

Before the
Federal Communications Commission
Washington, DC 20554

STAMP & RETURN

In the Matter of)	
)	
Application of Siga Broadcasting Corporation)	Facility ID No. 65313
For a Construction Permit)	FCC File No. BP-20090303AAP
KHFX(AM), 1140 kHz, Cleburne, Texas)	

To: Marlene H. Dortch, Secretary
Federal Communications Commission

FILED/ACCEPTED

Attn: Audio Division, Media Bureau

JAN 25 2010

Federal Communications Commission
Office of the Secretary

INFORMAL OBJECTION TO AMENDMENT

GAP Broadcasting Shreveport License, LLC ("GAP"), the licensee of AM broadcast station KWKH, Shreveport, Louisiana, by its attorneys and pursuant to Section 73.3587 of the Commission's rules, hereby objects to the amendment filed by Siga Broadcasting Corporation ("Siga") to the above-referenced application (the "Amended KHFX Application"). As demonstrated by the attached Supplemental Engineering Statement of Sellmeyer Engineering (the "Engineering Statement"), there will be significant prohibited interference to the listeners of KWKH if the Media Bureau were to approve the power increase requested by the Amended KHFX Application.

As described in the Engineering Statement, the Bureau should dismiss or deny the Amended KHFX Application because, among other things, there is significant question as to whether Siga actually undertook the field strength measurements on at least one radial. The Amended KHFX Application did not contain any maps that depict the measured locations. Therefore, in order to verify the accuracy of Siga's measurements on the 280 degree radial, the Vice President of Engineering for GAP, who has extensive knowledge of the local geography,

personally visited certain locations. As indicated on the maps included with the Engineering Statement, some of Siga's purported measurement locations are in the middle of a lake, while others are in very wet areas not near any road. Furthermore, it is virtually impossible for Siga to have undertaken the measurements in the reported timeframes. For example, it took GAP's engineer 41 minutes on local roads to obtain three readings on the 5.6, 6.5 and 8.0 km locations on that radial. However, Siga somehow claims that it was able to obtain six readings – on the 0.0, 3.8, 4.34, 4.7, 5.31 and 6.45 km locations – in just 33 minutes. Siga also claims that it obtained readings at the 20.38, 25.85 and 28.01 locations in just 24 minutes, even though two of those sites are not located on any road. However, it took GAP's engineer 34 minutes to obtain readings between the 19.3 and 29.8 km locations, without venturing off any roads. It is extremely implausible for Siga to have accomplished all of its measurements in the manner described in the Amended KHFX Application.

Moreover, Siga did not even take sufficient measurements on the 280 degree radial to the fullest extent of the KWKH 0.25 mV/m contour. Instead, it inexplicably ceased measurements approximately 25 kilometers short of that goal. Nor did Siga establish the location of the KWKH 0.5 mV/m contour. At the point where Siga ceased measurements, the KWKH field strength was still 0.57 mV/m per meter. Thus, the Commission cannot accurately assess the locations of the KWKH interfering contour to KHFX, and the KHFX interfering contour to KWKH, because Siga failed to provide the precise locations of the KWKH 0.25 mV/m and 0.5 mV/m contours.

GAP, at its own expense, undertook measurements of the proposed KHFX power increase on three radials – at 240, 260 and 280 degrees. GAP's data reveal very high conductivity levels, and in the case of the 240 and 260 degree radials, the conductivities are greater than the measurements GAP included with its initial Informal Objection to Siga's proposal, filed on May 19, 2009. (GAP previously did not take measurements on the 280 degree

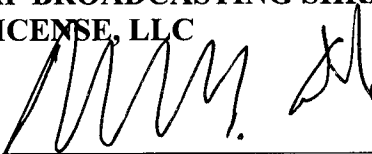
radial.) GAP's measurements on the three radials demonstrate that impermissible interference, both to KWKH from KHFX, and from KHFX to KWKH, would result from implementation of the proposed KHFX power increase. Thus, Siga has failed to address in the Amended KHFX Application the key element of GAP's objection – that the level of interference from KHFX to KWKH will be significantly greater than predicted.

In addition, the area of prohibited overlap from the KWKH 0.25 mV/m contour to the proposed KHFX 0.5 mV/m contour, as amended, is more than 1,900 square kilometers, and the area of prohibited overlap from the KHFX 0.25 mV/m contour to the proposed KWKH 0.5 mV/m contour, as amended, is almost 250 square kilometers. Both figures are in excess of the limits prescribed by Section 73.182(q) of the Commission's rules.

Because Siga has not satisfactorily demonstrated to the Commission that the proposed KHFX power increase would not adversely affect KWKH listeners, the Amended KHFX Application should be dismissed or denied.

Respectfully submitted,

**GAP BROADCASTING SHREVEPORT
LICENSE, LLC**

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January 25, 2010

CERTIFICATE OF SERVICE

I, Nellie Martinez-Redicks, a secretary at the law firm of Drinker Biddle & Reath LLP, certify that on this 25th day of January 2010, I caused the foregoing "Informal Objection to Amendment" to be mailed to:

Siga Broadcasting Corporation
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Attn: Gabriel Arango

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Attn: Gregory L. Masters, Esq.


Nellie Martinez-Redicks