

CONTOUR REPORT

This technical report is provided to demonstrate FCC local radio ownership rule compliance for certain aural broadcast markets formed by the assignment of the more than 200 radio stations controlled by Alpha Media Holdings LLC (“Alpha”) as debtor-in-possession to license subsidiaries of Alpha upon emergence from bankruptcy. As discussed in this comprehensive multiple ownership exhibit, certain stations subject to this application are neither home to nor geographically located within any Nielsen Metro market. This report by Laramie Guest of Guest Technology, LLC illustrates the requisite contour analysis to define the markets created by these stations and others to be commonly owned by Alpha, and demonstrates that the transfer would fully comply with Section 73.3555(a) of the Commission’s rules.

Contour-Defined Markets

As demonstrated by this study, each of the combinations in the contour-defined markets complies with Section 73.3555(a) of the Commission’s rules.

The table below contains an overview of the stations currently owned and that would be commonly-owned by Alpha in each defined market post-closing, and the total number of stations in the market for purposes of analysis under the Commission’s local radio ownership rules. Further discussion concerning compliance in each market follows.

Summary Table of Contour-Defined Markets

| <u>Defined Markets</u> | <u>Commonly Owned Stations</u> | <u>Number of Stations in Market*</u> | <u>Total Number/Same Service Stations Permitted Under Rule</u> |
|---------------------------------------|---------------------------------------|---|---|
| Market 1 Albert Lea, MN | 3 FM; 2 AMs | 28 | 6/4 |
| Market 2 Austin, MN | 3 FM; 2 AMs | 22 | 6/4 |
| Market 3-1 Bethany/Cameron, MO | 1 FM; 1 AM | Not Applicable | Permissible |
| Market 3-2 Bethany/Cameron, MO | 2 FM; 1 AM | 13 | 5/3 |
| Market 4 Brookings, SD | 3 FM; 2 AMs | 15 | 6/4 |
| Market 5 Columbia, SC | 3 FM | 30 | 7/4 |
| Market 6 Columbus, NE | 4 FM; 2 AMs | 32 | 7/4 |
| Market 7 Fairfield, IA | 1 FM; 1 AM | Not Applicable | Permissible |
| Market 8 Farmington/Festus, MO | 1 FM; 2 AMs | 37 | 7/4 |
| Market 9-1 Fort Dodge, IA | 4 FM; 2 AMs | 46 | 8/5 |
| Market 9-2 Fort Dodge, IA | 4 FM; 2 AMs | 35 | 7/4 |
| Market 10 Grays Harbor-Hoquiam, WA | 2 FM; 2 AMs | 20 | 6/4 |
| Market 11 Grinnell/Newton, IA | 2 FM; 2 AMs | 25 | 6/4 |
| Market 12 Lebanon/Waynesville, MO | 3 FM; 3 AMs | 37 | 7/4 |
| Market 13 Luverne, MN | 1 FM; 1 AM | Not Applicable | Permissible |
| Market 14 Mason City, IA | 4 FM; 2 AMs | 31 | 7/4 |
| Market 15 Madison, SD | 3 FM; 2 AMs | 16 | 6/4 |
| Market 16-1 Moberly, MO | 3 FM; 1 AM | 31 | 7/4 |
| Market 16-2 Moberly, MO | 3 FM; 1 AM | 29 | 6/4 |

| <u>Defined Markets</u> | <u>Commonly Owned Stations</u> | <u>Number of Stations in Market*</u> | <u>Total Number/Same Service Stations Permitted Under Rule</u> |
|---|---------------------------------------|---|---|
| Market 17 North Dallas, TX | 3 FMs | 26 | 6/4 |
| Market 18 North Mankato, MN | 4 FMs | 23 | 6/4 |
| Market 19 Redwood Falls, MN | 1 FM; 1 AM | Not Applicable | Permissible |
| Market 20 San Antonio, TX | 1 FM; 2 AMs | 42 | 7/4 |
| Market 21-1 Savannah, GA | 4 FMs; 1 AM | 26 | 6/4 |
| Market 21-2 Savannah, GA | 3 FMs | 34 | 7/4 |
| Market 22-1 Tyler-Longview, TX | 3 FMs | 63 | 8/5 |
| Market 22-2 Tyler-Longview, TX | 3 FMs | 39 | 7/4 |
| Market 22-3 Tyler-Longview, TX | 3 FMs | 28 | 6/4 |
| Market 23 Watertown, SD | 4 FMs; 2 AMs | 21 | 6/4 |
| Market 24 Wenatchee-Columbia River, WA | 2 FMs; 1 AM | 13 | 5/3 |
| Market 25 Lincoln, NE | 4 FMs; 2 AMs | 38 | 7/4 |
| Market 26 Lubbock, TX | 4 FMs; 2 AMs | 38 | 7/4 |
| Market 27 Salt Lake City, UT | 4 FMs | 33 | 6/4 |

*Note: Not a complete count of all stations in the market

Market 1 (Albert Lea, MN): This market is defined by the Alpha’s common ownership of 3 FM radio stations and 2 AM radio stations:

KAUS-FM, Austin, MN;
 KCPI(FM), Albert Lea, MN;
 KYTC(FM), Northwood, IA;
 KATE(AM), Albert Lea, MN; and
 KAUS(AM), Austin, MN

None of these stations is “home” to or located geographically within a Nielsen Metro, therefore a contour-based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission’s rules. As demonstrated below, this market contains more than 28 full power radio stations, allowing common ownership of 6 stations, no more than 4 of which may be in the same service. Thus, Alpha’s ownership of 5 stations, 3 of which are in the same service, complies with the local radio ownership rule.

Market 2 (Austin, MN): This market is defined by Alpha’s common ownership of 3 FM radio stations and 2 AM radio stations:

KAUS-FM, Austin, MN;
 KCPI(FM), Albert Lea, MN;
 KYTC(FM), Northwood, IA;
 KATE(AM), Albert Lea, MN; and
 KAUS(AM), Austin, MN

None of these stations is “home” to or located geographically within a Nielsen Metro, therefore a contour-based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission’s rules. As demonstrated below, this market contains more than 22 full power radio stations, allowing common ownership of 6 stations, no more than 4 of which may be in the same service. Thus, Alpha’s ownership of 5 stations, 3 of which are in the same service, complies with the local radio ownership rule.

Market 3-1 (Bethany/Cameron, MO): This market is defined by Alpha's common ownership of 1 FM radio station and 1 AM radio stations:

KKWK(FM), Cameron, MO; and
KMRN(AM), Cameron, MO

No further analysis is required for this market as a licensee may own 1 AM and 1 FM regardless of the number of stations contained in the market. Thus, Alpha's common ownership of these 2 stations complies with the local radio ownership rule.

Market 3-2 (Bethany/Cameron, MO): This market is defined by Alpha's common ownership of 2 FM radio stations and 1 AM radio stations:

KAAN-FM, Bethany, MO;
KKWK(FM), Cameron, MO; and
KSAN(AM), Bethany, MO

None of these stations are "home" to or located geographically within a Nielsen Metro, therefore a contour-based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission's rules. As demonstrated below, this market contains more than 13 full power radio stations, allowing common ownership of 5 stations, no more than 3 of which may be in the same service. Thus, Alpha's ownership of 3 stations, 2 of which are in the same service, complies with the local radio ownership rule.

Market 4 (Brookings, SD): This market is defined by Alpha's common ownership of 3 FM radio stations and 2 AM radio stations:

KBRK-FM, Brookings, SD;
KDBX(FM), Clear Lake, SD;
KKQQ(FM), Volga, SD;
KBRK(AM), Brookings, SD; and
KJJQ(AM), Volga, SD

None of these stations is “home” to or located geographically within a Nielsen Metro, therefore a contour-based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission’s rules. As demonstrated below, this market contains more than 15 full power radio stations, allowing common ownership of 6 stations, no more than 4 of which may be in the same service. Thus, Alpha’s ownership of 5 stations, 3 of which are in the same service, complies with the local radio ownership rule.

Market 5 (Columbia, SC): This market is defined by Alpha’s common ownership of 3 FM radio stations:

WSCZ(FM), Winnsboro, SC;
 WMFX(FM), St. Andrews, SC;
 WWDM, Sumter, SC

WSCZ is not “home” to or geographically located within the Columbia, SC Metro and WMFX(FM) and WWDM(FM) are located geographically within the Columbia Metro. As demonstrated below, this market contains more than 30 full power radio stations, allowing for common ownership of 7 stations, no more than 4 of which may be in the same service. Thus, Alpha’s ownership of 3 stations within the same service, complies with the local radio ownership rule.

Market 6 (Columbus, NE): This market is defined by Alpha’s common ownership of 4 FM radio stations and 2 AM radio stations:

KKOT(FM), Columbus, NE;
 KLIR(FM), Columbus, NE;
 KZEN(FM), Central City, NE;
 KZKX(FM), Seward, NE;
 KJSX(AM), Columbus, NE; and
 KTTT(AM), Columbus, NE

None of these stations is “home” to or located geographically within a Nielsen Metro, therefore a contour-based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission’s rules. As demonstrated below, this market contains more than 32 radio stations, allowing for common ownership of 7 stations, no more than 4 of which may be in the same service. Thus, Alpha’s ownership of 6 stations, 4 of which are in the same service, complies with the local radio ownership rule.

Market 7 (Fairfield, IA): This market is defined by Alpha's common ownership of 1 FM radio station and 1 AM radio station:

KKFD-FM, Fairfield, IA; and
KMCD(AM), Fairfield, IA

No further analysis is required for this market as a licensee may own 1 AM and 1 FM regardless of the number of stations contained in the market. Thus, Alpha's common ownership of these 2 stations complies with the local radio ownership rule.

Market 8 (Farmington/Festus, MO): This market is defined by Alpha's common ownership of 1 FM radio station and 2 AM radio stations:

KTJJ(FM), Farmington, MO;
KJFF(AM), Festus, MO; and
KREI(AM), Farmington, MO

None of these stations is "home" to or located geographically within a Nielsen Metro, therefore a contour-based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission's rules. As demonstrated below, this market contains more than 37 full power radio stations, allowing common ownership of 7 stations, no more than 4 of which may be in the same service. Thus, Alpha's ownership of 3 stations, 2 of which are in the same service, complies with the local radio ownership rule.

Market 9-1 (Fort Dodge, IA): This market is defined by Alpha's common ownership of 4 FM radio stations and 2 AM radio stations:

KIAQ (FM), Clarion, IA;
KKEZ(FM), Fort Dodge, IA;
KXFT(FM), Manson, IA
KZLB(FM), Fort Dodge, IA
KVFD(AM), Fort Dodge, IA; and
KWMT(AM), Fort Dodge, IA

None of these stations is “home” to or located geographically within a Nielsen Metro, therefore a contour-based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission’s rules. As demonstrated below, this market contains more than 46 radio stations, allowing for common ownership of 8 stations, no more than 5 of which may be in the same service. Thus, Alpha’s common ownership of 6 stations, 4 of which are in the same service, complies with the local radio ownership rule.

Market 9-2 (Fort Dodge, IA): This market is defined by Alpha’s common ownership of 4 FM radio stations and 2 AM radio stations:

KIAQ (FM), Clarion, IA;
 KKEZ(FM), Fort Dodge, IA:
 KTLB(FM), Twin Lakes, IA
 KXFT(FM), Manson, IA
 KVFD(AM), Fort Dodge, IA; and
 KWMT(AM), Fort Dodge, IA

None of these stations is “home” to or located geographically within a Nielsen Metro, therefore a contour-based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission’s rules. As demonstrated below, this market contains more than 35 radio stations, allowing for common ownership of 7 stations, no more than 4 of which may be in the same service. Thus, Alpha’s common ownership of 6 stations, 4 of which are in the same service, complies with the local radio ownership rule.

Market 10 (Grays Harbor-Hoquiam, WA): This market is defined by Alpha’s common ownership of 2 FM radio stations and 2 AM radio stations:

KDUX-FM, Hoquiam, WA;
 KXXK(FM), Hoquiam, WA;
 KWOK(AM), Aberdeen, WA; and
 KXRO(AM), Aberdeen, WA

None of these stations is “home” to or located geographically within a Nielsen Metro, therefore a contour-based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission’s rules. As demonstrated below, this market contains more than 20 radio stations, allowing

for common ownership of 6 stations, no more than 4 of which may be in the same service. Thus, Alpha's common ownership of 4 stations, 2 of which are in the same service, complies with the local radio ownership rule.

Market 11 (Grinnell/Newton, IA): This market is defined by Alpha's common ownership of 2

FM radio stations and 2 AM radio stations:

KCOB-FM, Newton, IA;
 KRTI(FM), Grinnell, IA
 KCOB(AM), Newton, IA; and
 KGRN(AM), Grinnell, IA

KCOB(AM) and KCOB-FM are "home" to and geographically located within the Des Moines, IA Metro (See Section II(G)), but the remaining stations are neither. Therefore, a contour-based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission's rules. As demonstrated below, this market contains more than 25 radio stations, allowing for common ownership of 6 stations, no more than 4 of which may be in the same service. Thus, Alpha's common ownership of 4 stations, 2 in each service, complies with the local radio ownership rule.

Market 12 (Lebanon/Waynesville, MO): This market is defined by Alpha's common ownership of 3 FM radio stations and 3 AM radio stations:

KFBD-FM, Waynesville, MO;
 KJEL, Lebanon, MO;
 KOZQ-FM, Waynesville, MO;
 KBNN(AM), Lebanon, MO;
 KIIK(AM), Waynesville, MO; and
 KJPW(AM), Waynesville, MO

None of these stations is "home" to or located geographically within a Nielsen Metro, therefore a contour-based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission's rules. As demonstrated below, this market contains more than 37 radio stations, allowing for common ownership of 7 stations, no more than 4 of which may be in the same service. Thus, Alpha's common ownership of 6 stations, 3 of which are in the same service, complies with the local radio ownership rule.

Market 13 (Luverne, MN): This market is defined by Alpha's common ownership of 1 FM radio station and 1 AM radio station:

KKFD-FM, Fairfield, IA; and
KMCD(AM), Fairfield, IA

No further analysis is required for this market as a licensee may own 1 AM and 1 FM regardless of the number of stations contained in the market. Thus, Alpha's common ownership of these 2 stations complies with the local radio ownership rule.

Market 14 (Mason City, IA): This market is defined by Alpha's common ownership of 4 FM radio stations and 2 AM radio stations:

KAUS-FM, Austin, MN;
KIAI(FM), Mason City, IA;
KLSS-FM, Mason City, IA;
KYTC(FM), Northwood, IA;
KGLO(AM), Mason City, IA; and
KRIB, Mason City, IA

None of these stations is "home" to or located geographically within a Nielsen Metro, therefore a contour-based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission's rules. As demonstrated below, this market contains more than 31 radio stations, allowing for common ownership of 7 stations, no more than 4 of which may be in the same service. Thus, Alpha's common ownership of 6 stations, 4 of which are in the same service, complies with the local radio ownership rule.

Market 15 (Madison, SD): This market is defined by Alpha’s common ownership of 3 FM radio stations and 2 AM radio stations:

KBRK-FM, Brookings, SD;
 KJAM-FM, Madison, SD;
 KKQQ(FM), Volga, SD;
 KJAM(AM), Madison, SD; and
 KJJQ(AM), Volga, SD

None of these stations is “home” to or located geographically within a Nielsen Metro, therefore a contour-based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission’s rules. As demonstrated below, this market contains more than 16 radio stations, allowing for common ownership of 6 stations, no more than 4 of which may be in the same service. Thus, Alpha’s common ownership of 5 stations, 3 of which are in the same service, complies with the local radio ownership rule.

Market 16-1 (Moberly, MO): This market is defined by the common ownership by Alpha of 3 FM radio stations and 1 AM radio station:

KIRK(FM), Macon, MO;
 KRES(FM), Moberly, MO;
 KTCM(FM), Madison, MO; and
 KWIX(AM), Moberly, MO

None of these stations is “home” to or located geographically within a Nielsen Metro, therefore a contour-based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission’s rules. As demonstrated below, this market contains more than 31 radio stations, allowing for common ownership of 7 stations, no more than 4 of which may be in the same service. Thus, Alpha’s common ownership of 4 stations, 3 of which are in the same service, complies with the local radio ownership rule.

Market 16-2 (Moberly, MO): This market is defined by the common ownership by Alpha of 3 FM radio stations and 1 AM radio station:

KIRK(FM), Macon, MO;
 KRES(FM), Moberly, MO;
 KWIX-FM, Cairo, MO; and
 KWIX(AM), Moberly, MO

None of these stations is “home” to or located geographically within a Nielsen Metro, therefore a contour-based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission’s rules. As demonstrated below, this market contains more than 29 radio stations, allowing for common ownership of 6 stations, no more than 4 of which may be in the same service. Thus, Alpha’s common ownership of 4 stations, 3 of which are in the same service, complies with the local radio ownership rule.

Market 17 (North Dallas, TX): This market is defined by Alpha’s common ownership of 3 FM radio stations:

KLAK(FM), Tom Bean, TX;
 KMAD-FM, Whitesboro, TX; and
 KMKT, Bells, TX

None of these stations is “home” to or located geographically within a Nielsen Metro, therefore a contour-based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission’s rules. As demonstrated below, this market contains more than 26 radio stations, allowing for common ownership of 6 stations, no more than 4 of which may be in the same service. Thus, Alpha’s proposed common ownership of three stations, all of which are in the same service, complies with the local radio ownership rule.

Market 18 (North Mankato, MN): This market is defined by the proposed common ownership by Alpha of 4 FM radio stations:

KEEZ-FM, Mankato, MN;
 KMKO-FM, Lake Crystal, MN; and
 KRBI-FM, Brookings, SD
 KYSM-FM, Mankato, MN;

None of these stations is “home” to or located geographically within a Nielsen Metro, therefore a contour-based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission’s rules. As demonstrated below, this market contains more than 23 radio stations, allowing for common ownership of 6 stations, no more than 4 of which may be in the same service. Thus, Alpha’s proposed common ownership of 4 stations, all 4 of which are in the same service, complies with the local radio ownership rule.

Market 19 (Redwood Falls, MN): This market is defined by Alpha’s proposed common ownership of 1 FM radio station and 1 AM radio station:

KLGR-FM, Redwood Falls, MN; and
 KLGR(AM), Redwood Falls, MN

No further analysis is required for this market as a licensee may own 1 AM and 1 FM regardless of the number of stations contained in the market. Thus, Alpha’s proposed common ownership of these 2 stations complies with the local radio ownership rule.

Market 20 (San Antonio, TX): This market is defined by Alpha’s common ownership of 1 FM radio station and 2 AM radio stations:

KHHL(FM), Karnes City, TX;
 KSAH(AM), Universal City, TX; and
 KTSA(AM), San Antonio, TX

KHHL is not “home” to or geographically located within the San Antonio, TX metro. KSAH(AM) and KTSA(AM) are both “home” to and geographically located within the San Antonio Metro. As demonstrated below, this market contains more than 42 full power radio stations, allowing for

common ownership of 7 stations, no more than 4 of which may be in the same service. Thus, Alpha's ownership of 3 stations, two in the same service, complies with the local radio ownership rule.

Market 21-1 (Savannah, GA): This market is defined by Alpha's common ownership of 4 FM radio stations and 1 AM radio station:

WFXH-FM, Hilton Head Island, SC;
 WUBB(FM), Bluffton, SC;
 WRWN(FM), Port Royal, SC;
 WXYX(FM), Rincon, GA; and
 WHHW(AM), Hilton Head Island, SC

WFXH-FM, WGO(FM), WUBB(FM) are "home" to the Savannah, GA Metro but located geographically outside the Savannah Metro and WXYX(FM) is located geographically within the Savannah Metro. As demonstrated below, this market contains more than 26 full power radio stations, allowing for common ownership of 6 stations, no more than 4 of which may be in the same service. Thus, Alpha's ownership of 5 stations, 4 of which are in the same service, complies with the local radio ownership rule.

Market 21-2 (Savannah, GA): This market is defined by Alpha's common ownership of 3 FM radio stations:

WGO(FM), Midway, GA;
 WUBB(FM), Bluffton, SC; and
 WXYX(FM), Rincon, GA

WUBB(FM) is "home" to the Savannah, GA Metro but located geographically outside the Savannah Metro and WXYX(FM) is located geographically within the Savannah Metro. As demonstrated below, this market contains more than 34 full power radio stations, allowing for common ownership of 7 stations, no more than 4 of which may be in the same service. Thus, Alpha's ownership of 3 stations, all of which are in the same service, complies with the local radio ownership rule.

Market 22-1 (Tyler-Longview, TX): This market is defined by Alpha's common ownership of 3 FM radio stations:

KTLH(FM), Hallsville, TX;
KTAL-FM, Texarkana, TX
KYKX(FM), Longview, TX

KTAL-FM is "home" to the Shreveport, LA Metro but located geographically outside the Shreveport Metro and KYKX(FM) is located geographically within the Tyler-Longview, TX Metro. As demonstrated below, this market contains more than 63 full power radio stations, allowing for common ownership of 8 stations, no more than 5 of which may be in the same service. Thus, Alpha's ownership of 3 stations, all of which are in the same service, complies with the local radio ownership rule.

Market 22-2 (Tyler-Longview, TX): This market is defined by Alpha's common ownership of 3 FM radio stations:

KOOI(FM), Jacksonville, TX;
KOYE(FM), Frankston, TX; and
KYKX(FM), Longview, TX

KOOI(FM) and KYKX(FM) are located geographically within the Tyler-Longview, TX Metro. As demonstrated below, this market contains more than 39 full power radio stations, allowing for common ownership of 7 stations, no more than 4 of which may be in the same service. Thus, Alpha's ownership of 3 stations, all of which are in the same service, complies with the local radio ownership rule.

Market 22-3 (Tyler-Longview, TX): This market is defined by Alpha's common ownership of 3 FM radio stations:

KKUS(FM), Tyler
KOOI(FM), Jacksonville, TX; and
KOYE(FM), Frankston, TX;

KKUS(FM) and KOOI(FM) are "home" to and geographically located within the Tyler-Longview, TX Metro. As demonstrated below, this market contains more than 28 full power radio

stations, allowing for common ownership of 6 stations, no more than 4 of which may be in the same service. Thus, Alpha's ownership of 3 stations, all of which are in the same service, complies with the local radio ownership rule.

Market 23 (Watertown, SD): This market is defined by Alpha's proposed common ownership of 4 FM radio stations and 2 AM radio stations:

KDLO-FM, Watertown, SD;
 KIXX(FM), Watertown, SD;
 KKSD(FM), Milbank, SD;
 KSDR-FM, Watertown, SD;
 KSDR(AM), Watertown, SD; and
 KWAT(AM), Watertown, SD

None of these stations are "home" to or located geographically within a Nielsen Metro, therefore a contour-based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission's rules. As demonstrated below, this market contains more than 21 radio stations, allowing for common ownership of 6 stations, no more than 4 of which may be in the same service. Thus, Alpha's proposed common ownership of 6 stations, 4 of which are in the same service, complies with the local radio ownership rule.

Market 24 (Wenatchee-Columbia River, MA): This market is defined by Alpha's common ownership of 2 FM radio station and 1AM radio stations:

KWIQ-FM, Moses Lake, WA;
 KWLN(FM), Wilson Creek, WA; and
 KWIQ(AM), Moses Lake North, WA

None of these stations is "home" to or located geographically within a Nielsen Metro, therefore a contour based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission's rules. As demonstrated below, this market contains more than 13 radio stations, allowing for common ownership of 5 stations, no more than 3 of which may be in the same service. Thus, Alpha's ownership of 3 stations, 2 of which are in the same service, complies with the local radio ownership rule.

Market 25 (Lincoln, NE): This market is defined by Alpha's common ownership of 4 FM radio stations and 2 AM radio stations:

KFRX(FM), Lincoln, NE;
 KIBZ(FM), Crete, NE;
 KTGL(FM), Beatrice, NE;
 KZKX(FM), Seward, NE;
 KFOR(AM), Lincoln, NE; and
 KLMS(AM), Lincoln, NE

KTGL(FM), KIBZ(FM) and KZKX(FM) are "home" to the Lincoln, NE Metro but located geographically outside the Lincoln Metro and KFRX(FM), KFOR(AM) and KLMS(AM) are located geographically within the Lincoln Metro. As demonstrated below, this market contains more than 38 full power radio stations, allowing for common ownership of 7 stations, no more than 4 of which may be in the same service. Thus, Alpha's ownership of 6 stations, 4 of which are in the same service, complies with the local radio ownership rule.

Market 26 (Lubbock, TX): This market is defined by Alpha's common ownership of 4 FM radio stations:

KBTE(FM), Tulia, TX;
 KLLL-FM, Lubbock, TX;
 KMMX(FM), Tahoka, TX; and
 KONE(FM), Lubbock, TX

KBTE(FM) and KMMX(FM) are "home" to the Lubbock, TX Metro but located geographically outside the Lubbock Metro and KLLL-FM and KONE(FM) are located geographically within the Lubbock Metro. As demonstrated below, this market contains more than 33 full power radio stations, allowing for common ownership of 7 stations, no more than 4 of which may be in the same service. Thus, Alpha's ownership of 4 stations in the same service complies with the local radio ownership rule.

Market 27 (Salt Lake City, UT): This market is defined by Alpha's common ownership of 2 FM radio stations and 1 AM radio station:

KBMG(FM), Evanston, WY;
KDUT(FM), Randolph, UT; and
KTUB(AM), Centerville, UT

KBMG(FM) and KDUT(FM) are "home" to the Salt Lake City, UT Metro but located geographically outside the Salt Lake City Metro and KTUB(AM) is located geographically within the Salt Lake City Metro. Therefore, a contour based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission's rules. As demonstrated below, this market contains more than 41 radio stations, allowing for common ownership of 7 stations, no more than 4 of which may be in the same service. Thus, Alpha's common ownership of 3 stations, no more than 2 of which are in the same service, complies with the local radio ownership rule.

Supporting Data

Figures 1 – 27 are the supporting maps and station lists for each market defined in Table 1.

Statement of the Consultant

The information in this study is compiled from the most recent Commission and outside data. Guest Technology is not responsible for errors resulting from incorrect data or unpublished rule and procedure changes.

I personally prepared this report and the accompanying Figures. I certify to the best of my knowledge, education, and belief the above information is true and correct.

For Guest Technology, LLC.

A handwritten signature in black ink, reading "Laramie Guest", written over a horizontal line. The signature is cursive and stylized.

Laramie Guest

3/3/2021

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