

**January 2015
KWTR(FM) Channel 209C1
Eldorado, Texas
Fair Distribution of Service**

The instant application proposes modification of the original construction permit BNPED-20071022BKS for KWTR, which was awarded based on a fair distribution of service preference. (See *Threshold Fair Distribution Analysis of 9 Groups of Mutually Exclusive Applications for Permits to Construct New or Modified Noncommercial Educational FM Stations Filed in the October 2007 Window*, Memorandum Opinion and Order, DA 10-2072, Released October 28, 2010.) BNPED-20071022BKS was the only applicant entitled to a fair distribution preference in MX Group 432.

It is proposed to change the transmitter site for KWTR to a tower located 17 kilometers southeast of the construction permit site. The attached "Baseline NCE Service Study" map exhibit was prepared using the "snapshot date" of the original application filing in 2007, and demonstrates that the proposed KWTR facility will provide a 60 dBu contour to nearly all of the area to which BNPED-20071022BKS provided a first or second NCE service. Although a 95 sq km area where BNPED-20071022BKS provided first or second NCE service lies outside the proposed 60 dBu contour, that area is unpopulated. The proposed facility, based on the "snapshot date" with 2000 Census block level data, will continue to provide first and second NCE service to the same 4,807 persons claimed in the original application.

Therefore, the applicant certifies that the proposed modification will not downgrade the service upon which the fair distribution preference grant was based.

Hatfield & Dawson Consulting Engineers

