

Kairos Broadcasting, LLC Amendment Exhibit KDLY/KOVE

Multiple Ownership Compliance: The proposed transaction involves an AM/FM combination in the same market. However, on August 11, 2021, Morcom Broadcasting, LLC filed an application for transfer of control seeking to transfer 85% of its membership interests to Kairos Broadcasting, LLC. See LMS File No. 0025961996. A multiple ownership showing demonstrating that common ownership of KDLY, KOVE and KTUG is permissible under 73.3555 of the Commission's Rules is attached.

MULTIPLE OWNERSHIP ANALYSIS

FREMONT BROADCASTING, INC.,

Proposed

KDLY(FM)	–	Lander, WY	97.5 MHz
KOVE(AM)	–	Lander, WY	1330 kHz
KTUG(FM)	–	Hudson, WY	105.1 MHz

Prepared By:

Edward P. De La Hunt

De La Hunt Communication Services

July 2021

Proposed Assignment of License to Fremont Broadcasting, Inc.

I am a Radio Consulting Engineer. My education and experience are a matter of record with the Federal Communications Commission. I have been authorized to prepare this statement and exhibits to review the proposed purchase for compliance with the multiple ownership rules. This statement and attached exhibits demonstrate full compliance with the Commission's Multiple Ownership rules.

There is mutual overlap of the principal community contours of proposed commonly owned stations. For FM stations, the principal community contour is the predicted 3.16 mV/m (70 dBu) contour. For AM stations, the principal community contour is the predicted daytime 5.0 mV/m groundwave contour computed in accordance with Section 73.183 of the FCC Rules.

The stations are not home to an Arbitron rated market.

Multiple Ownership Rules

Section 73.3555 of Commission's Rule and Regulations

(a)(1) Local radio ownership rule. A person or single entity (or entities under common control) may have a cognizable interest in licenses for AM or FM radio broadcast stations in accordance with the following limits:

(i) In a radio market with 45 or more full-power, commercial and noncommercial radio stations, not more than 8 commercial radio stations in total and not more than 5 commercial stations in the same service (AM or FM);

(ii) In a radio market with between 30 and 44 (inclusive) full-power, commercial and noncommercial radio stations, not more than 7 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM);

(iii) In a radio market with between 15 and 29 (inclusive) full-power, commercial and noncommercial radio stations, not more than 6 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM);

(iv) In a radio market with 14 or fewer full-power, commercial and noncommercial radio stations, not more than 5 commercial radio stations in total and not more than 3 commercial stations in the same service (AM or FM); provided, however, that no person or single entity (or entities under common control) may have a cognizable interest in more than 50% of the full-power, commercial and noncommercial radio stations in such market unless the combination of stations comprises not more than one AM and one FM station.

Radio Market Analysis

This analysis triggers one radio market of common contour overlap for consideration as a worst case. **See Figure 1.** The study will determine the number of AM and FM broadcast stations located in the competitive market as defined by the commonly owned radio stations.

To determine which stations are located in a given competitive market, the appropriate principal community coverage contours of all broadcast stations in the vicinity of the market must be calculated and a determination must be made if there is any overlap of these contours.

Market

The market is defined by the common overlap of **KDLY(FM), KTUG(FM) and KOVE(AM); (2) FM stations, (1) AM stations.** Figure 1 shows the three (3) commonly owned FM/AM stations that defined the radio market. It was determined that, in addition to the two (2) commonly owned FM stations and one (1) AM station, at a minimum ten (10) additional non-commonly owned FM stations overlap the defined radio market Figure 2.

FM stations within the defined market:

Call Sign	Principal City	State	Frequency (MHz)	FCC Facility ID
KXWY	Hudson	WY	103.1	166054
KDLY	Lander	WY	97.5	22623
KFCW	Riverton	WY	93.1	72899
KTAK	Riverton	WY	93.9	56590
KUWW	Fort Washakie	WY	90.9	174336
KTUG	Hudson	WY	105.1	166002
KWRR	Ethete	WY	89.5	54539
KCWC-FM	Riverton	WY	88.1	10030
KRKM	Fort Washakie	WY	91.7	173340
KMJB	Hudson	WY	89.1	173291
KWYW	Lost Cabin	WY	99.1	89088
KDNO	Thermopolis	WY	101.7	88672

None of the overlapping signals has a transmitter site more than 92 kilometers from the point of common overlap. None of these overlapping stations are owned by Fremont Broadcasting, Inc.

CONCLUSION

The proposed assignment is in compliance with the Commission's Multiple Ownership limits because the proponent will own only two (2) FM stations and one (1) AM station which will not represent control of more than 50% of the stations in the market. Specifically, in a radio market with 14 or fewer full-power, commercial and noncommercial radio stations, not more than 5 commercial radio stations in total and not more than 3 commercial stations in the same service (AM or FM); provided, however, that no person or single entity (or entities under common control) may have a cognizable interest in more than 50% of the full-power, commercial and noncommercial radio stations in such market unless the combination of stations comprises not more than one AM and one FM station.

Based on my analysis the proposed assignment is in compliance with the requirements of §73.3555. This statement and attached exhibit was prepared by me or under my direct supervision and is believed to be true and correct.

//signed//

Edward P. De La Hunt
De La Hunt Communications Service
17487 Driftwood Lane
Park Rapids, MN 56470

Date: July 21, 2021

FREMONT BROADCASTING, INC.

KOVE 5 mV/m

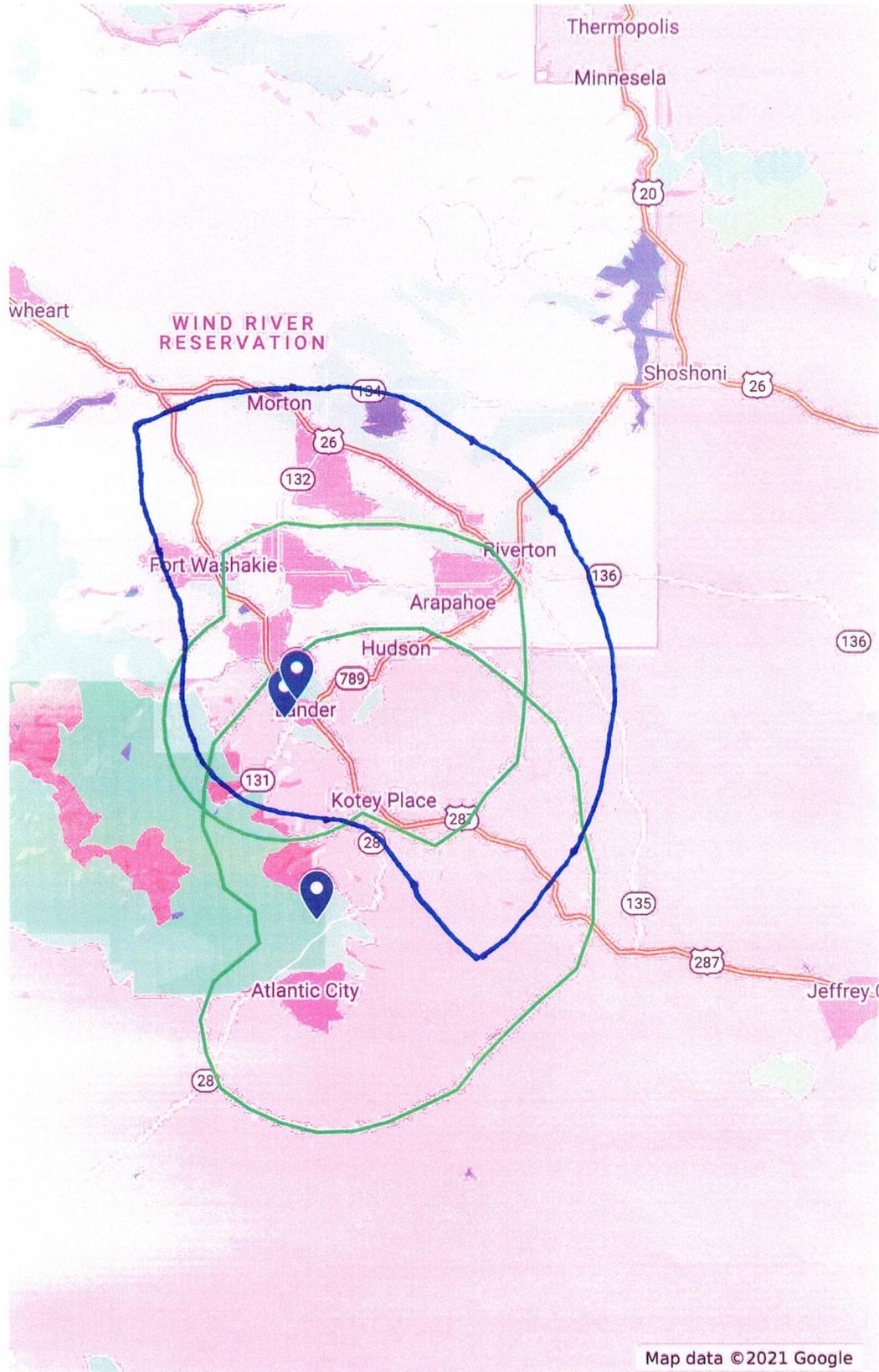
 KOVE, Lander 

KTUG 70 dBu

 286-166002-KTUG
 70 dBu (F50,50) contour

KDLY 70 dBu

 248-22623-KDLY
 70 dBu (F50,50) contour



FREMONT BROADCASTING, INC.

KTUG 70 dBu

- 286-166002-KTUG
- 70 dBu (F50,50) contour

KDLY 70 dBu

- 248-22623-KDLY
- 70 dBu (F50,50) contour

Terrain Based Contours

- KXWY
- 70 dBu (F50,50) contour

Terrain Based Contours

- KFCW
- 70 dBu (F50,50) contour

Terrain Based Contours

- KTAK
- 70 dBu (F50,50) contour

Terrain Based Contours

- KUWW
- 70 dBu (F50,50) contour

Terrain Based Contours

- KWRR
- 70 dBu (F50,50) contour

Terrain Based Contours

- KRKM
- 70 dBu (F50,50) contour

Terrain Based Contours

- KMJB
- 70 dBu (F50,50) contour

