

Engineering Exhibit

Radio – Television Multiple Ownership prepared for **Ramar Communications, Inc.**

This engineering statement has been prepared on behalf of *Ramar Communications, Inc.* (“*Ramar*”) regarding the proposed common attributable ownership of five radio stations and two television station in the Lubbock, TX region as listed below.

Ramar Radio and Television Stations

Call Sign	Ch/Freq.	Fac ID	Location
KLBB-FM	299C3	88795	Idalou, TX
KLZK(FM)	247C2	54684	New Deal, TX
KEJS(FM)	293C2	4019	Lubbock, TX
KXTQ-FM	229C1	55062	Lubbock, TX
KJTV(AM)	950	55061	Lubbock, TX
KJTV-TV	35	55031	Lubbock, TX
KLCW-TV ¹	43	77719	Wolfforth, TX

The radio-television crossownership rule is triggered when the Grade A contour of a television station entirely encompasses the community of license of a commonly owned AM or FM radio station. Additionally, the rule is triggered when the 60 dB μ (1 mV/m) FM station contour or the daytime 2 mV/m AM station contour entirely encompasses the community of license of a commonly owned television station. Television Grade A contour levels are defined in §73.683, however those specifications correspond to analog stations. With the transition to digital television (“DTV”) in 2009, full power television stations have ceased operating in analog.

The FCC has not defined a Grade A coverage contour level for digital television stations. For DTV stations, the coverage contours that have been recognized are described in §73.622(e) for DTV service and in §73.625(a) for principal community (city grade) service. Those contour levels are

¹KLCW-TV, licensed to *Woods Communications Corporation*, is attributable to Ramar pursuant to a joint sales agreement (JSA).

41 dB μ (DTV service) and 48 dB μ (principal community) for digital UHF stations such as KJTV-TV and KLCW-TV.

The lack of a Grade A contour for digital television was discussed in FCC staff action of DA10-312.² In that action, crossownership evaluation was based on the use of the §73.622(e) DTV service contour (described therein as the digital noise limited service contour, “NLSC”). The NLSC was considered to be equivalent to the Grade B contour for analog stations and therefore would encompass a larger area than the analog Grade A contour. Thus, the DA 10-312 decision applied a worst-case analysis regarding digital television-radio common ownership. Since the proposal addressed in DA 10-312 was found to be in compliance using the NLSC, there was no need to derive or consider a contour that might be equivalent to analog Grade A.

Applying the NLSC approach to the proposal at hand, the crossownership map attached as Figure 1 shows that the NLSC (41 dB μ) for KJTV-TV and KLCW-TV both encompass the entire principal community associated with each of the radio stations (Idalou, New Deal, and Lubbock), and each of the radio stations’ relevant contour (60 dB μ for FM, 2 mV/m for AM) encompass the principal communities associated with KJTV-TV (Lubbock) and KLCW-TV (Wolfforth).

Therefore, the radio-television crossownership rule is triggered and there is proposed common ownership of two television stations and five radio stations. This is permitted under §73.3555(c)(2)(i), which permits ownership of two commercial TV station with six commercial radio stations provided that at least 20 independently owned media voices remain. A separate exhibit is provided by counsel for *Ramar* indicating that the minimum number of voices is satisfied.

² See Order regarding BTC-20090518AHQ, BTCH-20090518AIO, BALH-20090518AIG, BALH-20090518AIK, released February 25, 2010.

Engineering Statement
Radio – Television Multiple Ownership
Ramar Communications, Inc.
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Certification

The undersigned hereby certifies that the foregoing statement was prepared by him or under his direction, and that it is true and correct to the best of his knowledge and belief.

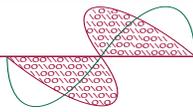


Joseph M. Davis, P.E.
August 18, 2015

Chesapeake RF Consultants, LLC
207 Old Dominion Road
Yorktown, VA 23692
703-650-9600

List of Attachments

Figure 1 Radio - Television Crossownership

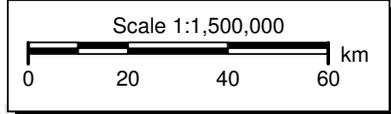
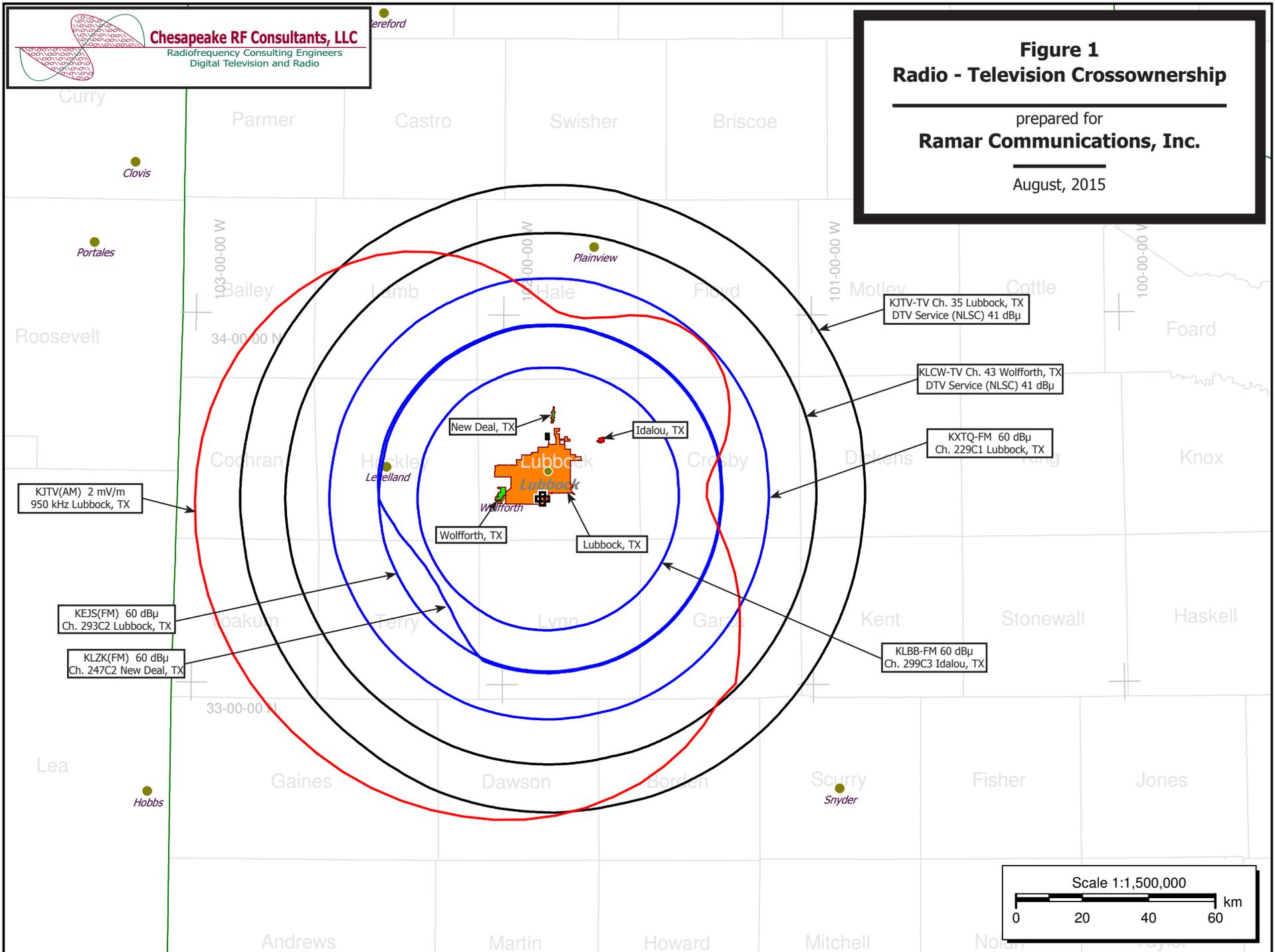


Chesapeake RF Consultants, LLC
Radiofrequency Consulting Engineers
Digital Television and Radio

Figure 1 Radio - Television Crossownership

prepared for
Ramar Communications, Inc.

August, 2015



Lubbock TX Independent Radio Voices

Voices	Call Signs	AM, FM or FX	City of License	County	State of License	Parent	AM Frequency	FM Frequency	Power Day/FM	Power Night	Class	
1	KBTE	FM	Tulia	Swisher	TX	Alpha Media		0	104.9	99	0	C1
1	KLLL	FM	Lubbock	Lubbock	TX	Alpha Media		0	96.3	100	0	C1
1	KMMX	FM	Tahoka	Lynn	TX	Alpha Media		0	100.3	100	0	C1
1	KONE	FM	Lubbock	Lubbock	TX	Alpha Media		0	101.1	100	0	C1
2	KTTU	FM	Brownfield	Terry	TX	Barton Broadcasting Co		0	104.3	50	0	C2
3	KAMZ	FM	Tahoka	Lynn	TX	Benavides, Albert		0	103.5	20	0	C3
4	KKLU	FM	Lubbock	Lubbock	TX	Educational Media Foundation		0	90.9	21	0	C2
5	KBZO	AM	Lubbock	Lubbock	TX	Entravision Communications Corp	1460	0	1	0.243	B	
5	KAIQ	FM	Wofforth	Lubbock	TX	Entravision Communications Corp		0	95.5	100	0	C1
6	KAMY	FM	Lubbock	Lubbock	TX	Family Life Broadcasting System		0	90.1	63	0	C1
7	KDAV	AM	Lubbock	Lubbock	TX	High Plains Radio Network LLC	1590	0	1	1	B	
8	KRFE	AM	Lubbock	Lubbock	TX	KRFE Radio Inc	580	0	0.5	0.29	B	
9	KJTV	AM	Lubbock	Lubbock	TX	Ramar Communications	950	0	5	0.5	B	
9	KEJS	FM	Lubbock	Lubbock	TX	Ramar Communications		0	106.5	34	0	C2
9	KLBB	FM	Idalou	Lubbock	TX	Ramar Communications		0	107.7	6	0	C3
9	KLZK	FM	New Deal	Lubbock	TX	Ramar Communications		0	97.3	32	0	C2
9	KXTQ	FM	Lubbock	Lubbock	TX	Ramar Communications		0	93.7	100	0	C1
10	KFLP	AM	Floydada	Floyd	TX	Ricketts, Anthony	900	0	0.25	0.007	D	
10	KFLP	FM	Floydada	Floyd	TX	Ricketts, Anthony		0	106.1	25	0	C3
11	KTTZ	FM	Lubbock	Lubbock	TX	Texas Tech University		0	89.1	70	0	C1
11	KTXT	FM	Lubbock	Lubbock	TX	Texas Tech University		0	88.1	35	0	C2
12	KFYO	AM	Lubbock	Lubbock	TX	Townsquare Media Incorporated	790	0	5	1	B	
12	KKAM	AM	Lubbock	Lubbock	TX	Townsquare Media Incorporated	1340	0	1	1	C	
12	KFMX	FM	Lubbock	Lubbock	TX	Townsquare Media Incorporated		0	94.5	100	0	C1
12	KKCL	FM	Lorenzo	Crosby	TX	Townsquare Media Incorporated		0	98.1	36	0	C2
12	KQBR	FM	Lubbock	Lubbock	TX	Townsquare Media Incorporated		0	99.5	100	0	C1
12	KZII	FM	Lubbock	Lubbock	TX	Townsquare Media Incorporated		0	102.5	100	0	C1
13	KJDL	AM	Lubbock	Lubbock	TX	Walker Broadcasting & Communications Ltd	1420	0	0.5	0.14	D	
13	KJDL	FM	Levelland	Hockley	TX	Walker Broadcasting & Communications Ltd		0	105.3	23.5	0	C2
13	KRBL	FM	Idalou	Lubbock	TX	Walker Broadcasting & Communications Ltd		0	105.7	5.5	0	A
14	KJAK	FM	Slaton	Lubbock	TX	Williams Broadcasting Group		0	92.7	100	0	C1

14 Independent Radio Voices. (Source: BIA Media Access PRO database, data 06/29/2015)

Lubbock TX Independent TV Voices

Voices	Call Signs	Channel	DTV Channel	Affiliation	City of License	State of License	Parent	County	Type Service
1	KAMC	28	27	ABC	Lubbock	TX	Mission Broadcasting Inc	Lubbock	MAIN
2	KLBK-TV	13	40	CBS	Lubbock	TX	Nexstar Broadcasting Group Inc	Lubbock	MAIN
3	KPTB-DT	16	16	REL	Lubbock	TX	Prime Time Christian Broadcasting Incorporated	Lubbock	MAIN
N/A	KJTV-TV	34	35	FOX	Lubbock	TX	Ramar Communications	Lubbock	MAIN
4	KCBD	11	11	NBC	Lubbock	TX	Raycom Media Incorporated	Lubbock	MAIN
N/A	KTTZ-TV	5	39	PBS	Lubbock	TX	Texas Tech University	Lubbock	PUB
5	KLCW-TV	22	43	CW+	Wolfforth	TX	Woods Communications Corporation	Lubbock	MAIN

5 Independent TV Voices; "N/A" Owns Attributable Radio Station(s). (Source: BIA Media Access PRO database, data 06/29/2015)

Lubbock TX Independent Newspaper Voice

Voice	Newspaper	Publisher	County Published	DMA Local Television Households (2014-2015)	Circulation (M-F)	Percentage of TV Households
1	Lubbock Avalanche-Journal	Morris Communications	Lubbock	158,400	32,804	20.70%

1 Independent Newspaper Voice. (Sources: Lubbock Avalanche-Journal; Nielsen Media Research)

Lubbock TX Independent Cable Voice

Voice	Cable System	Owner	County
1	Sudden Link Advanced Digital TV	Suddenlink Communications	Lubbock

1 Independent Cable Voice. (Source: Consumer Brands LLC)

Lubbock TX Independent Radio Voices

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1	KBTE	FM	Tulia	Swisher	TX	Alpha Media		0	104.9	99	0	C1
1	KLLL	FM	Lubbock	Lubbock	TX	Alpha Media		0	96.3	100	0	C1
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