

**Goldman Engineering Management  
Auburn, CA**

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Application for Rulemaking  
Channel Substitution Application  
NEW 292C1, Presidio, TX to  
NEW 237C3, Presidio, TX

Marfa Public Radio  
June 2016

**Goldman Engineering Management  
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This application on behalf of Marfa Public Radio (“Marfa”) requests a channel substitution reallocation of 292C1 at Presidio, TX to 237C3 and modification of the “Table of Allotments”, FCC 73.202(b). There will be no change in the community of license, Presidio, TX. This change is requested because, based upon the availability of towers or locations to build towers with respect to the area to locate on 292C1, or any class on that frequency down to 292A or any contiguous channel (plus or minus 3 channels or IF), there is no way to serve the community of Presidio based upon the required contour protection to Mexican allotments. Although 237C3 will be a lower class of station, since it will be located in Presidio itself, it will fully serve the 5,000 person Presidio community with the first US domestic radio service in the area. The proposed service area for the Presidio allotment on 237C3 is currently considered entirely “White Area” (First fulltime aural reception service) and thus Priority 1 in FCC allotment criteria<sup>1</sup> and clearly in the public interest. The proposed facility is over 300km from the nearest urbanized area of El Paso, TX.

Proposed allotment:

Reference Coordinates: 29-34-00 N, 104-21-01.4 W Contour Restricted to 237B (vacant allotment) at Delicias, CH Mexico<sup>2</sup>.

Proposed operating coordinates: 29-34-00 N, 104-21-01.4 W, 40m AGL, -4m HAAT, 15kW ERP

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<sup>1</sup> FCC Section 307(b), Four standard priorities, standards of allotment.

<sup>2</sup> Mexican allotments are not considered in determination of fully spaced reference coordinates for allotments in the United States [FCC 73.207(b)(1)].