

**RADIO MARKET ANALYSIS**  
**HARRISON RADIO STATIONS, INC.**  
**KNWA RADIO STATION**  
**BELLEFONTE, ARKANSAS**  
**December 2011**

**TECHNICAL STATEMENT**

1. This Technical Statement and attached exhibits were prepared on behalf of Harrison Radio Stations, Inc. (“HRS”), licensee of KNWA, 1600 kHz, Bellefonte, Arkansas. HRS is submitting an application to decrease the daytime power of KNWA; as such, a Radio Market Analysis is needed. Principals of HRS have attributable interests in the licences of KCWD<sup>1</sup>, Channel 241C2, Harrison, Arkansas; KOMT, Channel 298C0, and KPFM, Channel 288C2, Mountain Home, Arkansas; and KKTZ, Channel 228C3, Lakeview, Arkansas.<sup>2</sup> None of these stations are located in nor considered “home” in any rated market. Therefore, an analysis using the revised contour overlap rules is necessary. A map of the city grade contours of these stations is attached as Exhibit #1.

**CONTOUR OVERLAP ANALYSIS MARKET REVIEW**

2. Based on the overlap of the stations’ contours, one market is created, consisting of AM station KNWA and FM stations KCWD and KOMT. Therefore, a study has been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission’s rules. The contours of the stations will be used to determine the number of other stations serving the defined market. The study will determine the number of other commercial AM and FM stations

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1) KWCD has a application pending (BPH-20111216ABE) which is considered herein.

2) KKTZ and KPFM do not have city grade contour overlap with KNWA. As such, they are not considered further.

that either have transmitter sites within, or provide coverage to, the subject radio market. Only those stations with transmitter sites within 92.0 kilometers will be considered as contributors to the market. No other station in which HRS has interests will be considered, unless it is a subject station in the market under review. As the proposed city grade contour of KNWA is completely encompassed by the KCWD contour, the contours of KCWD and KOMT will be used to determine the number of other contributing stations serving the market. We will then add the subject stations in the relative markets.

3. Exhibit #2 is a depiction of the other commercial and non-commercial stations within, or providing service to the Radio Market boundary. Exhibit #3 is a tabulation of the stations in the Radio Market. There are nine AM and FM stations, when the three subject stations are included.<sup>3</sup> The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules. At the fourteen or fewer stations level, common ownership or control of up to five stations, with no more than three in the same service is permissible, provided the number of stations to be commonly held does not exceed 50% of the stations in the market. As such, the Radio Market is in compliance with the Commission's multiple ownership rules, as detailed in §73.3555 of the rules.

4. Based on the compliance demonstrated in the non-rated market reviewed, the proposed application for KNWA is in compliance with the Commission's ownership rules.

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3) There are additional stations in the market; however, they were not considered as there were sufficient stations, based on the number of facilities to be commonly held.

5. The foregoing technical statement was prepared on behalf of Harrison Radio Stations, Inc., by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.6. BIA database. All data relating to AM and FM facilities was extracted from the Commission's CDBS database. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.

**Graham Brock, Inc. - Broadcast Technical Consultants**

**KNWA**  
 Latitude: 36-14-49 N  
 Longitude: 093-05-06 W  
 Freq: 1600 kHz  
 ERP: 1.0 kW

**KCWD.A**  
 BPH-20111216ABE  
 Latitude: 36-14-49 N  
 Longitude: 039-05-07 W  
 ERP: 50.00 kW  
 Channel: 241C2  
 Frequency: 96.1 MHz

**KCWD AP 3.16 mV/m**

**KNWA 5.0 mV/m**

**KOMT**  
 BLH-20040618AAF  
 Latitude: 36-29-13 N  
 Longitude: 092-29-39 W  
 ERP: 100.00 kW  
 Channel: 298C0  
 Frequency: 107.5 MHz

**KOMT 3.16 mV/m**

**KPFM 3.16 mV/m**

**KKTZ 3.16 mV/m**

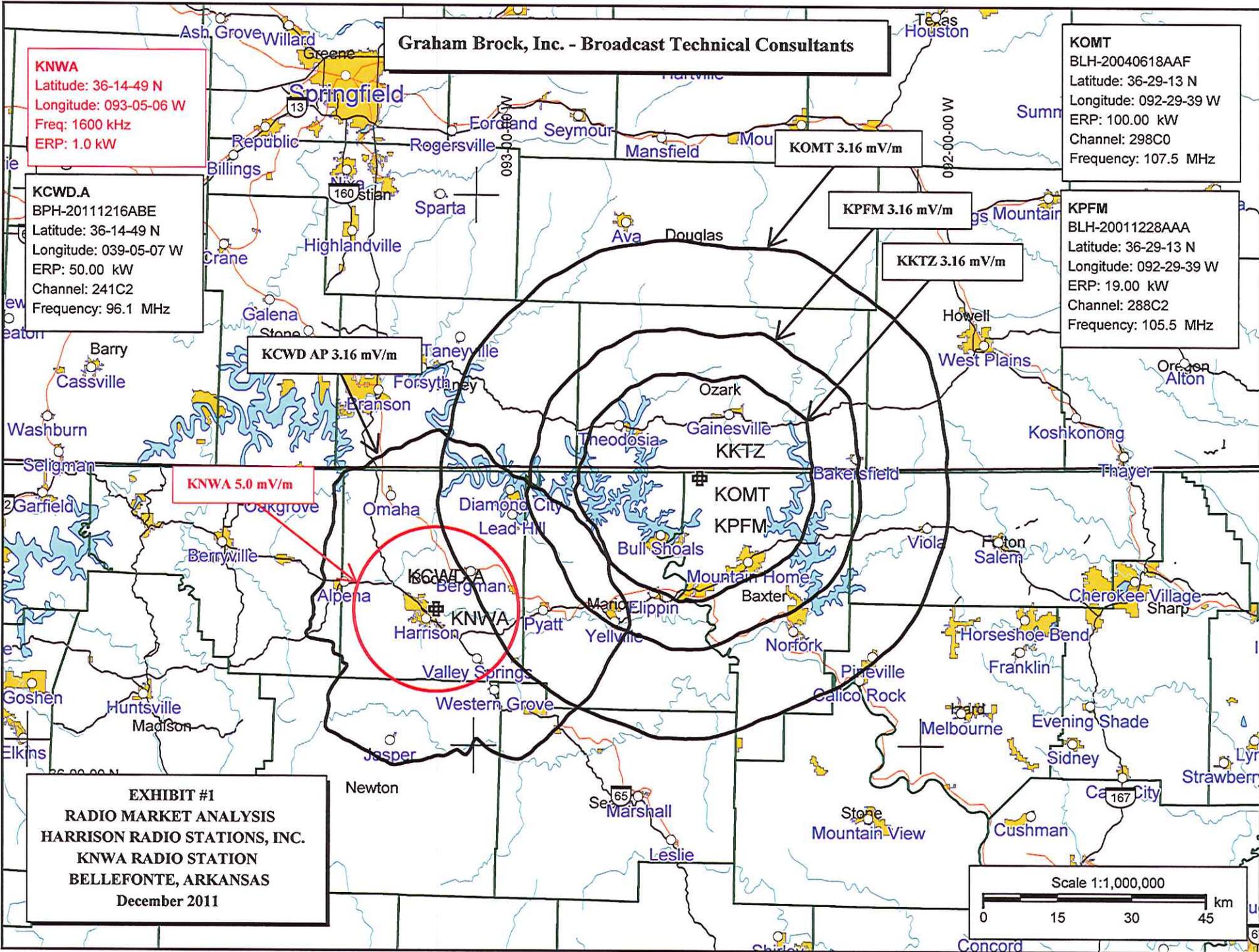
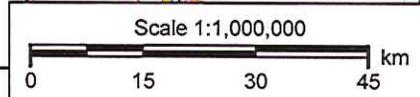
**KPFM**  
 BLH-20011228AAA  
 Latitude: 36-29-13 N  
 Longitude: 092-29-39 W  
 ERP: 19.00 kW  
 Channel: 288C2  
 Frequency: 105.5 MHz

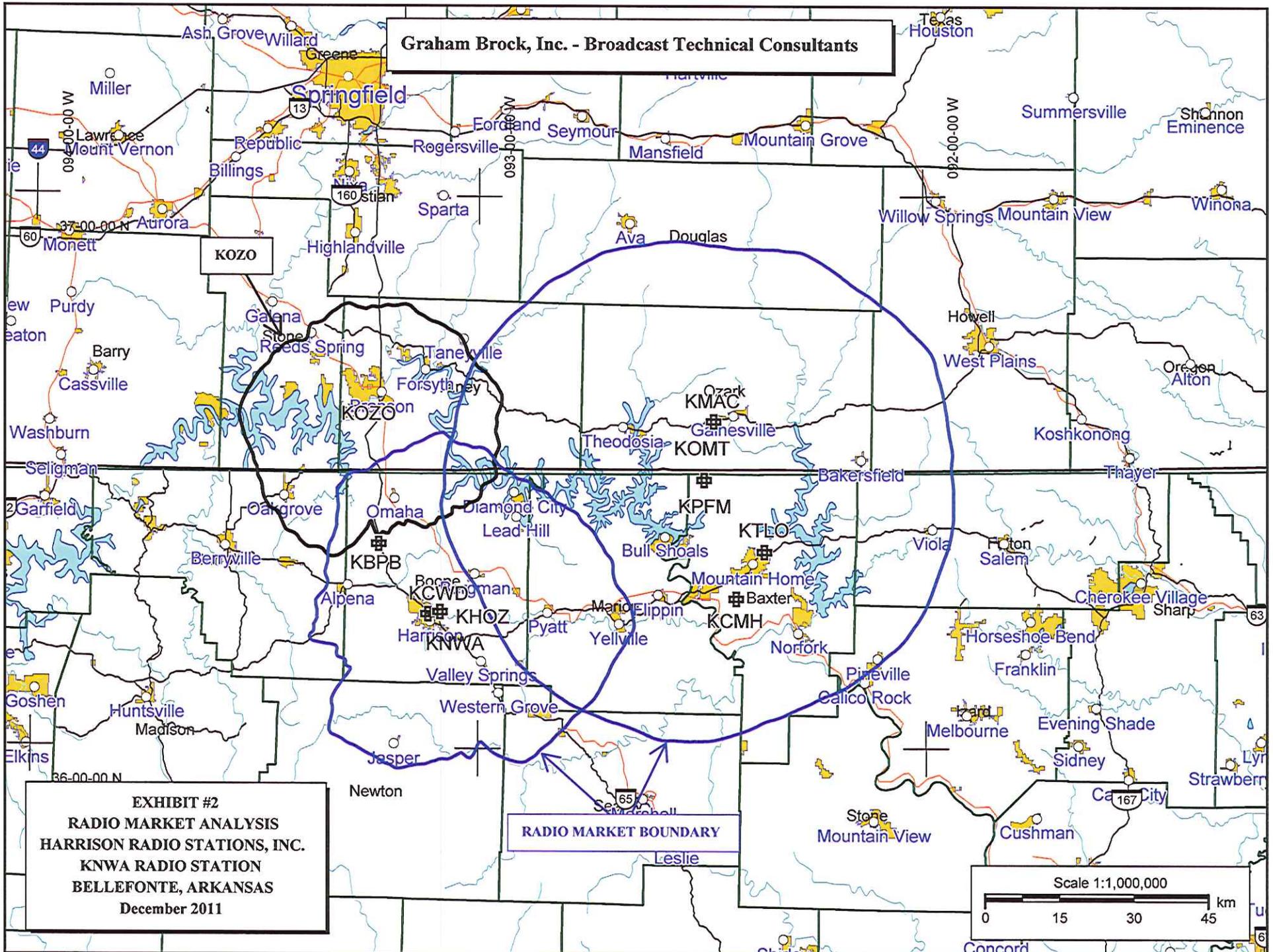
**KOMT**  
**KPFM**

**KKTZ**

**KNWA**

**EXHIBIT #1**  
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**EXHIBIT #3**

**Tabulation of Stations in Radio Market**

**AM Stations**

KHOZ	900 kHz	Harrison, Arkansas
KTLO	1240 kHz	Mountain Home, Arkansas
* KNWA	1600 kHz	Harrison, Arkansas

Total AM Stations - 3

**FM Stations**

+ KOZO	Ch 209C2	Branson, Missouri
KCMH	Ch 218C2	Mountain Home, Arkansas
KBPB	Ch 220A	Harrison, Arkansas
* KCWD	Ch 241C2	Harrison, Arkansas
KMAC	Ch 259C2	Gainesville, Missouri
* KOMT	Ch 298C0	Mountain Home, Arkansas

Total FM Stations - 6

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 9**

- \* Subject station.
- + Station provides city grade coverage to subject market.

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

*State of Georgia )*  
*St. Simons Island ) ss:*  
*County of Glynn )*

**R. STUART GRAHAM**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Harrison Radio Stations, Inc., to prepare the attached Technical Exhibit.

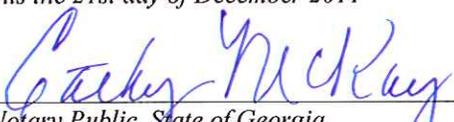
His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 21st day of December 2011.*

  
\_\_\_\_\_  
R. Stuart Graham  
*Affiant*

*Sworn to and subscribed before me  
this the 21st day of December 2011*

  
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*Notary Public, State of Georgia  
My Commission Expires: March 14, 2015*