

**RADIO MARKET ANALYSIS**  
**PETRACOM OF HOLBROOK, L.L.C.**  
**KDJI/KZUA RADIO STATIONS**  
**HOLBROOK, ARIZONA**  
**November 2010**

**TECHNICAL STATEMENT**

1. This Technical Statement and attached exhibits were prepared on behalf Petracom of Holbrook, L.L.C. ("Petracom"), licensee of radio station KDJI, 1270 kHz and KZUA, Channel 221C1, Holbrook, Arizona. Petracom is submitting an application to correct the geographic coordinates of the licensed KDJI facility and an application for minor change for station KZUA. As such, a Radio Market Analysis is necessary. Petracom is also the licensee of KZUZ, Channel 228C3, KRFM, Channel 243C, KVSL<sup>1</sup>, 1450 kHz and KVWM, 970 kHz, Show Low, Arizona. Petracom has a Local Marketing Agreement with the permittee of KSNX, Channel 288C1, Heber, Arizona. None of these stations are licensed to or considered home to any Arbitron rated market. The contours of KDJI and KZUA overlap with the contours of KRFM and KSNX.<sup>2</sup> Exhibit #1 is a map depicting the city grade contours of the relevant subject stations. Therefore, an ownership analysis to demonstrate compliance in a non-rated market is required.

2. A study has been conducted to verify that common control of the proposed KDJI, proposed KZUA, KRFM and the KSNX permit is in compliance with the Commission's revised contour overlap rules in §73.3555. The contours of the stations create a radio market boundary which will be used to determine the number of other commercial and non-commercial AM and

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1) There is a pending application to change the frequency of KVSL to 1470 kHz.

2) Since the contours of KVSL (applied for and licensed), KZUZ and KVWM do not overlap with either KDJI or KZUA, they are not considered further in this review.



FM stations that either have transmitter sites within or provide coverage to the Radio Market. The subject stations will then be added to determine the total number of stations in the market. Only those stations with transmitter sites within 92.0 kilometers of the common overlap area will be considered as contributors to the market. No other station in which Petracom 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. There are a total of ten stations which are considered contributors to the Radio Market, when the four subject stations are included. Exhibit #3 is a tabulation of the stations in the Radio Market. The number of stations depicted falls in the fourteen or less stations tier of §73.3555(a)(1)(iv) of the Commission's rules.<sup>3</sup> At this level, common ownership or control of up to five stations, with no more than three stations 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.

4. Therefore, the applications for KDJI and KZUA are in compliance with §73.3555 of the Commission's multiple ownership rules for a contour overlap market.

5. The foregoing technical statement was prepared on behalf of Petracom of Holbrook, 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

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3) There are additional stations providing service to the Radio Market, but they were not considered, as a sufficient number of stations are depicted based on the facilities to be commonly owned.

in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.5. BIA database. All other data was extracted from the 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**

**KZUA Corrected**

Latitude: 34-55-13 N  
Longitude: 110-07-53 W  
ERP: 100.00 kW  
Channel: 221C1  
Frequency: 92.1 MHz  
AMSL Height: 1673.4 m  
Horiz. Pattern: Omni  
Prop Model : FCC

**KDJI Corrected**

Latitude: 34-54-21 N  
Longitude: 110-11-25 W  
ERP: 5.00 kW  
Frequency: 1270.0 KHz  
Prop Model : FCC/M3

**KRFM**

BMLH-19850325KT  
Latitude: 34-12-20 N  
Longitude: 109-56-26 W  
ERP: 100.00 kW  
Channel: 243C  
Frequency: 96.5 MHz  
AMSL Height: 2378.0 m  
Horiz. Pattern: Omni  
Prop Model : FCC

**KSNX CP**

BNPH-20070409AAP  
Latitude: 34-27-43 N  
Longitude: 110-24-10 W  
ERP: 100.00 kW  
Channel: 288C1  
Frequency: 105.5 MHz  
AMSL Height: 2038.0 m  
Horiz. Pattern: Omni  
Prop Model : FCC

CITY GRADE CONTOURS

**EXHIBIT #1**  
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KZUA 3.16 mV/m

KDJI 5.0 mV/m

KVSL (Lic. and App.) 5.0 mV/m

KSNX CP 3.16 mV/m

KZUZ 3.16 mV/m

KRFM 3.16 mV/m

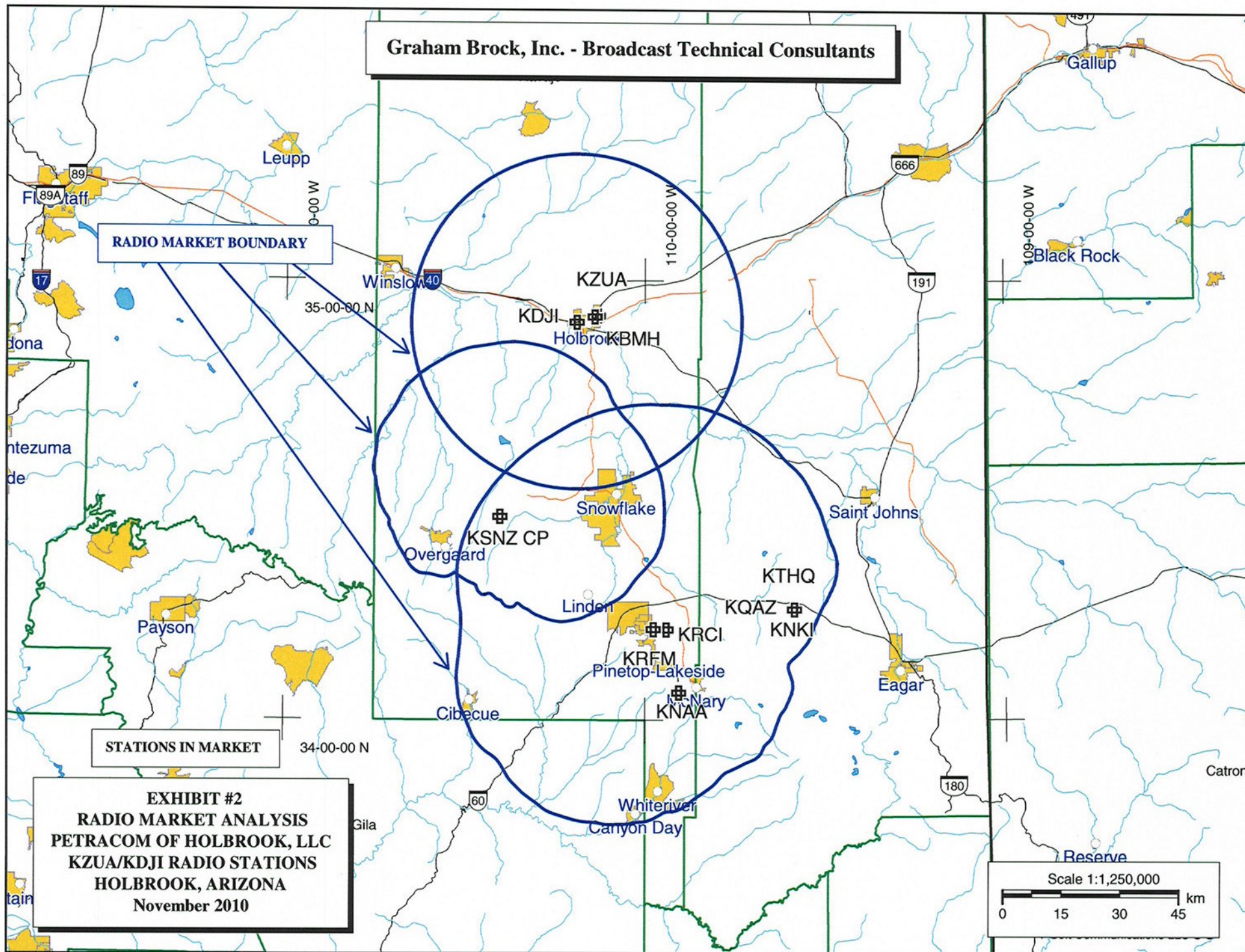
KVWM 5.0 mV/m

Scale 1:1,250,000

0 15 30 45 km



Graham Brock, Inc. - Broadcast Technical Consultants





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**EXHIBIT #3**

**Tabulation of Stations in Radio Market**

**AM Stations**

* KDJI	1270 kHz	Holbrook, Arizona
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Total AM Stations - 1

**FM Stations**

KRCI	Ch 208C3	Pinetop-Lakeside, Arizona
KNAA	Ch 214C3	Show Low, Arizona
* KZUA	Ch 221C1	Holbrook, Arizona
KTHQ	Ch 223C1	Eagar, Arizona
KWKM	Ch 239C	St. Johns, Arizona
* KRFM	Ch 243C	Show Low, Arizona
KQAZ	Ch 269C1	Springerville, Arizona
* KSNX (CP)	Ch 288C1	Heber, Arizona
KNKI	Ch 294C1	Pinetop, Arizona

Total FM Stations - 9

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 10**

\* Subject station.

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

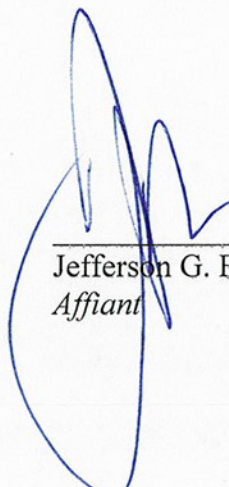
State of Georgia    )  
St. Simons Island    ) ss:  
County of Glynn    )

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Petracom of Holbrook, L.L.C., to prepare the attached Technical Exhibit.

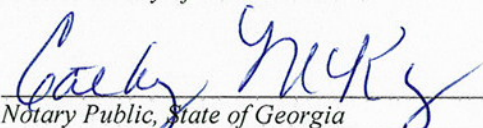
His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

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 1st day of November 2010.*

  
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Jefferson G. Brock  
Affiant

*Sworn to and subscribed before me  
this the 1st day of November 2010*

  
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Notary Public, State of Georgia  
My Commission Expires: March 18, 2011