

**RADIO MARKET ANALYSIS**  
**LEGEND COMMUNICATIONS OF WYOMING, LLC**

**KKLX RADIO STATION**  
**WORLAND, WYOMING**  
**KYTS RADIO STATION**  
**MANDERSON, WYOMING**  
**NEW FM RADIO STATION**  
**TEN SLEEP, WYOMING**  
**August 2008**

**TECHNICAL STATEMENT**

1. This Technical Statement and attached exhibits were prepared on behalf of Legend Communications of Wyoming, LLC (“Legend”), licensee of KKLX, Channel 241C2, Worland, Wyoming<sup>1</sup> and permittee of KYTS, Channel 271C2, Ten Sleep, Wyoming. Legend is submitting applications to modify the outstanding permit for KKLX (raise height and lower power at the CP site) and KYTS (downgrade to Channel 271C3 and change community of license to Manderson, Wyoming) and further is an applicant for a New FM (“New FM”) station on Channel 267A at Ten Sleep, Wyoming. Legend is submitting several applications, as such, a Radio Market analysis is needed. Legend is also the licensee of stations KZMQ, 1140 kHz, and KZMQ-FM, Channel 262C, Greybull, Wyoming; and KWOR, 1340 kHz, Worland, Wyoming.<sup>2</sup> The 3.16 mV/m contours of the proposed KKLX and KYTS overlap with the contours of KZMQ-FM,

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- 1) There is an outstanding permit to upgrade KKLX to Channel 241C1 at Worland, Wyoming.
- 2) Legend is also the licensee of KCGL, Channel 281C, Powell, Wyoming; KODI, 1400 kHz, and KTAG, Channel 250C, Cody, Wyoming; KBBS, 1450 kHz, and KLGT, Channel 225C1, Buffalo, Wyoming; and KZZS, Channel 252C1, Story, Wyoming, as depicted on Exhibit #1. Exhibit #1A shows no overlap of the proposed KKLX with either KCGL or KTAG.

Legend is also the licensee of KGWY, Channel 264C1, Gillette, Wyoming; KAML-FM, Channel 245C1 (with a permit to move to Channel 247C0), and KIML, 1270 kHz, Gillette, Wyoming; and is the permittee of KDDV, Channel 268C0 Wright, Wyoming. These stations are so far removed that they are not shown on Exhibit #1. None of these stations have city grade overlap with KKLX, KYTS or the New FM at Ten Sleep; therefore, they are not considered further.

KZMQ and KWOR. Further the proposed KKLX contour overlaps with the proposed New FM contour at Ten Sleep. A map depicting the city grade contours of these facilities is shown on Exhibit #1. None of these facilities is licensed to, or considered “home”, in any rated market. Therefore, a review based on the modified contour overlap rules has been undertaken.

2. The overlap of contours between commonly held stations results in two distinct radio markets. Market #1 consists of FM station KKLX and the New FM at Ten Sleep, Wyoming. Market #2 consists of FM stations KKLX, KYTS and KZMQ-FM and AM stations KZMQ and KWOR. 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 relevant subject stations in the markets under study will be used to define the market boundary, hereinafter referred to as the “Radio Market”. The study will determine the number of other commercial AM and FM stations that either have transmitter sites within, or provide coverage to, the 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 Legend has an interest will be considered, unless it is a subject station in the market under review.

3. Exhibit #2 is a depiction of the stations within, or providing service to, the Radio Market #1 boundary. A total of five stations is depicted, including the two subject stations. Exhibit #3 is a tabulation of the stations in the Radio Market. 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 and 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. Based on Legend's interest in KKLX and New FM, Market #1 is in compliance with the Commission's multiple ownership rules, as detailed in §73.3555 of the rules.

4. Exhibit #4 is a depiction of the stations within, or providing service to, the Radio Market #2 boundary. A total of eleven stations is depicted, including the five subject stations. Exhibit #5 is a tabulation of the stations in the Radio Market. 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 and 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. Based on Legend's interest in KKLX, KYTS, KZMQ-FM, KZMQ and KWOR, Market #2 is in compliance with the Commission's multiple ownership rules, as detailed in §73.3555 of the rules.

5. Based on the above, each of the impacted radio markets is in compliance with the Commission's ownership rules. Therefore, the modification applications for KKLX and KYTS, and the new application for Ten Sleep, Wyoming are individually, and wholly, in compliance with the rules.

6. The foregoing technical statement was prepared on behalf of Legend Communications of Wyoming, LLC, 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 4.2. 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**

**KKLX Proposed**  
 Latitude: 44-03-31 N  
 Longitude: 107-51-12 W  
 ERP: 63.00 kW  
 Channel: 241C1  
 Frequency: 96.1 MHz  
 AMSL Height: 1491.38 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model : FCC

**New FM Ten Sleep, WY**  
 Latitude: 44-01-55 N  
 Longitude: 107-28-12 W  
 ERP: 1.00 kW  
 Channel: 267A  
 Frequency: 101.3 MHz  
 AMSL Height: 1429.5 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model : FCC

**KYTS Proposed**  
 Latitude: 44-03-31 N  
 Longitude: 107-51-12 W  
 ERP: 11.00 kW  
 Channel: 271C3  
 Frequency: 102.1 MHz  
 AMSL Height: 1466.1 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model : FCC

**KZMQ**  
 Latitude: 44-27-01 N  
 Longitude: 108-02-56 W  
 ERP: 10.00 kW  
 Frequency: 1140.0 kHz  
 Prop Model : FCC/M3

**KZMQ-FM**  
 BMLH-20040617AAP  
 Latitude: 44-48-41 N  
 Longitude: 107-55-06 W  
 ERP: 56.00 kW  
 Channel: 262C  
 Frequency: 100.3 MHz  
 AMSL Height: 2960.0 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model : FCC

**KWOR**  
 Latitude: 44-01-02 N  
 Longitude: 107-58-14 W  
 ERP: 1.00 kW  
 Frequency: 1340.0 kHz  
 Prop Model : FCC/M3

**KCGL**  
**KTAG**  
**KODI**

**KODI 5.0 mV/m**

**KCGL 3.16 mV/m**

**KTAG 3.16 mV/m**

**KZMQ 5.0 mV/m**

**KZMQ-FM 3.16 mV/m**

**KLGT 3.16 mV/m**

**KZZS 3.16 mV/m**

**KZZS**  
**KLGT**

**KBBS**

**KBBS 5.0 mV/m**

**KCGL 3.16 mV/m**

**KYTS**  
**KKLX**  
**KWOR**

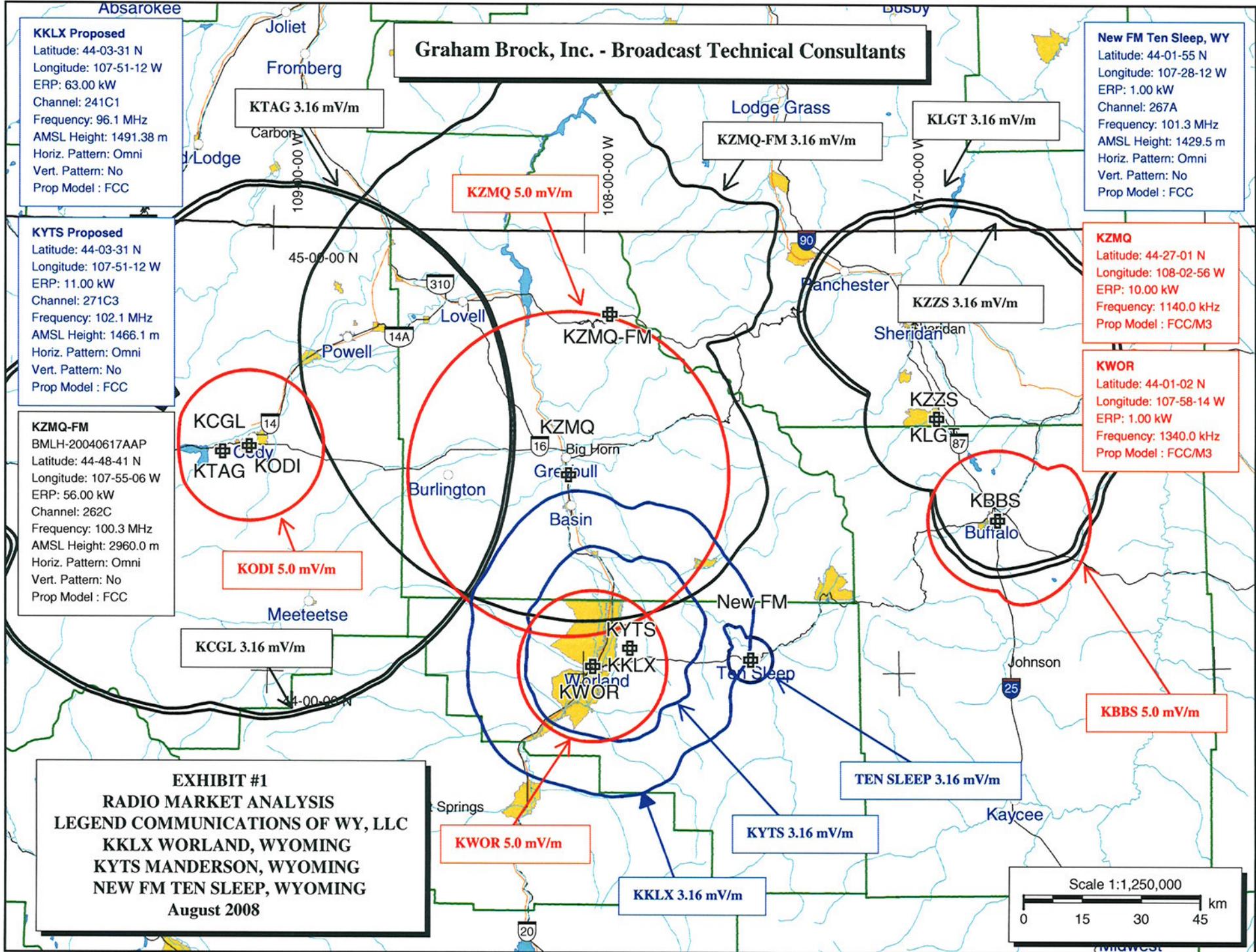
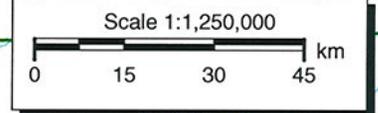
**KWOR 5.0 mV/m**

**KYTS 3.16 mV/m**

**TEN SLEEP 3.16 mV/m**

**KKLX 3.16 mV/m**

**EXHIBIT #1**  
**RADIO MARKET ANALYSIS**  
**LEGEND COMMUNICATIONS OF WY, LLC**  
**KKLX WORLAND, WYOMING**  
**KYTS MANDERSON, WYOMING**  
**NEW FM TEN SLEEP, WYOMING**  
**August 2008**



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

**KKLX Proposed**  
 Latitude: 44-03-31 N  
 Longitude: 107-51-12 W  
 ERP: 63.00 kW  
 Channel: 241C1  
 Frequency: 96.1 MHz  
 AMSL Height: 1491.38 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model : FCC

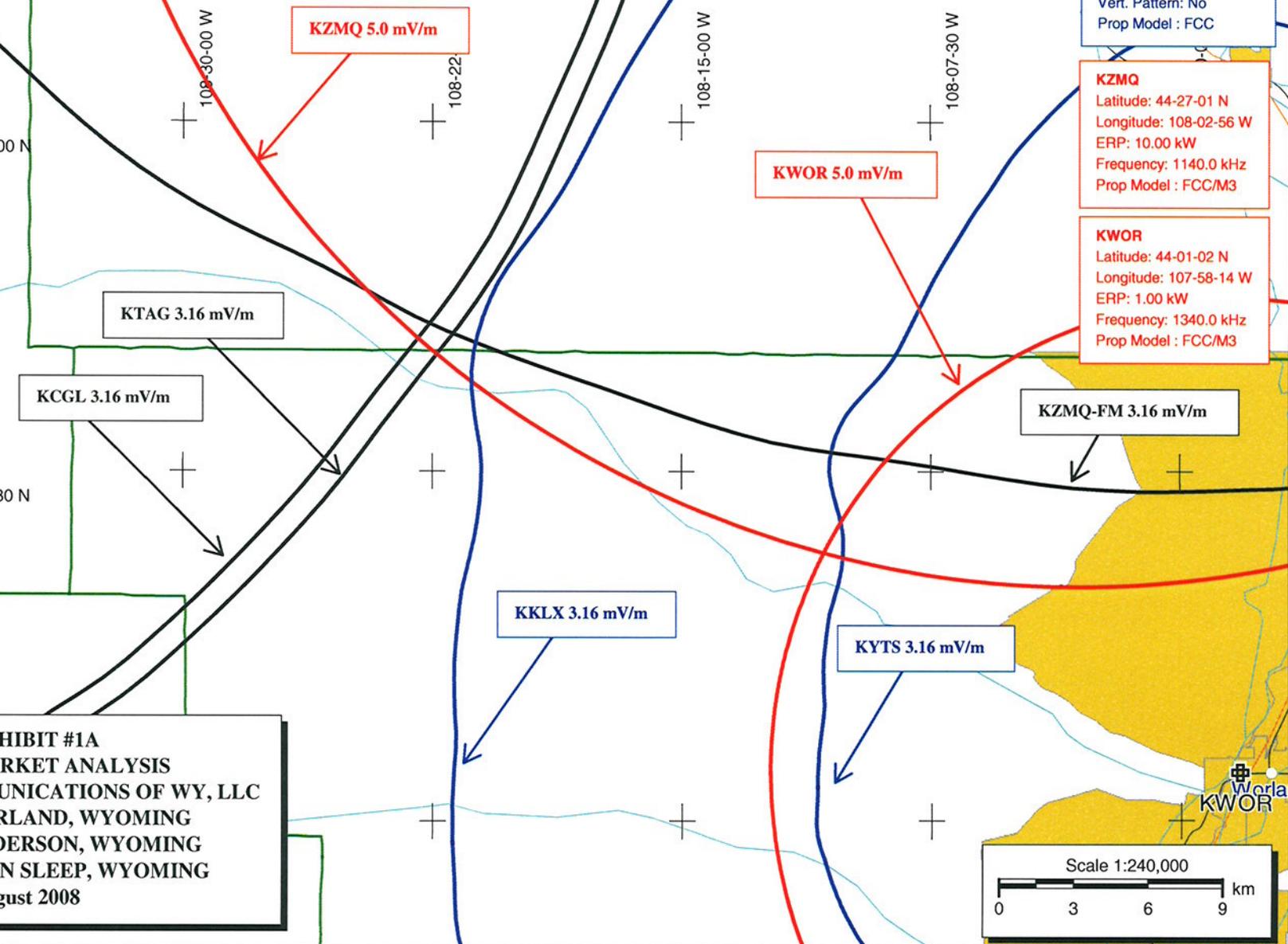
**KYTS Proposed**  
 Latitude: 44-03-31 N  
 Longitude: 107-51-12 W  
 ERP: 11.00 kW  
 Channel: 271C3  
 Frequency: 102.1 MHz  
 AMSL Height: 1466.1 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model : FCC

**KZMQ-FM**  
 BMLH-20040617AAP  
 Latitude: 44-48-41 N  
 Longitude: 107-55-06 W  
 ERP: 56.00 kW  
 Channel: 262C  
 Frequency: 100.3 MHz  
 AMSL Height: 2960.0 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model : FCC

**New FM Ten Sleep, WY**  
 Latitude: 44-01-55 N  
 Longitude: 107-28-12 W  
 ERP: 1.00 kW  
 Channel: 267A  
 Frequency: 101.3 MHz  
 AMSL Height: 1429.5 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model : FCC

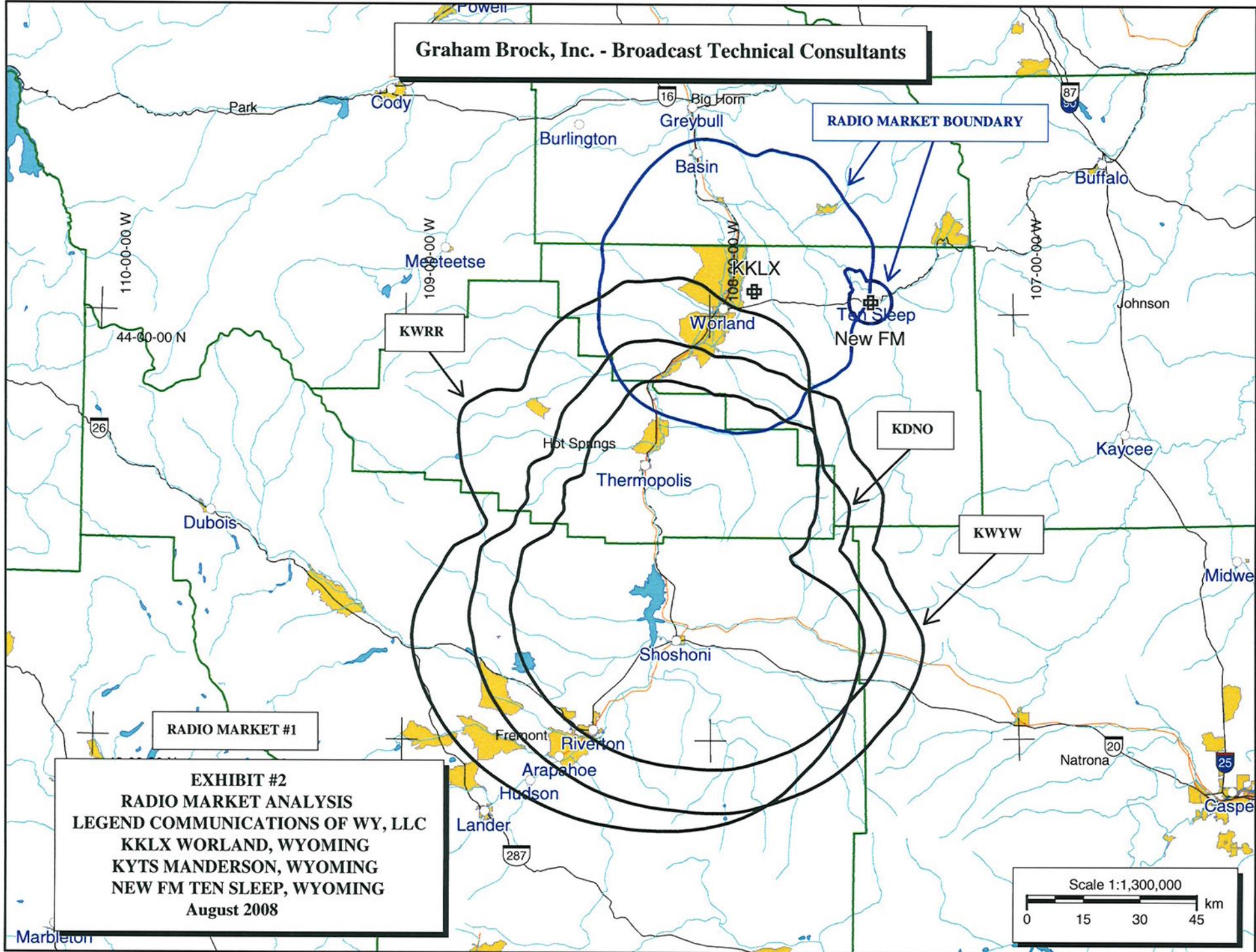
**KZMQ**  
 Latitude: 44-27-01 N  
 Longitude: 108-02-56 W  
 ERP: 10.00 kW  
 Frequency: 1140.0 kHz  
 Prop Model : FCC/M3

**KWOR**  
 Latitude: 44-01-02 N  
 Longitude: 107-58-14 W  
 ERP: 1.00 kW  
 Frequency: 1340.0 kHz  
 Prop Model : FCC/M3



**EXHIBIT #1A**  
**RADIO MARKET ANALYSIS**  
**LEGEND COMMUNICATIONS OF WY, LLC**  
**KKLX WORLAND, WYOMING**  
**KYTS MANDERSON, WYOMING**  
**NEW FM TEN SLEEP, WYOMING**  
**August 2008**

Graham Brock, Inc. - Broadcast Technical Consultants



RADIO MARKET BOUNDARY

KRRR

KKLX

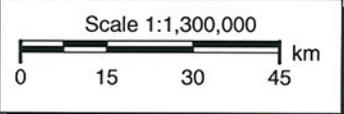
Ten Sleep  
New FM

KDNO

KQYW

RADIO MARKET #1

**EXHIBIT #2**  
**RADIO MARKET ANALYSIS**  
**LEGEND COMMUNICATIONS OF WY, LLC**  
**KKLX WORLAND, WYOMING**  
**KYTS MANDERSON, WYOMING**  
**NEW FM TEN SLEEP, WYOMING**  
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**August 2008**

**EXHIBIT #3**

**Tabulation of Stations in Radio Market #1**

**FM Stations**

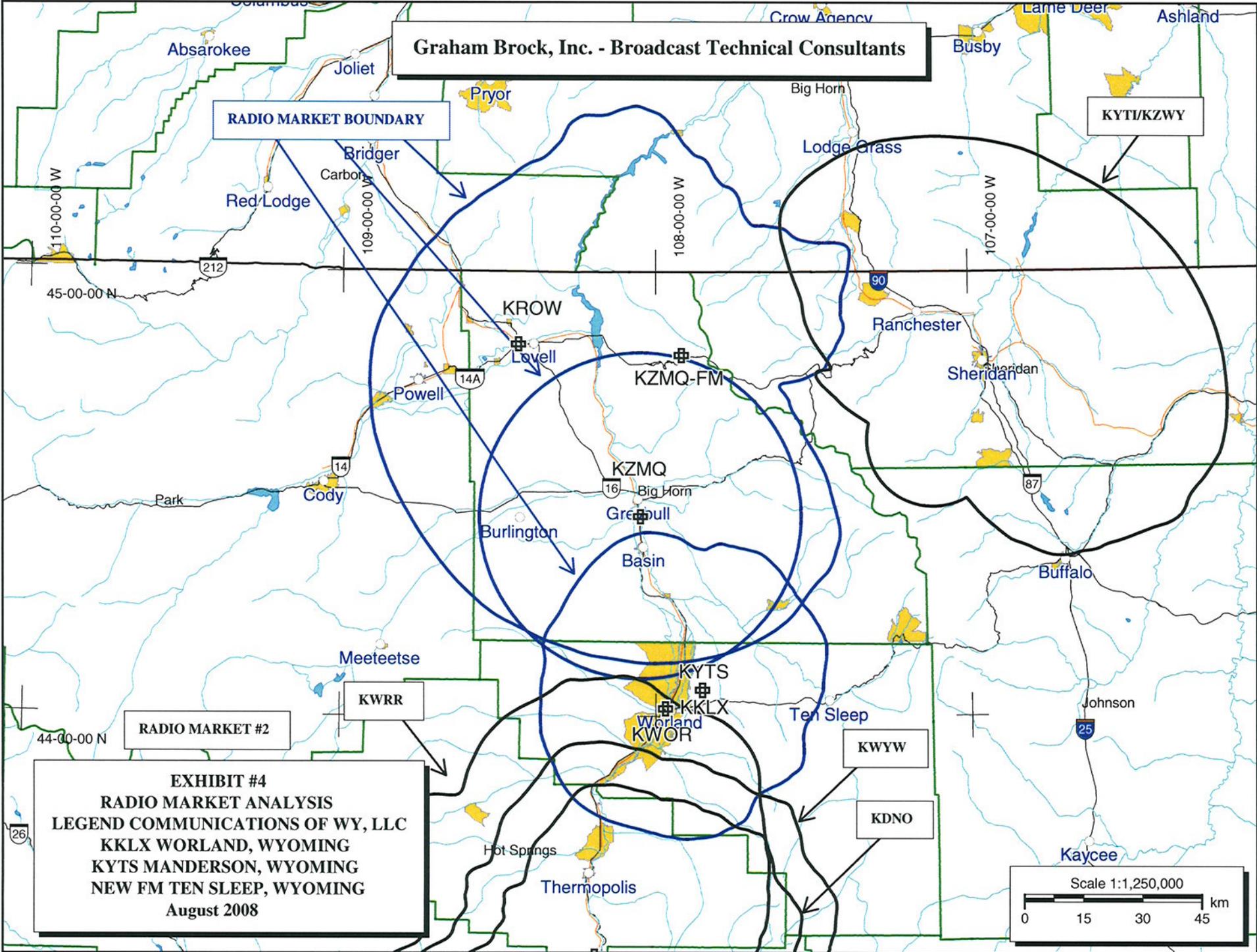
|          |          |                      |
|----------|----------|----------------------|
| + KWRR   | Ch 208C  | Ethete, Wyoming      |
| * KKLX   | Ch 241C1 | Worland, Wyoming     |
| + KWYW   | Ch 256C  | Lost Cabin, Wyoming  |
| * New FM | Ch 267A  | Ten Sleep, Wyoming   |
| + KDNO   | Ch 269C1 | Thermopolis, Wyoming |

Total FM Stations - 5

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 5**

- \* Subject station.
- + Provides city grade coverage to radio market.

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

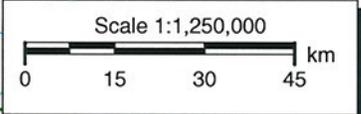


**RADIO MARKET BOUNDARY**

**KYTI/KZWY**

**RADIO MARKET #2**

**EXHIBIT #4**  
**RADIO MARKET ANALYSIS**  
**LEGEND COMMUNICATIONS OF WY, LLC**  
**KKLX WORLAND, WYOMING**  
**KYTS MANDERSON, WYOMING**  
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**August 2008**



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**August 2008**

**EXHIBIT #5**

**Tabulation of Stations in Radio Market #2**

**AM Stations**

|        |          |                   |
|--------|----------|-------------------|
| * KZMQ | 1140 kHz | Greybull, Wyoming |
| * KWOR | 1340 kHz | Worland, Wyoming  |

Total AM Stations - 2

**FM Stations**

|           |          |                      |
|-----------|----------|----------------------|
| + KWRR    | Ch 208C  | Ethete, Wyoming      |
| + KYTI    | Ch 229C  | Sheridan, Wyoming    |
| + KZWY    | Ch 235C  | Sheridan, Wyoming    |
| * KKLX    | Ch 241C1 | Worland, Wyoming     |
| + KWYW    | Ch 256C  | Lost Cabin, Wyoming  |
| * KZMQ-FM | Ch 262C  | Greybull, Wyoming    |
| + KDNO    | Ch 269C1 | Thermopolis, Wyoming |
| * KYTS    | Ch 271C3 | Manderson, Wyoming   |
| KROW      | Ch 297C3 | Lovell, Wyoming      |

Total FM Stations - 9

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 11**

- \* Subject station.
- + Provides city grade coverage to radio market.

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

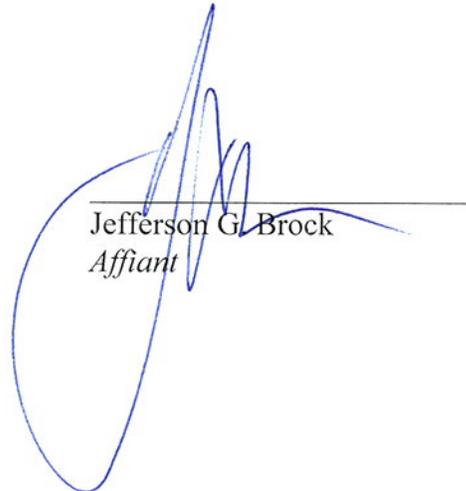
*State of Georgia )*  
*St. Simons Island ) ss:*  
*County of Glynn )*

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Legend Communications of Wyoming, LLC, 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 20th day of August 2008.*

  
\_\_\_\_\_  
Jefferson G. Brock  
*Affiant*

*Sworn to and subscribed before me  
this the 20th day of August 2008*

  
\_\_\_\_\_  
*Notary Public, State of Georgia  
My Commission Expires: June 16, 2012*