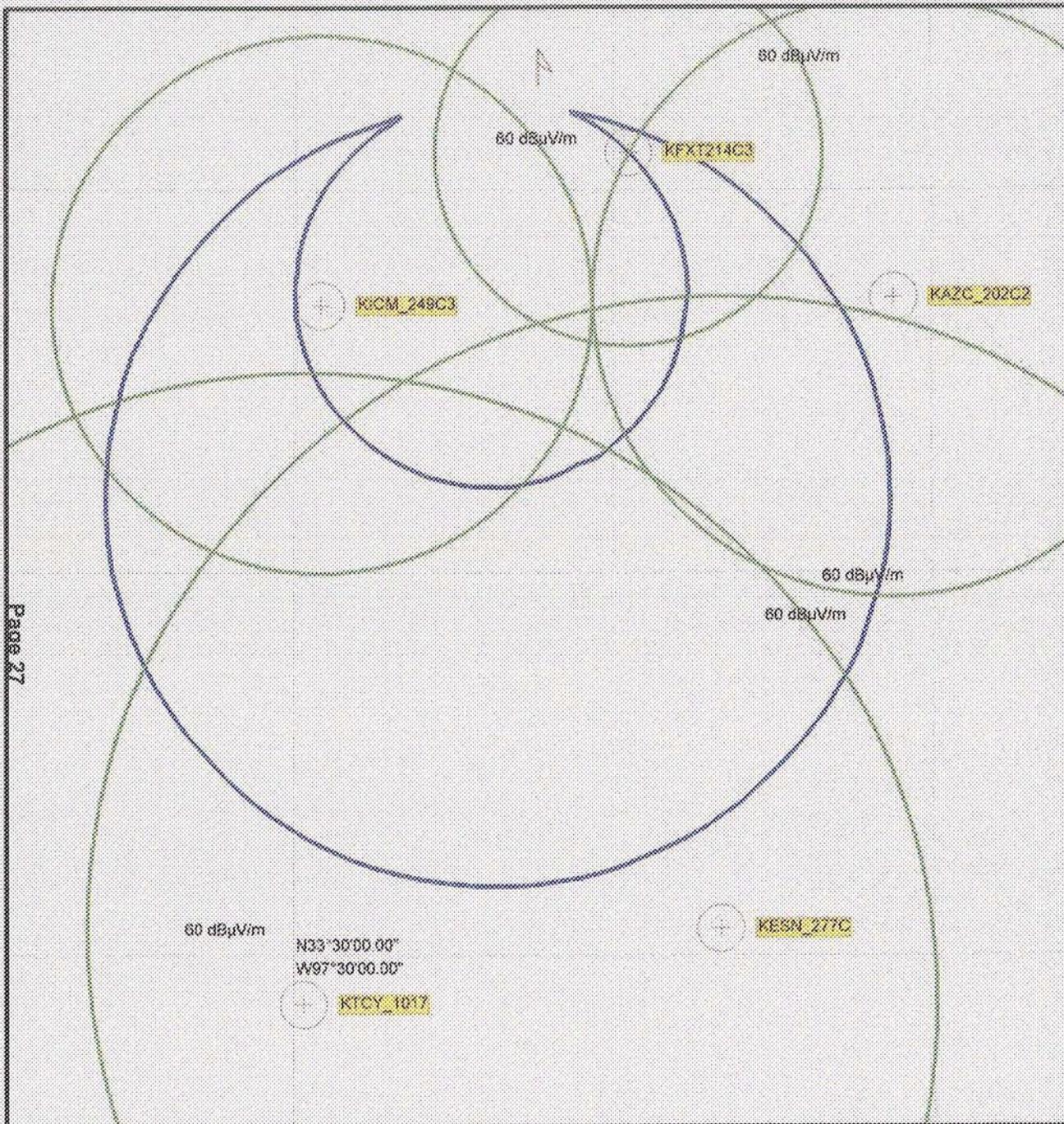
Call sign: KSKYd Power: 20,000 kW
 Pattern: DA-U Frequency: 680 kHz
 Coordinates: N33°02'27.00" W96°56'51.00"

Call sign: KMKId Power: 5,000 kW
 Pattern: DA-U Frequency: 620 kHz
 Coordinates: N33°14'34.00" W96°32'29.00"

----- MineralWells Short



LKCM Radio Group L.P.
 Ardmore Loss Area Remaining Aural 1 & 2
 Exhibit E Figure 2R1 March 2006



SIGNAL™ - Ardmore_RFM

Prop. model: FCC-FCC
 Time: 50.0% Loc.: 50.0%
 Prediction Confidence Margin: 0.0dB
 Climate: Continental Temperate
 Land use (clutter): none
 Atmospheric Abs.: none
 K Factor: 1.333
 RX Antenna - Type: OMNI
 Height: 2.0 m AGL Gain: -2.15 dBd

Field strength at remote

█ = 60.0 dBuV/m

Display threshold level: -120.0 dBmW

Reference Grid (spacing: 30')

Ardmore Loss Area

KILOMETERS



ENTRONICS
 Broadcast Engineering

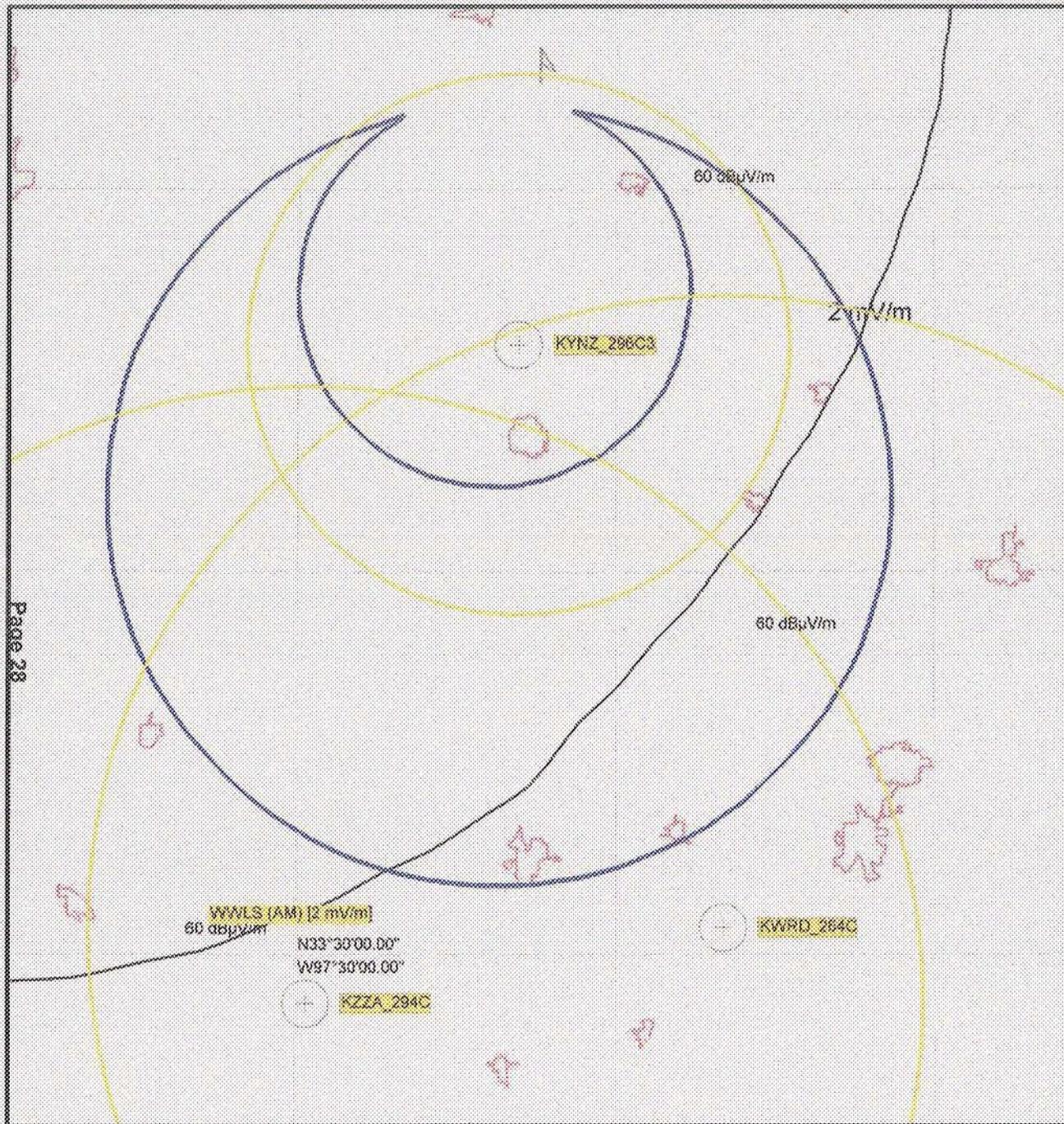


LKCM Radio Group, L. P.

Ardmore Loss Area Remaining Services-#3

Exhibit E Figure 2R2

March 2006

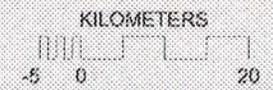


SIGNAL™: Ardmore_RFM

Prop. model: FCC-FCC
 Time: 50.0% Loc.: 50.0%
 Prediction Confidence Margin: 0.0dB
 Climate: Continental Temperate
 Land use (clutter): none
 Atmospheric Abs.: none
 K Factor: 1.333
 RX Antenna - Type: OMNI
 Height: 2.0 m AGL Gain: -2.15 dBd

Field strength at remote

■ = 60.0 dBuV/m
 Display threshold level: -120.0 dBmW
 Reference Grid (spacing: 30')
 Ardmore Loss Area
 Urban Area



ENTRONICS
 Broadcast Engineering



LKCM Radio Group, L. P.
 Ardmore Loss Area Remaining Services-#4
 Exhibit E Figure 2R3 March 2008