

This application proposes the transfer of control of KNZA, Inc. ("KNZA") which holds the licenses of four full-power FM stations and one AM station. Attached are two maps demonstrating compliance with the FCC's radio ownership rules.

The first map depicts the overlap of the stations. There are several markets created by the overlaps of these commonly owned stations. There is a market created by the overlap of KTNC(AM) and KLZA(FM). No other commonly owned stations overlap the overlap area between these stations, and thus no other commonly owned stations are considered to be part of this market. As common ownership of an AM and an FM is always permitted, there is no ownership issue with this combination.

There is another market created by the overlap of KTNC(AM) and KNZA(FM). No other commonly owned stations overlap the overlap area between these stations, and thus no other commonly owned stations are considered to be part of this market. As common ownership of an AM and an FM is always permitted, there is no ownership issue with this combination.

There is another market created by the overlap of KTNC(AM) and KMZA(FM). No other commonly owned stations overlap the overlap area between these stations, and thus no other commonly owned stations are considered to be part of this market. As common ownership of an AM and an FM is always permitted, there is no ownership issue with this combination.

The only market created by the overlap of two same-service station is that of KNZA(FM) and KAIR-FM. In a market where there are two commonly owned FM stations, one owner cannot control more than 50% of the stations in that market. The second map, and the tabulation that follows, shows that there are 28 other independently owned stations in the market created by the contours of KNZA and KAIR-FM. This company clearly will not control more than 50% of the stations in the market.

Based on this showing, the continued common ownership of these stations complies with the ownership requirements of Section 47 C.F.R. § 73.3555(a).

This report and accompanying maps were prepared by George Nicholas, Technical Consultant from Cedar Rapids, IA., and retained by KNZA, Inc. His qualifications are a matter of record before the Federal Communications Commission.



George Nicholas, Technical Consultant for KNZA, Inc.
December 10, 2021

MAP 1

MAP of ATTRIBUTABLE SIGNALS

KNZA, Inc

KAIR-FM - Ch 229C3 - Horton, KS

KNZA (FM) - Ch 280C2 - Hiawatha, KS

KTNC (AM) - 1230 KHz - Falls City, NE

KLZA (FM) - Ch 267C3 - Falls City, NE

KMZA (FM) - Ch 221A - Seneca, KS

George Nicholas Communications

December, 2021

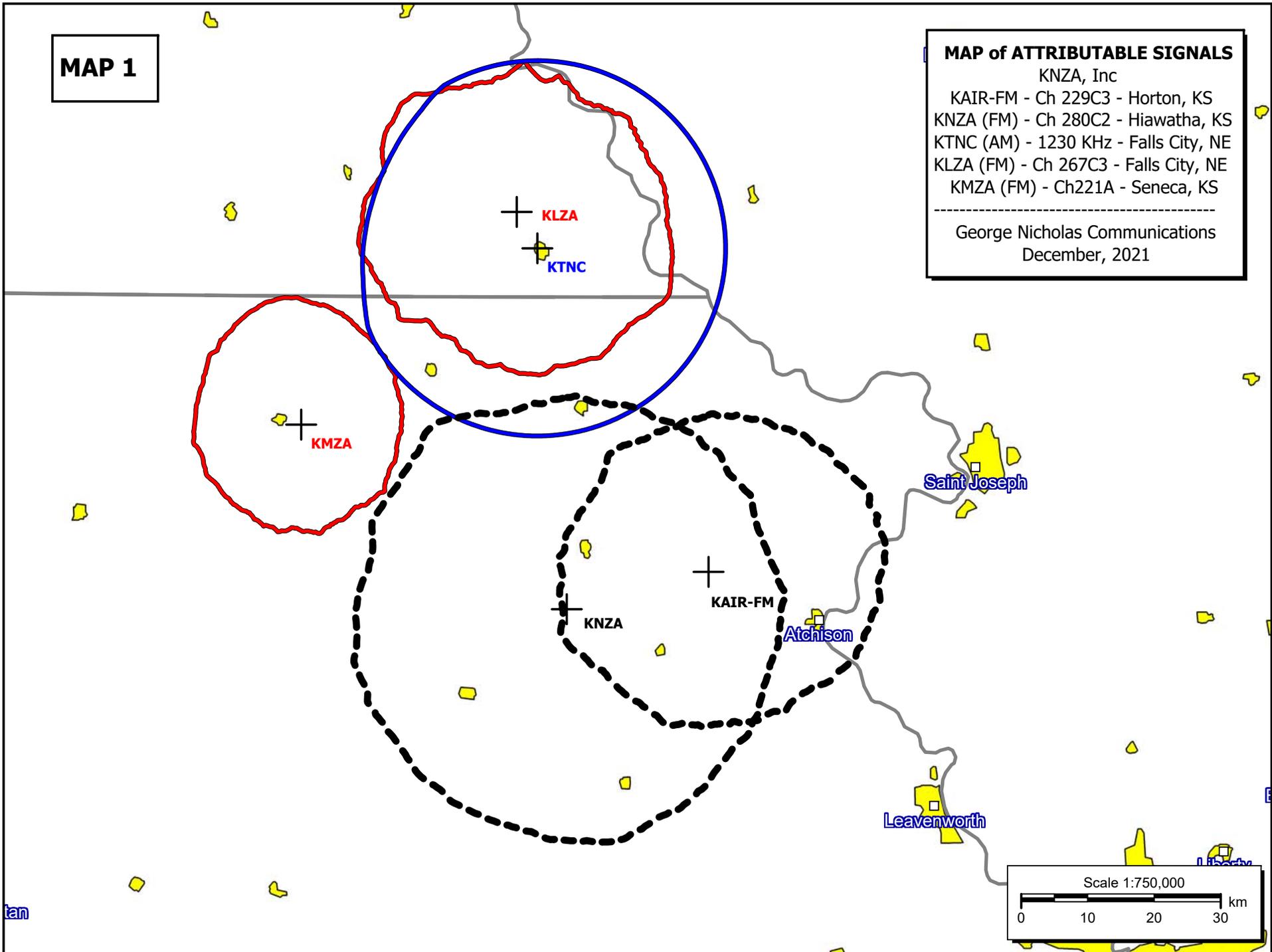


Table 1

Total number of overlapping contours: 28

Reference:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)

KAIR-FM	FM	229C3	Horton	KS	BLH19950206KE	0.0	0.0
KNZA	FM	280C2	Hiawatha	KS	BLH19940622KA	22.0	255.3

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)

KJTY	FM	201C1	Topeka	KS	BLED20170109ABB	66.5	190.1
KANU	FM	218C1	Lawrence	KS	BLED19920721KA	75.0	177.0
WIBW-FM	FM	233C0	Topeka	KS	BLH20050623ABS	93.7	222.7
KCHZ	FM	239C1	Ottawa	KS	BMLH20031103ADD	72.7	160.1
KDVB	FM	245A	Effingham	KS	BLH20161121AEC	13.8	211.2
KSAJ-FM	FM	253C2	Burlingame	KS	BLH20171220ABU	73.7	211.8
KWIC	FM	257C2	Topeka	KS	0000120992	73.7	211.8
KDVV	FM	262C0	Topeka	KS	BLH19890718KB	90.9	214.7
KTOP-FM	FM	275C2	St. Marys	KS	BLH20030326AHX	73.7	211.8
KKSW	FM	290C1	Lawrence	KS	BLH19871119KC	66.5	190.1
KTPK	FM	295C	Topeka	KS	0000125347	84.7	218.0
KMAJ-FM	FM	299C1	Carbondale	KS	BLH20090618ABH	90.9	214.7
KJCV-FM	FM	209C2	Country Club	MO	BLED20100707FCN	50.0	74.8
KSJI	FM	216C3	St. Joseph	MO	BLED20111206AFB	46.5	75.2
KSRD	FM	220C3	St. Joseph	MO	BLED20040928AHD	25.0	68.8
KSJQ	FM	224C2	Savannah	MO	BLH19911003KA	48.2	36.8
KKJO-FM	FM	288C1	St. Joseph	MO	BLH20000509AAQ	25.0	68.8
KCSP	AM	610	KANSAS CITY	MO	BL19990714AAC	92.9	140.2
WHB	AM	810	KANSAS CITY	MO	BL19810706AA	73.0	119.1
KGNM	AM	1270	ST. JOSEPH	MO	BL	47.0	74.0
KFEQ	AM	680	ST. JOSEPH	MO	BMML20110511AHO	49.0	62.9
KESJ	AM	1550	ST. JOSEPH	MO	BMML20110322ABY	48.5	62.8
KCMO	AM	710	KANSAS CITY	MO	BL	78.3	115.8
KEXS	AM	1090	EXCELSIOR SPRINGS	MO	BMML20171012AFP	98.0	111.9
KMAJ	AM	1440	TOPEKA	KS	BL20120308ACM	71.3	198.3
KTOP	AM	1490	TOPEKA	KS	BL19960415AC	68.8	207.3
WIBW	AM	580	TOPEKA	KS	BML20020912ABX	72.6	213.9
KYFR	AM	920	SHENANDOAH	IA	BML20000519ADZ	110.5	3.1

Distance and bearing calculations from coordinates: 39-37-42.90 N, 095-18-52.99 W

Duopoly Options:

TV: Not Included

FM: 3.16 mV/m (70 dBu); Include NCE

AM: 5.0 mV/m

*Any stations with attributable interest are not included in total market count