

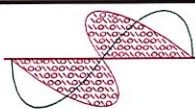
Multiple Ownership Compliance

Grant of the minor change in the KRTN-TV technical facilities proposed in this application will be compliant with the Commission's multiple ownership rules, as demonstrated by the two attachments hereto.

Attachment 1 hereto is a predicted NLSC contour map prepared by Chesapeake RF Consultants, LLC showing the current relevant NLSC contours of Ramar Communications, Inc.'s ("Ramar") stations in the Albuquerque-Santa Fe DMA (the "Market"), as well as the proposed new KRTN-TV contour. This map demonstrates that the proposed change in the KRTN-TV contour would create no new area of overlap with any other Ramar station in the Market.

Attachment 2 hereto is a copy of the Multiple Ownership Compliance Showing approved by the Commission in connection with application BALCDT-20160708ABF, by which Ramar acquired KASA-TV, Santa Fe. Because the only change in the contours of Ramar stations shown in Attachment 2 is the proposed change in the KRTN-TV contours, Attachment 2 continues to demonstrate Ramar's compliance with the Commission's multiple ownership rules in the Market.

ATTACHMENT 1

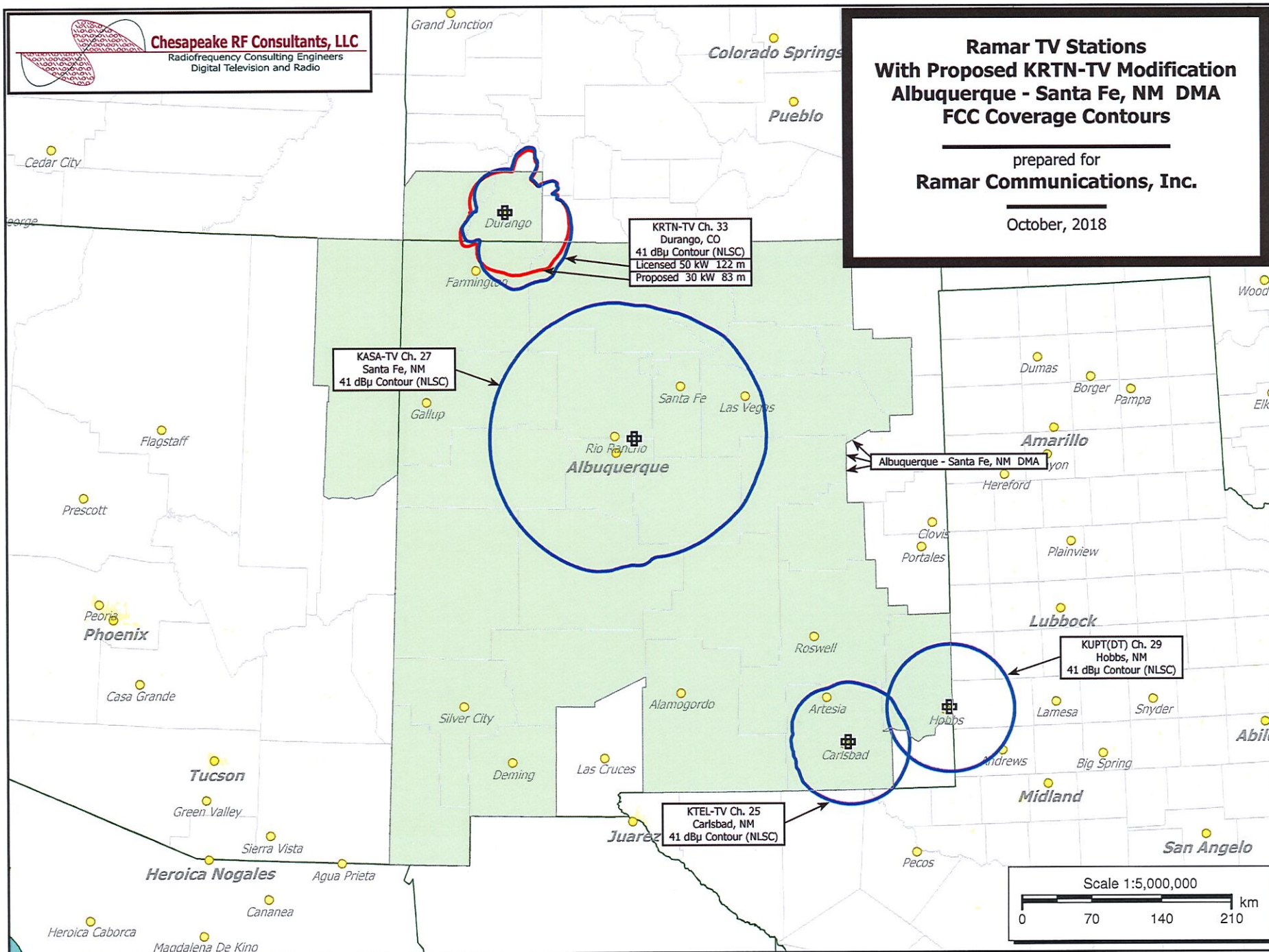


Chesapeake RF Consultants, LLC
Radiofrequency Consulting Engineers
Digital Television and Radio

Ramar TV Stations With Proposed KRTN-TV Modification Albuquerque - Santa Fe, NM DMA FCC Coverage Contours

prepared for
Ramar Communications, Inc.

October, 2018



ATTACHMENT 2

Multiple Ownership Compliance

With this application, Ramar Communications, Inc. ("Ramar") proposes to acquire television station KASA-TV, Santa Fe, New Mexico (Facility ID No. 32311) (the "Station" or "KASA-TV"), which is located in the Albuquerque-Santa Fe New Mexico Nielsen Designated Market Area (the "Albuquerque-Santa Fe DMA" or the "Market"). In the Albuquerque-Santa Fe DMA, Ramar currently controls the following three (3) full-power, commercial television stations:

<u>Station</u>	<u>Facility ID No.</u>	<u>Community of License</u>
KRTN-TV	82613	Durango, CO
KTEL-TV	83707	Carlsbad, NM
KUPT	27431	Hobbs, NM

As shown on the map attached hereto as Exhibit 1, the noise limited service contour ("NLSC") contour of KASA-TV does not overlap with any of the other full-power television stations that Ramar currently controls in the Market.¹ Therefore, Ramar's acquisition of the Station fully complies with the FCC's multiple ownership rules.²

Grant of this application will serve the public interest. Ramar intends to operate KRTN-TV, KTEL-TV, and KUPT as satellites of KASA-TV upon Ramar's acquisition of the Station.³

¹ The Commission's multiple ownership rules refer to Grade B contours. However, as a result of the digital transition, full-power television stations no longer have a Grade B contour and the Commission uses the digital NLSC to approximate the Grade B contour. *See, e.g., Schurz Communications, Inc.*, 31 FCC Rcd 1113, 1115 n.6 (citing 47 C.F.R. § 73.622(e); 2014 Quadrennial Review FNPRM and Report and Order, 29 FCC Rcd 4371, 4383-84 (2014); *Riverside Media, Letter*, 26 FCC Rcd 16038, 16060, n.2 (2011)).

² *See KWCH-TV Hutchinson, Kansas*, 21 FCC Rcd 10730, 10730-31 (2006) ("[S]tations in a single DMA may be commonly owned, without the need for a waiver, if their Grade B contours do not overlap.").

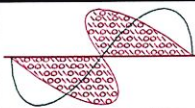
³ Because there is no Grade B overlap between KASA-TV and any of the stations that Ramar currently controls in the Market, no satellite exemption is needed under Section 73.3555, Note 5 of the Commission's rules. *See Mark III Media, Inc. c/o John Borsari, Esq. Borsari & Associates, PLLC*, 21 FCC Rcd 6255 (2006) (noting that a satellite exemption was no longer required to permit common ownership of multiple television stations in the same DMA when there was either *de minimis* or no Grade B overlap among the stations). Ramar notes that there is *de minimis* overlap between the NLSC of KUPT(DT) and the NLSC of KTEL-TV due to the digital conversion. Based on 2010 census information the population in the area of overlap is approximately 9, which is *de minimis* and not cognizable under Commission standards. *See, e.g., Soda Mountain Broadcasting, Inc.*, 29 FCC Rcd 5781, 5782 (2014) (acknowledging 179

Because of the extremely large geographic area of the Albuquerque-Santa Fe DMA, which covers almost the entire state of New Mexico and a portion of Colorado, the NLSC for each of the stations that Ramar currently owns in the Market covers only a very small portion of the Market and none reaches the highly populated cities of Albuquerque or Santa Fe. KRTN-TV, one of three stations licensed to Durango, CO, is located in the northwest corner of the Albuquerque-Santa Fe DMA. KTEL-TV and KUPT are licensed to Carlsbad, NM and Hobbs, NM, respectively, and located in the southeast corner of the Albuquerque-Santa Fe DMA. KTEL-TV and KUPT are the only stations licensed to their respective communities. KRTN-TV, KTEL-TV, and KUPT each only reach about 4% of the population of the entire Albuquerque-Santa Fe DMA. Because these stations are located on the outskirts of the Market and reach only a very small portion of the population, Ramar has historically used KRTN-TV, KTEL-TV, and KUPT to relay the programming of its low power and Class A stations that are located in Albuquerque. Ramar's acquisition of the Station, which is licensed to Santa Fe, will allow Ramar to have a full-power station that reaches the most populated portion of, and supports Ramar's other full-power stations in, the Market.⁴

persons in an area of overlap to be *de minimis*). Additionally, prior to the digital transition, the Grade B contours of KUPT(DT) and KTEL-TV did not overlap. See Exhibit 2 hereto.

⁴ The Station is currently a FOX affiliate. In connection with the transaction, Ramar will not acquire the FOX affiliation for the Station. Instead, Ramar will change the affiliation of KASA-TV to Spanish-language Telemundo on the Station's primary signal, MeTV on its .2 signal, and Heroes & Icons on its .3 signal. This is the same programming that KRTN-TV, KTEL-TV, and KUPT currently air, although the various multicast streams on which each network airs differ for each station.

EXHIBIT 1



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

Proposed Ramar TV Stations Albuquerque - Santa Fe, NM DMA FCC Coverage Contours

prepared for
Ramar Communications, Inc.

July, 2016

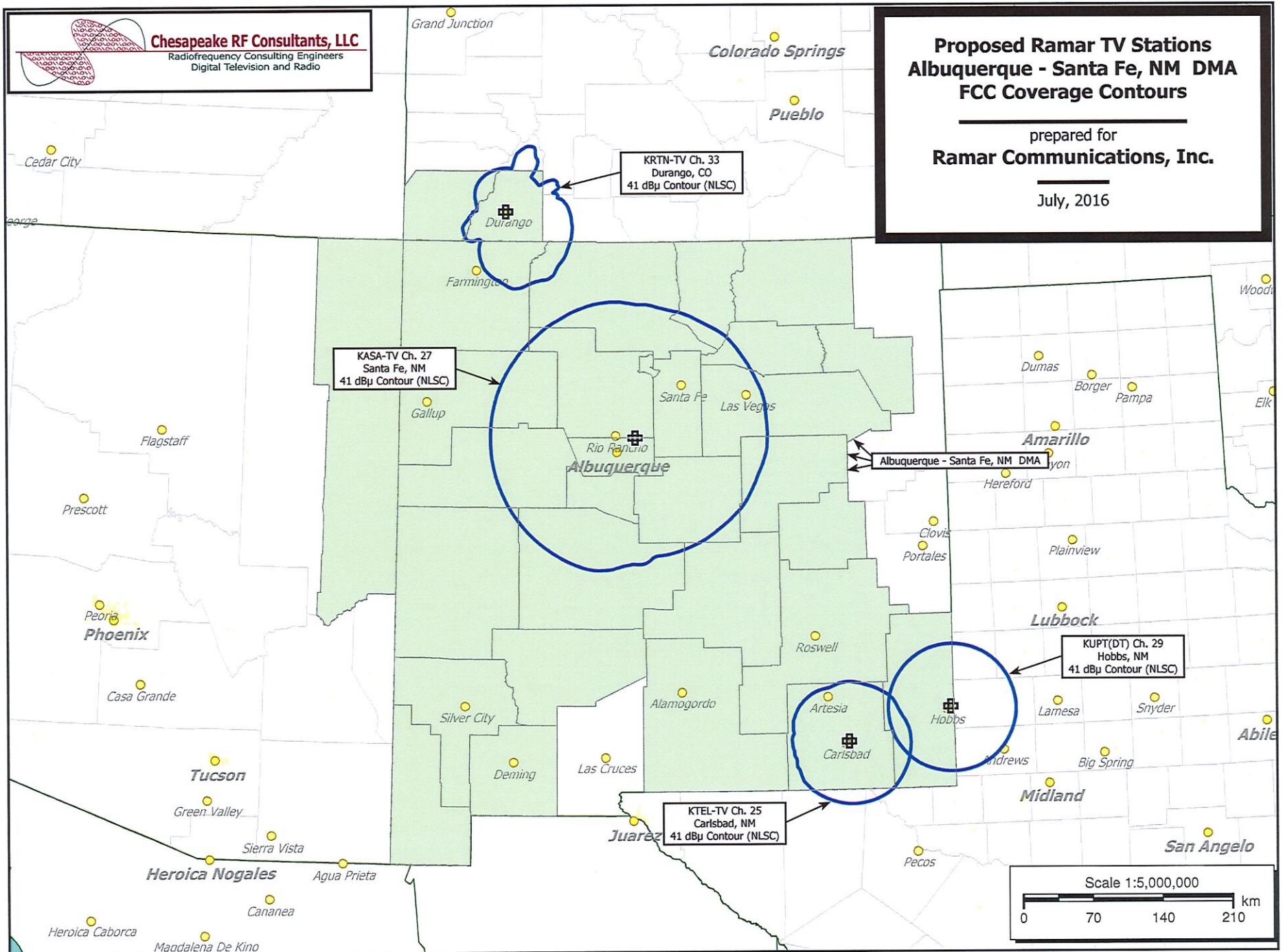


EXHIBIT 2

KTEL-TV Carlsbad, NM KUPT(DT) Hobbs, NM

prepared for
Ramar Communications Inc.

November, 2012



Chesapeake RF Consultants, LLC

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Digital Television and Radio

