Supplemental Showing for Community Coverage Compliance
and Use of Alternative Method for Contour Prediction
NCE Station KRRT(FM), Arroyo Seco, NM
Facility ID No. 94047

The Regents of the University of New Mexico (the "University"), licensee of noncommercial educational ("NCE") FM station KRRT, Arroyo Seco, New Mexico, submits this supplemental showing in support of the use of Longley-Rice and PTP Version 2 methods to demonstrate compliance with the community coverage requirement in Section 73.515 of the Commission's Rules. The University believes that this supplemental showing complies with Section 73.313(e) of the Commission's Rules and is consistent with the guidelines set forth by the Commission.

Background. Section 73.515 requires NCE FM stations to provide a 60 dBu contour over at least 50 percent of the community of license or 50 percent of the community's population. With the instant application, the University is proposing to modify the KRRT license to reduce power in order to accommodate Forestry Service imposed limitations for the transmitter site. (KRRT is currently operating under a grant of Special Temporary Authority for the reduced power operation necessitated by these concerns.) The University submits that the modified KRRT facility will continue to comply with its community coverage requirements as shown by a permissible Longley-Rice analysis which, as discussed below and in the preceding engineering statement, demonstrates that KRRT will still greatly exceed both the population and area coverage minimums.

Supplemental Showing. Section 73.313(e) of the Commission's Rules permits supplemental showings using alternative methods to predict contour distances "where the terrain in one or more directions from the antenna site departs widely from the average elevation of the 3 to 16 kilometer sector." The Commission has set forth guidelines for such supplemental showings in the context of community coverage compliance.[1] Typically, such showings must include, *inter alia*, (1) an explanation for why use of a supplemental showing is warranted (e.g., very flat terrain); and (2) a showing that the distance to the relevant contour as predicted by the alternative method is at least 10 percent larger than the distance to the relevant contour using the standard contour prediction method.[2]

In this case, the terrain between the authorized transmitter for KRRT and the station's community of license (Arroyo Seco) is flat, except for a small rise immediately preceding Arroyo Seco's post office-based community marker.[3] In addition, the distance

[1] *See Amendments of Parts 73 and 74 of the Commission's Rules to Permit Certain Minor Changes in Broadcast Facilities without a Construction Permit*, Report and Order, 12 FCC Rcd 12371, 12401-03 (rel. Aug. 22, 1997).

[2] *See id* at 12402.

to the 60 dBu contour for KRRT's proposed facility using a Longley-Rice analysis is at least 10 percent larger than the predicted FCC 60 dBu contour.[4] Specifically, 96.1 percent of the pertinent radials travel more than 10 percent farther than the FCC predicted contour.[5] The Longley-Rice analysis thus meets the "threshold requirement" for a supplemental showing using alternative contour prediction methods.[6]

In a similar case in the commercial context, the Commission has recently affirmed the grant of a modification application where the applicant used a supplemental showing to demonstrate compliance with the community coverage requirement in Section 73.315(a) of the Commission's Rules.[7] In that case, the applicant claimed that the terrain between its transmitter and the community of license was "particularly smooth" and submitted a supplemental showing that, using an alternative method of analysis, the relevant contour extended beyond the standard predicted contour by greater than 10 percent to encompass the community of license.[8] In its decision affirming grant of application, the Commission noted that the Office of Engineering and Technology's verification of the extended contour distance "suggest[ed]" that the terrain between the transmitter and the community of license departed widely from the average elevation of the 3 to 16 kilometer sector.

The University respectfully submits that this supplemental showing also meets the "threshold requirement" for consideration set forth by the Commission. The use of a Longley-Rice analysis extends the 60 dBu coverage contour for KRRT's proposed facility by greater than 10 percent in the direction of Arroyo Seco. Moreover, this extended contour distance suggests that the terrain between the KRRT transmitter and Arroyo Seco departs widely from the average elevation assumed by the standard contour prediction method.

This supplemental showing also demonstrates the compliance of KRRT's proposed facility with the community coverage requirement for NCE stations in Section 73.515 of the Commission's Rules. As illustrated in the Engineering Statement, use of a Longley-Rice analysis confirms that the 60 dBu coverage contour for KRRT will encompass over 80 percent of the community – and 100 percent of the population – of Arroyo Seco.

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[3] *See* Engineering Statement.

[4] *See id.*

[5] *Id.*

[6] *See CMP Houston-KC, LLC*, Memorandum Opinion and Order, 23 FCC Rcd 10656 at ¶ 7-9 (2008) (the "CMP Decision").

[7] *See id.*

[8] *Id* at ¶¶ 2, 8.

Finally, the University believes that the public interest will be served by allowing the proposed KRRT modifications to allow continued service to the residents of Arroyo Seco, a small community of just over 1,000 people, despite the power limitations imposed by the Forestry Service at the station's transmitter site. KRRT rebroadcasts the programming of the University's noncommercial educational FM station KUNM(FM), Albuquerque, NM. The stated goal of KUNM(FM) is to serve local listeners by providing a variety of high quality programming that serves diverse interests. Such programming includes *Voices of the Southwest* and *Latino USA*, which focus on regional and Hispanic issues, and NPR's *All Things Considered*, an award-winning news magazine.