

FOR
FCC
USE
ONLY

FCC 301

APPLICATION FOR CONSTRUCTION PERMIT FOR COMMERCIAL BROADCAST STATION

FOR COMMISSION USE ONLY

FILE NO.

Section I - General Information

1	Legal Name of the Applicant		
	Mailing Address		
	City	State or Country (if foreign address)	ZIP Code
	Telephone Number (include area code)	E-Mail Address (if available)	
	FCC Registration Number	Call Sign	Facility ID Number
2.	Contact Representative (if other than applicant)		Firm or Company Name
	Mailing Address		
	City	State or Country (if foreign address)	ZIP Code
	Telephone Number (include area code)	E-Mail Address (if available)	

3. If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114):

☐ Governmental Entity ☐ Other _____

4. Application Purpose.

- | | |
|--|---|
| ☐ New Station | ☐ Major Modification of construction permit |
| ☐ New Station with Petition for Rulemaking or Counterproposal to Amend FM Table of Allotments | ☐ Minor Modification of construction permit |
| ☐ New Station with Petition for Rulemaking or Counterproposal to Amend FM Table of Allotments using Tribal Priority | ☐ Major Amendment to pending application |
| | ☒ Minor Amendment to pending application BP - 20220921AAC |
| ☐ Major Change in licensed facility | |
| ☐ Minor Change in licensed facility | |

a. File number of original construction permit: _____

☐ N/A

b. Service Type: ☐ AM ☐ FM ☐ TV ☐ DTV ☐ DTS

c. DTV Type: ☐ Pre-Transition ☐ Post-Transition ☐ Both

d. Community of License:

City	State
------	-------

e. Facility Type: ☐ Main ☐ Auxiliary

If an amendment, submit as an Exhibit a listing by Section and Question Number of the portions of the pending application that are being revised.

Exhibit No.
Day Power

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

Section II - Legal

1. **Certification.** Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its representation that the application satisfies each of the pertinent standards and criteria set forth in the application instructions and worksheets. ☐ Yes ☐ No

2. **Parties to the Application.**

- a. List the applicant, and, if other than a natural person, its officers, directors, stockholders and other entities with attributable interests, non-insulated partners and/or members. If a corporation or partnership holds an attributable interest in the applicant, list separately its officers, directors, stockholders and other entities with attributable interests, non-insulated partners and/or members. Create a separate row for each individual or entity. Attach additional pages if necessary.

(1) Name and address of the applicant and each party to the application holding an attributable interest (if other than individual also show name, address and citizenship of natural person authorized to vote the stock or holding the attributable interest). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and other entities with attributable interests, and partners.

(2) Citizenship.

(3) Positional Interest: Officer, director, general partner, limited partner, LLC member, investor/creditor attributable under the Commission's **equity/debt plus** standard, etc.

(4) Percentage of votes.

(5) Percentage of total assets (equity plus debt).

(1)	(2)	(3)	(4)	(5)
1. 97.5 Licensee TX, LLC: 2100 Trawood Drive, El Paso, TX 79935; 2. 97.5 Holdings TX Inc.: 2100 Trawood Drive, El Paso, TX 79935; 3. Luz Maria Rygaard: 1034 Sunflower TRL, Austin, TX 78745.	United States	1. Applicant 2. Parent Entity 3. 100% Owner of Parent Entity	1. N/A 2. 100% 3. 0%	100%

- b. Applicant certifies that equity and financial interests not set forth above are non-attributable.

☐ Yes ☐ No

See Explanation
in Exhibit No.

☐ N/A

3. **Other Authorizations.** List call signs, locations, and facility identifiers of all other broadcast stations in which applicant or any party to the application has an attributable interest.

Exhibit No.

☐ N/A

4. **Multiple Ownership.**

- a. Is the applicant or any party to the application the holder of an attributable radio joint sales agreement or an attributable radio or television time brokerage agreement in the same market as the station subject to this application?

☐ Yes ☐ No

If "YES," radio applicants must submit as an Exhibit a copy of each such agreement for radio stations.

Exhibit No.

Section II - Legal

- b. Applicant certifies that the proposed facility complies with the Commission's multiple ownership rules.

☐ Yes ☐ No

Radio applicants only: If "Yes," submit an Exhibit providing information regarding the market, broadcast station(s), and other information necessary to demonstrate compliance with 47 C.F.R. Section 73.3555(a).

See Explanation
in Exhibit No.
2

All Applicants: If "No," submit as an Exhibit a detailed explanation in support of an exemption from, or waiver of, 47 C.F.R. Section 73.3555.

- c. Applicant certifies that the proposed facility:

☐ Yes ☐ No

- (1) does not present an issue under the Commission's policies relating to media interests of immediate family members;
- (2) complies with the Commission's policies relating to future ownership interests; and
- (3) complies with the Commission's restrictions relating to the insulation and non-participation of non-party investors and creditors.

See Explanation
in Exhibit No.

- d. Does the Applicant claim status as an "eligible entity," that is, an entity that qualifies as a small business under the Small Business Administration's size standards for its industry grouping (as set forth in 13 C.F.R. Section 121.201), and holds:

☐ Yes ☐ No

- (1) 30 percent or more of the stock or partnership interests and more than 50 percent of the voting power of the corporation or partnership that will own the media outlet; or
- (2) 15 percent or more of the stock or partnership interests and more than 50 percent of the voting power of the corporation or partnership that will own the media outlet, provided that no other person or entity owns or controls more than 25 percent of the outstanding stock or partnership interests; or
- (3) more than 50 percent of the voting power of the corporation that will own the media outlet (if such corporation is a publicly traded company)?

See Explanation
in Exhibit No.

All applicants: If "Yes," submit as an Exhibit a detailed showing demonstrating proof of status as an eligible entity.

5. **Character Issues.** Applicant certifies that neither applicant nor any party to the application

☐ Yes ☐ No

- a. any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or
- b. any pending broadcast application in which character issues have been raised.

See Explanation
in Exhibit No.

6. **Adverse Findings.** Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another governmental unit; or discrimination.

☐ Yes ☐ No

See Explanation
in Exhibit No.

7. **Alien Ownership and Control.** Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments.

☐ Yes ☐ No

See Explanation
in Exhibit No.

8. **Program Service Certification.** Applicant certifies that it is cognizant of and will comply with its obligations as a Commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area.

☐ Yes ☐ No

9. **Local Public Notice.** Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580.

☐ Yes ☐ No

10. **Auction Authorization.** If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable.

☐ Yes ☐ No ☐ N/A

Exhibit No.

An exhibit is required unless this question is inapplicable.

11. **Anti-Drug Abuse Act Certification.** Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.

☐ Yes ☐ No

12. **Equal Employment Opportunity (EEO).** If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A.

☐ Yes ☐ No ☐ N/A

13. **Petition for Rulemaking/Counterproposal to Add New FM Channel to FM Table of Allotments.** If the application is being submitted concurrently with a Petition for Rulemaking or Counterproposal to Amend the FM Table of Allotments (47 C.F.R. Section 73.202) to add a new FM channel allotment, petitioner/counter-proponent certifies that, if the FM channel allotment requested is allotted, petitioner/counter-proponent will apply to participate in the auction of the channel allotment requested and specified in this application.

☐ Yes ☐ No ☐ N/A

14. **Tribal Priority - Threshold Qualifications.** Is the Applicant applying for an FM allotment set forth in a Public Notice announcing a Tribal Threshold Qualifications window? An Applicant answering "Yes" must provide an Exhibit demonstrating that it would have been qualified to add the allotment for which it is applying using the Tribal Priority.

☐ Yes ☐ No

Exhibit No.

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

Typed or Printed Name of Person Signing	Typed or Printed Title of Person Signing
Signature	Date December 6, 2022

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

Name Thomas S. Gorton P.E.	Relationship to Applicant (e.g., Consulting Engineer) Consulting Engineer	
Signature 	Date December 5, 2022	
Mailing Address 9500 Greenwood Ave N.		
City Seattle	State or Country (if foreign address) WA	ZIP Code 98103-3012
Telephone Number (include area code) 206 783-9151	E-Mail Address (if available) gorton@hatdaw.com	

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

SECTION III - A AM Engineering

TECHNICAL SPECIFICATIONS Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

TECH BOX

1. Frequency: 920 kHz
2. Class: ☐ A ☒ B ☐ C ☐ D
3. Hours of Operation: ☒ Unlimited ☐ Limited ☐ Daytime ☐ Share Time ☐ Specified Hours: _____
4. Daytime Operation: ☒ Yes ☐ No
- a. Power: 1.5 kW
- b. Antenna Location Coordinates: (NAD 27)
- 31 ° 46 ' 30 " ☒ N ☐ S Latitude
- 106 ° 16 ' 46 " ☐ E ☒ W Longitude
- c. Nondirectional: ☒ Yes ☐ No

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Exhibit No.

Theoretical 319.079 mV/m per kW at 1 km

Tower	
Overall height above ground (include obstruction lighting) (meters)	100.9
Antenna structure registration	1229577 Number ☐ Notification filed with FAA ☐ Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)	99.9
Electrical height of radiator (degrees)	110.4
Top-Loaded/Sectionalized apparent height (degrees)	
A	
B	
C	
D	

TECH BOX - DAYTIME OPERATION

d. Directional:

☐ Yes ☒ No

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Exhibit No.

Theoretical _____ mV/m at 1 km

Standard RMS: _____ mV/m at 1 km

Towers	1	2	3	4
Overall height above ground (include obstruction lighting) (meters)				
Antenna structure registration	☐ Number Notification filed with FAA ☐ Not applicable	☐ Number Notification filed with FAA ☐ Not applicable	☐ Number Notification filed with FAA ☐ Not applicable	☐ Number Notification filed with FAA ☐ Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)				
Electrical height of radiator (degrees)				
Field ratio				
Phase (degrees)				
Spacing (degrees)				
Tower orientation (degrees)				
Tower reference switch				
Top-Loaded/Sectionalized apparent height (degrees)				
A				
B				
C				
D				

Augmented:

☐ Yes ☐ No

If "Yes," complete the following:

Augmented RMS: _____ mV/m at 1 km

Azimuth

Span

Augmentation radiation
(mV/m at 1 km)

TECH BOX - NIGHTTIME OPERATION

5. Nighttime Operation:

☒ Yes ☐ No

a. Power: 0.166 kW

b. Antenna Location Coordinates: (NAD 27)

31° 46' 30" ☒ N ☐ S Latitude
106° 16' 46" ☐ E ☒ W Longitude

c. Nondirectional:

☒ Yes ☐ No

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Exhibit No.

Theoretical 319.079 mV/m per kW at 1 km

Tower	
Overall height above ground (include obstruction lighting) (meters)	<u>110.9</u>
Antenna structure registration	<u>1229577</u> Number ☐ Notification filed with FAA ☐ Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)	<u>99.9</u>
Electrical height of radiator (degrees)	<u>110.4</u>
Top-Loaded/Sectionalized apparent height (degrees)	
A	
B	
C	
D	

TECH BOX - NIGHTTIME OPERATION

d. Directional:

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

☐ Yes ☒ No

Exhibit No.

Theoretical _____ mV/m at 1 km

Standard RMS: _____ mV/m at 1 km

Towers	1	2	3	4
Overall height above ground (include obstruction lighting) (meters)				
Antenna structure registration	Number ☐ Notification filed with FAA ☐ Not applicable	Number ☐ Notification filed with FAA ☐ Not applicable	Number ☐ Notification filed with FAA ☐ Not applicable	Number ☐ Notification filed with FAA ☐ Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)				
Electrical height of radiator (degrees)				
Field ratio				
Phase (degrees)				
Spacing (degrees)				
Tower orientation (degrees)				
Tower reference switch				
Top-Loaded/Sectionalized apparent height (degrees)				
A				
B				
C				
D				

Augmented:

☐ Yes ☐ No

If "Yes," complete the following:

Augmented RMS: _____ mV/m at 1 km

Azimuth

Span

Augmentation radiation

TECH BOX - CRITICAL HOURS OPERATION

6. Critical Hours Operation:

☐ Yes ☒ No

a. Power: _____ kW

b. Antenna Location Coordinates: (NAD 27)

_____ ° _____ ' _____ " ☐ N ☐ S Latitude
 _____ ° _____ ' _____ " ☐ E ☐ W Longitude

c. Nondirectional:

☐ Yes ☐ No

If "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Exhibit No.

Theoretical _____ mV/m per kW at 1 km

Tower	
Overall height above ground (include obstruction lighting) (meters)	
Antenna structure registration	_____ Number ☐ Notification filed with FAA ☐ Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)	
Electrical height of radiator (degrees)	
Top-Loaded/Sectionalized apparent height (meters)	
A	
B	
C	
D	

TECH BOX - CRITICAL HOURS OPERATION

d. Directional:

☐ Yes ☐ No

if "Yes," complete the following items. If additional space is needed, please provide the information requested below in an Exhibit.

Exhibit No.

Theoretical mV/m at 1 km

Standard RMS: mV/m at 1 km

Towers	1	2	3	4
Overall height above ground (include obstruction lighting) (meters)				
Antenna structure registration	☐ Notification filed with FAA ☐ Not applicable	☐ Notification filed with FAA ☐ Not applicable	☐ Notification filed with FAA ☐ Not applicable	☐ Notification filed with FAA ☐ Not applicable
Height of radiator above base insulator, or above base, if grounded (meters)				
Electrical height of radiator (degrees)				
Field ratio				
Phase (degrees)				
Spacing (degrees)				
Tower orientation (degrees)				
Tower reference switch				
Top-Loaded/Sectionalized apparent height (degrees)				
A				
B				
C				
D				

Augmented:

☐ Yes ☐ No

If "Yes," complete the following:

Augmented RMS: mV/m at 1 km

Azimuth

Span

Augmentation radiation

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

CERTIFICATION

7. **Broadcast Facility.** The proposed facility complies with the engineering standards and assignment requirements of 47 C.F.R. Sections 73.24(e), 73.24(g), 73.33, 73.45, 73.150, 73.152, 73.160, 73.182(a)-(i), 73.186, 73.189, 73.1650. **Exhibit Required.**
- ☒ Yes ☐ No See Explanation in Exhibit No.
- Exhibit No.
Eng Rpt
8. **Community Coverage.** The proposed facility complies with community coverage requirements of 47 C.F.R. Section 73.24(i).
- ☒ Yes ☐ No See Explanation in Exhibit No.
9. **Main Studio Location.** The proposed main studio location complies with requirements of 47 C.F.R. Section 73.1125.
- ☐ Yes ☐ No See Explanation in Exhibit No.
N/A
10. **Interference.** The proposed facility complies with all of the following applicable rule sections. Check all those that apply. An exhibit is required for each applicable section.
- Groundwave.**
- a. ☒ 47 C.F.R. Section 73.37
- Exhibit No.
- Skywave.**
- b. ☒ 47 C.F.R. Section 73.182.
- Exhibit No.
- Critical Hours.**
- c. ☐ 47 C.F.R. Section 73.187.
- Exhibit No.
DNA
11. **Environmental Protection Act.** The proposed facility is excluded from environmental processing under 47 C.F.R. Section 1.1306 (i.e., the facility will not have a significant environmental impact and complies with the maximum permissible radio frequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an **Exhibit is required.**
- ☒ Yes ☐ No See Explanation in Exhibit No.
- By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radio frequency electromagnetic exposure in excess of FCC guidelines.
12. **Community of License Change - Section 307(b).** If the application is being submitted to change the facility's community of license, then the applicant certifies that it has attached an exhibit containing information demonstrating that the proposed community of license change constitutes a preferential arrangement of assignments under Section 307(b) of the Communications Act of 1934, as amended (47 U.S.C. Section 307(b)).
- ☐ Yes ☐ No ☒ N/A
- Exhibit No.
- An exhibit is required** unless this question is not applicable.
13. **Dispositive Section 307(b) Preference**
- a. Was the AM facility that is the subject of this application awarded on the basis of a dispositive Section 307(b) preference?
- ☐ Yes ☒ No
- b. If yes to 13(a), applicant certifies that: (i) the community of license proposed in the subject application is the same as that on which the Section 307(b) preference was based, or (ii) as shown in the attached Exhibit, the service area proposed in the subject application is substantially equivalent to the service area on which the Section 307(b) preference was based.
- ☐ Yes ☐ No ☐ N/A
- Exhibit No.
- c. If yes to 13(a) and no to 13(b), applicant certifies that, although in the subject application it proposes to: (i) change the community of license, or (ii) modify service to the area on which the Section 307(b) preference was based, it has for a period of four years of on-air operations: (1) served the community of license, or (2) provided full service to the area on which the Section 307(b) preference was based.
- ☐ Yes ☐ No
- Exhibit No.

EXHIBIT 1

OTHER AUTHORIZATIONS

In addition to KQBU-AM, FCC Facility ID No. 67065, El Paso, Texas, 97.5 Licensee TX, LLC holds attributable interests in the following stations:

Fac. ID No.	Call Sign	City	State	Service
36948	KAMA	El Paso	TX	AM
67066	KBNA-FM	Paso	TX	FM

EXHIBIT 2

MULTIPLE OWNERSHIP ANALYSIS

97.5 Licensee TX, LLC (“Licensee”) is the licensee of KQBU-AM, Facility ID No. 67065, El Paso, Texas, KAMA-AM, Facility ID No. 36948, El Paso, Texas, and KBNA-FM, Facility ID No. 67066, El Paso, Texas. Even if the El Paso market had 14 or fewer full-power, commercial and noncommercial radio stations, this modification application would still comply with the FCC’s multiple ownership rules because those rules provide that an entity or entities under common control may have a cognizable interest in not more than 5 commercial radio stations in total and not more than 3 commercial stations in the same service (AM or FM).

Licensee has no additional cognizable interests in a broadcast station other than the three stations noted above. In addition, Licensee has interests in three commercial stations and two are in the same service. Further, Licensee certifies that it does not have a cognizable interest in more than 50% of the full-power, commercial and noncommercial radio stations in the El Paso market.

KQBU (AM) is located in the El Paso, TX rated market. As shown in the attached BIA Market Report, that market contains a total of 44 commercial and noncommercial full-power stations. Under Section 73.3555(a)(1)(ii) of the Commission’s rules, in markets with between 30 and 44 full-power radio stations, a single entity may have cognizable interests in a maximum of seven commercial stations in total and not more than four in the same service.

97.5 Licensee TX, LLC is currently the licensee of two full-power AM stations in the El Paso Market (KQBU and KAMA) and one full-power FM station (KBNA-FM). Neither the applicant nor any parties with attributable interests in the applicant have cognizable interests in any other stations in this market. Accordingly, as licensee of three total stations in the El Paso market, 97.5 Licensee TX, LLC is within the FCC’s multiple ownership limits.

STEPHEN S. LOCKWOOD, PE, PMP

THOMAS M. ECKELS, PE
THOMAS S. GORTON, PE

JAMES B. HATFIELD, PE
BENJAMIN F. DAWSON III, PE
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MAURY L. HATFIELD, PE
(1942-2009)
PAUL W. LEONARD, PE
(1925-2011)

ENGINEERING REPORT

AMENDED

APPLICATION for CONSTRUCTION PERMIT

to RELOCATE ANTENNA

KQBU(AM)
920 kHz
El Paso, Texas

Facility ID 67065

1.5 kW Day 166 Watts Night ND-U

97.5 Licensee TX, LLC

December 2022

Purpose of Application

This Engineering Report has been prepared in support of an application by 97.5 Licensee TX, LLC ("97.5") to relocate the antenna of KQBU(AM), 920 kHz, El Paso, Texas. 97.5 proposes combined operation with co-owned KAMA(AM) on tower #3 of the existing KAMA array. No tower construction is proposed.

This amended application reduces the requested daytime power from 1.7 kW to 1.5 kW to resolve coordination issues with Mexican regulators.

Allocation Considerations

Daytime

The proposed daytime 1.5 kW omni-directional operation of KQBU will not result in prohibited contour overlap with any facility listed in the current version of the CDBS, with the exception of 2nd adjacent channel XENVA2, El Porvenir, CH Mexico. Existing received overlap from XENVA2 is increased slightly by this proposal, as demonstrated by the daytime allocation study maps included in this report. Waiver of §73.37 is respectfully requested, as the operation of XENVA2 has been objected to by the Commission, and there is no overlap of the respective 5 mV/m contours, thus satisfying the standard for domestic stations operating on 2nd adjacent channels. The proposed KQBU 15 mV/m contour does not extend past the 15 mV/m contour of the licensed KQBU operation over Mexican territory.

No third adjacent channel map is included, as there are no such facilities close enough to require study. All daytime allocation study maps and exhibits included in this report are based on data from the December 5, 2022 edition of the CDBS. M3 ground conductivity was used with respect to all domestic stations, Region II conductivity data was used with respect to Mexican stations.

Nighttime

As demonstrated by the Site to Site RSS calculations included in this report, the proposed nighttime operation of KQBU will not enter the 50% RSS of any co-channel Mexican facility, or the 25% RSS of any domestic facility with the exception of KFLB Odessa, TX and KSVA Albuquerque, NM. The RSS contribution from KQBU to both of these facilities is reduced by this proposal. This exhibit considers all facilities listed in the CDBS for which KQBU will exceed the 10% RSS threshold.

Facilities Proposed

97.5 proposes continued operation of KQBU on 920 kHz with a power of 1.5 kW daytime and 166 Watts nighttime, using an omni-directional antenna (ND-U). The proposed tower is the #3 tower of the currently licensed KAMA array, identified by ASR number 1229577. This tower is 110.4° at 920 kHz, resulting in an antenna efficiency of 319.079 mV/m/km at 1 kW.

The daytime 5 mV/m contour will cover 69% of El Paso.

Based on study of 2020 US census data using the block centroid method, the area within the proposed 1V/m blanketing contour of the 1.5 kW operation of KQBU is unpopulated, however observation of satellite imagery of the area surrounding the site calls this conclusion into doubt. The study included in the previous application, at a power of 1.7 kW, resulted in a population of 371, which is 0.995% of the 373,019 persons within the 25 mV/m contour, thus satisfying the requirements of §73.24(g). The 1V/m contour of the proposed KQBU operation will be completely within the 1V/m contour of the existing 10 kW operation of KAMA.

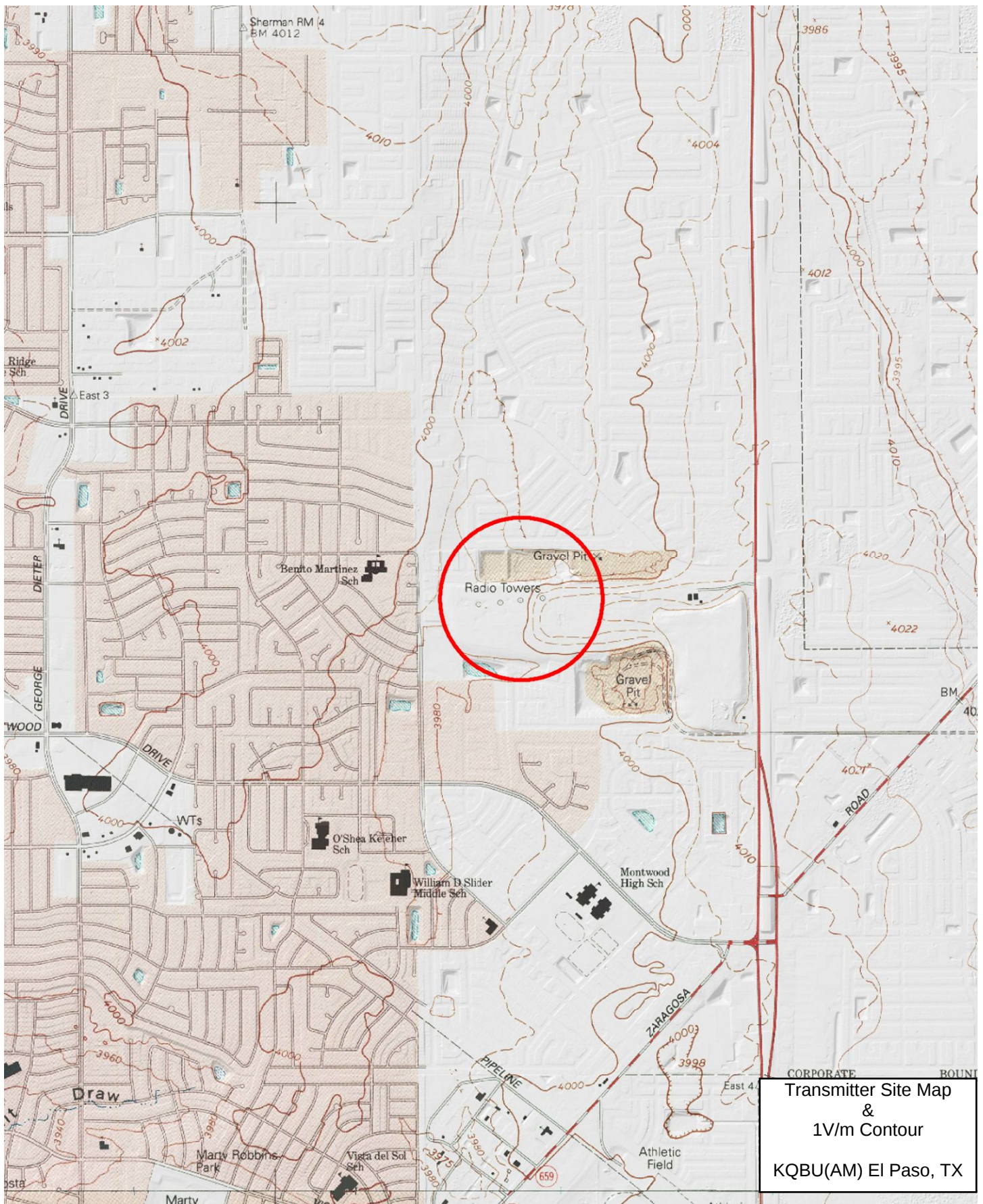
Ground System Consists of 120-100 meters in length copper ground radials equally spaced about each tower, shortened at intersecting strap plus 120-15.24 meters long interspersed radials¹.

¹BL-20010508ACG

Antenna tower access is restricted by a fence with a locked gate that is at least 4 meters from the tower base, as required by OET-65. The antenna tower is posted with warning signs, and all station personnel and contractors will be required to follow appropriate safety procedures before any work is commenced on the antenna tower, including reduction in power or discontinuance of operation before any maintenance work is undertaken.



KQBU Transmitter Site Photograph



Mercator Projection

WGS84

UTM Zone 13R



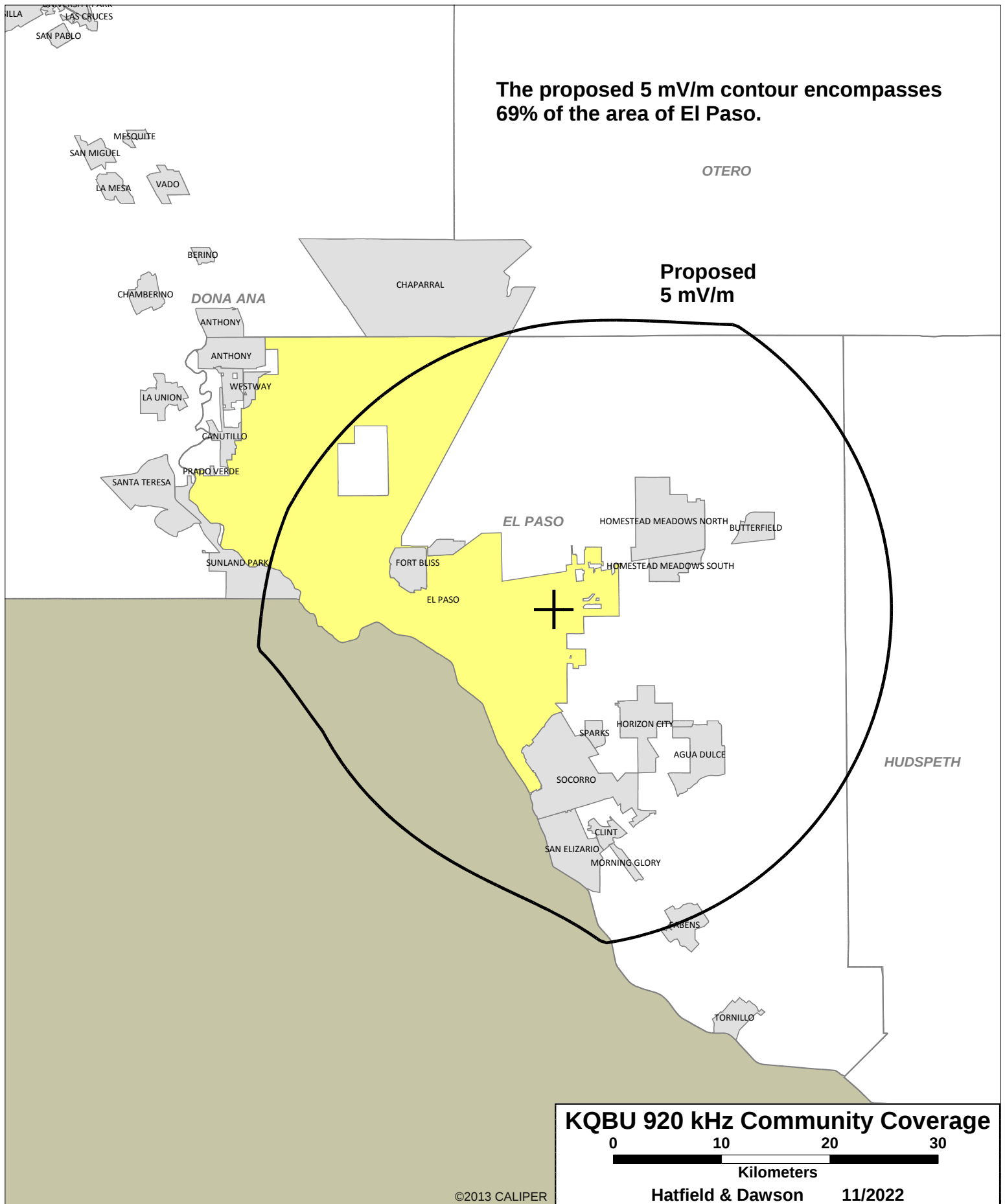
0.5 1.0 1.5 2.0 2.5 km



0.5 1.0 1.5 mi
Scale 1:24000 1 inch = 2000 feet



MN
7.6°



KQBU

Freq: 920 kHz

Class: B

Latitude: 31-46-30 N

Longitude: 106-16-46 W

Power: 1.5 kW

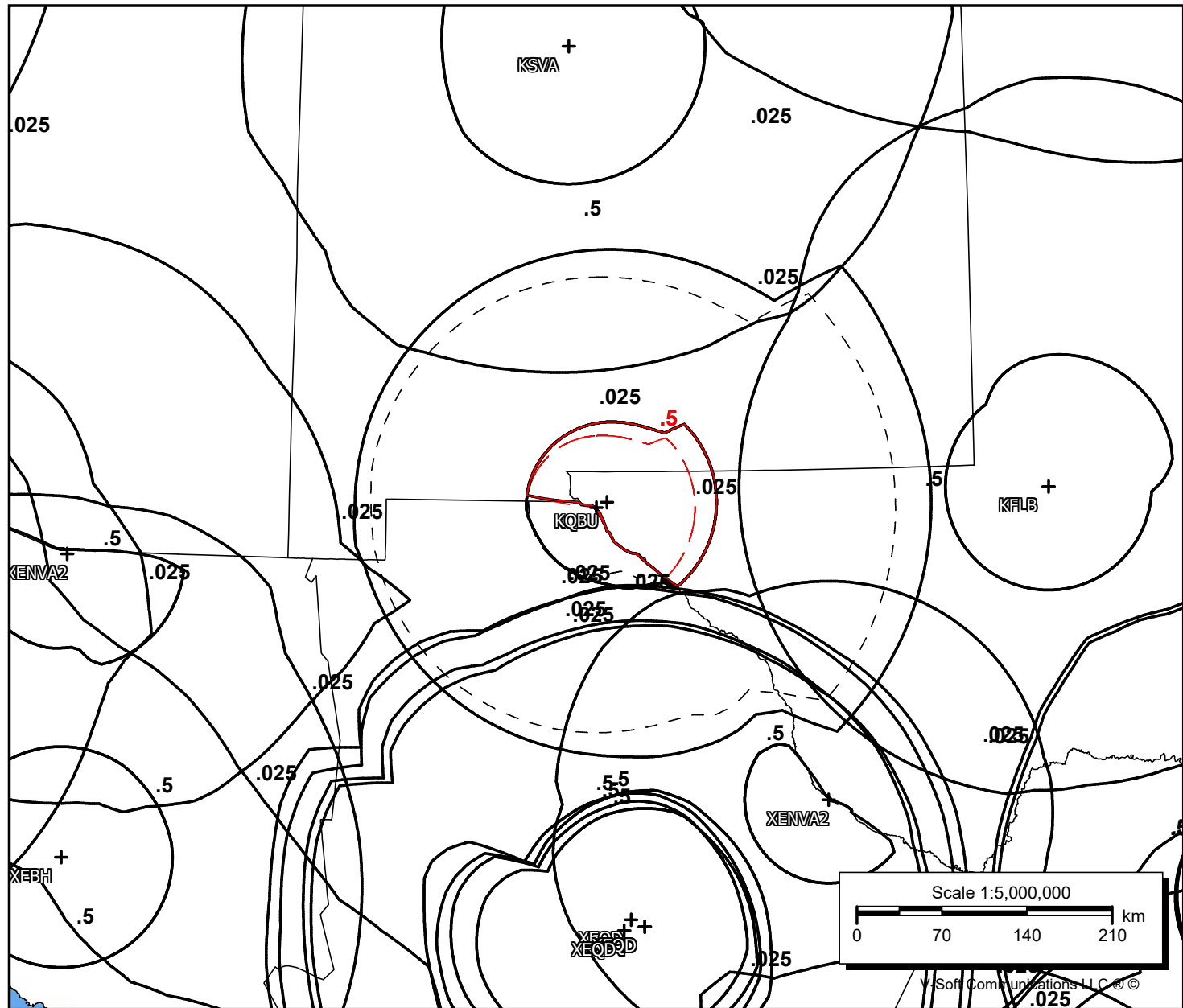
RMS: 319.079 mV/m @1km

Towers: 1

Aucs: 0

Daytime Allocation Study
Co-Channel

Dashed Lines are
Licensed Contours



KQBU

Freq: 920 kHz

Class: B

Latitude: 31-46-30 N

Longitude: 106-16-46 W

Power: 1.5 kW

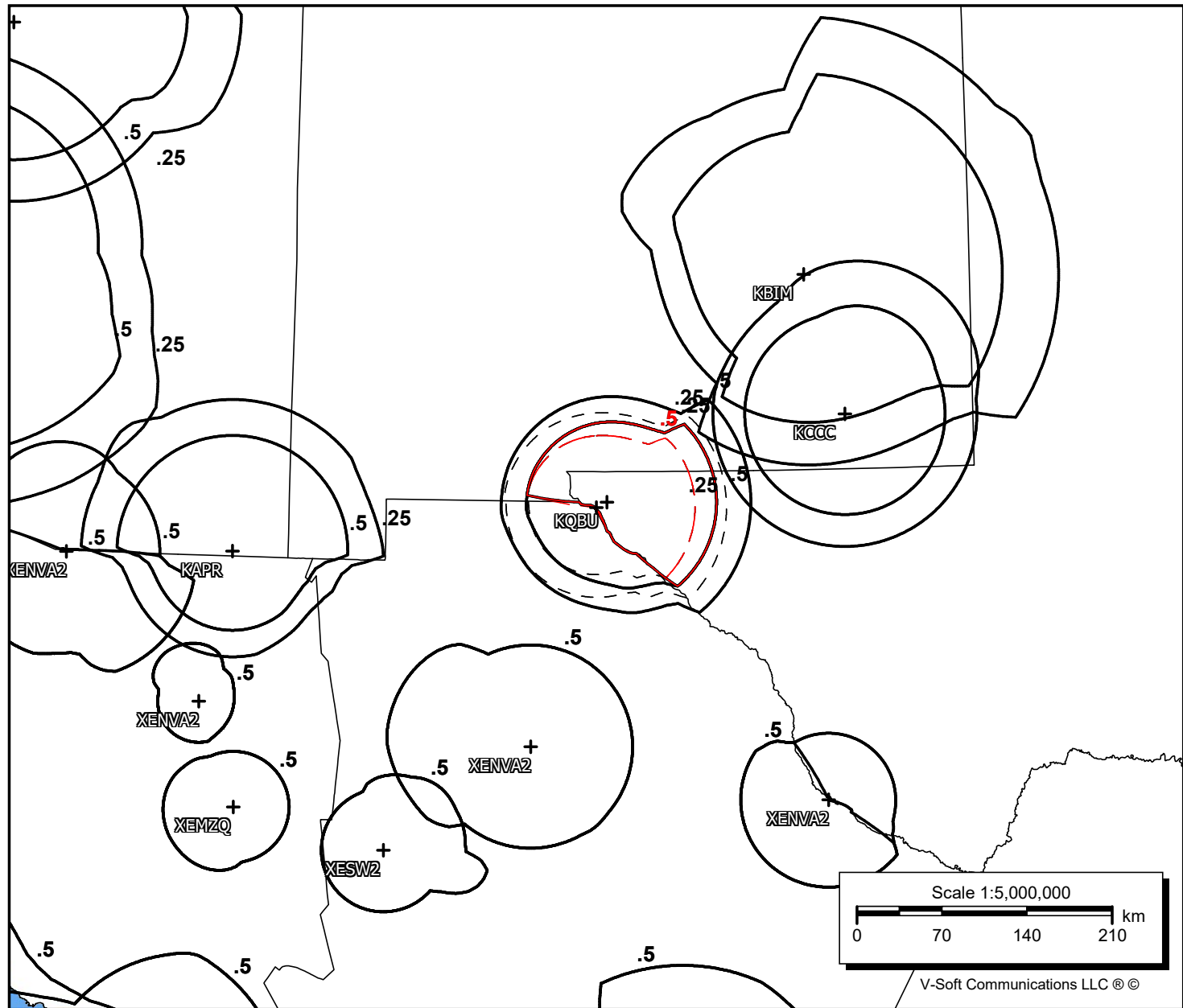
RMS: 319.079 mV/m @1km

Towers: 1

Augs: 0

Daytime Allocation Study
1st-adjacent Channel

Dashed Lines are
Licensed Contours



V-Soft Communications LLC ©

KQBU

Freq: 920 kHz

Class: B

Latitude: 31-46-30 N

Longitude: 106-16-46 W

Power: 1.5 kW

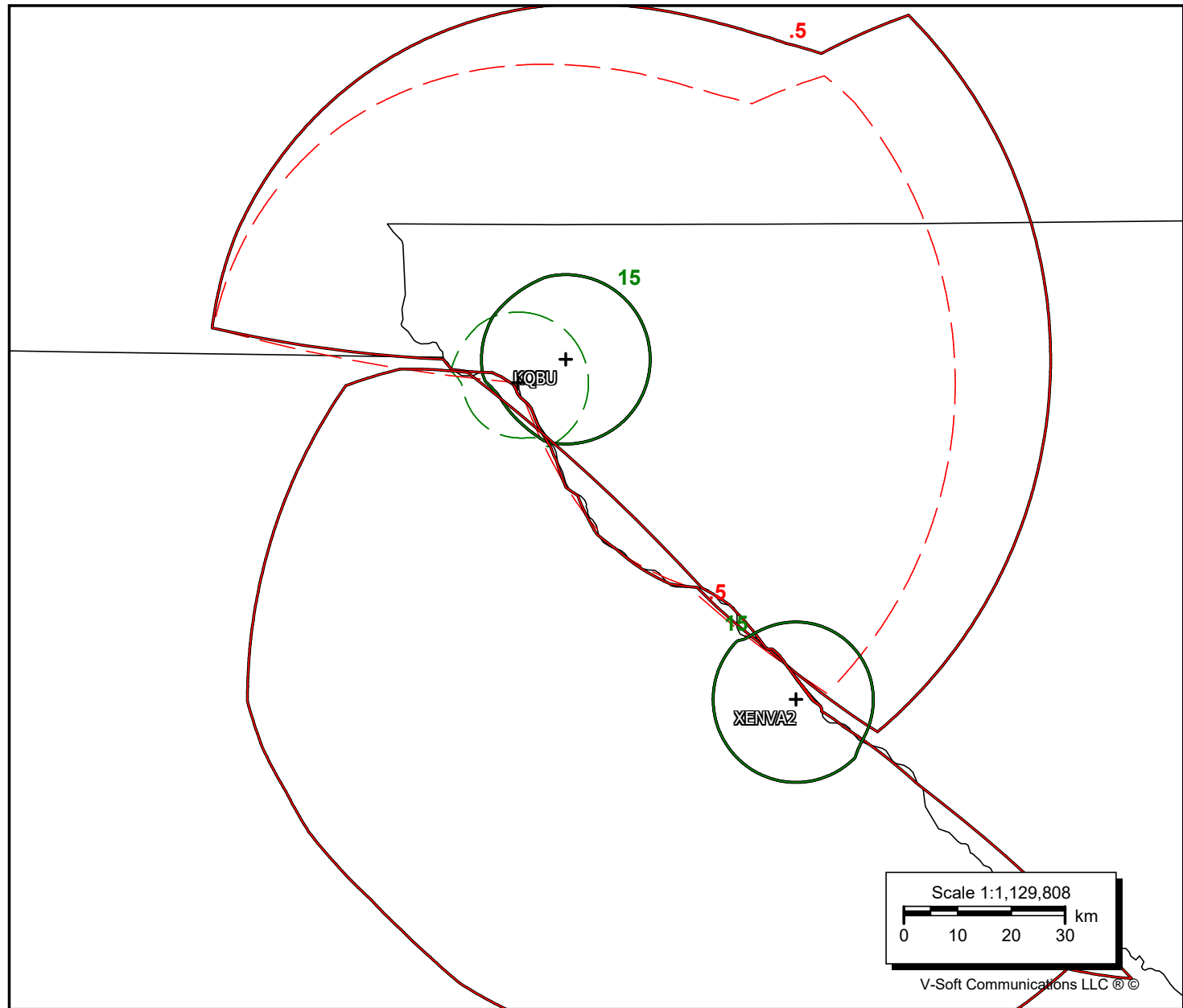
RMS: 319.079 mV/m @1km

Towers: 1

AUs: 0

Daytime Allocation Study
2nd-adjacent Channel

Dashed Lines are
Licensed Contours



KQBU

Freq: 920 kHz

Class: B

Latitude: 31-46-30 N

Longitude: 106-16-46 W

Power: 1.5 kW

RMS: 319.079 mV/m @1km

Towers: 1

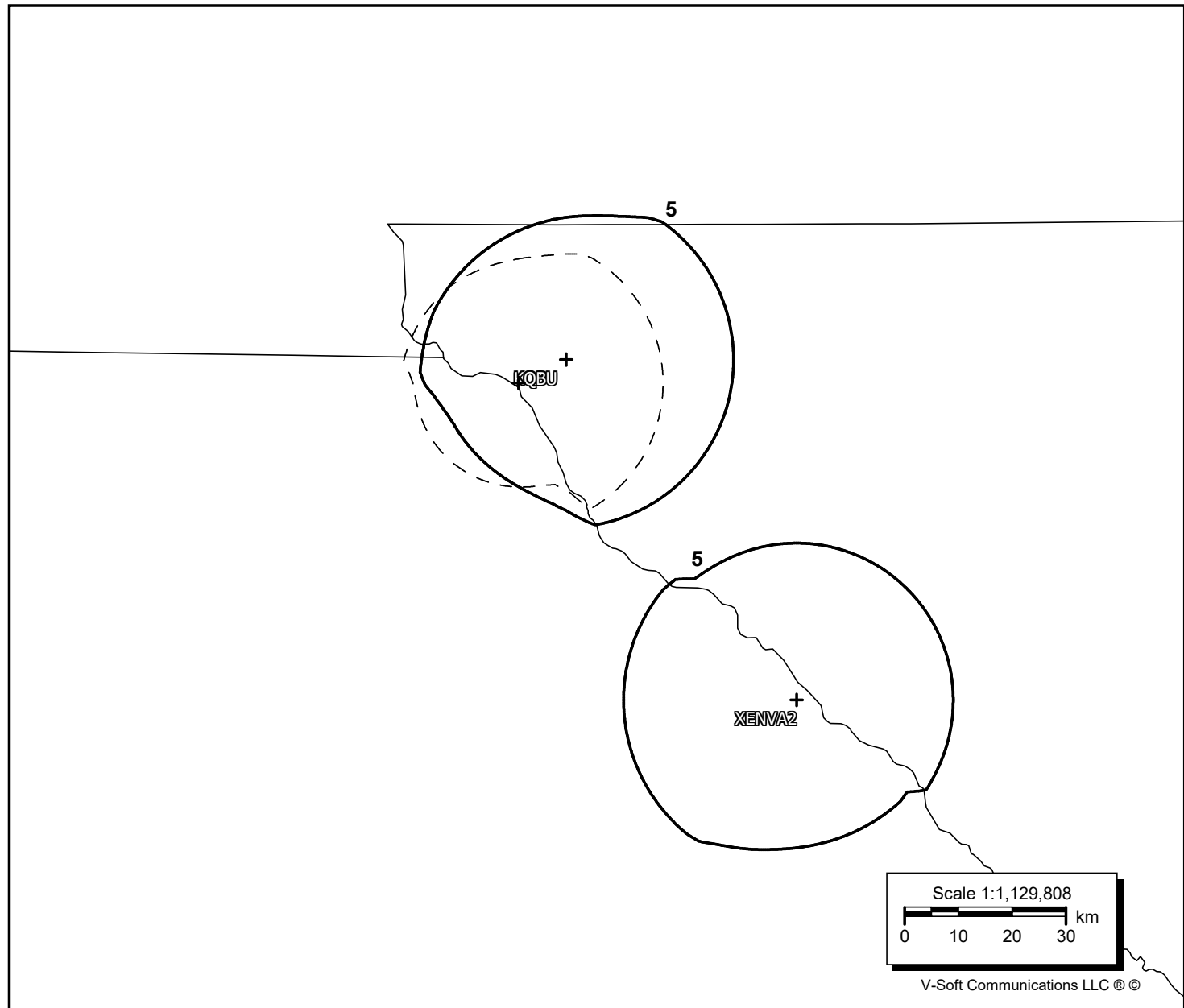
Aucs: 0

Daytime Allocation Study

2nd-adjacent Channel

Domestic Allocation Standard

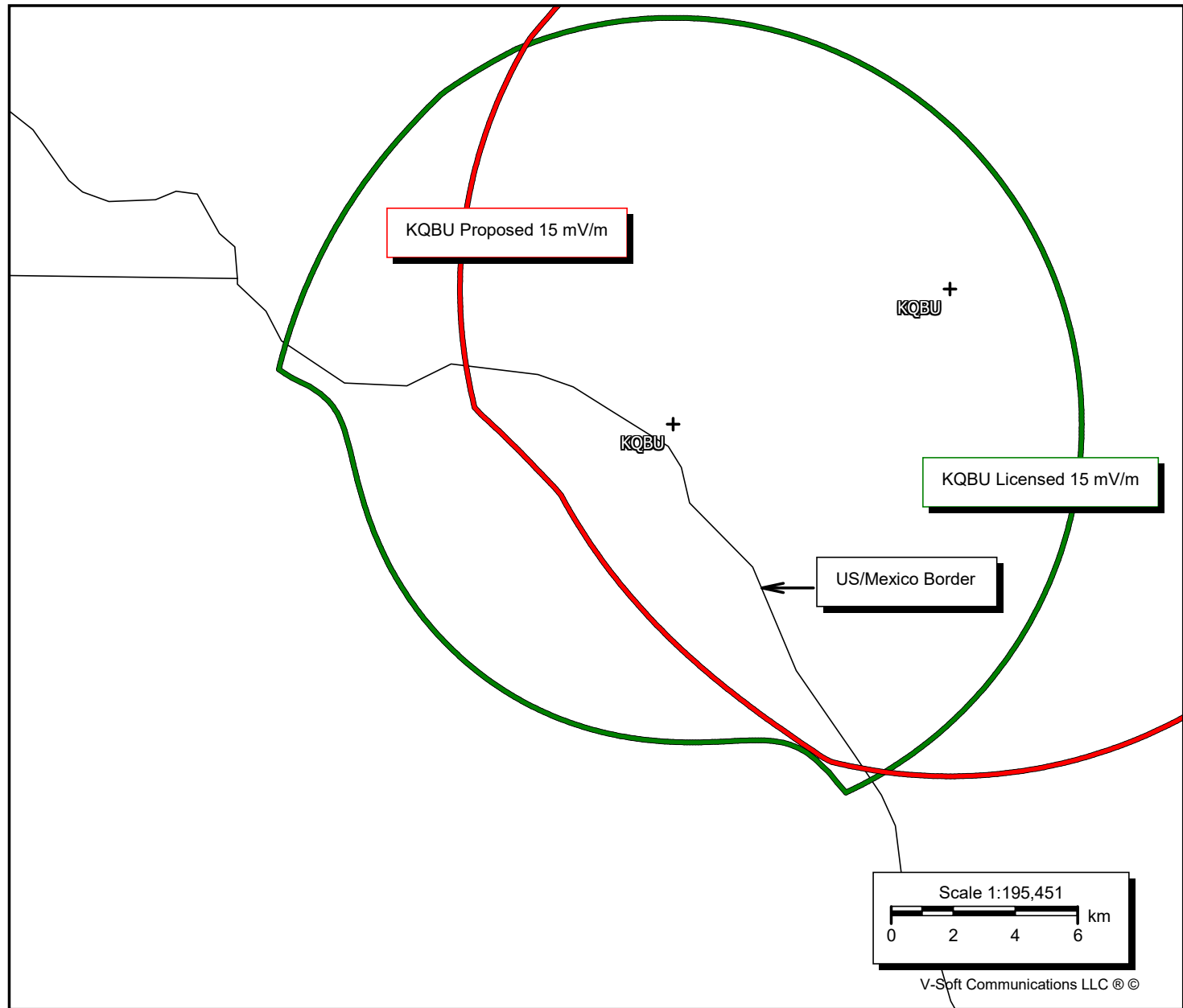
Dashed Lines are
Licensed Contours



KQBU

Freq: 920 kHz
Class: B
Latitude: 31-44-09 N
Longitude: 106-22-24 W
Power: 1 kW
RMS: 302.56 mV/m @1km
Towers: 1
Aucs: 0

15 mV/m
2nd-adjacent
"interfering" contour



Site to Site RSS Calculations

Protected Station: XEBH/A, 920 kHz - HERMOSILLO, SO, MX
 Coordinates: 29-03-11 N, 110-53-10 W
 Standard: Mexican [10%]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
XECQ/A	0920	4.442	100.0
XEQD/A	0920	2.886	64.9
KARN	0920	2.828	53.3
-----	50%	-----	
XEBM/A	0920	2.484	41.3
XESDA/A	0920	2.235	34.3
XEOK/A	0920	2.110	30.7
XETAA/A	0920	2.019	28.0
KVEC	0920	2.000	26.7
KFLB	0920	1.989	25.7
-----	25%	-----	
KKGX	0920	1.949	24.4
XERE/A	0920	1.912	23.2
KRLV	0920	1.835	21.7
KVEL	0920	1.810	20.9
XEMJ/A	0920	1.703	19.3
XEQH1/A	0920	1.448	16.1
*KQBU	0920	1.369	15.0
KXLY	0920	1.357	14.7
XEOP/A	0920	1.326	14.2
XELCM/A	0920	1.278	13.6
XELT1/A	0920	0.983	10.3
XEZAR/A	0920	0.974	10.2

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
XECQ/A	0920	4.442	100.0
XEQD/A	0920	2.886	64.9
KARN	0920	2.828	53.3
-----	50%	-----	
*KQBU-PRO	0920	2.825	47.0
XEBM/A	0920	2.484	37.4
XESDA/A	0920	2.235	31.5
XEOK/A	0920	2.110	28.4
XETAA/A	0920	2.019	26.1
KVEC	0920	2.000	25.0
-----	25%	-----	
KFLB	0920	1.989	24.1
KKGX	0920	1.949	23.0
XERE/A	0920	1.912	22.0
KRLV	0920	1.835	20.6
KVEL	0920	1.810	19.9
XEMJ/A	0920	1.703	18.3
XEQH1/A	0920	1.448	15.3
KXLY	0920	1.357	14.2
XEOP/A	0920	1.326	13.7
XELCM/A	0920	1.278	13.1
XELT1/A	0920	0.983	10.0

Protected Station: KFLB, 920 kHz - ODESSA, TX, US
 Coordinates: 31-49-14 N, 102-25-42 W
 Standard: FCC Rules (1992 Skywave Propagation Model) [10%]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
KARN	0920	9.976	100.0
*KQBU	0920	5.484	54.9
-----	50%	-----	
KYST	0920	5.131	45.0
KLMR	0920	4.765	38.1
KYFR	0920	4.085	30.5
XEMJ/A	0920	4.081	29.1
-----	25%	-----	
XEBH/A	0920	3.619	24.8
XEOK/A	0920	3.058	20.3
XEQD/A	0920	2.932	19.1
XEBM/A	0920	2.750	17.6
WGNU	0920	2.519	15.9
XECQ/A	0920	2.348	14.6
XERE/A	0920	2.191	13.5
XEOP/A	0920	2.102	12.8
XETAA/A	0920	2.008	12.1
XEQH1/A	0920	2.004	12.0
WMOK	0920	1.848	11.0
KRLV	0920	1.824	10.8
YVQX-A	0920	1.760	10.3

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
KARN	0920	9.976	100.0
KYST	0920	5.131	51.4
-----	50%	-----	
KLMR	0920	4.765	42.4
KYFR	0920	4.085	33.5
XEMJ/A	0920	4.081	31.7
*KQBU-PRO	0920	4.060	30.1
XEBH/A	0920	3.619	25.6
-----	25%	-----	
XEOK/A	0920	3.058	21.0
XEQD/A	0920	2.932	19.7
XEBM/A	0920	2.750	18.1
WGNU	0920	2.519	16.3
XECQ/A	0920	2.348	15.0
XERE/A	0920	2.191	13.8
XEOP/A	0920	2.102	13.1
XETAA/A	0920	2.008	12.4
XEQH1/A	0920	2.004	12.3
WMOK	0920	1.848	11.3
KRLV	0920	1.824	11.1
YVQX-A	0920	1.760	10.6

Protected Station: KSVB, 920 kHz - ALBUQUERQUE, NM, US
 Coordinates: 35-07-56 N, 106-37-18 W
 Standard: FCC Rules (1992 Skywave Propagation Model) [10%]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
KFLB	0920	5.920	100.0
*KQBU	0920	5.915	99.9
KARN	0920	5.379	64.2
-----	50%	-----	-----
XEBH/A	0920	4.065	40.8
KRLV	0920	3.775	35.1
KLMR	0920	3.275	28.7
KKGX	0920	3.231	27.2
-----	25%	-----	-----
KVEL	0920	3.046	24.7
KYST	0920	3.001	23.7
KXLY	0920	2.552	19.6
WGNU	0920	1.915	14.4
XEQD/A	0920	1.870	13.9
KIHM	0920	1.730	12.7
XECQ/A	0920	1.640	12.0
WMOK	0920	1.598	11.6
XEBM/A	0920	1.528	11.0
XEMJ/A	0920	1.450	10.4
XEOK/A	0920	1.428	10.2
KYFR	0920	1.420	10.1

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
KFLB	0920	5.920	100.0
KARN	0920	5.379	90.8
XEBH/A	0920	4.065	50.8
-----	50%	-----	-----
*KQBU-PRO	0920	3.976	44.3
KRLV	0920	3.775	38.4
KLMR	0920	3.275	31.1
KKGX	0920	3.231	29.3
KVEL	0920	3.046	26.5
KYST	0920	3.001	25.2
-----	25%	-----	-----
KXLY	0920	2.552	20.8
WGNU	0920	1.915	15.3
XEQD/A	0920	1.870	14.7
KIHM	0920	1.730	13.5
XECQ/A	0920	1.640	12.6
WMOK	0920	1.598	12.2
XEBM/A	0920	1.528	11.6
XEMJ/A	0920	1.450	10.9
XEOK/A	0920	1.428	10.7
KYFR	0920	1.420	10.6

Protected Station: XEQD/A, 920 kHz - CHIHUAHUA, CH, MX
 Coordinates: 28-40-56 N, 106-04-46 W
 Standard: Mexican [10%]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)

XEBH/A	0920	7.209	100.0
KARN	0920	6.277	87.0
KFLB	0920	5.454	57.0
-----	50%	-----	
XECQ/A	0920	4.960	45.0
XEBM/A	0920	4.486	37.1
XEOK/A	0920	3.657	28.3
XERE/A	0920	3.435	25.6
-----	25%	-----	
XETAA/A	0920	3.039	21.9
XEMJ/A	0920	2.995	21.1
XEQH1/A	0920	2.826	19.5
XEOP/A	0920	2.288	15.5
*KQBU	0920	2.092	14.0
XELCM/A	0920	2.077	13.7
KYST	0920	2.064	13.5
XEZAR/A	0920	1.987	12.9
KYFR	0920	1.892	12.2
XE/A	0920	1.874	12.0
KRLV	0920	1.643	10.4

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)

XEBH/A	0920	7.209	100.0
KARN	0920	6.277	87.0
KFLB	0920	5.454	57.0
-----	50%	-----	
XECQ/A	0920	4.960	45.0
XEBM/A	0920	4.486	37.1
XEOK/A	0920	3.657	28.3
XERE/A	0920	3.435	25.6
-----	25%	-----	
*KQBU-PRO	0920	3.298	23.8
XETAA/A	0920	3.039	21.3
XEMJ/A	0920	2.995	20.6
XEQH1/A	0920	2.826	19.0
XEOP/A	0920	2.288	15.1
XELCM/A	0920	2.077	13.5
KYST	0920	2.064	13.3
XEZAR/A	0920	1.987	12.7
KYFR	0920	1.892	12.0
XE/A	0920	1.874	11.8
KRLV	0920	1.643	10.3

Protected Station: XEQD/A, 920 kHz - CHIHUAHUA, CH, MX
 Coordinates: 28-36-07 N, 106-08-19 W
 Standard: Mexican [10%]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)

XEBH/A	0920	7.238	100.0
KARN	0920	6.169	85.2
KFLB	0920	5.444	57.2
-----	50%	-----	
XECQ/A	0920	5.014	45.7
XEBM/A	0920	4.510	37.4
XEOK/A	0920	3.653	28.3
XERE/A	0920	3.458	25.8
-----	25%	-----	
XETAA/A	0920	3.049	22.0
XEMJ/A	0920	2.978	21.0
XEQH1/A	0920	2.843	19.6
XEOP/A	0920	2.284	15.5
XELCM/A	0920	2.100	14.0
KYST	0920	2.027	13.4
XEZAR/A	0920	1.999	13.1
*KQBU	0920	1.978	12.9
XE/A	0920	1.879	12.1
KYFR	0920	1.852	11.8
KRLV	0920	1.615	10.2

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)

XEBH/A	0920	7.238	100.0
KARN	0920	6.169	85.2
KFLB	0920	5.444	57.2
-----	50%	-----	
XECQ/A	0920	5.014	45.7
XEBM/A	0920	4.510	37.4
XEOK/A	0920	3.653	28.3
XERE/A	0920	3.458	25.8
-----	25%	-----	
*KQBU-PRO	0920	3.272	23.6
XETAA/A	0920	3.049	21.4
XEMJ/A	0920	2.978	20.5
XEQH1/A	0920	2.843	19.1
XEOP/A	0920	2.284	15.1
XELCM/A	0920	2.100	13.7
KYST	0920	2.027	13.1
XEZAR/A	0920	1.999	12.8
XE/A	0920	1.879	11.9
KYFR	0920	1.852	11.7
KRLV	0920	1.615	10.1

Protected Station: XEQD/A, 920 kHz - CHIHUAHUA, CH, MX
 Coordinates: 28-37-49 N, 105-57-58 W
 Standard: Mexican [10%]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
XEBH/A	0920	7.138	100.0
KARN	0920	6.364	89.1
KFLB	0920	5.593	58.4
-----	50%	-----	-----
XECQ/A	0920	4.968	44.8
XEBM/A	0920	4.561	37.5
XEOK/A	0920	3.682	28.3
XERE/A	0920	3.489	25.8
-----	25%	-----	-----
XETAA/A	0920	3.074	22.0
XEMJ/A	0920	3.023	21.1
XEQH1/A	0920	2.885	19.7
*KQBU	0920	2.339	15.7
XEOP/A	0920	2.316	15.3
XELCM/A	0920	2.109	13.8
KYST	0920	2.084	13.5
XEZAR/A	0920	2.029	13.0
KYFR	0920	1.934	12.3
XE/A	0920	1.913	12.1
KRLV	0920	1.619	10.1

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
XEBH/A	0920	7.138	100.0
KARN	0920	6.364	89.1
KFLB	0920	5.593	58.4
-----	50%	-----	-----
XECQ/A	0920	4.968	44.8
XEBM/A	0920	4.561	37.5
XEOK/A	0920	3.682	28.3
XERE/A	0920	3.489	25.8
-----	25%	-----	-----
*KQBU-PRO	0920	3.279	23.5
XETAA/A	0920	3.074	21.4
XEMJ/A	0920	3.023	20.6
XEQH1/A	0920	2.885	19.3
XEOP/A	0920	2.316	15.2
XELCM/A	0920	2.109	13.7
KYST	0920	2.084	13.4
XEZAR/A	0920	2.029	12.9
KYFR	0920	1.934	12.2
XE/A	0920	1.913	12.0
KRLV	0920	1.619	10.0

Protected Station: KVEL, 920 kHz - VERNAL, UT, US
 Coordinates: 40-29-30 N, 109-31-45 W
 Standard: FCC Rules (1992 Skywave Propagation Model) [10%]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
KXLY	0920	5.631	100.0
KRLV	0920	4.421	78.5
-----	50%	-----	-----
KIHM	0920	3.151	44.0
KKGX	0920	2.433	31.1
KARN	0920	2.414	29.4
-----	25%	-----	-----
KFLB	0920	2.085	24.4
XEBH/A	0920	1.910	21.7
*KQBU	0920	1.879	20.8
KYST	0920	1.731	18.8
KSEI	0930	1.658	17.7
KVEC	0920	1.463	15.4
KYFR	0920	1.288	13.4

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
KXLY	0920	5.631	100.0
KRLV	0920	4.421	78.5
-----	50%	-----	-----
KIHM	0920	3.151	44.0
KKGX	0920	2.433	31.1
KARN	0920	2.414	29.4
-----	25%	-----	-----
KFLB	0920	2.085	24.4
XEBH/A	0920	1.910	21.7
KYST	0920	1.731	19.2
KSEI	0930	1.658	18.0
KVEC	0920	1.463	15.7
KYFR	0920	1.288	13.6
*KQBU-PRO	0920	1.133	11.9

Protected Station: KLMR, 920 kHz - LAMAR, CO, US
 Coordinates: 38-06-53 N, 102-37-16 W
 Standard: FCC Rules (1992 Skywave Propagation Model) [10%]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
KARN	0920	6.221	100.0
KFLB	0920	4.039	64.9
-----	50%	-----	
KVEL	0920	3.411	45.9
KYST	0920	3.362	41.1
*KQBU	0920	3.252	36.8
KYFR	0920	3.176	33.7
WGNU	0920	2.643	26.6
-----	25%	-----	
KXLY	0920	2.466	23.9
XEBH/A	0920	1.963	18.5
KKGX	0920	1.874	17.4
WMOK	0920	1.846	16.9
KIHM	0920	1.332	12.0
KOGA	0930	1.317	11.8
YVQX-A	0920	1.317	11.7
XEMJ/A	0920	1.140	10.0
XEBM/A	0920	1.136	10.0

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
KARN	0920	6.221	100.0
KFLB	0920	4.039	64.9
-----	50%	-----	
KVEL	0920	3.411	45.9
KYST	0920	3.362	41.1
KYFR	0920	3.176	35.9
WGNU	0920	2.643	28.1
KXLY	0920	2.466	25.2
-----	25%	-----	
XEBH/A	0920	1.963	19.5
KKGX	0920	1.874	18.2
WMOK	0920	1.846	17.7
*KQBU-PRO	0920	1.685	15.9
KIHM	0920	1.332	12.4
KOGA	0930	1.317	12.2
YVQX-A	0920	1.317	12.1
XEMJ/A	0920	1.140	10.4
XEBM/A	0920	1.136	10.3
KPOF	0910	1.121	10.1

Protected Station: KYFR, 920 kHz - SHENANDOAH, IA, US
 Coordinates: 40-37-22 N, 095-14-42 W
 Standard: FCC Rules (1992 Skywave Propagation Model) [10%]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
WGKA	0920	1.802	100.0
KARN	0920	1.558	86.4
YVQX-A	0920	1.489	62.5
KXLY	0920	1.451	51.6
----- 50% -----			
CKNX/	0920	1.295	40.9
*KQBU	0920	1.283	37.5
KFLB	0920	1.205	33.0
KDHL	0920	1.171	30.4
WOKY	0920	1.162	28.9
ZP 1-A	0920	1.122	26.8
----- 25% -----			
WMOK	0920	1.069	24.6
KYST	0920	1.061	23.7
920CFLS/	0920	1.011	22.0
WKVA	0920	0.926	19.7
KLMR	0920	0.919	19.2
XEBH/A	0920	0.916	18.7
WSUI	0910	0.857	17.2
KKGX	0920	0.839	16.6
920CBO/	0920	0.832	16.3
WBAA	0920	0.828	16.0
WTAD	0930	0.813	15.5
KWOC	0930	0.812	15.3
KWAD	0920	0.807	15.0
XEBM/A	0920	0.801	14.7
HCCM1-A	0920	0.768	14.0
XEOK/A	0920	0.756	13.6
WYBY	0920	0.715	12.8
XERE/A	0920	0.701	12.4
XEMJ/A	0920	0.699	12.3
XEQH1/A	0920	0.676	11.8
KVEL	0920	0.673	11.6
KIHM	0920	0.629	10.8
XE/A	0920	0.606	10.3
WGNU	0920	0.606	10.3
920CKCY/	0920	0.604	10.2
XEZAR/A	0920	0.598	10.0

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
WGKA	0920	1.802	100.0
KARN	0920	1.558	86.4
YVQX-A	0920	1.489	62.5
KXLY	0920	1.451	51.6
----- 50% -----			
CKNX/	0920	1.295	40.9
KFLB	0920	1.205	35.2
KDHL	0920	1.171	32.3
WOKY	0920	1.162	30.5
ZP 1-A	0920	1.122	28.1
WMOK	0920	1.069	25.8
----- 25% -----			
KYST	0920	1.061	24.8
920CFLS/	0920	1.011	22.9
WKVA	0920	0.926	20.5
KLMR	0920	0.919	19.9
XEBH/A	0920	0.916	19.4
WSUI	0910	0.857	17.8
KKGX	0920	0.839	17.2
920CBO/	0920	0.832	16.8
WBAA	0920	0.828	16.5
WTAD	0930	0.813	16.0
KWOC	0930	0.812	15.8
KWAD	0920	0.807	15.5
XEBM/A	0920	0.801	15.2
HCCM1-A	0920	0.768	14.4
XEOK/A	0920	0.756	14.0
WYBY	0920	0.715	13.1
XERE/A	0920	0.701	12.7
XEMJ/A	0920	0.699	12.6
XEQH1/A	0920	0.676	12.1
KVEL	0920	0.673	11.9
*KQBU-PRO	0920	0.654	11.5
KIHM	0920	0.629	11.0
XE/A	0920	0.606	10.5
WGNU	0920	0.606	10.5
920CKCY/	0920	0.604	10.4
XEZAR/A	0920	0.598	10.2
WKBM	0930	0.585	10.0

Protected Station: XECQ/A, 920 kHz - CULIACAN, SI, MX
 Coordinates: 24-49-20 N, 107-28-36 W
 Standard: Mexican [10%]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
XEBH/A	0920	6.568	100.0
XEBM/A	0920	5.523	84.0
XERE/A	0920	4.822	56.1
-----	50%	-----	-----
KFLB	0920	3.992	40.5
XEQH1/A	0920	3.703	34.8
XELCM/A	0920	3.487	30.9
XEOK/A	0920	3.454	29.3
KARN	0920	3.181	25.9
-----	25%	-----	-----
XETAA/A	0920	3.095	24.4
XEQD/A	0920	2.932	22.4
XEZAR/A	0920	2.738	20.4
XE/A	0920	2.257	16.5
XEMJ/A	0920	2.251	16.2
XELT1/A	0920	2.231	15.9
XEOP/A	0920	1.990	14.0
XE/A	0920	1.676	11.6

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
XEBH/A	0920	6.568	100.0
XEBM/A	0920	5.523	84.0
XERE/A	0920	4.822	56.1
-----	50%	-----	-----
KFLB	0920	3.992	40.5
XEQH1/A	0920	3.703	34.8
XELCM/A	0920	3.487	30.9
XEOK/A	0920	3.454	29.3
KARN	0920	3.181	25.9
-----	25%	-----	-----
XETAA/A	0920	3.095	24.4
XEQD/A	0920	2.932	22.4
XEZAR/A	0920	2.738	20.4
XE/A	0920	2.257	16.5
XEMJ/A	0920	2.251	16.2
XELT1/A	0920	2.231	15.9
*KQBU-PRO	0920	2.205	15.5
XEOP/A	0920	1.990	13.8
XE/A	0920	1.676	11.5

Protected Station: KRLV, 920 kHz - LAS VEGAS, NV, US
 Coordinates: 36-11-25 N, 115-10-35 W
 Standard: FCC Rules (1992 Skywave Propagation Model) [10%]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
KVEC	0920	4.674	100.0
KKGX	0920	4.300	91.9
KXLY	0920	4.123	64.9
KIHM	0920	3.988	52.6
-----	50%	-----	-----
XEBH/A	0920	3.419	39.9
KVEL	0920	3.296	35.7
*KQBU	0920	2.883	29.4
XESDA/A	0920	2.565	25.1
-----	25%	-----	-----
KARN	0920	2.192	20.8
KVIN	0920	2.174	20.2
KFLB	0920	1.712	15.6
KLMR	0920	1.589	14.3
KYST	0920	1.166	10.3

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
KVEC	0920	4.674	100.0
KKGX	0920	4.300	91.9
KXLY	0920	4.123	64.9
KIHM	0920	3.988	52.6
-----	50%	-----	-----
XEBH/A	0920	3.419	39.9
KVEL	0920	3.296	35.7
XESDA/A	0920	2.565	26.2
-----	25%	-----	-----
KARN	0920	2.192	21.6
KVIN	0920	2.174	20.9
KFLB	0920	1.712	16.1
KLMR	0920	1.589	14.8
*KQBU-PRO	0920	1.277	11.7
KYST	0920	1.166	10.6
XECQ/A	0920	1.122	10.2

Protected Station: XETAA/A, 920 kHz - TORREON, CI, MX
 Coordinates: 25-34-55 N, 103-28-39 W
 Standard: Mexican [10%]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)

XEBM/A	0920	7.145	100.0
KARN	0920	6.367	89.1
XERE/A	0920	6.118	63.9
-----	50%	-----	
XEQH1/A	0920	5.280	46.4
XECQ/A	0920	5.164	41.2
XEBH/A	0920	4.994	36.8
KFLB	0920	4.954	34.3
XEZAR/A	0920	4.032	26.4
-----	25%	-----	
*KQBU	0920	3.933	24.9
XELCM/A	0920	3.929	24.1
XEOK/A	0920	3.582	21.4
XE/A	0920	3.578	20.9
XEMJ/A	0920	3.214	18.3
XEOP/A	0920	2.974	16.7
XEQD/A	0920	2.964	16.4
KYST	0920	2.733	14.9
XE/A	0920	2.722	14.7
XELT1/A	0920	2.387	12.7
KYFR	0920	2.187	11.6

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)

XEBM/A	0920	7.145	100.0
KARN	0920	6.367	89.1
XERE/A	0920	6.118	63.9
-----	50%	-----	
XEQH1/A	0920	5.280	46.4
XECQ/A	0920	5.164	41.2
XEBH/A	0920	4.994	36.8
KFLB	0920	4.954	34.3
XEZAR/A	0920	4.032	26.4
-----	25%	-----	
XELCM/A	0920	3.929	24.8
XEOK/A	0920	3.582	22.0
XE/A	0920	3.578	21.4
XEMJ/A	0920	3.214	18.8
XEOP/A	0920	2.974	17.1
XEQD/A	0920	2.964	16.8
KYST	0920	2.733	15.3
XE/A	0920	2.722	15.0
XELT1/A	0920	2.387	13.0
*KQBU-PRO	0920	2.321	12.6
KYFR	0920	2.187	11.7

Protected Station: XEOP1/A, 920 kHz - VILLA FRONTERA, CI, MX
 Coordinates: 26-55-29 N, 101-27-02 W
 Standard: Mexican [10%]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
KARN	0920	10.067	100.0
XEBM/A	0920	6.705	66.5
-----	50%	-----	
XERE/A	0920	5.505	45.5
KFLB	0920	5.168	38.8
*KQBU	0920	5.160	36.1
XEQH1/A	0920	5.038	33.2
XECQ/A	0920	4.182	26.1
XEBH/A	0920	4.150	25.1
-----	25%	-----	
XEMJ/A	0920	3.946	23.1
XEZAR/A	0920	3.855	22.0
KYST	0920	3.761	21.0
XE/A	0920	3.692	20.1
KYFR	0920	3.649	19.5
XETAA/A	0920	3.608	18.9
XELCM/A	0920	3.163	16.3
KLMR	0920	2.865	14.6
XEQD/A	0920	2.824	14.2
XE/A	0920	2.749	13.7
XEOK/A	0920	2.062	10.2

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
KARN	0920	10.067	100.0
XEBM/A	0920	6.705	66.5
-----	50%	-----	
XERE/A	0920	5.505	45.5
KFLB	0920	5.168	38.8
XEQH1/A	0920	5.038	35.3
XECQ/A	0920	4.182	27.6
XEBH/A	0920	4.150	26.4
-----	25%	-----	
XEMJ/A	0920	3.946	24.3
XEZAR/A	0920	3.855	23.0
KYST	0920	3.761	21.9
XE/A	0920	3.692	21.0
KYFR	0920	3.649	20.3
XETAA/A	0920	3.608	19.7
XELCM/A	0920	3.163	16.9
KLMR	0920	2.865	15.1
XEQD/A	0920	2.824	14.7
XE/A	0920	2.749	14.2
*KQBU-PRO	0920	2.402	12.2
XEOK/A	0920	2.062	10.4
XELT1/A	0920	2.001	10.1

Protected Station: XEOP/A, 920 kHz - VILLA FRONTERA, CI, MX
 Coordinates: 26-55-30 N, 101-26-50 W
 Standard: Mexican [10%]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
KARN	0920	10.071	100.0
XEBM/A	0920	6.705	66.5
-----	50%	-----	
XERE/A	0920	5.505	45.5
KFLB	0920	5.164	38.8
*KQBU	0920	5.159	36.1
XEQH1/A	0920	5.039	33.2
XECQ/A	0920	4.180	26.1
XEBH/A	0920	4.148	25.1
-----	25%	-----	
XEMJ/A	0920	3.940	23.1
XEZAR/A	0920	3.856	22.0
KYST	0920	3.763	21.0
XE/A	0920	3.693	20.1
KYFR	0920	3.651	19.5
XETAA/A	0920	3.611	18.9
XELCM/A	0920	3.162	16.3
KLMR	0920	2.866	14.6
XEQD/A	0920	2.823	14.2
XE/A	0920	2.750	13.7
XEOK/A	0920	2.047	10.1

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
KARN	0920	10.071	100.0
XEBM/A	0920	6.705	66.5
-----	50%	-----	
XERE/A	0920	5.505	45.5
KFLB	0920	5.164	38.8
XEQH1/A	0920	5.039	35.3
XECQ/A	0920	4.180	27.6
XEBH/A	0920	4.148	26.4
-----	25%	-----	
XEMJ/A	0920	3.940	24.2
XEZAR/A	0920	3.856	23.0
KYST	0920	3.763	21.9
XE/A	0920	3.693	21.0
KYFR	0920	3.651	20.3
XETAA/A	0920	3.611	19.7
XELCM/A	0920	3.162	16.9
KLMR	0920	2.866	15.1
XEQD/A	0920	2.823	14.7
XE/A	0920	2.750	14.2
*KQBU-PRO	0920	2.401	12.2
XEOK/A	0920	2.047	10.3
XELT1/A	0920	2.001	10.1

Protected Station: XEMJ/A, 920 kHz - PIEDRAS NEGRAS, CI, MX
 Coordinates: 28-42-46 N, 100-32-49 W
 Standard: Mexican [10%]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
KARN	0920	13.993	100.0
-----	50%	-----	
KYFR	0920	5.693	40.6
KFLB	0920	5.547	36.7
XEBM/A	0920	5.516	34.2
*KQBU	0920	5.475	32.1
-----	25%	-----	
KYST	0920	4.364	24.4
KLMR	0920	4.302	23.3
XERE/A	0920	4.234	22.4
XEQH1/A	0920	4.005	20.6
XEBH/A	0920	3.839	19.4
XEOK/A	0920	3.659	18.1
XECQ/A	0920	3.431	16.7
XEOP/A	0920	3.131	15.0
XE/A	0920	3.068	14.6
XEZAR/A	0920	3.002	14.1
XETAA/A	0920	2.968	13.8
XEQD/A	0920	2.727	12.6
XELCM/A	0920	2.250	10.3

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
KARN	0920	13.993	100.0
-----	50%	-----	
KYFR	0920	5.693	40.6
KFLB	0920	5.547	36.7
XEBM/A	0920	5.516	34.2
KYST	0920	4.364	25.6
-----	25%	-----	
KLMR	0920	4.302	24.4
XERE/A	0920	4.234	23.4
XEQH1/A	0920	4.005	21.5
XEBH/A	0920	3.839	20.2
XEOK/A	0920	3.659	18.8
XECQ/A	0920	3.431	17.3
XEOP/A	0920	3.131	15.6
XE/A	0920	3.068	15.1
XEZAR/A	0920	3.002	14.6
XETAA/A	0920	2.968	14.3
XEQD/A	0920	2.727	13.0
*KQBU-PRO	0920	2.576	12.2
XELCM/A	0920	2.250	10.5
XE/A	0920	2.160	10.1

Protected Station: XEMJ/A, 920 kHz - PIEDRAS NEGRAS, CI, MX
 Coordinates: 28-41-24 N, 100-31-18 W
 Standard: Mexican [10%]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
KARN	0920	13.999	100.0
-----	50%	-----	
KYFR	0920	5.689	40.6
XEBM/A	0920	5.535	36.6
KFLB	0920	5.511	34.2
*KQBU	0920	5.463	32.1
-----	25%	-----	
KYST	0920	4.366	24.4
KLMR	0920	4.289	23.3
XERE/A	0920	4.250	22.5
XEQH1/A	0920	4.023	20.7
XEBH/A	0920	3.823	19.3
XEOK/A	0920	3.649	18.1
XECQ/A	0920	3.428	16.7
XEOP/A	0920	3.139	15.1
XE/A	0920	3.084	14.6
XEZAR/A	0920	3.016	14.2
XETAA/A	0920	2.969	13.8
XEQD/A	0920	2.723	12.5
XELCM/A	0920	2.258	10.3

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
KARN	0920	13.999	100.0
-----	50%	-----	
KYFR	0920	5.689	40.6
XEBM/A	0920	5.535	36.6
KFLB	0920	5.511	34.2
KYST	0920	4.366	25.6
-----	25%	-----	
KLMR	0920	4.289	24.4
XERE/A	0920	4.250	23.5
XEQH1/A	0920	4.023	21.6
XEBH/A	0920	3.823	20.1
XEOK/A	0920	3.649	18.8
XECQ/A	0920	3.428	17.3
XEOP/A	0920	3.139	15.6
XE/A	0920	3.084	15.2
XEZAR/A	0920	3.016	14.7
XETAA/A	0920	2.969	14.3
XEQD/A	0920	2.723	13.0
*KQBU-PRO	0920	2.568	12.1
XELCM/A	0920	2.258	10.6
XE/A	0920	2.173	10.1

Protected Station: XESDA/A, 920 kHz - ENSENADA, BN, MX
 Coordinates: 31-52-05 N, 116-39-30 W
 Standard: Mexican [10%]

Current:

Call	Freq (kHz)	Limit (mV/m)	(%)
XEBH/A	0920	6.251	100.0
KRLV	0920	4.898	78.3
KVEC	0920	4.523	56.9
-----	50%	-----	
KKGX	0920	3.497	38.2
*KQBU	0920	2.740	28.0
-----	25%	-----	
KVEL	0920	2.507	24.6
KXLY	0920	2.488	23.7
XECQ/A	0920	1.918	17.8
KVIN	0920	1.463	13.3
XEQD/A	0920	1.442	13.0
KARN	0920	1.426	12.8
KFLB	0920	1.314	11.7
KLMR	0920	1.279	11.3
KSHO	0920	1.192	10.4

Proposed:

Call	Freq (kHz)	Limit (mV/m)	(%)
XEBH/A	0920	6.251	100.0
KRLV	0920	4.898	78.3
KVEC	0920	4.523	56.9
-----	50%	-----	
KKGX	0920	3.497	38.2
KVEL	0920	2.507	25.6
-----	25%	-----	
KXLY	0920	2.488	24.6
XECQ/A	0920	1.918	18.4
*KQBU-PRO	0920	1.678	15.8
KVIN	0920	1.463	13.6
XEQD/A	0920	1.442	13.3
KARN	0920	1.426	13.0
KFLB	0920	1.314	11.9
KLMR	0920	1.279	11.5
KSHO	0920	1.192	10.6

Statement of Engineer

This Engineering Report, relative to a change in facilities for KQBU(AM) 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.

Signed this 6th day of December, 2022



Thomas S. Gorton, P.E.