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MULTIPLE OWNERSHIP SERVICE CONTOUR ANALYSIS

**Prepared for
Alcon Media
November 2020**

The attached analysis of compliance with the radio multiple ownership rules was prepared in accordance with the Rules and Regulations of the Federal Communications Commission, in connection with two assignment of license applications. In separate transactions, Alcon Media proposed to acquire the license of KQFO(FM) from Alexandra Communications, Inc., and the license of KZLY(FM) from Xana Oregon, LLC.

The attached ownership study map depicts the principal community contours of these stations, which will be the only attributable stations for Alcon Media. It can be seen the there is no principal community contour overlap of the KQFO(FM) license and the KZLY(FM) license. However there is overlap of the KQFO(FM) construction permit facility with the KZLY(FM) license, forming one cluster for analysis. Both of these stations operate in an unrated area.

Unrated Market Study

Therefore, an analysis has been made consistent with the Commission's interim rules for unrated markets. The 70 dBu contours of FM stations were determined from the technical data contained in the most recent edition of the FCC FM Database. The listed antenna height above average terrain was used together with topographic data obtained from the digitized 30 second or 3 second database. The 5 mV/m daytime contours of AM stations were determined from the technical data contained in the most recent edition of the FCC AM Database. The listed antenna parameter information was used together with a digitized version of the FCC M-3 or Region II ground conductivity database.

The service contours were plotted using correct map projection mathematics. Those stations whose transmitter sites are within the respective principal community service contours of the stations proposed to be commonly owned have only the sites rather than their contours shown. All contours and enclosed transmitter site locations have been labeled.

In counting stations providing service to the “market”, stations whose transmitter sites are located in excess of 92 km from the perimeter of the common overlap area have been excluded, as have other stations to be commonly-owned but which are not a part of the discrete cluster being studied. This exhibit evidences at least the minimum number of stations necessary to demonstrate compliance with the rules concerning radio multiple ownership in unrated markets.

KQFO(FM) CP + KZLY(FM)

In order to qualify for common ownership of this 0AM/2FM cluster, there must be at least 4 stations in the relevant “market”. This study demonstrates that there are at least 17 stations in the relevant market. (In fact, numerous other stations have principal community contours which would be included in the market. For the sake of clarity, only those stations with transmitter sites inside the contours of the attributable stations have been included in this study.)

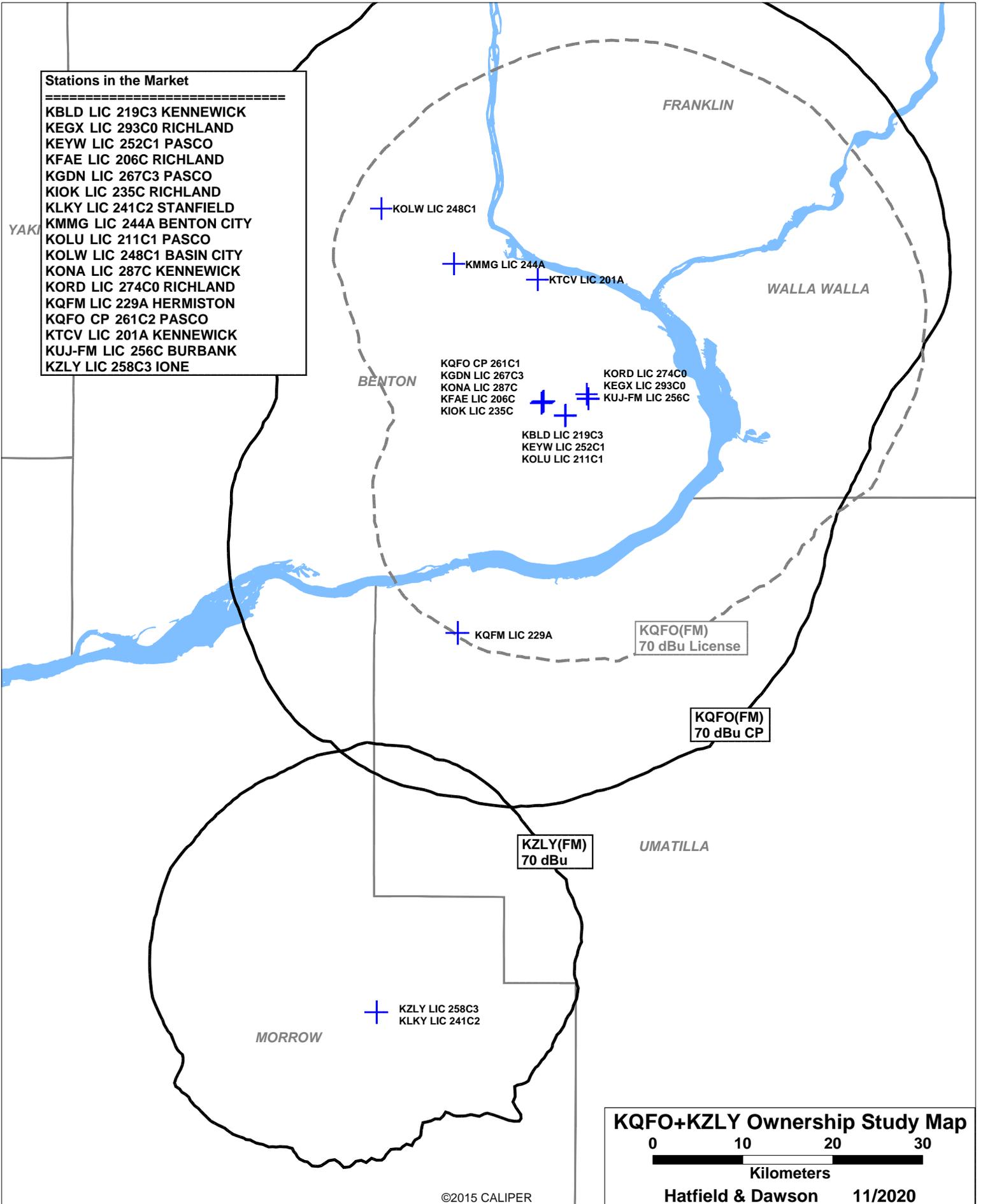
November 20, 2020

A handwritten signature in black ink, appearing to read "Erik C. Swanson". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Erik C. Swanson

Stations in the Market

KBLD LIC 219C3 KENNEWICK
 KEGX LIC 293C0 RICHLAND
 KEYW LIC 252C1 PASCO
 KFAE LIC 206C RICHLAND
 KGDN LIC 267C3 PASCO
 KIOK LIC 235C RICHLAND
 KLKY LIC 241C2 STANFIELD
 KMMG LIC 244A BENTON CITY
 KOLW LIC 211C1 PASCO
 KOLW LIC 248C1 BASIN CITY
 KONA LIC 287C KENNEWICK
 KORD LIC 274C0 RICHLAND
 KQFM LIC 229A HERMISTON
 KQFO CP 261C2 PASCO
 KTCV LIC 201A KENNEWICK
 KUJ-FM LIC 256C BURBANK
 KZLY LIC 258C3 IONE



KQFO+KZLY Ownership Study Map

0 10 20 30

Kilometers

Hatfield & Dawson 11/2020