



**STATEMENT OF WILLIAM J. GETZ
IN SUPPORT OF A MINOR CHANGE
APPLICATION FOR CONSTRUCTION PERMIT
KTPR(FM), SNYDER, TX to STANTON, TX
SEPTEMBER, 2017**

**SECTION 307(b) SHOWING FOR COMMUNITY OF LICENSE
CHANGE PURSUANT TO *RURAL RADIO*¹**

I am a Radio Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission.

This office has been authorized by the Applicant to prepare this statement and the associated exhibits in support of the above-referenced application to upgrade, relocate and reallocate reserved band channel station KTPR(FM) from Snyder, Texas to Stanton, Texas. Specifically, this material contains an enhanced technical showing pursuant to the Commission's decision in *Rural Radio* to demonstrate that the proposed change in the KTPR(FM) community of license represents a preferential arrangement of allotments over the current KTPR(FM) facility.

Local Transmission Service

The instant proposal involves removing the sixth local service from Snyder, TX (population 11,202 persons), in order to establish a third local service to the community of

¹ See *Policies to Promote Rural Radio Service and to Streamline Allotment and Assignment Procedures*, Second Report and Order, First Order on Reconsideration, and Second Further Notice of Proposed Rulemaking, 26 FCC Rcd 2556 (2011) ("*Rural Radio*") and Second Order on Reconsideration, adopted October 11, 2012 ("*Second Order on Recon*").

Stanton, TX (population 2,492). The five remaining full time local services in Snyder, Texas, would be as follows:

- KGWB(FM) [Facility ID No. 175017]
- KHMZ(FM) [Facility ID No. 189476]
- KLYD(FM) [Facility ID No. 81514]
- KSNY-FM [Facility ID No. 60711]
- KSNY(AM) [Facility ID No. 60710]

As demonstrated herein, the proposed third local service at Stanton, TX, represents a preferential arrangement of allotments in comparison to a continued sixth local service at Snyder according to FM Allotment Priorities (1), (2) and (4).²

Urbanized Area Service Presumption

As shown in Exhibit A, the principal community contour (60 dBu) from the presently licensed KTPR(FM), Snyder, TX, technical facility (KTPR-Snyder) covers 100% of the Snyder, TX, and serves no portion of any nearby Urbanized Area. The principal community contour from the proposed KTPR(FM), Stanton, TX, technical facility (KTPR-Stanton) covers 50.1% of the Midland, TX, Urbanized Area. Because the instant proposal does not seek a dispositive Section 307(B) preference under Priority (3) by claiming to offer a first local transmission service to a particular community, the predicted level of principal community grade service to a nearby Urbanized Area is irrelevant.³

² See *FM Assignment Policies*, 90 FCC 2d at 91-93. The four priorities are: (1) First fulltime aural (reception) service; (2) Second fulltime aural service; (3) First local (transmission) service; and (4) Other public interest matters. Priorities (2) and (3) are considered co-equal.

³ See *Policies to Promote Rural Radio Service and to Streamline Allotment and Assignment Procedures*, Second Report and Order, First Order on Reconsideration, and Second Further Notice of Proposed Rulemaking, 26 FCC Rcd

As demonstrated elsewhere in this Application, Stanton, Texas is a *bona fide* community for allotment purposes. The suitability of Stanton, TX for allotment purposes is further evidenced by the fact that the community presently has one licensed full-service reserved band FM broadcast station, KFLB-FM [Facility ID 92993], and one outstanding FCC Construction Permit for a new non-reserved band FM broadcast station on Channel 290C2 [Facility ID 191560; FCC File No. BMPH-20160926AAF, Granted 1/17/2017, Expires 2/11/2019].

Gain and Loss Area Population

As shown in Exhibit A, the presently licensed KTPR-Snyder facility serves 15,558 persons within its predicted 60 dBu F(50,50) primary service contour land area of 1,091 km². The proposed KTPR-Stanton facility will serve 107,892 persons within its predicted 60 dBu F(50,50) primary service contour land area of 9,582 km². There is no population within the small, one square kilometer, common 60 dBu service area between the present and proposed KTPR(FM) facility. Accordingly, the proposal to relocate and reallocate KTPR(FM) to Stanton results in a net gain of 92,334 persons within the KTPR(FM) primary service contour and a net gain area of 8,491 km².

Other Reception Services to Gain and Loss Areas

Loss Area Studies

Exhibit 1 (Page 1) depicts KTPR(FM) loss area and shows all the stations which provide a reception service to any portion of the loss area. The stations counted in the loss area are listed in Exhibit 1 (Page 2). As shown in Exhibit 1 (Page 1) the entire loss area continue to receive a minimum of 4 reception services and a maximum of 7 reception services.

2556 (2011) ("*Rural Radio*") and Second Order on Reconsideration, adopted October 11, 2012 ("*Second Order on Recon*").

Accordingly, the entire loss area is well-served because the instant proposal does not result in the loss of an only, second, third or fourth reception service to any population and results in a loss of a fifth service to only a small percentage of the licensed KTPR(FM) service area.

Exhibit 1 (Page 3) is a detailed accounting of the reception services available to the loss area as recommended in *Rural Radio*. As shown Exhibit 1 (Page 3), the loss area will remain well served with 99.2% continuing to receive 5 or more aural services.

Finally, as recommended by *Rural Radio*, the majority of the population losing a service was determined. As shown on Exhibit 1 (Page 3), this majority was found to be the 13,385 persons (86.0%) of the current coverage population that would lose a seventh reception service.

Gain Area Studies

Exhibit 2 (Page 1) depicts the KTPR(FM) gain area and shows all the stations which provide a reception service to any portion of the gain area. The stations counted in gain area are listed in Exhibit 2 (Page 2). As shown on Exhibit 2 (Page 1) the gain area mostly well-served, however, the KTPR(FM) proposal will provide a first aural reception service and a second aural reception service to existing white and gray areas respectively. Accordingly, the proposed upgrade, relocation and reallocation of KTPR(FM) advances FM Allotment Priority (1) and FM Allotment Priority (2).

Exhibit 2 (Page 3) is a detailed accounting of the reception services available to the gain area as recommended in *Rural Radio*. As shown on Exhibit 3 (Page 3), KTPR-Stanton would provide a first aural reception service to 14 people and a second aural reception service to 2 additional people within the proposed 60 dBu contour thereby eliminating white and gray areas to this population. In addition, the KTPR-Stanton proposal would provide a new aural reception service to 14,448 people (13.4% of the predicted KTPR-Stanton 60 dBu service area) whom are

presently considered to be underserved, while eliminating an underserved area presently consisting of 6,738 people.

As recommended by *Rural Radio*, the majority of the population gaining a service was determined. As shown on Exhibit 3 (Page 3), this majority was found to be the 93,512 persons (86.7% of the proposed coverage population) that would gain a 10th or greater reception service.

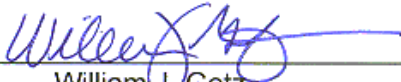
Summary

The KTPR(FM) proposal would provide a first fulltime aural reception service and a second fulltime aural reception service to people within white and gray areas which presently receive zero or one aural reception service. Accordingly, the KTPR(FM) proposal qualifies for a clear Section 307(B) preference under the highest allotment Priorities (1) and (2).

Moreover, the instant proposal will allow KTPR(FM) to provide a third local service to Stanton, TX, while leaving five local services at Snyder, TX, the current KTPR(FM) community of license. The proposed reallocation and station relocation will also allow KTPR(FM) to provide a new reception service to 107,892 persons resulting in a net gain of 92,334 persons within the KTPR(FM) primary service contour and a net gain area of 8,491 km². In addition, the KTPR-Stanton proposal would provide a new aural reception service to 14,448 people (13.4% of the predicted KTPR-Stanton 60 dBu service area) whom are presently considered to be underserved, while eliminating an underserved area presently consisting of 6,738 people. These public interest factors clearly further FCC allotment Priority (4).

This statement and the supporting Exhibits were prepared by me or under my direct supervision and are believed to be true and correct.

DATED: September 9, 2017



William J. Getz

Loss Area - Remaining Aural Reception Services

See Exhibit 1 (Page 2) for Detailed Summary

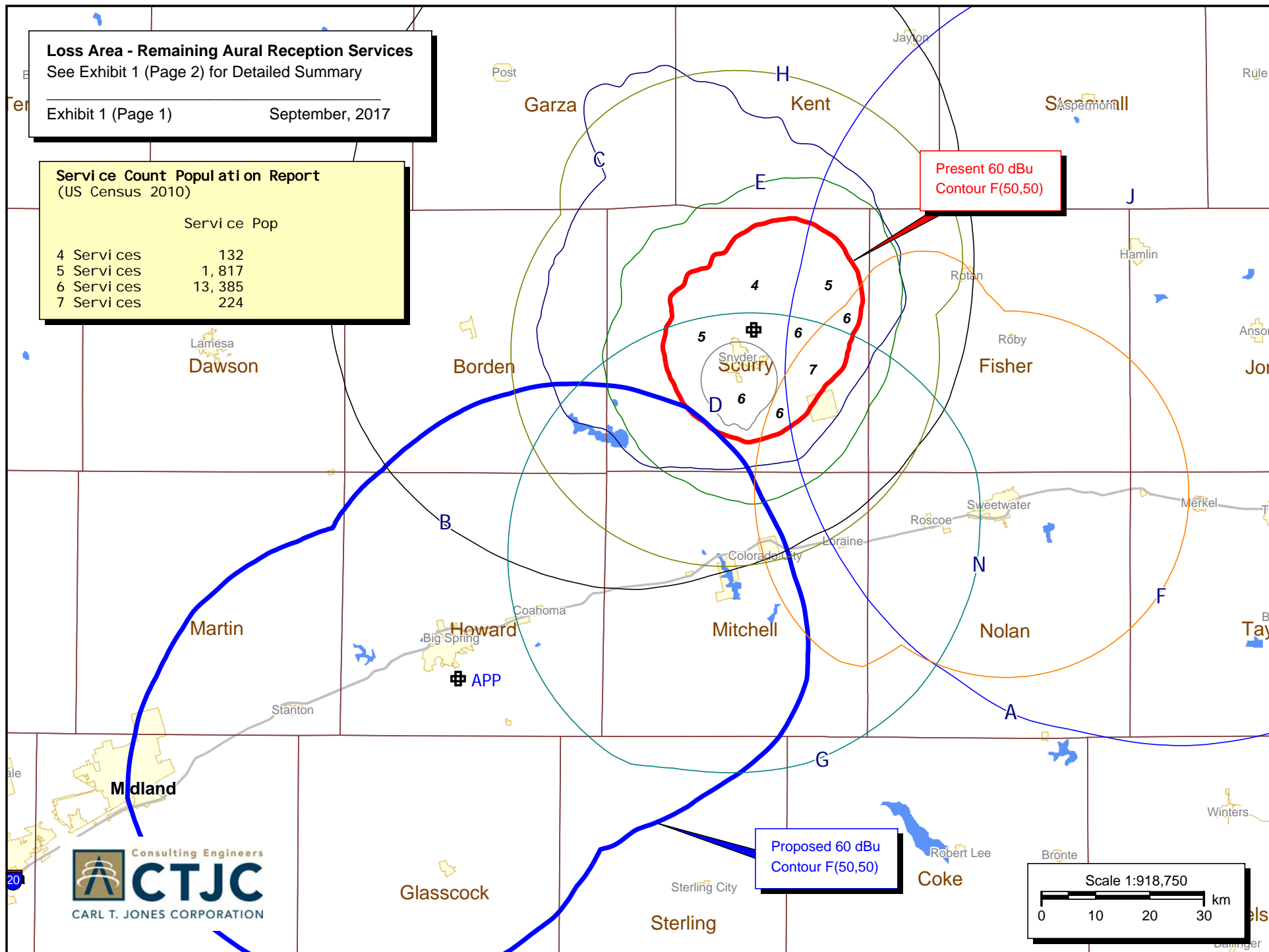
Exhibit 1 (Page 1)

September, 2017

Service Count Population Report (US Census 2010)

Service Pop

4 Services	132
5 Services	1,817
6 Services	13,385
7 Services	224



**List of Other Aural Services Available to
KTPR Loss Area**
September, 2017

<u>Map Label</u>	<u>Call</u>	<u>Status</u>	<u>FM Channel/ AM Freq</u>	<u>Service</u>	<u>Class</u>	<u>City</u>	<u>State</u>	<u>DA</u>	<u>Power</u>
	KTPR.LIC		210	FM	A	Snyder	TX	No	1
	KTPR.APP		210	FM	C1	Stanton	TX	Yes	100
A	KCDD	LIC	279	FM	C0	Hamlin	TX	No	100
B	KSNY-FM	LIC	268	FM	C1	Snyder	TX	No	100
C	KHMZ	LIC	235	FM	C3	Snyder	TX	No	25
D	KGWB	LIC	216	FM	A	Snyder	TX	No	0.24
E	KLYD	LIC	255	FM	A	Snyder	TX	No	5.6
F	KXOX.AM	LIC	1240	AM	C	Sweetwater	TX	No	1
G	KVMC.AM	LIC	1320	AM	D	Colorado City	TX	No	1

**Accounting of Reception Services
to KTPR Loss Area**
September, 2017

Population within presently licensed KTPR 60 dBu contour (i.e. Loss Area)	15,558	persons
	1091	sq. km land area

Loss Area Remaining Services	Population	Percent of Current Coverage Population
4	132	0.8%
5	1,817	11.7%
6	13,385	86.0%
7	224	1.4%
<i>Totals</i>	<i>15,558</i>	<i>100.0%</i>

	<u>Population</u>	<u>Percent of Current Coverage Population</u>
Population that would continue to receive 5 or more services:	15,426	99.2%
Population that would be left with 4 services:	132	0.8%

Gain Area - Other Aural Reception Services
See Exhibit 2 (Page 2) for Detailed Summary

Exhibit 2 (Page 1)

September, 2017

Present 60 dBu
Contour F(50,50)

Proposed 60 dBu
Contour F(50,50)

Service Count Population Report
(US Census 2010)

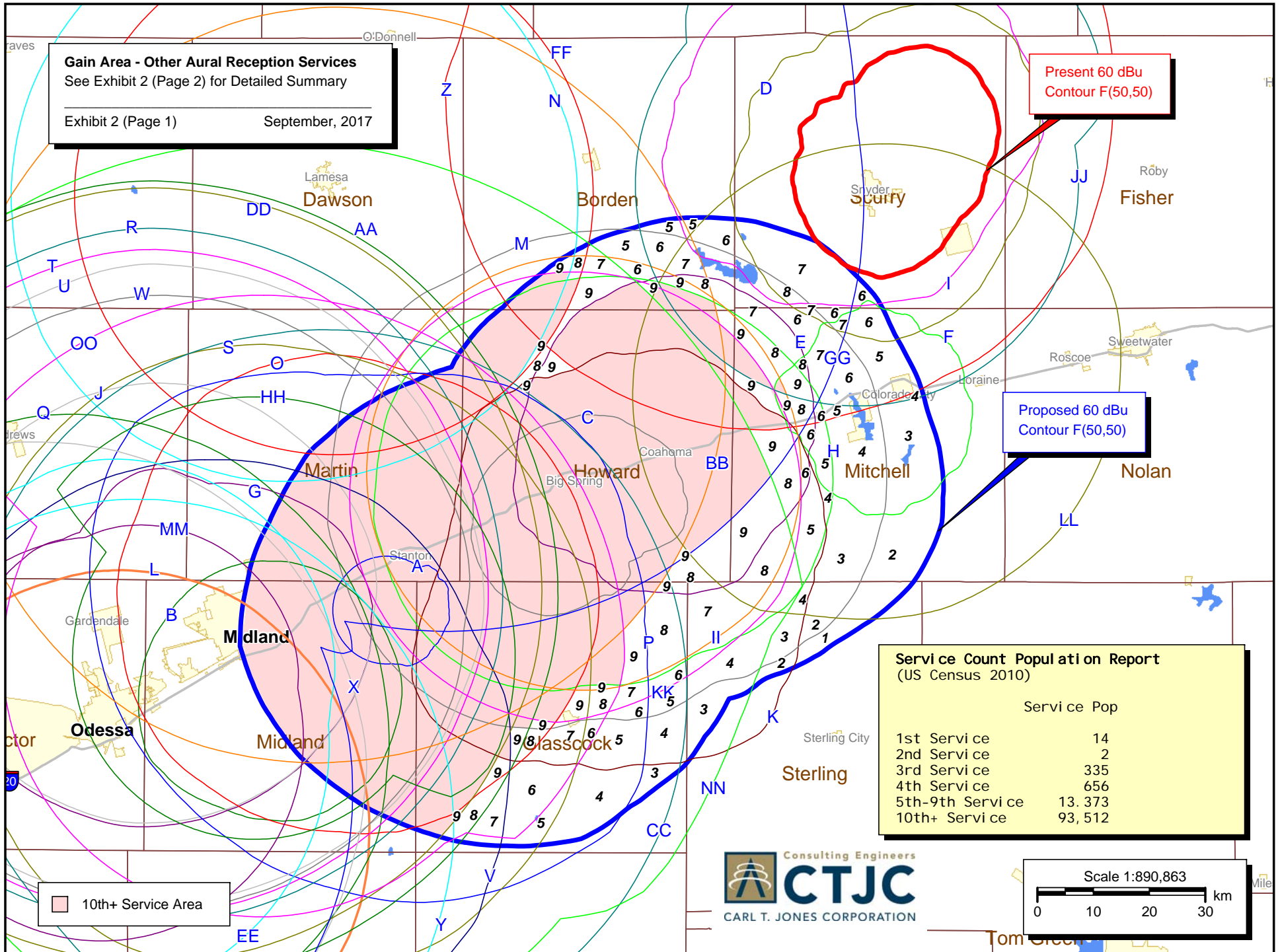
Service Pop

1st Service	14
2nd Service	2
3rd Service	335
4th Service	656
5th-9th Service	13,373
10th+ Service	93,512

Consulting Engineers
CTJC
CARL T. JONES CORPORATION

Scale 1:890,863

0 10 20 30 km



**List of Other Aural Services Available to
KTPR Gain Area
September, 2017**

<u>Map Label</u>	<u>Call</u>	<u>Status</u>	<u>FM Channel/ AM Freq</u>	<u>Service</u>	<u>Class</u>	<u>City</u>	<u>State</u>	<u>DA</u>	<u>Power</u>
	KTPR.APP		210	FM	C1	Stanton	TX	Yes	100
	KTPR.LIC		210	FM	A	Snyder	TX	No	1
A	KAGP	LIC	206	FM	A	Greenwood	TX	No	0.8
B	KVDG	LIC	215	FM	A	Midland	TX	No	1.5
C	KBCX	LIC	218	FM	A	Big Spring	TX	No	1
D	KLYD	LIC	255	FM	A	Snyder	TX	No	5.6
E	KXCS	LIC	288	FM	A	Coahoma	TX	No	5
F	KAUM	LIC	296	FM	A	Colorado City	TX	No	3
G	KXWT	LIC	217	FM	C3	Odessa	TX	Yes	20
H	KBTS	LIC	232	FM	C3	Big Spring	TX	No	8.3
I	KHMZ	LIC	235	FM	C3	Snyder	TX	No	25
J	KQRX	LIC	236	FM	C3	Midland	TX	No	10.5
K	NEW.CP	CP	265	FM	C3	Big Spring	TX	Yes	18.5
L	KBMM	LIC	208	FM	C2	Odessa	TX	No	25
M	KBST-FM	LIC	239	FM	C2	Big Spring	TX	No	33
N	KJJT	LIC	253	FM	C2	Los Ybanez	TX	No	50
O	NEW.CP	CP	290	FM	C2	Stanton	TX	No	50
P	KFLB-FM	LIC	201	FM	C1	Stanton	TX	Yes	100
Q	KFRI	LIC	204	FM	C1	West Odessa	TX	No	100
R	KLVW	LIC	213	FM	C1	Odessa	TX	No	86
S	KZBT	LIC	227	FM	C1	Midland	TX	No	100
T	KMRK-FM	LIC	241	FM	C1	Odessa	TX	No	29
U	KMCM	LIC	245	FM	C1	Odessa	TX	No	100
V	KODM	LIC	250	FM	C1	Odessa	TX	No	100
W	KHKX	LIC	256	FM	C1	Odessa	TX	No	100
X	KBAT	LIC	260	FM	C1	Monahans	TX	No	100
Y	KMMZ	LIC	267	FM	C1	Crane	TX	No	100
Z	KSNY-FM	LIC	268	FM	C1	Snyder	TX	No	100
AA	KCRS-FM	LIC	277	FM	C1	Midland	TX	No	100
BB	KTXC	LIC	284	FM	C1	Lamesa	TX	No	100
CC	KCHX	LIC	294	FM	C1	Midland	TX	No	100
DD	KQLM	LIC	300	FM	C1	Odessa	TX	No	100
EE	KFLB.AM	LIC	920	AM	B	Odessa	TX	No	1
FF	KPET.AM	LIC	690	AM	B	Lamesa	TX	No	0.25
GG	KCRS.AM	LIC	550	AM	B	Midland	TX	No	5
HH	KMND.AM	LIC	1510	AM	D	Midland	TX	No	2.4
II	KBST.AM	LIC	1490	AM	C	Big Spring	TX	No	1
JJ	KSNY.AM	LIC	1450	AM	C	Snyder	TX	No	1
KK	KBYG.AM	LIC	1400	AM	C	Big Spring	TX	No	1
LL	KVMC.AM	LIC	1320	AM	D	Colorado City	TX	No	1
MM	KOZA.AM	LIC	1230	AM	C	Odessa	TX	No	1
NN	KLPF.AM	LIC	1180	AM	D	Midland	TX	No	25
OO	KWEL.AM	LIC	1070	AM	D	Midland	TX	No	2.5

**Accounting of Reception Services
to KTPR Gain Area**
September, 2017

Population within Proposed
KTPR 60 dBu contour 107,892 persons
(i.e. Gain Area):

Gain Area KTPR-APP Adds an "x" Service	Population	Percent of Current Coverage Population
1st	14	0.0%
2nd	2	0.0%
3rd	335	0.3%
4th	656	0.6%
5th	6,738	6.2%
6th to 9th	6,635	6.1%
10th Plus	93,512	86.7%
<i>Totals</i>	<i>107,892</i>	<i>100.0%</i>

<u>KTPR-APP Gain Area Description</u>	<u>Population</u>	<u>Percent of Current Coverage Population</u>
First Aural Reception Service (Eliminate White Area)	14	0.0%
Second Aural Reception Service (Eliminate Gray Area)	2	0.0%
Combined New Service to White and Gray Areas	16	0.0%
New Service to a Presently Underserved Area (less than 5 services)	7,745	7.2%
Fifth Aural Reception Service (Eliminate underserved area)	6,738	6.2%