

§ 73.3555(a) Multiple Ownership Exhibit

May 3, 2021

Dana R. Withers (“Withers”) herein seeks to acquire the licenses of four full power commercial FM stations from Stone Canyon Media Group, LLC (“SCMG”) and therefore must demonstrate compliance with the Commission's Section 73.3555(a) Multiple Ownership rules. None of the four stations are located in or listed as home to any Nielsen Audio Metro. Therefore a Non-Nielsen Metro contour method ownership study is required. No facility of which Withers will have an attributable interest in will be considered as a contributor to a Defined Radio market unless it is a subject station in the Defined Radio market under study. No stations with transmitters more than 92 km. from the boundary of the common overlap of subject stations will be considered. Two Defined Radio Markets will be the result of the proposed license transfers of the four FM stations. The principal community contours of the other AM and FM full power stations that overlap contours with the Defined Radio market boundaries are shown for each Defined Radio market. The subject stations FCC F(50,50) 70 dBu contours are shown in green. Overlapping FM station FCC F(50,50) 70 dBu contours are shown in red and the overlapping AM station 5.0 mV/M daytime contours are shown in blue. Non-contributing subject station contours are shown in black.

Defined Radio Market Number One

Subject stations in Defined Radio Market #1

KBTK Channel 246C2, Facility ID No. 14938, Kachina, Village, Arizona

KSED Channel 298C0, Facility ID No. 55402, Sedona, Arizona

KWMX Channel 244C2, Facility ID No. 30433, Williams, Arizona

Withers stations not included in the Defined Radio Market #1 station total:

KFLX Channel 223A, Facility ID No. 171022, Chino Valley, Arizona

Exhibit One is a map showing the FCC F(50,50) 70 dBu contours of the three subject stations as well as the other AM and FM stations which overlap principal community contours with the Defined Radio market boundary. A total of 32 stations are shown on the map. A total of 6 AM stations and 26 FM stations are shown. Table One is a table of all the stations shown on the Exhibit One map. One non-contributing FM subject station is not included in the totals. Therefore, Defined Radio Market #1 has a total of 31 stations. This includes the three subject FM stations that comprise the Radio Market Boundary.

Defined Radio Market Number Two

Subject stations in Defined Radio Market # 2:

KWMX Channel 244C2, Facility ID No. 30433, Williams, Arizona

KFLX Channel 223A, Facility ID No. 171022, Chino Valley, Arizona

Withers stations not included in the Defined Radio Market #2 station total:

KBTK Channel 246C2, Facility ID No. 14938, Kachina, Village, Arizona

KSED Channel 298C0, Facility ID No. 55402, Sedona, Arizona

Exhibit Two is a map showing the FCC F(50,50) 70 dBu contours of the two subject stations as well as the other AM and FM stations which overlap principal community contours with the Defined Radio market boundary. A total of 35 stations are shown on the map. A total of 7 AM stations and 28 FM stations are shown. Table Two is a table of all the stations shown on the Exhibit Two map. Two non-contributing FM subject stations are not included in the totals. Therefore, Defined Radio Market #2 has a total of 33 stations. This includes the two subject FM stations that comprise the Radio Market Boundary.

Summary

There are a total of 31 full power AM and FM radio stations in Defined Radio Market #1. There are a total of 33 full power AM and FM radio stations in Defined Radio Market #2. FCC Rule §73.3555(a)(1)(ii) states that in a market with between 30 and 44 full power commercial and non-commercial radio stations, ownership of up to seven stations with no more than four in the same service (AM or FM) is allowed. Withers will own a total of three full FM power stations in Defined Radio Market #1 and two full power FM stations in Defined Radio Market #2. Therefore, it is believed that the proposed acquisitions are in compliance with §73.3555(a)(1)(ii) of the Commission's multiple ownership rules.

The foregoing technical statement was prepared on behalf of Withers by Donald Lynch of Horizon Broadcast Solutions, LLC, its Technical Consultant. Any information contained herein is true and accurate to the best of my belief and knowledge. All data relating to AM and FM facilities was taken from the FCC LMS database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.

KBTK

Kachina Village, AZ
 BLH20161021ABF
 Latitude: 34-58-06 N
 Longitude: 111-30-29 W
 ERP: 5.00 kW
 HAAT: 444.0 m
 Channel: 246
 Frequency: 97.1 MHz
 AMSL Height: 2622.0 m
 Elevation: 2576.0 m
 Horiz. Pattern: Omni
 Vert. Pattern: No
 Prop Model: None

KSED

Sedona, AZ
 BPH20190923ABT
 Latitude: 34-58-07 N
 Longitude: 111-30-24 W
 ERP: 100.00 kW
 HAAT: 451 m
 Channel: 298
 Frequency: 107.5 MHz
 AMSL Height: 2625.0 m
 Elevation: 2580.0 m
 Horiz. Pattern: Omni
 Vert. Pattern: No
 Prop Model: None

KWMX

Williams, AZ
 BLH19970609KA
 Latitude: 35-07-52 N
 Longitude: 112-08-03 W
 ERP: 10.50 kW
 HAAT: 325.0 m
 Channel: 244
 Frequency: 96.7 MHz
 AMSL Height: 2390.0 m
 Elevation: 2374.0 m
 Horiz. Pattern: Omni
 Vert. Pattern: No
 Prop Model: None

Exhibit One Section 73.3555 Multiple Ownership

Non-Nielsen Audio Market - Defined Radio Market #1

Dana R. Withers

KBTK - KSED - KWMX

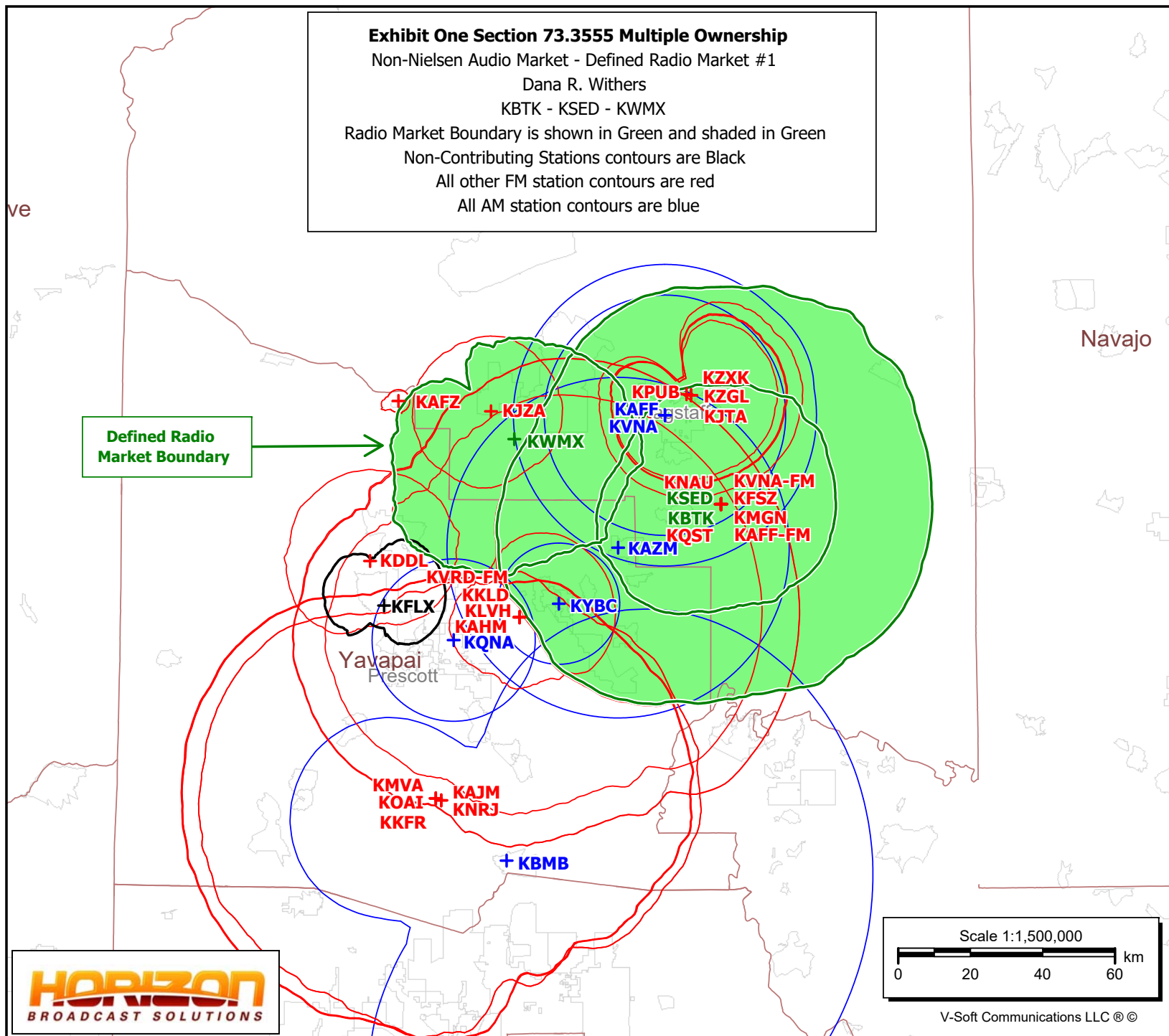
Radio Market Boundary is shown in Green and shaded in Green

Non-Contributing Stations contours are Black

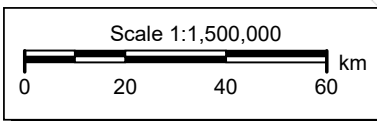
All other FM station contours are red

All AM station contours are blue

Defined Radio
Market Boundary



HORIZON
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**Table One - Table of Stations Shown
Non-Nielsen Audio Metro Defined Market No. One
Dana R. Withers**

Total number of overlapping contours:32

Total number of stations not included in the defined market total: 1

Total number of stations in Defined Market: 31

Reference: Subject Stations

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KBTK	FM	246C2	Kachina Village	AZ	BLH20161021ABF	0.0	0.0
KSED	FM	298C	Sedona	AZ	BPH20190923ABT	0.1	76.3
KWMX	FM	244C2	Williams	AZ	BLH19970609KA	59.9	287.7
Total Subject Stations: 3							

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KNAU	FM	204C	Flagstaff	AZ	BLD19991014AAT	0.1	76.3
KJZA	FM	208C3	Drake	AZ	BMLD20171004ABO	68.6	292.2
KJTA	FM	210C2	Flagstaff	AZ	BMLD20181019ACE	31.2	345.0
KLVH	FM	215C	Prescott	AZ	BLD19941212KD	63.8	241.0
KPUB	FM	219C3	Flagstaff	AZ	BLD19960119KA	31.9	342.9
KFLX¹	FM	223A	Chino Valley	AZ	BLH20100706IZD	97.2	253.5
KAFF-FM	FM	225C	Flagstaff	AZ	BLH19891016KC	0.1	76.3
KMGN	FM	230C	Flagstaff	AZ	BMLH19940818KG	0.1	22.4
KDDL	FM	232C3	Chino Valley	AZ	BLH20040831ACC	98.3	261.0
KOAI	FM	236C	Sun City West	AZ	BLH20050623AAN	113.3	224.3
KKLD	FM	240C0	Cottonwood	AZ	BMLH20100428AEO	63.9	240.9
KMVA	FM	248C	Dewey-Humboldt	AZ	BLH20050413ABX	113.3	224.3
KKFR	FM	252C	Mayer	AZ	BLH20060831AAC	113.3	224.3
KZXX	FM	255C2	Doney Park	AZ	BLH20170627AAA	31.2	345.0
KAFZ	FM	259A	Ash Fork	AZ	BLH20150623ABL	93.6	288.0
KVNA-FM	FM	261C2	Flagstaff	AZ	BMLH20060113ABB	0.0	180.0
KZCE	FM	266C	Cordes Lakes	AZ	BLH20120321AET	112.6	223.6
KAHM	FM	271C	Prescott	AZ	BLH19960111BK	63.8	240.9
KQST	FM	275C	Sedona	AZ	BLH20060307BHN	0.0	180.0
KZGL	FM	279C3	Flagstaff	AZ	BLH20070806AAV	31.3	344.8
KAJM	FM	282C	Camp Verde	AZ	BMLH20120321AES	112.6	223.6
KVRD-FM	FM	289C3	Cottonwood	AZ	BMLH20100428AEN	63.8	240.9
KFSZ	FM	291C2	Munds Park	AZ	BLH20080219BFC	0.0	0.0
Total Other FM Stations: 23							

KAZM	AM	780	SEDONA	AZ	BL19811119AA	30.8	247.2
KYBC	AM	1600	COTTONWOOD	AZ	BL	52.5	238.6
KQNA	AM	1130	PRESCOTT VALLEY	AZ	BL19860707AI	82.9	243.2
KBMB	AM	710	BLACK CANYON CITY	AZ	BMML20090608ADP	115.0	211.2
KAFF	AM	930	FLAGSTAFF	AZ	BL	29.0	328.2
KVNA	AM	600	FLAGSTAFF	AZ	BL20160411ACC	29.0	328.2
Total AM Stations: 6							

Distance and bearing calculations from coordinates: 34-58-06.10 N, 111-30-31.50 W

Duopoly Options:

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.

¹ Station is attributable to the applicant and not included in the defined market total.

Distance and bearing calculations from coordinates: 34-58-06 N, 111-30-29 W

Duopoly Options:

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.

KWMX

Williams, AZ
 BLH19970609KA
 Latitude: 35-07-52 N
 Longitude: 112-08-03 W
 ERP: 10.50 kW
 HAAT: 325.0 m
 Channel: 244
 Frequency: 96.7 MHz
 AMSL Height: 2390.0 m
 Elevation: 2374.0 m
 Horiz. Pattern: Omni
 Vert. Pattern: No
 Prop Model: None

KFLX

Chino Valley, AZ
 BLH20100706IZD
 Latitude: 34-42-53 N
 Longitude: 112-31-33 W
 ERP: 1.50 kW
 HAAT: 174.0 m
 Channel: 223
 Frequency: 92.5 MHz
 AMSL Height: 1696.0 m
 Elevation: 1670.0 m
 Horiz. Pattern: Omni
 Vert. Pattern: No
 Prop Model: None

Exhibit Two Section 73.3555 Multiple Ownership

Non-Nielsen Audio Market - Defined Radio Market #2

Dana R. Withers

KWMX - KFLX

Radio Market Boundary is shown in Green and shaded in Green

Non-Contributing Stations contours are Black

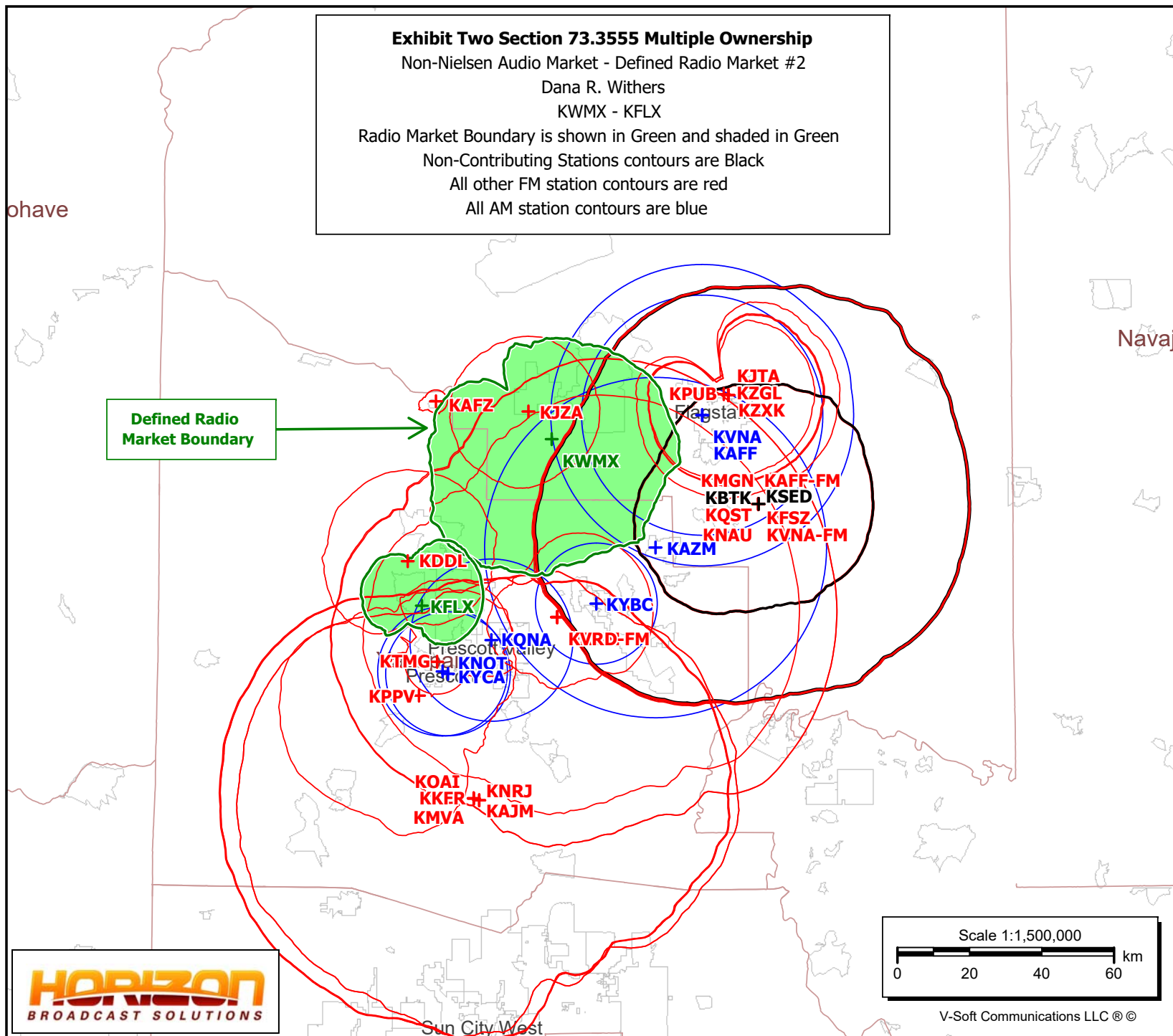
All other FM station contours are red

All AM station contours are blue

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Defined Radio
Market Boundary



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Scale 1:1,500,000
0 20 40 60 km

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**Table Two - Table of Stations Shown
Non-Nielsen Audio Metro Defined Market No. Two
Dana R. Withers**

Total number of overlapping contours:35

Total number of stations not included in the defined market total: 2

Total number of stations in Defined Market: 33

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KFLX	FM	223A	Chino Valley	AZ	BLH20100706IZD	0.0	0.0
KWMX	FM	244C2	Williams	AZ	BLH19970609KA	58.4	37.7
Total Subject Stations: 2							

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KNAU	FM	204C	Flagstaff	AZ	BLD19991014AAT	97.4	72.9
KJZA	FM	208C3	Drake	AZ	BMLD20171004ABO	61.3	28.5
KJTA	FM	210C2	Flagstaff	AZ	BMLD20181019ACE	102.9	55.2
KLVB	FM	215C	Prescott	AZ	BLD19941212KD	37.6	94.5
KPUB	FM	219C3	Flagstaff	AZ	BLD19960119KA	102.0	54.7
KAFF-FM	FM	225C	Flagstaff	AZ	BLH19891016KC	97.4	72.9
KMGN	FM	230C	Flagstaff	AZ	BMLH19940818KG	97.3	72.9
KDDL	FM	232C3	Chino Valley	AZ	BLH20040831ACC	12.9	342.1
KOAI	FM	236C	Sun City West	AZ	BLH20050623AAN	55.2	164.7
KKLD	FM	240C0	Cottonwood	AZ	BMLH20100428AEO	37.6	94.6
KBTK¹	FM	246C2	Kachina Village	AZ	BLH20161021ABF	97.2	72.9
KMVA	FM	248C	Dewey-Humboldt	AZ	BLH20050413ABX	55.2	164.7
KKFR	FM	252C	Mayer	AZ	BLH20060831AAC	55.3	164.6
KZXX	FM	255C2	Doney Park	AZ	BLH20170627AAA	102.9	55.2
KTMG	FM	256A	Prescott	AZ	BLH19930510KC	16.1	164.6
KAFF	FM	259A	Ash Fork	AZ	BLH20150623ABL	56.7	3.6
KVNA-FM	FM	261C2	Flagstaff	AZ	BMLH20060113ABB	97.2	72.9
KZCE	FM	266C	Cordes Lakes	AZ	BLH20120321AET	56.2	163.3
KAHM	FM	271C	Prescott	AZ	BLH19960111BK	37.6	94.5
KQST	FM	275C	Sedona	AZ	BLH20060307BHN	97.2	72.9
KZGL	FM	279C3	Flagstaff	AZ	BLH20070806AAV	102.8	55.2
KAJM	FM	282C	Camp Verde	AZ	BMLH20120321AES	56.2	163.3
KVRD-FM	FM	289C3	Cottonwood	AZ	BMLH20100428AEN	37.6	94.6
KFSZ	FM	291C2	Munds Park	AZ	BLH20080219BFC	97.2	72.9
KPPV	FM	294C2	Prescott Valley	AZ	BLH19930204KB	24.9	181.6
KSED²	FM	298C	Sedona	AZ	BPH20190923ABT	97.4	72.9
Total Number of Other FM Stations: 26							

KAZM	AM	780	SEDONA	AZ	BL19811119AA	66.7	75.8
KYBC	AM	1600	COTTONWOOD	AZ	BL	48.4	89.1
KNOT	AM	1450	PRESCOTT	AZ	BL19840326AF	20.2	158.6
KQNA	AM	1130	PRESCOTT VALLEY	AZ	BL19860707AI	21.5	116.0
KYCA	AM	1490	PRESCOTT	AZ	BL	19.1	162.1
KAFF	AM	930	FLAGSTAFF	AZ	BL	93.9	55.5
KVNA	AM	600	FLAGSTAFF	AZ	BL20160411ACC	93.9	55.5

Total Number of AM Stations: 7

Distance and bearing calculations from coordinates: 34-42-53.10 N, 112-31-35.60 W

Duopoly Options:

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.