

## **MULTIPLE SERVICES STUDY**

for

### **Midwest Communications Inc.**

Associated with the Purchase of

WDAY-FM - Fargo	ND	BMLH-20071019AJE
KBVB(FM) - Barnesville, MN		BLH-20080922AEJ
KRWK(FM) - Fargo	ND	BMLH-20071019AJB
KMJO(FM) - Hope	ND	BLH-20021220AAO
KVOX(AM) - Fargo	ND	BL-20061214ACN
KFGO(AM) - Fargo	ND	BL-

**September 2012**

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**MUNN-REESE, INC.**  
Broadcast Engineering Consultants  
Coldwater, MI 49036

# Engineering Statement

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This firm was retained to determine the number of principal community radio contours available from stations authorized for commercial and non-commercial service associated with the purchase of stations:

<b>Callsign</b>	<b>Chan</b>	<b>City</b>	<b>ST</b>	<b>File Number</b>	<b>FAC ID</b>
WDAY-FM	229C0	Fargo	ND	BMLH-20071019AJE	22123
KBVB(FM)	236C1	Barnesville	MN	BLH-20080922AEJ	37001
KRWK(FM)	270C1	Fargo	ND	BMLH-20071019AJB	34422
KMJO(FM)	284C1	Hope	ND	BLH-20021220AAO	88502
KVOX(AM)	740kHz	Fargo	ND	BL-20061214ACN	135847
KFGO(AM)	790kHz	Fargo	ND	BL-	34421

All facilities and their respective communities of license reside within the Fargo-Moorhead Arbitron Market (as reported by BIA) with the exception of KMJO(FM) – Hope, ND (Facility ID: 88502). Therefore Multiple Ownership Studies have been conducted under both the Interim Contour Methodology and BIA Worksheet Rules demonstrating compliance with the current duopoly guidelines. The study contained here-in solely addresses compliance under the Interim Contour Methodology. Compliance under the BIA Worksheet Rules has been addressed in a separate showing.

Midwest Communications Inc. currently owns or has an attributable interest in multiple aural services spanning six (6) states including Michigan, Wisconsin, Minnesota, Indiana, Illinois and South Dakota. However the purchase of this North Dakota/Minnesota grouping of facilities represents one unique market which is separate and distinct from any other Midwest Communications Inc. holding. Therefore, no other Midwest Communications' holdings are relevant for this study. This separate and unique market to be studied is comprised of six (6) stations and has been identified as "Market 1". A map of the commonly controlled stations for this relevant purchase has been included in **Exhibit 1.1**. "Market 1" will be comprised of all six (6) stations to be purchased including WDAY-FM - Fargo, ND; KBVB(FM) - Barnesville, MN; KRWK(FM) - Fargo, ND; KMJO(FM) - Hope, ND; KVOX(AM) - Fargo, ND; and KFGO(AM) - Fargo, ND.

The existing facilities of the stations included in this report were determined by the use of currently updated copies of the FCC computer databases of AM and FM stations. The listed facilities served as the basis for the computation of the respective principal community contours. The accuracy of the results of this study is understood to be limited to the accuracy of these databases. The FCC databases give no indication of licensed facilities that may be inoperative, construction permit facilities that may now be operating under program test authority (but have not yet been issued a license) or facilities which may have been licensed since the last update. Therefore, some stations may have been included or excluded erroneously. However, unless otherwise indicated, all licensed facilities known to be inoperative and all known applications and construction permit facilities, have been eliminated from consideration in this study.

For AM stations, Map M-3 soil conductivity values and the authorized licensed transmitting facilities served as the basis for the computation of the predicted 5.0 mV/m groundwave contour in accordance with §73.183 of the FCC Rules. The distance to the contour was computed for seventy-two (72) equally spaced azimuths beginning with 0° True. For FM stations, the authorized Center of Radiation and ERP values were utilized to compute the predicted 3.16 mV/m (70 dBu) contour as provided in §73.313 of the Rules. The predicted FM contours shown in this report are based on the use of 72 equally spaced terrain radials beginning with 0° True employing the NED 03 second terrain database.

## Engineering Statement (continued)

As stated before, there will be one unique and distinct market associated with this assignment. The market has been defined, in accordance with §73.3555 of the FCC Rules, as the area within the total perimeter formed by the combined principal community contours of WDAY-FM, KBVB(FM), KRWK(FM), KMJO(FM), KVOX(AM) and KFGO(AM). And as stated before, **Exhibit 1.1** shows the stations proposed to be under common control relevant for this purchase. To aid in identifying the respective contours, AM stations to be acquired have been shown with solid blue lines. FM stations to be acquired have been shown with solid red lines. The "Market 1" common overlap area has been designated as well.

For "Market 1", the market defining contours have been shown in **Exhibit 2.1** of this report along with a minimum number of principal community contours entering the market. The defining contours have been shown with light green lines on this map with the market itself highlighted in yellow. FM contours entering the market have been denoted in purple lines. AM contours entering the market have been shown in orange lines. Per the Interim Contour Methodology Rules, common holdings which enter the market, but do not define the market have been omitted from the station count. However, in this instance there are no Midwest Communications Inc. common holdings which enter the market but do not define the market. A complete tabulation of all stations entering the market will be supplied upon request.

Under the current rules, the market falls at least within the minimum limitations set forth in §73.3555 (a)(1)(iii): ***In a radio market with between 15 and 29 (inclusive) full-power, commercial and noncommercial radio stations, not more than 6 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM).*** The principal community contours of at least twenty-two (22) other stations entering the market are shown in **Exhibit 2.1**. Including the four (4) FM and two (2) AM station(s) which define the market there are at least twenty-eight (28) aural services in this market. This represents no more than 22% of the market as shown. **Exhibit 3.1** lists the facilities of the individual stations used in this report.

### CERTIFICATION

I hereby certify, subject to penalties for perjury, that the contents of this Engineering Statement are true and accurate to the best of my knowledge and belief.

September 18, 2012

**MUNN-REESE, INC.**

By Justin W. Asher  
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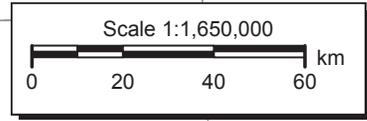
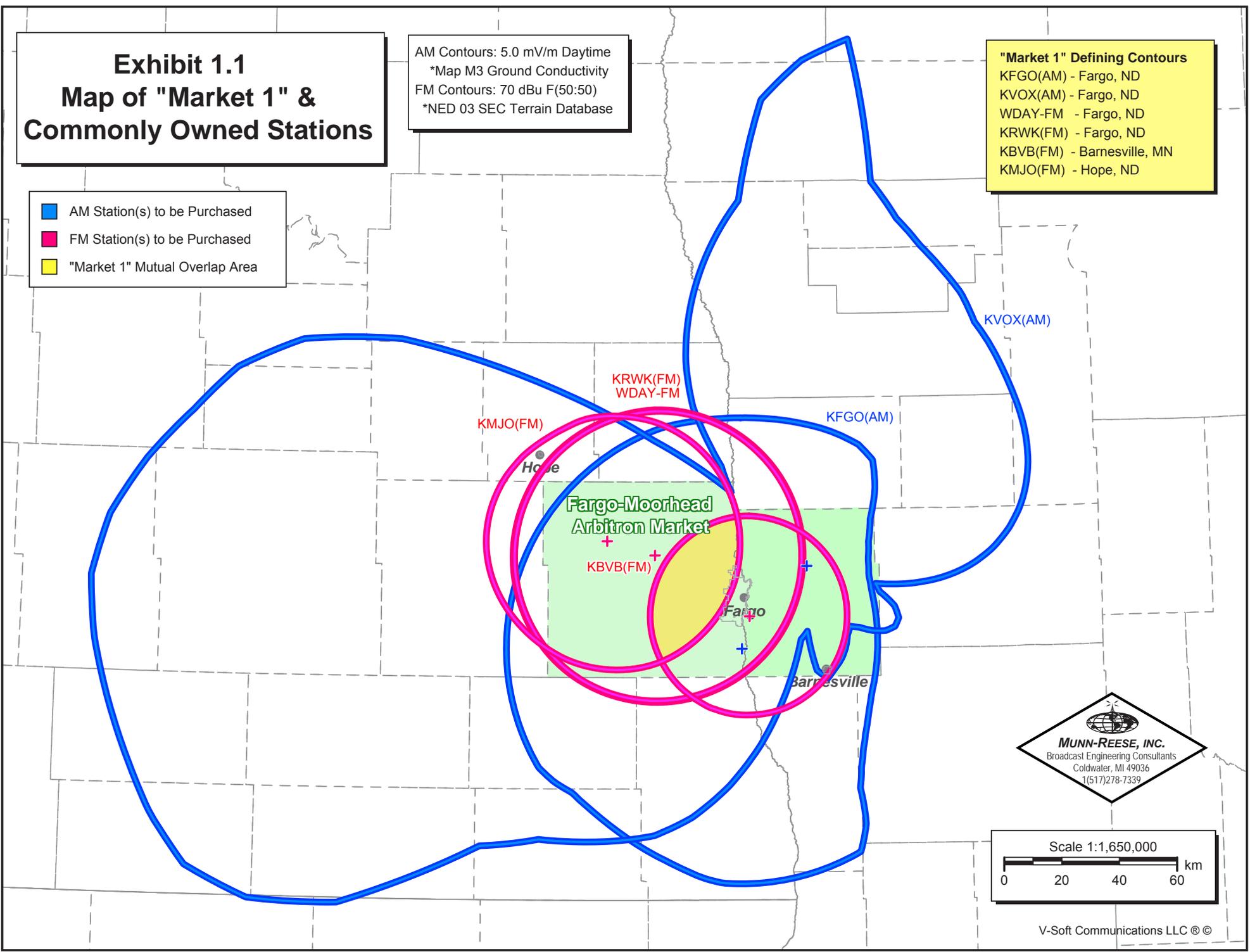
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# Exhibit 1.1 Map of "Market 1" & Commonly Owned Stations

AM Contours: 5.0 mV/m Daytime  
\*Map M3 Ground Conductivity  
FM Contours: 70 dBu F(50:50)  
\*NED 03 SEC Terrain Database

**"Market 1" Defining Contours**  
KFGO(AM) - Fargo, ND  
KVOX(AM) - Fargo, ND  
WDAY-FM - Fargo, ND  
KRWK(FM) - Fargo, ND  
KBVB(FM) - Barnesville, MN  
KMJO(FM) - Hope, ND

- AM Station(s) to be Purchased
- FM Station(s) to be Purchased
- "Market 1" Mutual Overlap Area

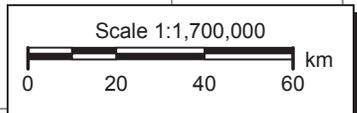
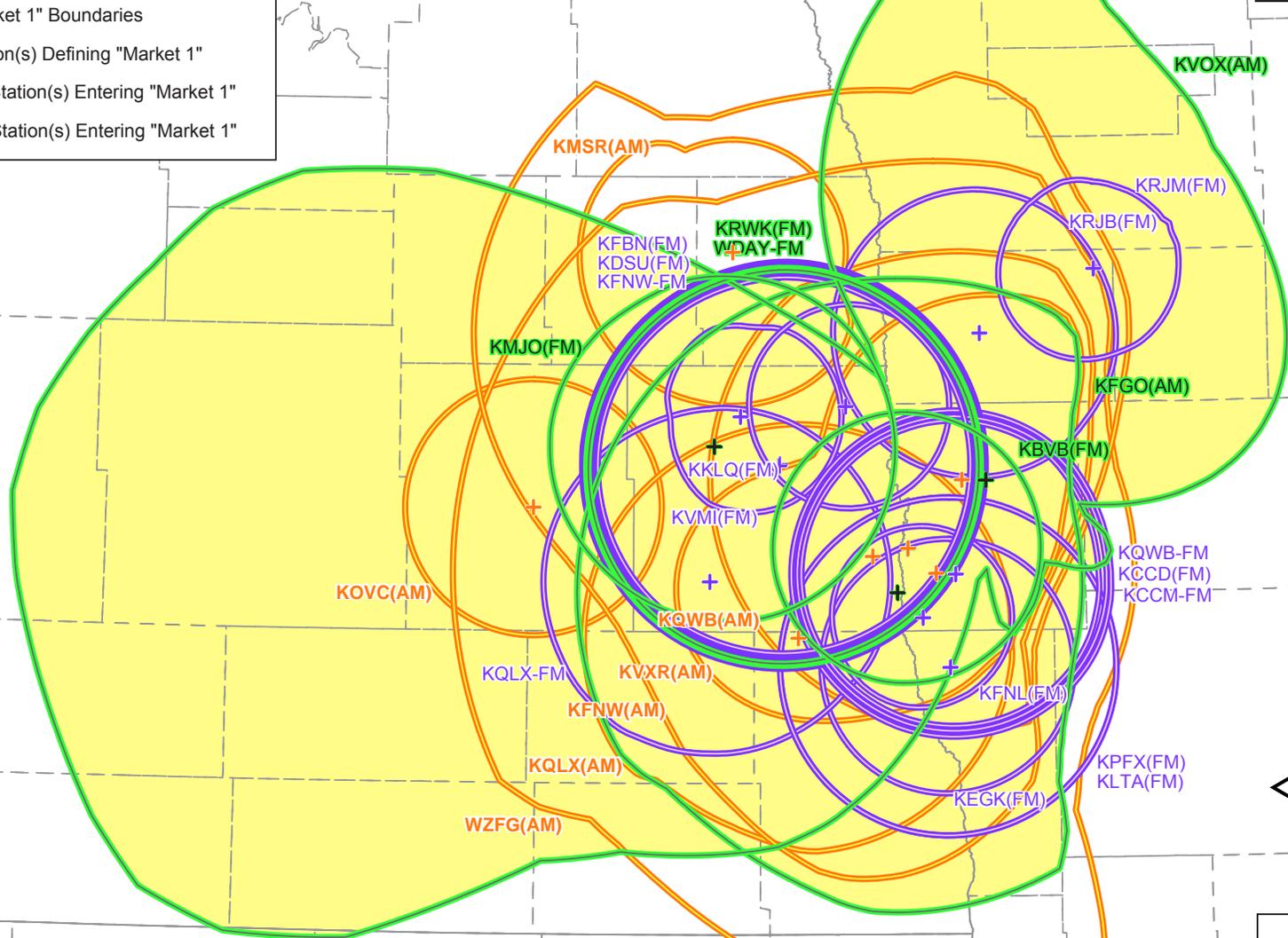


# Exhibit 2.1 Map of Stations Entering "Market 1"

AM Contours: 5.0 mV/m Daytime  
 \*Map M3 Ground Conductivity  
 FM Contours: 70 dBu F(50:50)  
 \*NED 03 SEC Terrain Database

**"Market 1" Defining Contours**  
 KFGO(AM) - Fargo, ND  
 KVOX(AM) - Fargo, ND  
 WDAY-FM - Fargo, ND  
 KRWK(FM) - Fargo, ND  
 KBVB(FM) - Barnesville, MN  
 KMJO(FM) - Hope, ND

- "Market 1" Boundaries
- Station(s) Defining "Market 1"
- FM Station(s) Entering "Market 1"
- AM Station(s) Entering "Market 1"



# Exhibit 3.1

## Tabulation of Select Stations Entering "Market 1"

Total number of overlapping contours: 28

Callsign	Type	Chan	City	St	File Number	Dist(km)	Azi(deg)
<i>KFGO(AM)*</i>	<i>AM</i>	<i>790</i>	<i>FARGO</i>	<i>ND</i>	<i>BL</i>	<i>0.0</i>	<i>0.0</i>
<i>KVOX(AM)*</i>	<i>AM</i>	<i>740</i>	<i>FARGO</i>	<i>ND</i>	<i>BL20061214ACN</i>	<i>36.5</i>	<i>38.4</i>
<i>WDAY-FM*</i>	<i>FM</i>	<i>229C0</i>	<i>Fargo</i>	<i>ND</i>	<i>BMLH20071019AJE</i>	<i>44.2</i>	<i>317.4</i>
<i>KRWK(FM)*</i>	<i>FM</i>	<i>270C1</i>	<i>Fargo</i>	<i>ND</i>	<i>BMLH20071019AJB</i>	<i>44.2</i>	<i>317.4</i>
<i>KBVB(FM)*</i>	<i>FM</i>	<i>236C1</i>	<i>Barnesville</i>	<i>MN</i>	<i>BLH20080922AEJ</i>	<i>11.6</i>	<i>13.7</i>
<i>KMJO(FM)*</i>	<i>FM</i>	<i>284C1</i>	<i>Hope</i>	<i>ND</i>	<i>BLH20021220AAO</i>	<i>59.7</i>	<i>309.0</i>
KFBN(FM)	FM	204C1	Fargo	ND	BLED19971222KD	44.4	317.8
KCCD(FM)	FM	212C1	Moorhead	MN	BLED19920612KA	15.5	72.6
KCCM-FM	FM	216C1	Moorhead	MN	BMLED20090903ACC	15.5	72.6
KDSU(FM)	FM	220C	Fargo	ND	BLED19820621AB	44.4	317.8
KFNL(FM)	FM	224C3	Kindred	ND	BMLH20110502ABI	9.1	134.8
KFNW-FM	FM	250C	Fargo	ND	BMLED20061220ACI	44.2	317.4
KQWB-FM	FM	254C1	Moorhead	MN	BLH19820104AR	15.5	72.6
KKLQ(FM)	FM	264C2	Harwood	ND	BLED20051012ADA	49.2	344.8
KRJM(FM)	FM	268C3	Mahnomen	MN	BLH20020419AAI	96.5	31.5
KVMI(FM)	FM	280C3	Arthur	ND	BLH20030303ACH	60.1	318.6
KLTA(FM)	FM	286C1	Breckenridge	MN	BMLH20120507ABA	23.3	145.1
KQLX-FM	FM	291C1	Lisbon	ND	BLH20080521ACW	47.9	273.7
KRJB(FM)	FM	293C1	Ada	MN	BLH20070924AVP	69.3	17.9
KEGK(FM)	FM	295C2	Wahpeton	ND	BLH20061023ABL	23.3	145.1
KPFX(FM)	FM	300C1	Fargo	ND	BMLH20120507ABB	23.3	145.1
KVXR(AM)	AM	1280	MOORHEAD	MN	BML20090227ACS	11.6	13.6
KFNW(AM)	AM	1200	WEST FARGO	ND	BMML20090130AVH	11.2	326.2
WZFG(AM)	AM	1100	DILWORTH	MN	BL20070601BTB	11.0	63.6
KQWB(AM)	AM	1660	WEST FARGO	ND	BL20001212ABT	33.1	30.0
KQLX(AM)	AM	890	LISBON	ND	BL20080102ACQ	27.8	245.8
KOVC(AM)	AM	1490	VALLEY CITY	ND	BL	95.3	283.6
KMSR(AM)	AM	1520	MAYVILLE	ND	BL20020326ABV	96.3	334.5

*\* Indicates stations defining the market*

TV: Not Included

FM: 3.16 mV/m (70 dBu); Include NCE

AM: 5.0 mV/m

Stations more than 92 km from the common area were excluded.

Distance and bearing calculations from coordinates: 43-29-17 N, 096-38-14 W