CARA EBERT CAMERON, P.A.
ATTORNEY AT LAW

January 8, 2010

Ms. Marlene Dortch
Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

RE: Application of JHT Ventures Inc for
For Minor Change in the Licensed Facilities of
KULF (AM) Bellville, Texas
File No. BP – 20091207ACW

Dear Ms. Dortch,

On behalf of BusinessRadio Houston Licensee LLC, Transmitted herewith is an original and one copy of its Informal Objection in connection with the above referenced matter.

Please stamp the enclosed Return Copy of this filing and return it in the envelope provided.

If there are any questions concerning this matter, please contact the undersigned.

Very truly yours,

Cara Ebert Cameron

Cara Ebert Cameron

Enclosures

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2929 EAST COMMERCIAL BOULEVARD
FORT LAUDERDALE, FLORIDA 33308
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BETSY.CAMERON@WORLDNET.ATT.NET

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20552

In re Application of	)	
	)	
JHT VENTURES INC.	)	File No. BP – 20091207ACW
	)	
For Minor change in the Licensed Facilities	)	
Of KULF (AM) (f/k/a KNUZ) (AM)	)	
Bellville, Texas	)	
(Facility ID No.48653)	)	

To: Office of the Secretary

Attn: Chief, Audio Division, Media Bureau

INFORMAL OBJECTION

BusinessRadio Houston Licensee LLC ("BusinessRadio")by its attorneys, hereby files this Informal Objection to the above captioned minor change application (The "Application") of JHT Ventures Inc, ("JHT"), licensee of station KULF (AM) (fka KNUZ) Bellville, Texas Facility ID No. 48653. In the Application JHT proposes to make changes in KULF's antenna locations, antenna system and power.

BusinessRadio is licensee of station KTEK (AM) Alvin, Texas which operates on 1110 KHz. Included in JHT's Application is an exhibit, in Attachment 16 which is labeled "KTEK Exhibit". In the Application JHT utilizes measured conductivity data in place if M3 conductivity data for KTEK and a test site, KY5XND 1680 KHz, at the

proposed KULF site. In the Application, JHT attempts to demonstrate through the use of this measured data that there is no overlap of the 5mV/m contours of KULF and KTEK.

BusinessRadio conducted a thorough analysis of the predicted contours of KULF and KTEK , using the data represented by JHT in the Application and found it is evident that the contour of KULF represented in the Application is in error and will cause prohibited overlap as the Application is filed. BusinessRadio conducted measurements on the KTEK 300 degree radio on 12/30/09. These measurements contradict the JHT measurements and demonstrated significantly higher conductivity from 14 to 56 kilometers. See attached Engineering Exhibit.

BusinessRadio also believes the JHT "test transmitter" site data is incomplete and deficient, in that it does not include sufficient close-in measurements between .2 and 3 kilometers to determine accurate efficiency or any detailed description of the facility constructed or the method used to determine operating power.

BusinessRadio believes JHT should be required to re-establish the "test transmitter" site and perform close in readings to establish true efficiency of the site, as well as re-measure the entire set of radials toward KTEK as well as the other facilities impacted by this application. Additionally, in view of the previous discrepancies in the JHT Measurements, BusinessRadio requests that JHT should be required to permit it to make its own readings of the "test transmitter" site. Without the requested corrective action, the JHT Application must be dismissed due to prohibited overlap and incomplete and deficient data as described herein.

Respectfully submitted,

BUSINESSRADIO HOUSTON LICENSEE LLC

By: Cara Ebert Cameron

Cara Ebert Cameron P.A
2929 East Commercial Boulevard
Suite 410
Fort Lauderdale, FL 33308
954-771-9221

Its Attorneys

January 8, 2010

Certificate of Service

I hereby certify that a complete copy of the foregoing Informal Objection with all attachments has been sent this 8th day of January 2010 by US mail to:

JHT Ventures Inc
12054 Mighty Oak #A
Houston, Texas 77066

By 
Cara Ebert Cameron

ENGINEERING EXHIBIT
INFORMAL OBJECTION OF BUSINESSRADIO HOUSTON LICENSEE, LLC
APPLICATION BY JHT VENTURES, INC
BP-20091207ACW
KULF (AM) 10 kW DA DAY/CRIT
1090 KHz
BELLVILLE, TEXAS
FACILITY ID# 48653

BusinessRadio Houston Licensee, LLC, ("BusinessRadio"), has conducted a technical review of the application by JHT Ventures, INC ("JHT") for modifications to KULF. As a result of this analysis, BusinessRadio believes its KTEK, 1110 Alvin, TX (Facility ID 10827) will receive prohibited overlap of the 5 mV/m contours from the second adjacent channel proposal, in violation of 47CFR 73.37, as a result of the JHT application.

In the above referenced application, JHT utilizes measured conductivity data in place of M3 conductivity data for KTEK and a test site, KY5XND 1680 KHz, at the proposed KULF site. In the application, JHT attempts to demonstrate through the use of this measured data, that there is no overlap of the 5 mV/m contours of KULF and KTEK.

After conducting a thorough analysis of the predicted contours of KULF and KTEK, utilizing the data represented by JHT in the application, it is evident the contour of KULF represented in the application is in error and will cause prohibited overlap. BusinessRadio conducted measurements on the KTEK 300 degree radial on 12-30-2009. These measurements made by BusinessRadio contradict the JHT measurements and demonstrated significantly higher conductivity from 14 to 56 kilometers.

Additionally, a very recent measurement of the KTEK 323 degree radial was made by M&M Broadcasters, LTD, in BP20081103ADC, 10-8-2008. There is a similar demonstration of higher conductivity in the 323 degree KTEK radial data from the granted BP20081103ADC than shown in the JHT measured 320 degree KTEK radial, which occurs over the entire radial.

BusinessRadio analyzed the conductivity and efficiency of the KY5XND "test transmitter" site using the field strength readings in the JHT application. See the graphs

in the pages that follow for this analysis. BusinessRadio's analysis shows conductivity exceeding that represented by JHT, and lower efficiency than represented by the JHT application. BusinessRadio also believes the JHT "test transmitter" site data is both incomplete and deficient, in that it does not include sufficient close-in measurements between .2 and 3 kilometers to determine accurate efficiency or any detailed description of the facility constructed or the method used to determine operating power. The actual "test transmitter" facility was very likely much less efficient than JHT represents in the application. Allowing JHT to utilize these "test transmitter" measurements to show non-interference puts BusinessRadio at a disadvantage, as there is no possible means to verify their validity independently of JHT. BusinessRadio believes JHT should be required to re-establish the "test transmitter" site and perform close in readings to establish true efficiency of the site, as well as re-measure the entire set of radials toward KTEK, as well as the other facilities impacted by this application. Additionally, in view of the previous discrepancies in the JHT measurements, BusinessRadio believes they should be given the opportunity to make their own readings of the "test transmitter" (if it is re-established) to verify the accuracy.

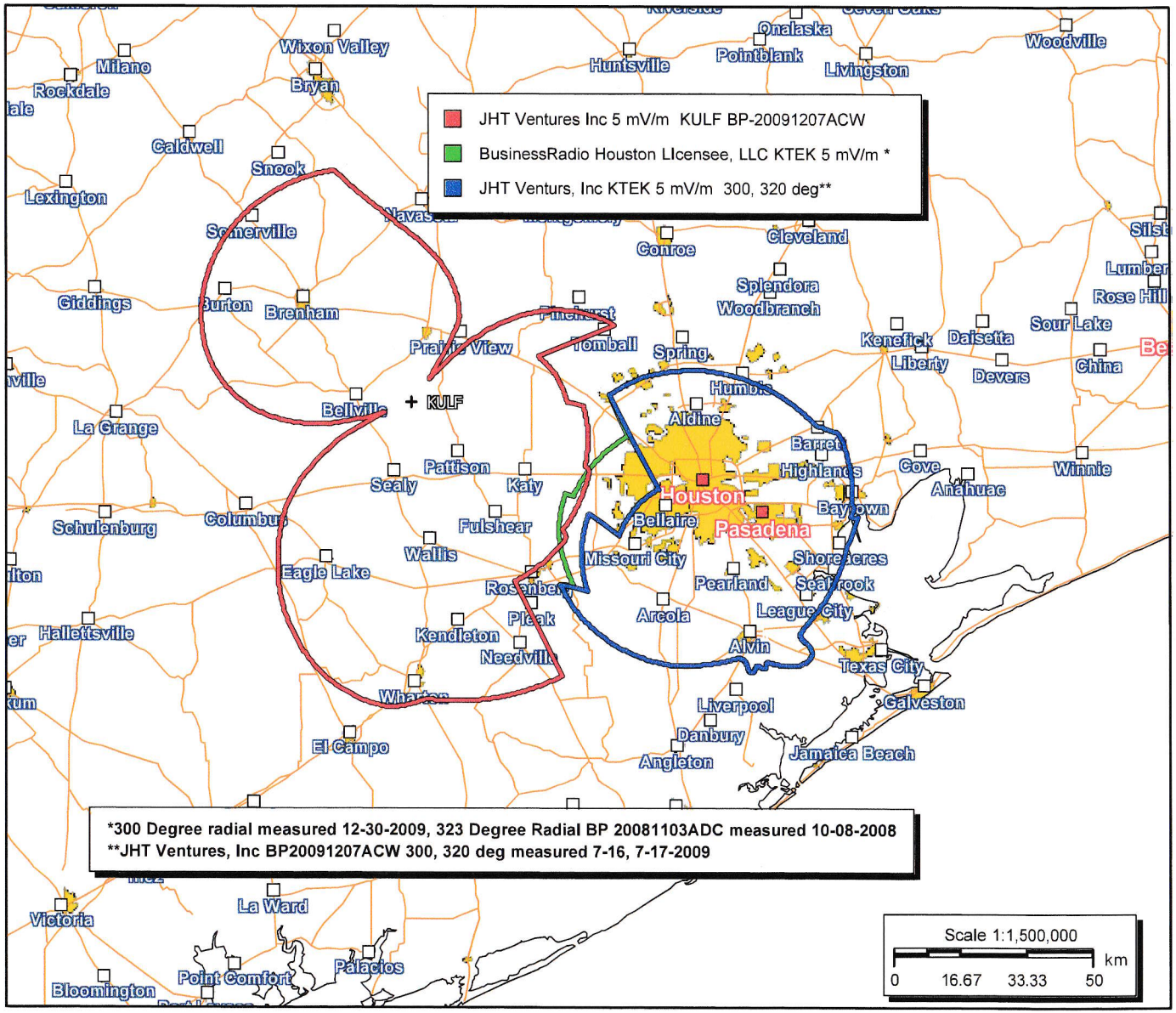
Predicted contours utilizing the recently measured KTEK 300 degree radial and the BP20081103ADC 323 measured data are included in the contours exhibit, which follows. All contours are derived, based on the "equivalent distance" method from the various data sources identified in the exhibit. This exhibit demonstrates prohibited overlap with KTEK using both the JHT proposal's data for the bearings pertinent to KTEK, and the 300 degree radial and 323 degree radial data measured and or supplied by BusinessRadio.

KULF

Freq: 1090 kHz
Class: D
Latitude: 29-56-05 N
Longitude: 096-06-47 W
Power: 10 kW
RMS: 985.5 mV/m @1km
Towers: 2

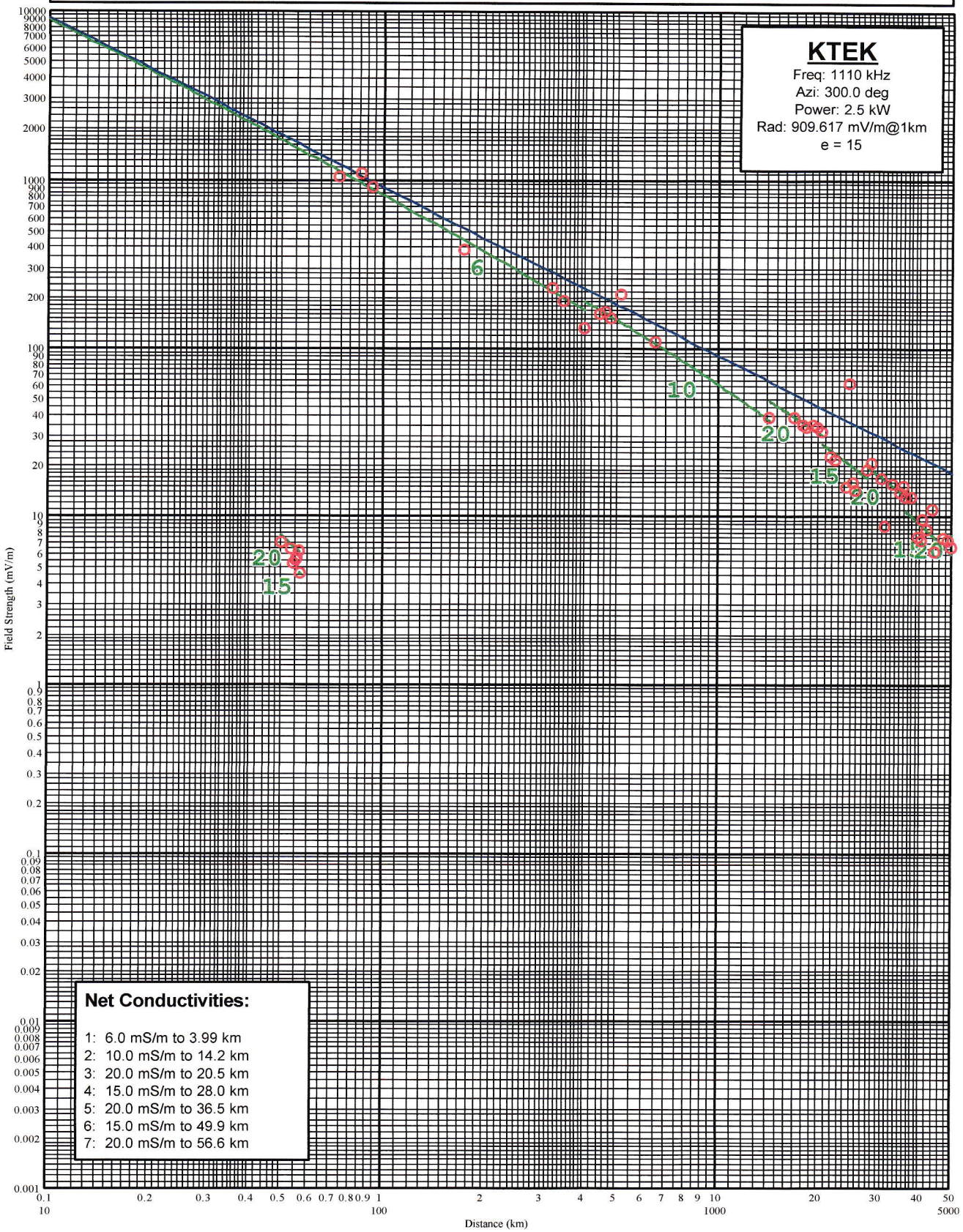
KTEK

Freq: 1110 kHz
Class: D
Latitude: 29-22-51 N
Longitude: 095-14-15 W
Power: 2.5 kW
RMS: 516.58 mV/m @1km
Towers: 6



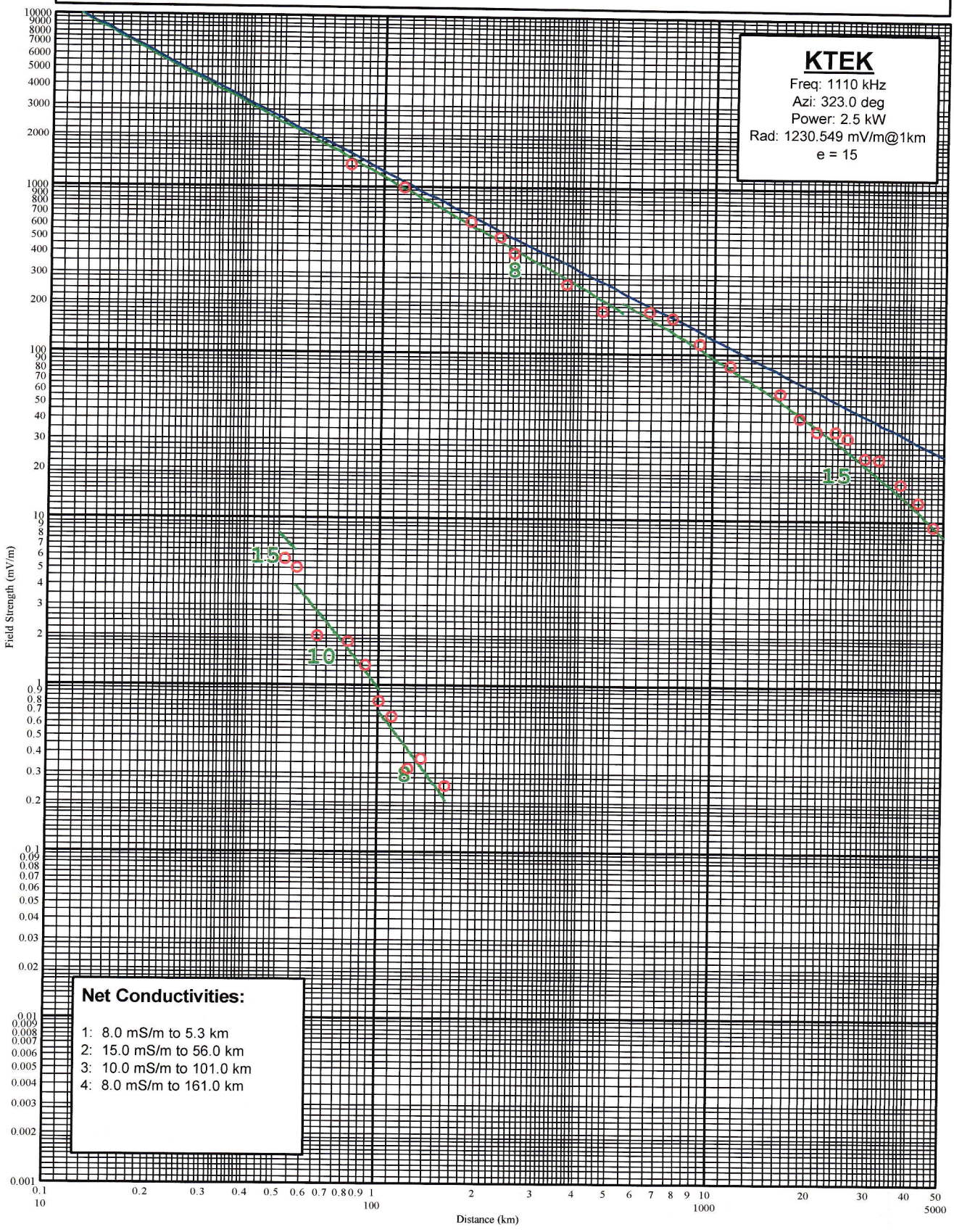
KTEK AM Measured Field Strength

Shown With Matching Conductivity Curves



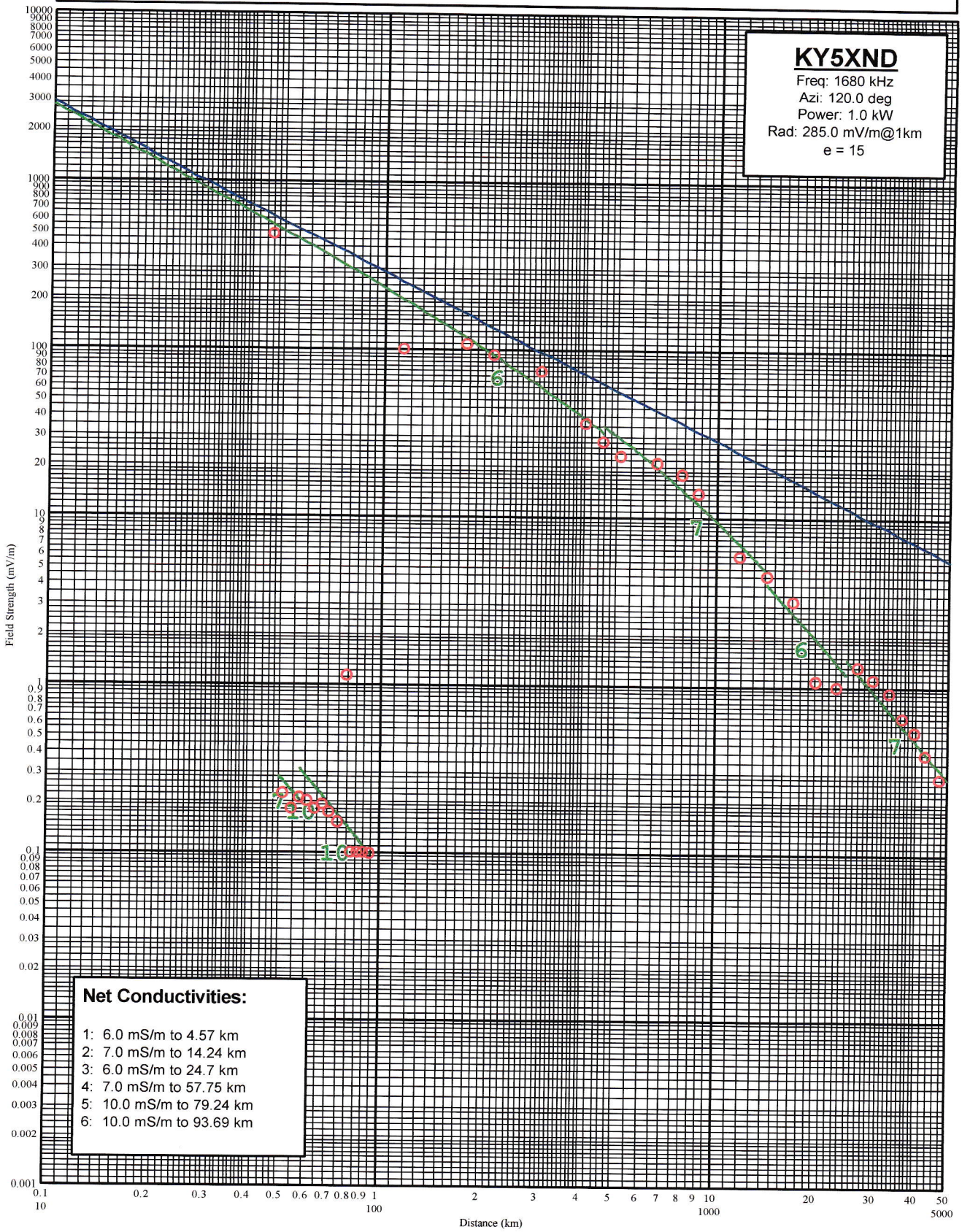
KTEK AM Measured Field Strength

Shown With Matching Conductivity Curves



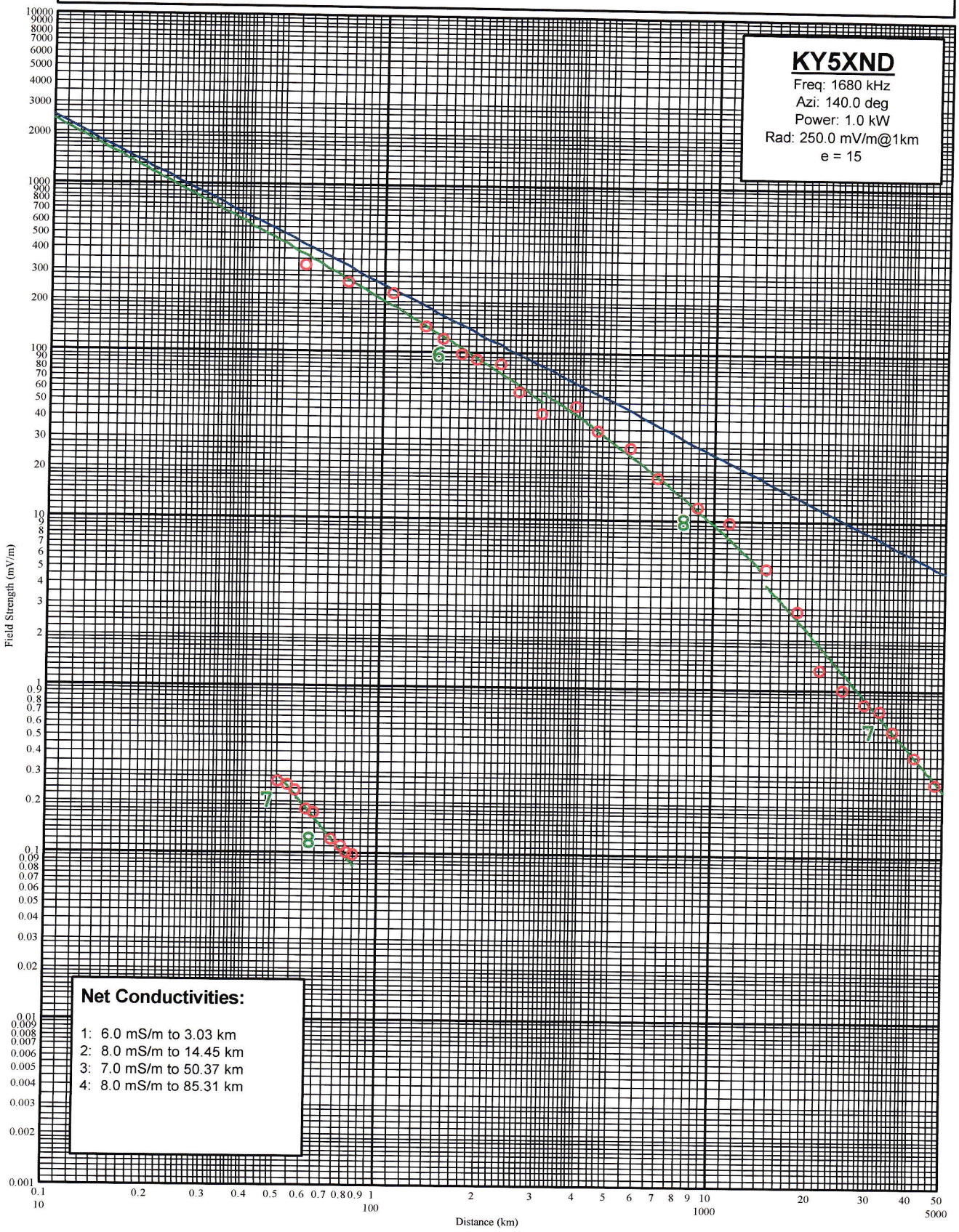
KY5XND AM Measured Field Strength

Shown With Matching Conductivity Curves



KY5XND AM Measured Field Strength

Shown With Matching Conductivity Curves



KTEK

Freq:	1110kHz	323 Degree Radial	Weather:	PC 67-85 De	Meter: Potomac Instruments FIM-41 Serial No: 968
Power:	2.5 kW		Ground:	Dry	Engineer: E.J. Pryor Jr.
Mode:	DA-Day				

Point Number	Distance kM	Field mv/m	Time CDST		GPS Latitude	GPS Longitude	Point Description & Remarks
1	0.798	1330	9:15	10/8/2008	29-23-11.4	095-14-33.0	At intersection of CR 424 and CR 890
2	1.16	980	9:20	10/8/2008	29-23-21.1	095-14-40.4	On CR 890 in open field west side of road
3	1.85	610	9:34	10/8/2008	29-23-38.8	095-14-56.7	On SH 35 - NLM
4	2.26	500	9:42	10/8/2008	29-23-49.4	095-15-05.8	IFO #2502 CR 171 (Johnson Street)
5	2.49	398	9:47	10/8/2008	29-23-55.0	095-15-11.0	On FM 1462 across rod from Vet Clinic of Alvin
6	3.61	256	9:52	10/8/2008	29-24-24.6	095-15-35.0	On Kost Road between Sherwood and Ridgewood streets
7	4.64	177	9:57	10/8/2008	29-24-51.0	095-15-58.7	IFO #2200 Stadium Road
8	6.39	176	10:09	10/8/2008	29-25-36.3	095-16-37.7	IFO #1222 CR 857
9	7.56	161	10:16	10/8/2008	29-26-06.0	095-17-04.1	IFO #1195 CR 186
10	9.05	115	10:22	10/8/2008	29-26-44.9	095-17-36.9	On SH 6 west side IFO Parkway Storage
11	11.3	84	10:35	10/8/2008	29-27-42.4	095-18-27.0	North side of CR 99 IFO #866
12	16	58.5	10:53	10/8/2008	29-29-43.1	095-20-12.1	On Scoppel Road by gas wellhead
13	18.3	41	10:55	10/8/2008	29-30-42.9	095-21-03.3	On Old Chocklate Bayou Road - north side - NLM
14	20.7	34.5	11:05	10/8/2008	29-31-46.9	095-21-58.5	On CR 101 - NLM
15	23.4	34.2	11:14	10/8/2008	29-32-55.0	095-22-58.7	On Larkdale Road - NLM
16	25.7	31.5	11:33	10/8/2008	29-33-55.6	095-23-51.9	At intersection of Kirby Road and Skymist in median
17	28.9	24.2	11:40	10/8/2008	29-35-16.0	095-25-01.0	On west side of Kingsley Road - NLM
18	31.8	23.8	11:49	10/8/2008	29-36-32.6	095-26-07.5	IFO #3915 Brownstone Street
19	37	16.8	12:04	10/8/2008	29-38-45.5	095-28-02.6	West bound access road for Alt US 90 - NLM
20	42	12.9	12:20	10/8/2008	29-40-53.4	095-29-55.1	IFO # 6115 Birdwood Street
21	46.5	9.3	12:38	10/8/2008	29-42-51.6	095-31-37.3	IFO #8177 Sands Point Road Building #4
22	52.3	5.7	13:00	10/8/2008	29-45-20.8	095-33-46.7	IFO # 503 Blue Willow Street
23	56.9	5.05	13:37	10/8/2008	29-47-18.1	095-35-30.1	IFO # 11730 Pecan Creek Road
24	65.7	1.95	13:56	10/8/2008	29-51-31.6	095-39-13.5	IFO #5538 Girnigoe Road
25	81	1.82	14:31	10/8/2008	29-57-40.3	095-44-35.2	Beyond pavment end on House Hahl Road north of small lake
26	91.6	1.3	14:52	10/8/2008	30-02-11.8	095-48-32.4	On South side of Bauer Hockley Road IFO #24616
27	101	0.79	15:09	10/8/2008	30-06-18.3	095-52-10.7	On Margerstadt Road - NLM
28	111	0.64	15:27	10/8/2008	30-10-25.9	095-55-49.2	On Wilsonville Road - NLM
29	124	0.32	15:43	10/8/2008	30-16-25.7	096-01-07.3	IFO #5239 FM 2
30	136	0.36	15:58	10/8/2008	30-21-25.8	096-05-32.7	IFO # 10379 FM 1227
31	161	0.255	16:40	10/8/2008	30-31-58.2	096-14-50.7	IFO #1423 Wayfarer Lane

Certification of Engineer:

I am president of the firm of CHARLES STAPLES TECHNICAL SERVICES, LLC.

I am a graduate of Texas Christian University.

I have provided services to the broadcast industry including preparation of applications before the Federal Communications Commission for over thirty years.

My qualifications are a matter of record with the Federal Communications Commission.

I prepared this technical exhibit personally.

All facts stated herein are true and correct to the best of my knowledge and belief.

Charles W. Staples
January 7, 2010

4424 Glenwick Lane
University Park, Texas 75205-1037
214 526 6200

Electronic mail: charlesstaples@att.net

KTEK 300 DEGREE RADIAL MEASUREMENTS
WEDNESDAY, DECEMBER 30TH, 2009

ALL MEASUREMENTS DONE BY FRED R MORTON, CSRE
POTOMAC INSTURMENTS FIM-21 SN# 851
CALIBRATED 5/6/2006

DISTANCE IN KM	TIME	READING IN MV/M
0.74	918	1050
0.86	921	1100
0.93	924	920
1.74	928	385
3.22	935	228
3.48	938	190
3.99	941	132
4.44	943	160
4.63	946	165
4.81	950	150
5.15	954	210
6.52	1029	110
14.2	1049	39
17	1056	38.7
18	1100	34.9
18.5	1103	34
19.3	1106	35
19.9	1110	34
20.5	1115	32
21.8	1123	22.6
22.5	1126	21.5
24.2	1133	14.8
24.9	1141	62
25.3	1145	15.8
25.8	1148	14.1
28	1157	18.8
29	1205	20.5
31	1216	16.8
31.7	1219	8.8
33.2	1222	15.5
35.1	1229	13.8
36	1235	15
36.5	1238	13
37.8	1241	13
39.8	1247	7.6
40.6	1251	7.2
40.9	1253	9.6
42.4	1259	8.4
43.9	110	11
44.7	113	6.2

47.4	128	7.4
48.6	132	7.2
49.9	201	6.6
50.5	206	7
54	215	6.4
54.7	219	5.3
55.5	223	5.5
55.8	225	5.7
56.6	229	6.2
57.2	232	4.6