

ENGINEERING STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS

This radio multiple ownership analysis was prepared on behalf of Desert Mountain Broadcasting Licenses, LLC concerning the acquisition of stations in the Bozeman, Montana market tabulated below. This analysis was prepared under the FCC “Interim” contour analysis method.¹ The following stations were analyzed:²

Call Sign / Facility ID	Location	Facilities
KYWL(AM) / 161553 Licensed Facility	Bozeman, MT	1490 kHz, 1 kW-D/0.9 kW-N, ND
KYWL(AM) / 161553 Construction Permit	Bozeman, MT	1480 kHz, 3 kW-D/0.15 kW-N, ND
<i>KBOZ(AM) / 16775 Licensed Facility</i>	<i>Bozeman, MT</i>	<i>1090 kHz, 5 kW-U, DA-N</i>
<i>KBOZ-FM / 55676 Licensed Facility</i>	<i>Bozeman, MT</i>	<i>Channel 260C3 19 kW -56 m</i>
<i>KOBB(AM) / 55677 Licensed Facility</i>	<i>Bozeman, MT</i>	<i>1230 kHz, 1 kW-U, ND</i>
<i>KOBB-FM / 16776 Licensed Facility</i>	<i>Bozeman, MT</i>	<i>Channel 229C1 51 kW -39 m</i>
<i>KOZB(FM) / 16777 Licensed Facility</i>	<i>Livingston, MT</i>	<i>Channel 248C1 100 kW 75 m</i>

The principal community contours of these stations are depicted on a map included herein as Figure 1. Since the principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) of the stations above are all involved in common overlap, an ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

Radio Markets

The “radio market” applicable to common ownership of the subject stations are defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. As listed in the Table below, there is one (1) defined “radio market” formed by the subject stations:

¹ See Report and Order and Notice of Proposed Rulemaking, MB Docket 02-277, FCC 03-127, Released July 2, 2003.

² Station KYWL(AM) is currently owned. Stations KBOZ(AM), KBOZ-FM, KOBB(AM) KOBB-FM and KOZB(FM) are being acquired.

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Station
Market 1	KYWL(Lic & CP), KBOZ, KOBB	KBOZ-FM, KOBB-FM, KOZB

Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating stations having principal community contours that overlap or intersect the principal community contours, which define the radio market. Only those stations located within 92 km of the perimeter of the mutual overlap area of the defined market area were employed in the count of stations. Commonly owned stations, other than those that form the market in question were not considered in the count of stations in the defined market. The results of the analysis are tabulated below:

Defined Radio Markets	Total Number of Stations in the Radio Market
Market 1	5 AM, 17 FM; 22 Total

Figure 2 is a map depicting the radio market along with the principal community contours of other AM and FM stations in the defined market. Figure 3 is a tabulation of other stations in the defined markets. Only known licensed, operating stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission’s AM database and the appropriate Ground Wave Field Strength versus Distance Graph of 47 CFR 73.184. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR 73.313. Terrain data was derived from the USGS 1-second computer database for each of the FM stations using radials evenly-spaced every 5 degrees of azimuth.

Based on the above, the proposed acquisition complies with Section 73.3555(a) of the FCC Rules.

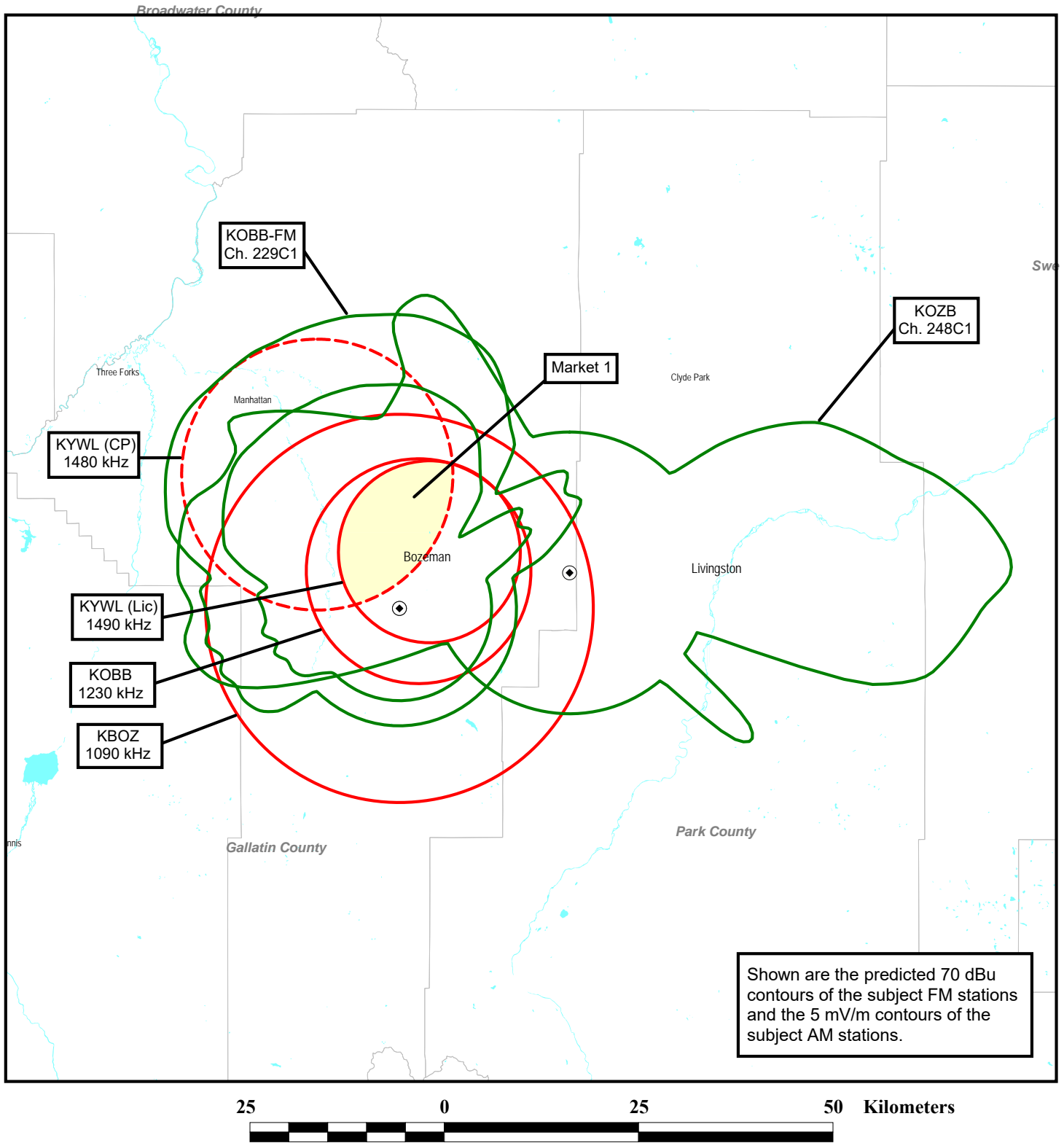
A handwritten signature in black ink, appearing to read "W. Jeffrey Reynolds". The signature is fluid and cursive, with the first name "W." and last name "Reynolds" clearly distinguishable.

W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
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August 10, 2021

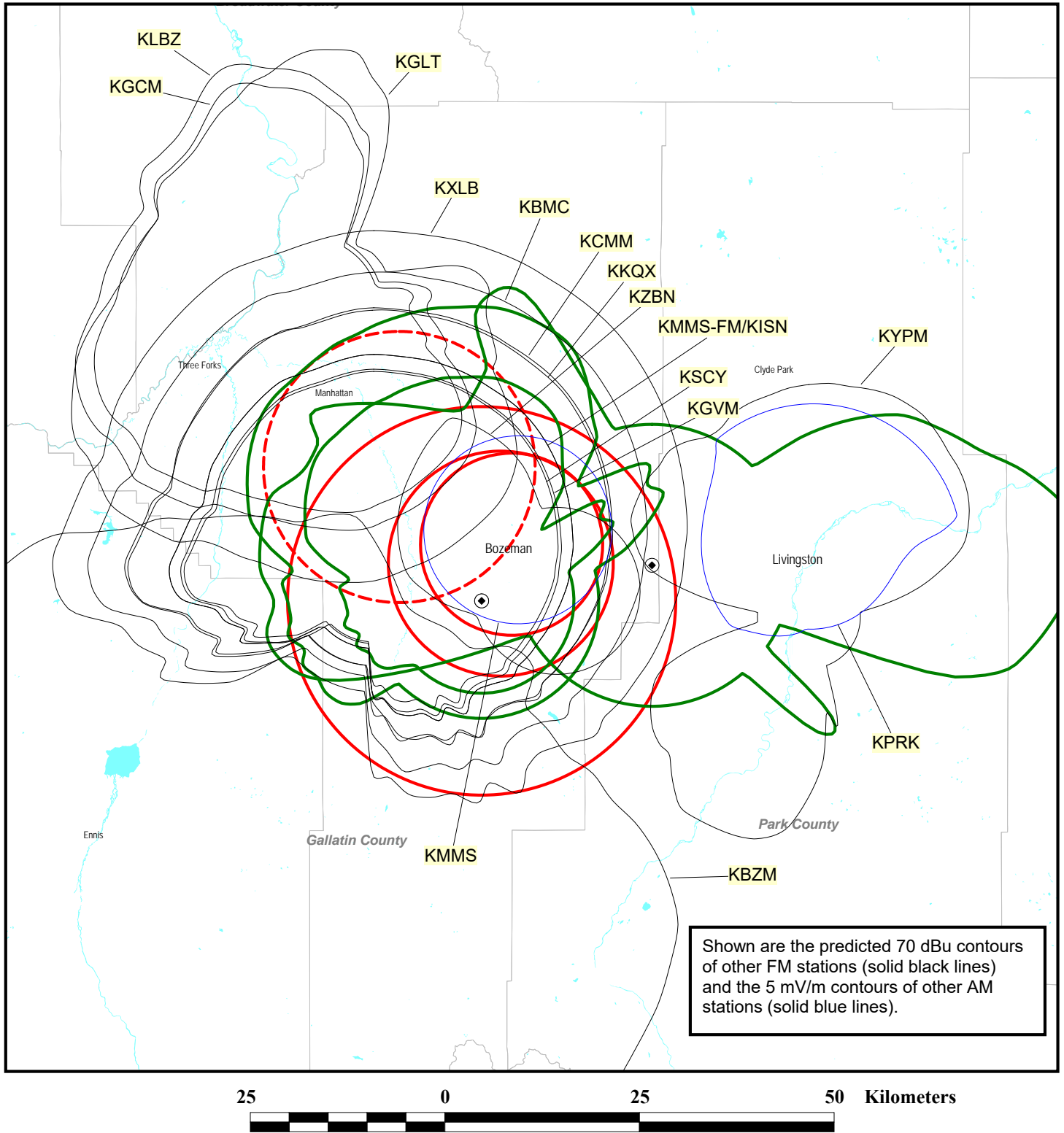
Figure 1



PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

du Treil, Lundin & Rackley, Inc. Sarasota, Florida 34237

Figure 2



PRINCIPAL COMMUNITY CONTOURS OF OTHER AM AND FM STATIONS

du Treil, Lundin & Rackley, Inc. Sarasota, Florida 34237

Figure 3

Tabulation of Other AM/FM Stations in the Radio Market

<u>FM Stations</u>				
<u>CALLSIGN</u>	<u>CITY</u>	<u>STATUS</u>	<u>STATE</u>	<u>Ch./Freq.</u>
KISN	Belgrade	License	MT	244 C3
KCMM	Belgrade	License	MT	256 C2
KBZM	Big Sky	License	MT	284 C1
KZBN	Bozeman	License	MT	212 C3
KMMS-FM	Bozeman	License	MT	234 C3
KLBZ	Bozeman	License	MT	207 C2
KGVM	Bozeman	License	MT	240 C3
KGLT	Bozeman	License	MT	220 C2
KBMC	Bozeman	License	MT	271 C2
KXLB	Churchill	License	MT	264 C1
KSCY	Four Corners	License	MT	295 C3
KYPM	Livingston	License	MT	210 C3
KKQX	Manhattan	License	MT	289 C2
<u>KGCM</u>	<u>Three Forks</u>	<u>License</u>	<u>MT</u>	<u>215 C3</u>
Total	14			

<u>AM Stations</u>				
<u>CALLSIGN</u>	<u>CITY</u>	<u>STATUS</u>	<u>STATE</u>	<u>Ch./Freq.</u>
KMMS	Bozeman	License	MT	1450
<u>KPRK</u>	<u>Livingston</u>	<u>License</u>	<u>MT</u>	<u>1340</u>
Total	2			