

MULTIPLE OWNERSHIP STUDY

The following engineering statement and attached exhibits have been prepared for **High Desert Broadcasting LLC** ("High Desert"), licensee of several broadcast facilities in the State of California, and are in support of the analysis of the facilities attributable to them, and related entities. This study is being filed as a supporting exhibit to an application for construction permit for KGMX at Lancaster, California.¹

The principals in High Desert have other attributable interests in multiple broadcast licensees. The majority of the facilities attributable to High Desert are found in two clusters, with the remaining facilities in isolated stand-alone areas. One of the two main clusters is located in the coastal areas of California northwest of the Los Angeles metropolitan area. The second cluster, and the one of the subject of this study, is located north of the Los Angeles metropolitan area in the vicinity of Lancaster and Barstow, California. Exhibit E-1 illustrates the facilities in this cluster, which are detailed in the following tabulation.²

Callsign	Community	Service	Licensee	Facility ID
KCEL	Mojave	FM	Coloma Mojave, LLC	164156
KGMX	Lancaster	FM	High Desert Broadcasting LLC	19703
KKZQ	Tehachapi	FM	High Desert Broadcasting LLC	85024
KMVE	California City	FM	High Desert Broadcasting LLC	33526
KOSS	Lancaster	AM	High Desert Broadcasting LLC	19702
KQAV	Rosamond	FM	High Desert Broadcasting LLC	70879
KUTY	Palmdale	AM	High Desert Broadcasting LLC	22011
KHDR	Lenwood	FM	The Drive LLC	89344
KWIE	Barstow	FM	Point Five LLC	191522
<i>KTPI-FM</i>	<i>Mojave</i>	<i>FM</i>	<i>RZ Radio LLC</i>	<i>2320</i>
<i>KTPI</i>	<i>Mojave</i>	<i>AM</i>	<i>RZ Radio LLC</i>	<i>66229</i>
<i>KAVL</i>	<i>Lancaster</i>	<i>AM</i>	<i>RZ Radio LLC</i>	<i>2318</i>

¹ The Facility ID for KGMX at Lancaster, California is 19703.

² The map in Exhibit E-1 also includes contours for outstanding construction permits. Facilities in the table that are italicized represent those operated under LMA by High Desert.

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Due to the locations of these facilities relative to each other, different contour based markets are created. Specifically, five different contour markets are created. Each will be specifically discussed and analyzed.

Contour Market #1:

Contour Market #1 is defined by the common overlap between KAVL, KHDR, and KWIE. KHDR has a licensed facility, as well as an outstanding construction permit, as does KWIE. Depending on the authorization considered, the area of common overlap defining this market shifts. Exhibit E-2 illustrates the market based on the licensed KHDR facility, while Exhibit E-3 depicts the market when based on the construction permit. The 70 dBu service contour for KWIE under its current construction permit is also illustrated, however, the market defining overlap area is based on the KWIE licensed facility. No change in the facility concentration occurs with a change in the KWIE authorization considered.

Regardless of the authorizations considered, this market consists of one AM facility, and two FM stations. It is therefore necessary and sufficient to demonstrate that High Desert would not have an attributable interest in more than fifty percent of the stations serving the market. Exhibits E-4 and E-5 analyze contour markets #1 and #1C respectively. The facilities depicted on these maps are summarized in the following table.³ As these maps demonstrate, High Desert would not control in excess of fifty percent of the stations serving these contour markets. Each of the facilities under consideration has a transmitter site located within 92 kilometers of the perimeter of

³ Italicized facilities are those attributable to High Desert, including those operated under LMA. It should be noted that the 70 dBu service contour resulting from the KWIE CP facilities is also indicated on Exhibits E-4 and E-5. The 70 dBu contour for the licensed KWIE facilities is indicated by the contour designated as "D", thus the presence of the KWIE 70 dBu contour should not be construed as an additional facility comprising the market. The magenta shaded area depicting the market defining common overlap is based on the KWIE licensed contour.

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the market boundary. Italicized facilities are those attributable to High Desert, including those operated by LMA.

Designation	Callsign	Community	Service	Facility ID
<i>A</i>	<i>KAVL</i>	<i>Lancaster, CA</i>	<i>AM</i>	<i>2318</i>
<i>B</i>	<i>KHDR (License)</i>	<i>Lenwood, CA</i>	<i>FM</i>	<i>89344</i>
<i>C</i>	<i>KHDR (CP)</i>	<i>Lenwood, CA</i>	<i>FM</i>	<i>89344</i>
<i>D</i>	<i>KWIE</i>	<i>Barstow, CA</i>	<i>FM</i>	<i>191522</i>
E ⁴	KBTW	Lenwood, CA	FM	81804
F	KDUC	Barstow, CA	FM	21495
G	KIQQ-FM	Newberry Springs, CA	FM	79388
H	KXXZ	Barstow, CA	FM	122214
I	KODV	Barstow, CA	FM	27984

It should be noted that the facilities comprising contour market #1 with the exception of KAVL, are home to the Victor Valley Rated Market. KAVL, being licensed to Lancaster, California, is home to the Los Angeles rated market. High Desert therefore has an attributable interest in three facilities home to the Victor Valley market, which is less than fifty percent of the stations considered home to the rated market. Thus, High Desert complies with the provisions of Section 73.3555 with respect to Contour Market #1.

Contour Market #2:

Contour market #2 is defined by the common overlap between KAVL at Lancaster, California, and KMVE at California City, California. This market is comprised of the common overlap between one AM station and one FM station. Since the market defining overlap does not overlap any other facility attributable to High Desert, this market complies with the provisions of Section 73.3555(a)(2) of the Commission's Rules.

The majority of the area of overlap between these two facilities is located in the southeastern portion of Kern County, which is not a constituent county in any rated market. The

⁴ KBTW and licensed KHDR located at same site with similar parameters.

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remainder of the overlap area is within the western portion of San Bernardino County, and although that county is part of the Victor Valley rated market, neither KMVE nor KAVL are considered home to that market.⁵ Exhibit E-6 provides an illustration of the overlap area between these two facilities.

Contour Market #3:

Contour market #3 is defined by a very small area, which is the result of the overlap between KAVL, KTPI, KTPI-FM, the licensed KQAV facility, KKZQ, and KCEL. This market is created by six stations, four of which are FM facilities. Thus, it is necessary and sufficient to demonstrate that there are at least fifteen total stations serving the market. Exhibits E-7 and E-8 illustrate the area that creates this market, while Exhibit E-9 illustrates the analysis of this market. The stations depicted on this map are detailed in the following tabulation.

Designation	Callsign	Community	Service	Facility ID
<i>A</i>	<i>KAVL</i>	<i>Lancaster, CA</i>	<i>AM</i>	<i>2318</i>
<i>B</i>	<i>KTPI</i>	<i>Mojave, CA</i>	<i>AM</i>	<i>66229</i>
<i>C</i>	<i>KTPI-FM</i>	<i>Mojave, CA</i>	<i>FM</i>	<i>2320</i>
<i>D</i>	<i>KQAV (License)</i>	<i>Rosamond, CA</i>	<i>FM</i>	<i>70879</i>
<i>E</i>	<i>KKZQ</i>	<i>Tehachapi, CA</i>	<i>FM</i>	<i>85024</i>
<i>F</i>	<i>KCEL</i>	<i>Mojave, CA</i>	<i>FM</i>	<i>164156</i>
1	KCRY	Mojave, CA	FM	59092
2	KGBB	Edwards, CA	FM	457
3	KSRV	Tehachapi, CA	FM	66228
4	KTLW	Lancaster, CA	FM	37813
5	KLOS	Los Angeles, CA	FM	35078
6	KRRL	Los Angeles, CA	FM	35022
7	KRTH	Los Angeles, CA	FM	28631
8	KTWV	Los Angeles, CA	FM	25437
9	KPFK	Los Angeles, CA	FM	51252
10	KBIG	Los Angeles, CA	FM	6360
11	KVVS	Rosamond, CA	FM	49950
12	KCBS-FM	Los Angeles, CA	FM	9612

⁵ KAVL is considered home to the Los Angeles rated market

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Each of the additional stations considered has a transmitter site located within 92 kilometers of the perimeter of the contour overlap region. This contour based market is located in southeastern Kern County, and is outside of any rated market. This third contour market complies with the provisions of Section 73.3555 of the Commission's Rules.

Contour Market #4:

Contour market #4 is defined by the overlap between KAVL, KTPI, KOSS, KGMX, KQAV, and KTPI-FM. In the case of KGMX, the related application for construction permit to which this study is attached, is considered. KQAV also has an outstanding construction permit, however, it is not relevant for the purposes of this analysis, whether the KQAV license or construction permit is considered. Exhibits E-10 and E-11 provide an illustration of contour market #4.

This market is created by the common overlap between six facilities, which are evenly split between AM and FM stations. As a result, it is necessary and sufficient to demonstrate that there are at least fifteen stations serving the market. Exhibit E-12 illustrates the analysis of this market, with the facilities depicted summarized in the following table.

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Designation	Callsign	Community	Service	Facility ID
<i>A</i>	<i>KAVL</i>	<i>Lancaster, CA</i>	<i>AM</i>	<i>2318</i>
<i>B</i>	<i>KTPI</i>	<i>Mojave, CA</i>	<i>AM</i>	<i>66229</i>
<i>C</i>	<i>KOSS</i>	<i>Lancaster, CA</i>	<i>AM</i>	<i>19702</i>
<i>D</i>	<i>KGMX(APP)</i>	<i>Lancaster, CA</i>	<i>FM</i>	<i>19703</i>
<i>E</i>	<i>KQAV (License)</i>	<i>Rosamond, CA</i>	<i>FM</i>	<i>70879</i>
<i>F</i>	<i>KQAV(CP)</i>	<i>Rosamond, CA</i>	<i>FM</i>	<i>70879</i>
<i>G</i>	<i>KTPI-FM</i>	<i>Mojave, CA</i>	<i>FM</i>	<i>66229</i>
<i>1</i>	<i>KCRY</i>	<i>Mojave, CA</i>	<i>FM</i>	<i>59092</i>
<i>2</i>	<i>KGBB</i>	<i>Edwards, CA</i>	<i>FM</i>	<i>457</i>
<i>3</i>	<i>KSRV</i>	<i>Tehachapi, CA</i>	<i>FM</i>	<i>66228</i>
<i>4</i>	<i>KTLW</i>	<i>Lancaster, CA</i>	<i>FM</i>	<i>37813</i>
<i>5</i>	<i>KLOS</i>	<i>Los Angeles, CA</i>	<i>FM</i>	<i>35078</i>
<i>6</i>	<i>KRRL</i>	<i>Los Angeles, CA</i>	<i>FM</i>	<i>35022</i>
<i>7</i>	<i>KRTH</i>	<i>Los Angeles, CA</i>	<i>FM</i>	<i>28631</i>
<i>8</i>	<i>KTWV</i>	<i>Los Angeles, CA</i>	<i>FM</i>	<i>25437</i>
<i>9</i>	<i>KPFK</i>	<i>Los Angeles, CA</i>	<i>FM</i>	<i>51252</i>
<i>10</i>	<i>KBIG</i>	<i>Los Angeles, CA</i>	<i>FM</i>	<i>6360</i>
<i>11</i>	<i>KVVS</i>	<i>Rosamond, CA</i>	<i>FM</i>	<i>49950</i>
<i>12</i>	<i>KCBS-FM</i>	<i>Los Angeles, CA</i>	<i>FM</i>	<i>9612</i>

Each of the additional stations considered has a transmitter site located within 92 kilometers of the perimeter of the overlap region defining the contour market. The contour based market is located in southeastern Kern County, and is outside of any rated market. This fourth contour market complies with the provisions of Section 73.3555 of the Commission's Rules.

Contour Market #5:

The fifth and final contour market is defined by the common overlap between KAVL, KOSS, KUTY, KGMX, KQAV, and KTPI-FM. As has been previously discussed, KQAV has an outstanding construction permit. For KGMX, a license exists, as does the application for construction permit to which this study is attached. There is no difference in the analysis, or market location, regardless of which KQAV or KGMX facility is considered.

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This contour market is also defined by the overlap between six facilities. These six facilities are evenly split between AM and FM stations. As a result, it is also necessary and sufficient to demonstrate that there are at least fifteen stations serving this particular market. Exhibit E-14 makes this demonstration, with the facilities depicted listed in the following table.

Designation	Callsign	Community	Service	Facility ID
<i>A</i>	<i>KAVL</i>	<i>Lancaster, CA</i>	<i>AM</i>	<i>2318</i>
<i>B</i>	<i>KOSS</i>	<i>Lancaster, CA</i>	<i>AM</i>	<i>19702</i>
<i>C</i>	<i>KUTY</i>	<i>Palmdale, CA</i>	<i>AM</i>	<i>22011</i>
<i>D</i>	<i>KGMX(License)</i>	<i>Lancaster, CA</i>	<i>FM</i>	<i>19703</i>
<i>E</i>	<i>KGMX (APP)</i>	<i>Lancaster, CA</i>	<i>FM</i>	<i>19703</i>
<i>F</i>	<i>KQAV (License)</i>	<i>Rosamond, CA</i>	<i>FM</i>	<i>70879</i>
<i>G</i>	<i>KQAV (CP)</i>	<i>Rosamond, CA</i>	<i>FM</i>	<i>70879</i>
<i>H</i>	<i>KTPI-FM</i>	<i>Mojave, CA</i>	<i>FM</i>	<i>2320</i>
<i>1</i>	<i>KCRY</i>	<i>Mojave, CA</i>	<i>FM</i>	<i>59092</i>
<i>2</i>	<i>KGBB</i>	<i>Edwards, CA</i>	<i>FM</i>	<i>457</i>
<i>3</i>	<i>KSRV</i>	<i>Tehachapi, CA</i>	<i>FM</i>	<i>66228</i>
<i>4</i>	<i>KTLW</i>	<i>Lancaster, CA</i>	<i>FM</i>	<i>37813</i>
<i>5</i>	<i>KLOS</i>	<i>Los Angeles, CA</i>	<i>FM</i>	<i>35078</i>
<i>6</i>	<i>KRRL</i>	<i>Los Angeles, CA</i>	<i>FM</i>	<i>35022</i>
<i>7</i>	<i>KRTH</i>	<i>Los Angeles, CA</i>	<i>FM</i>	<i>28631</i>
<i>8</i>	<i>KTWV</i>	<i>Los Angeles, CA</i>	<i>FM</i>	<i>25437</i>
<i>9</i>	<i>KPFK</i>	<i>Los Angeles, CA</i>	<i>FM</i>	<i>51252</i>
<i>10</i>	<i>KBIG</i>	<i>Los Angeles, CA</i>	<i>FM</i>	<i>6360</i>
<i>11</i>	<i>KVVS</i>	<i>Rosamond, CA</i>	<i>FM</i>	<i>49950</i>
<i>12</i>	<i>KCBS-FM</i>	<i>Los Angeles, CA</i>	<i>FM</i>	<i>9612</i>

Each of the additional stations considered has a transmitter site located within 92 kilometers of the perimeter of the common overlap region. Most of the market defining overlap is located within southeastern Kern County, and as such is outside of any rated market. A portion of the overlap does include area within Los Angeles County as well as stations home to the Los Angeles rated market. The situation with the Los Angeles rated market will be discussed following the discussion of the contour markets. The fifth contour market complies with the provisions of Section 73.3555 of the Commission's Rules.

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Los Angeles Rated Market:

High Desert, and related entities, have an attributable interest in four facilities within the Los Angeles rated market. The following table lists those facilities home to the Los Angeles rated market.

Callsign	Community	Service	Facility ID
KAVL	Lancaster, CA	AM	2318
KGMX	Lancaster, CA	FM	19703
KOSS	Lancaster, CA	AM	19702
KUTY	Palmdale, CA	AM	22011

The Los Angeles rated market is home to 92 stations. High Desert has an attributable interest in four stations, three of which are in the same service. With regard to the Los Angeles rated market, High Desert is in compliance with the provisions of Section 73.3555 of the Commission's Rules.⁶

Since each of the markets under consideration complies with the provisions of Section 73.3555 of the Commission's Rules, the combination of facilities described in this study that are attributable to High Desert, or its related entities, complies with the provisions of that section of the Commission's Rules.

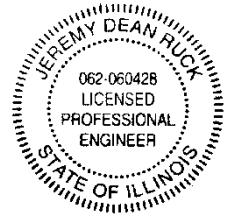
⁶ BIA data lists KCEL, KKZQ, KMVE, and KQAV, all attributable to High Desert, as previously home to the Los Angeles rated market. These facilities are considered under the contour markets.

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The preceding statement and attached exhibits have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.



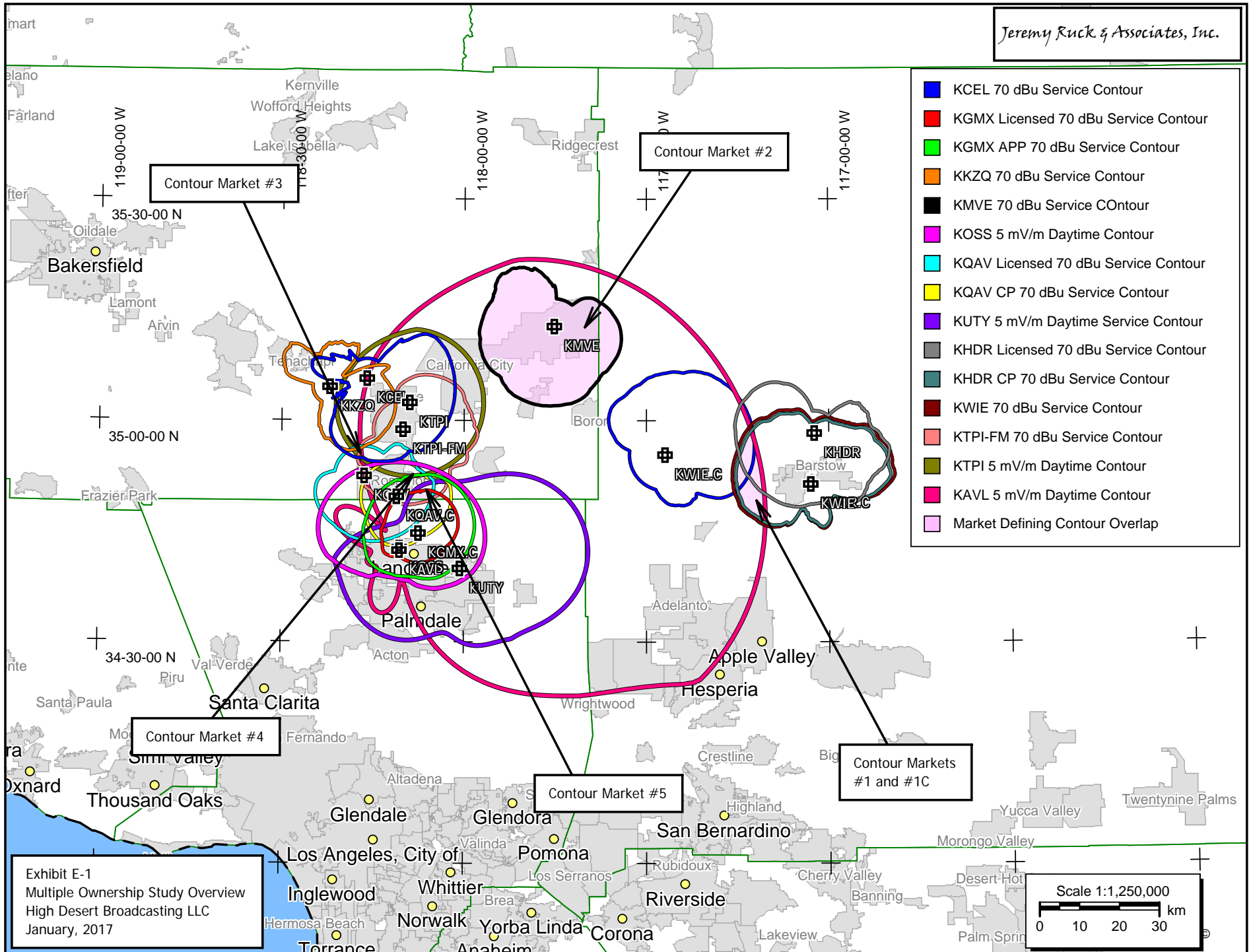
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Jeremy D. Ruck, PE
January 9, 2017

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- KAVL Daytime 5 mV/m Contour
- KHDR Licensed 70 dBu Service Contour
- KHDR CP 70 dBu Service Contour
- KWIE Licensed 70 dBu Service Contour
- KWIE CP 70 dBu Service Contour
- Market Defining Contour Overlap

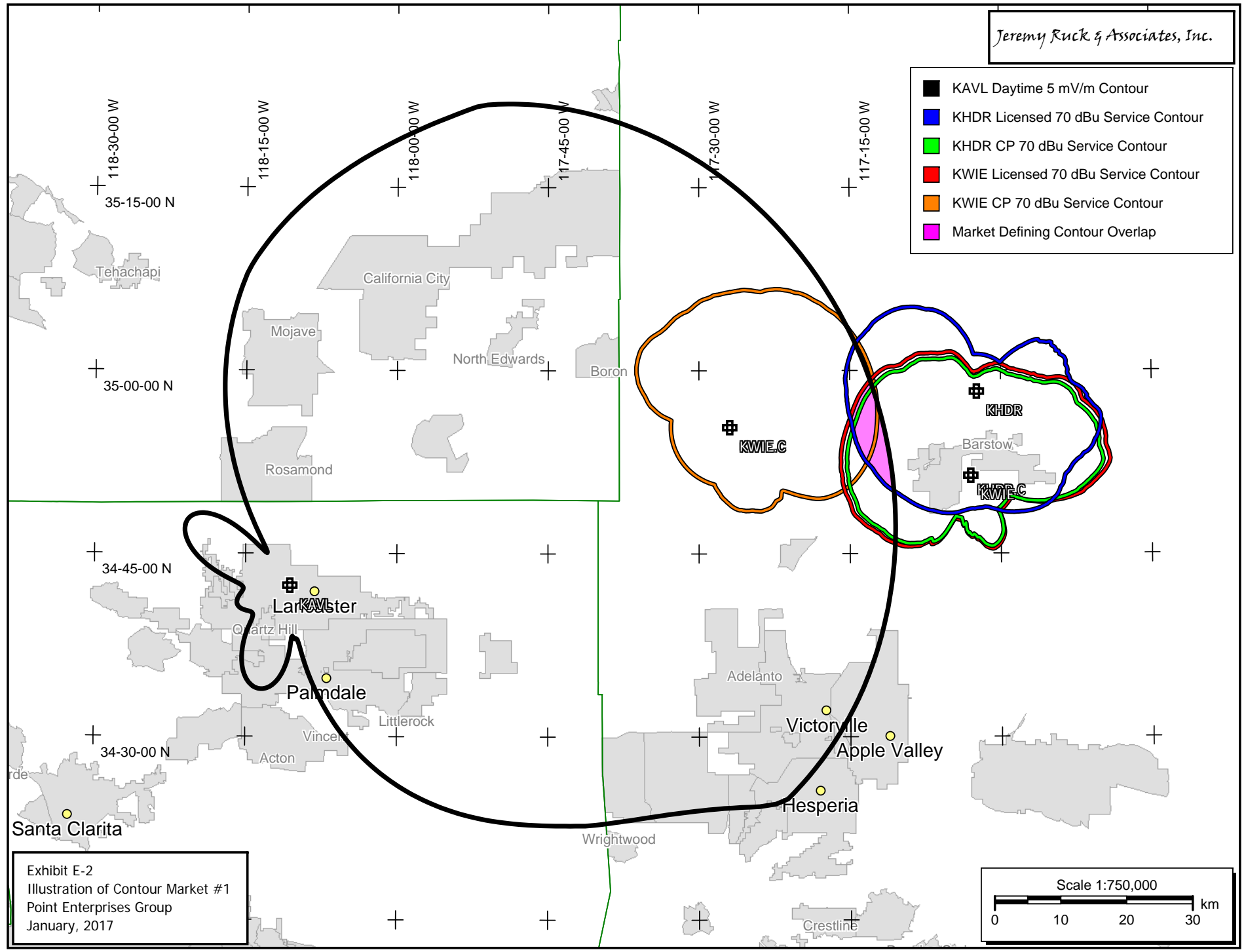
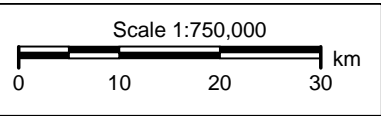
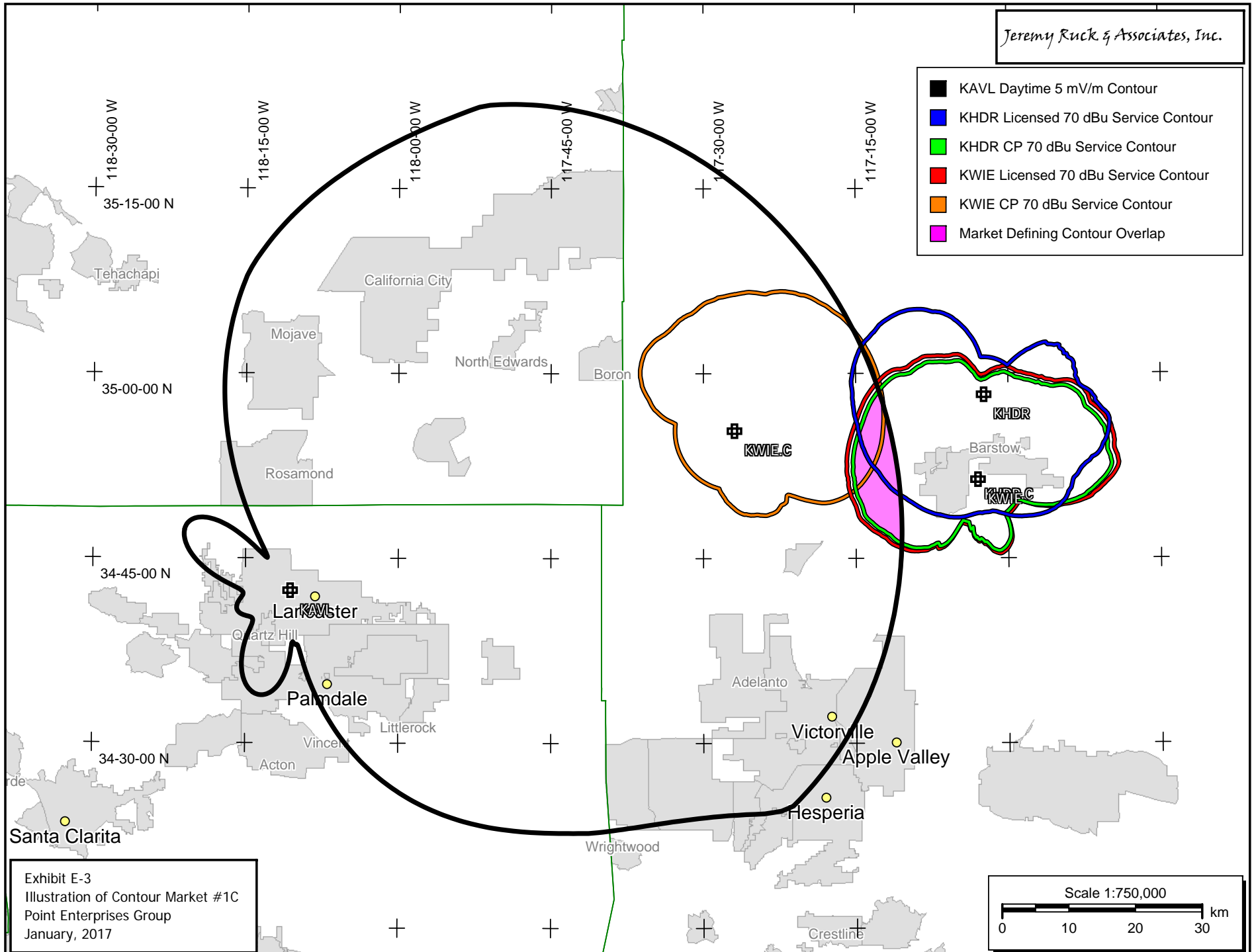
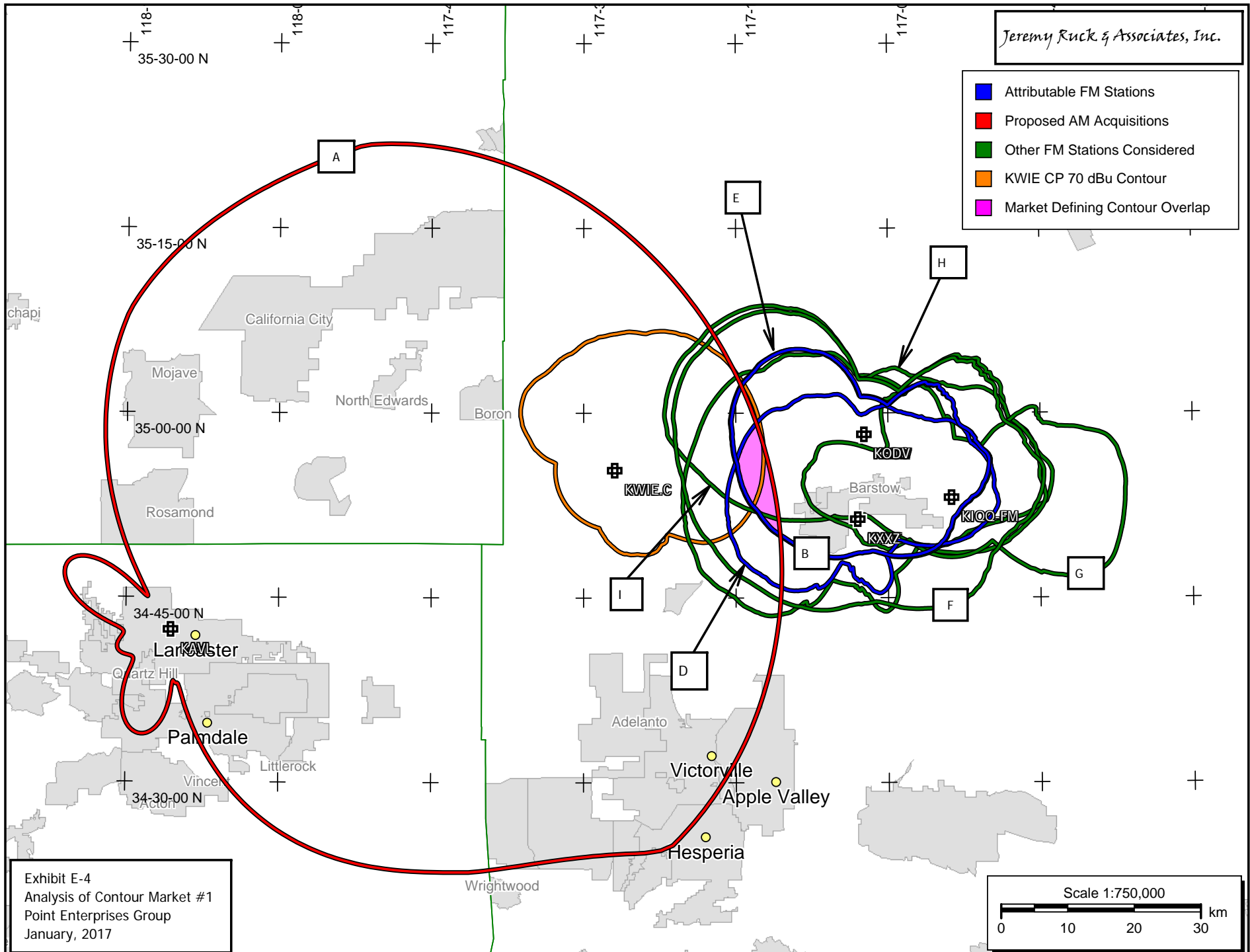


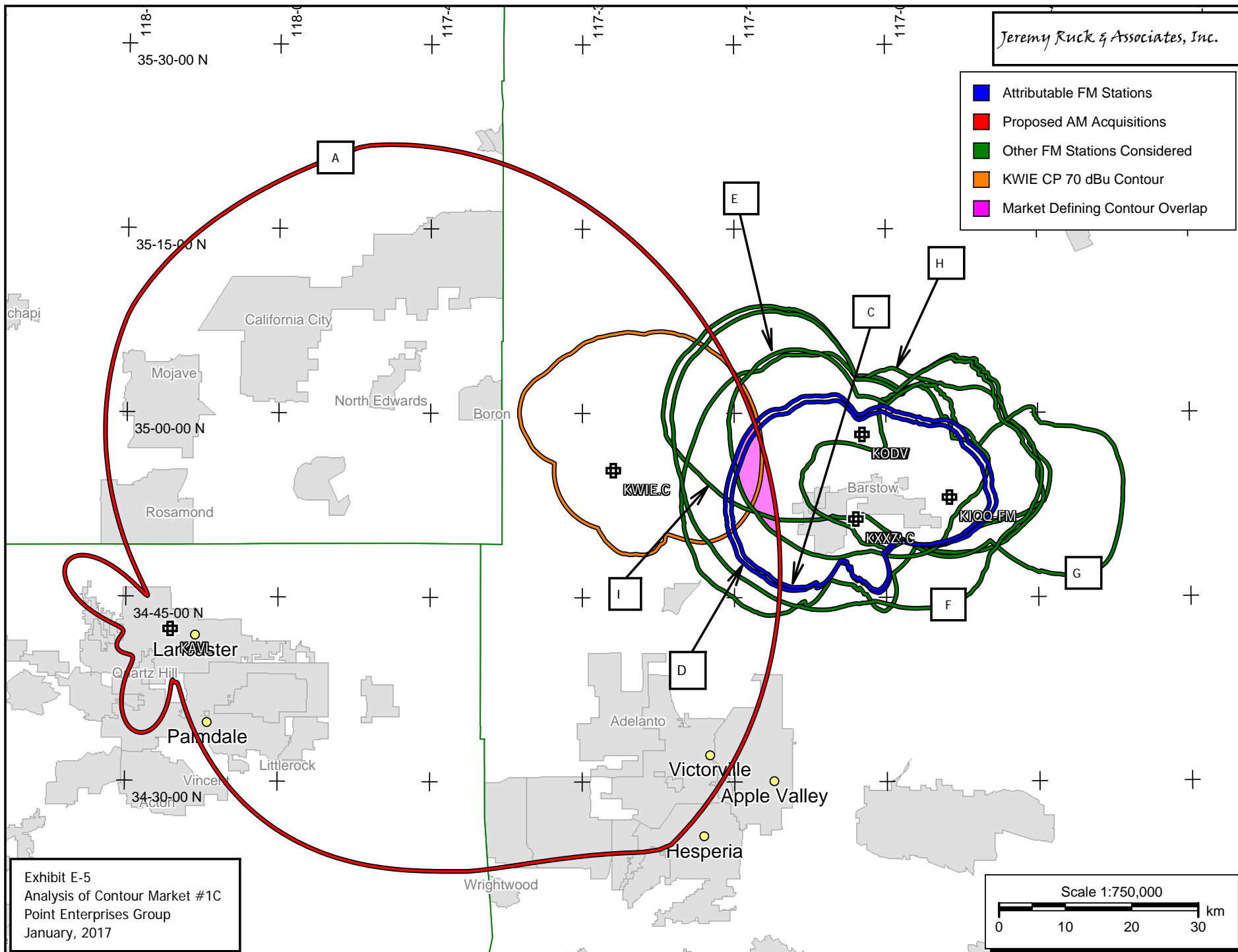
Exhibit E-2
Illustration of Contour Market #1
Point Enterprises Group
January, 2017

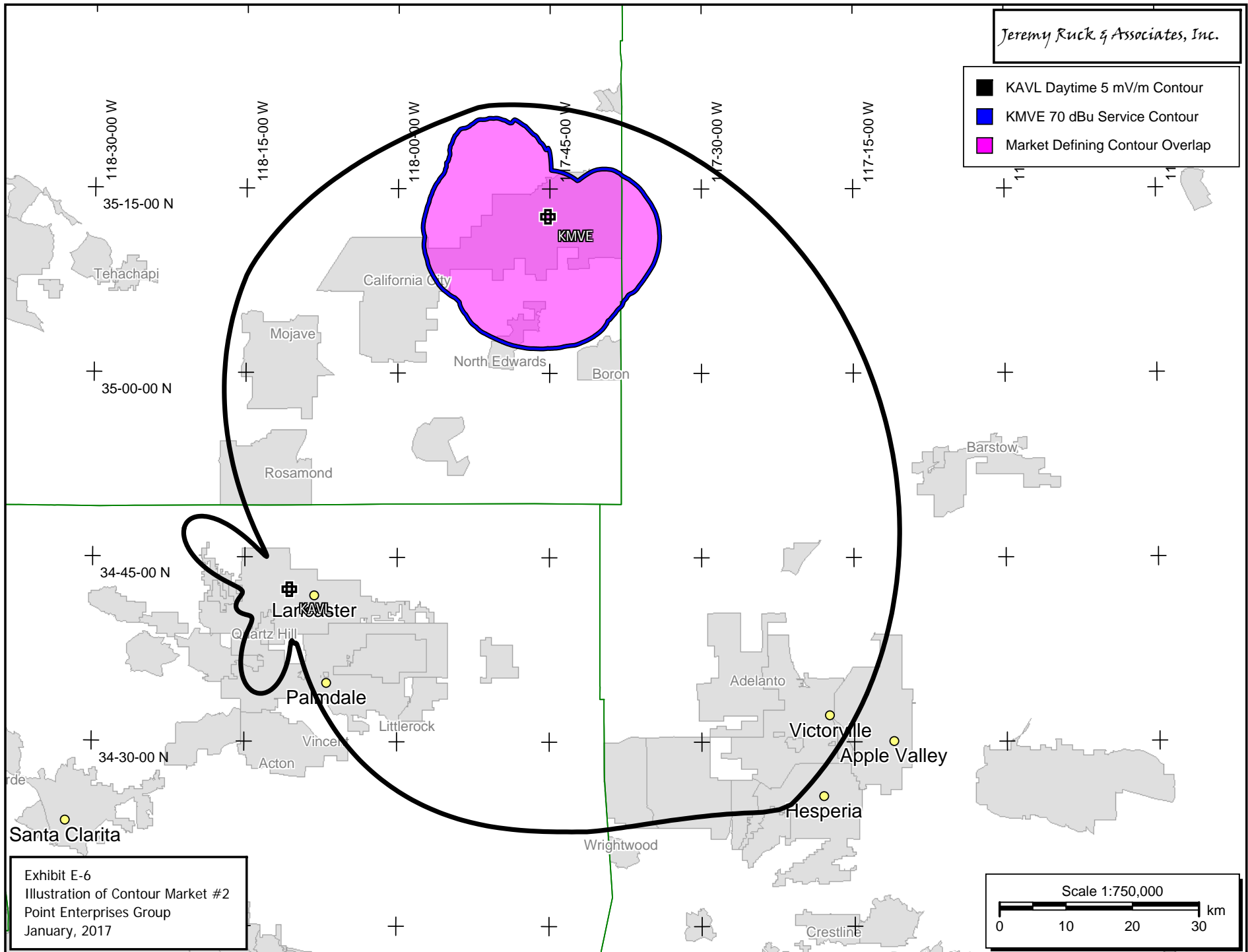


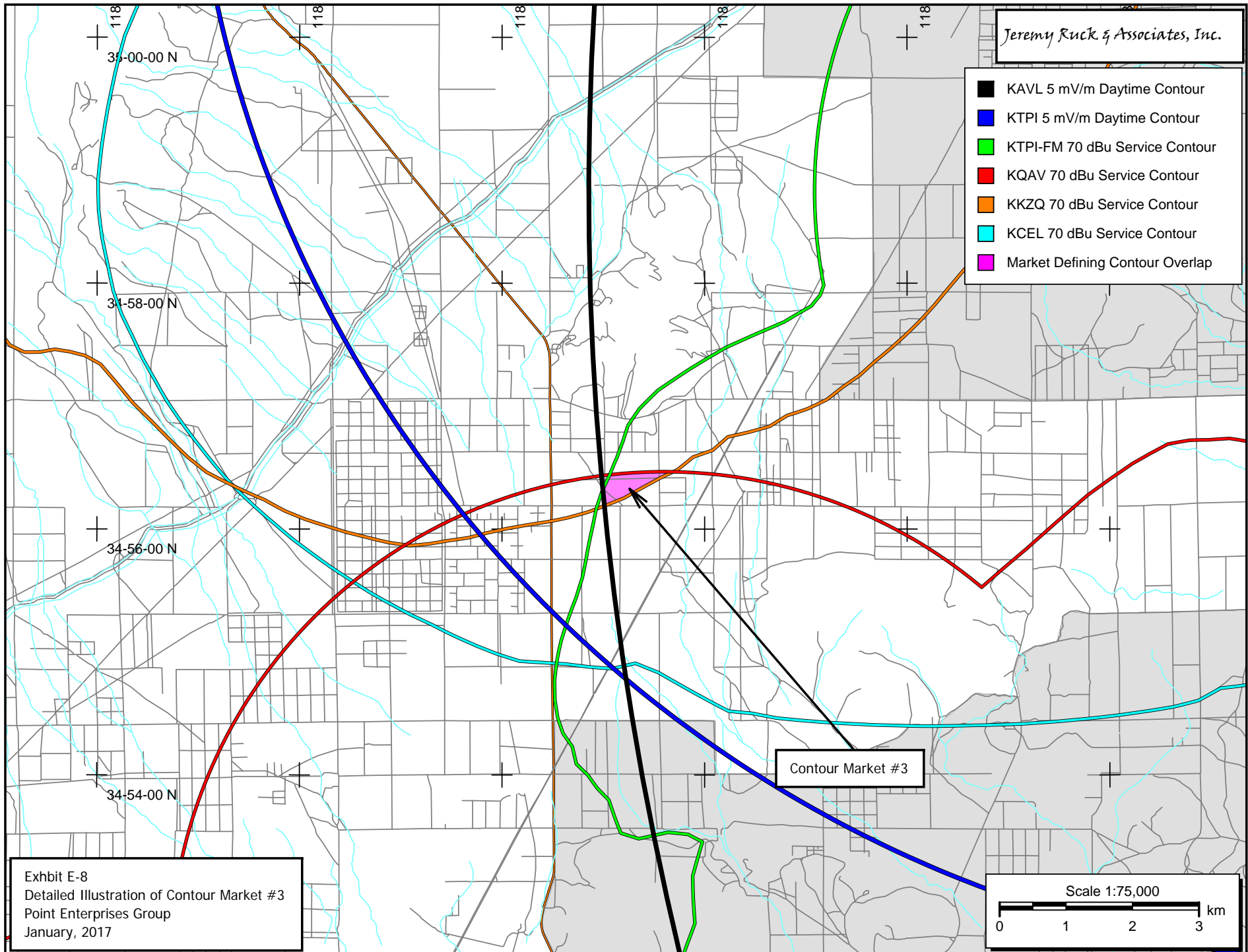
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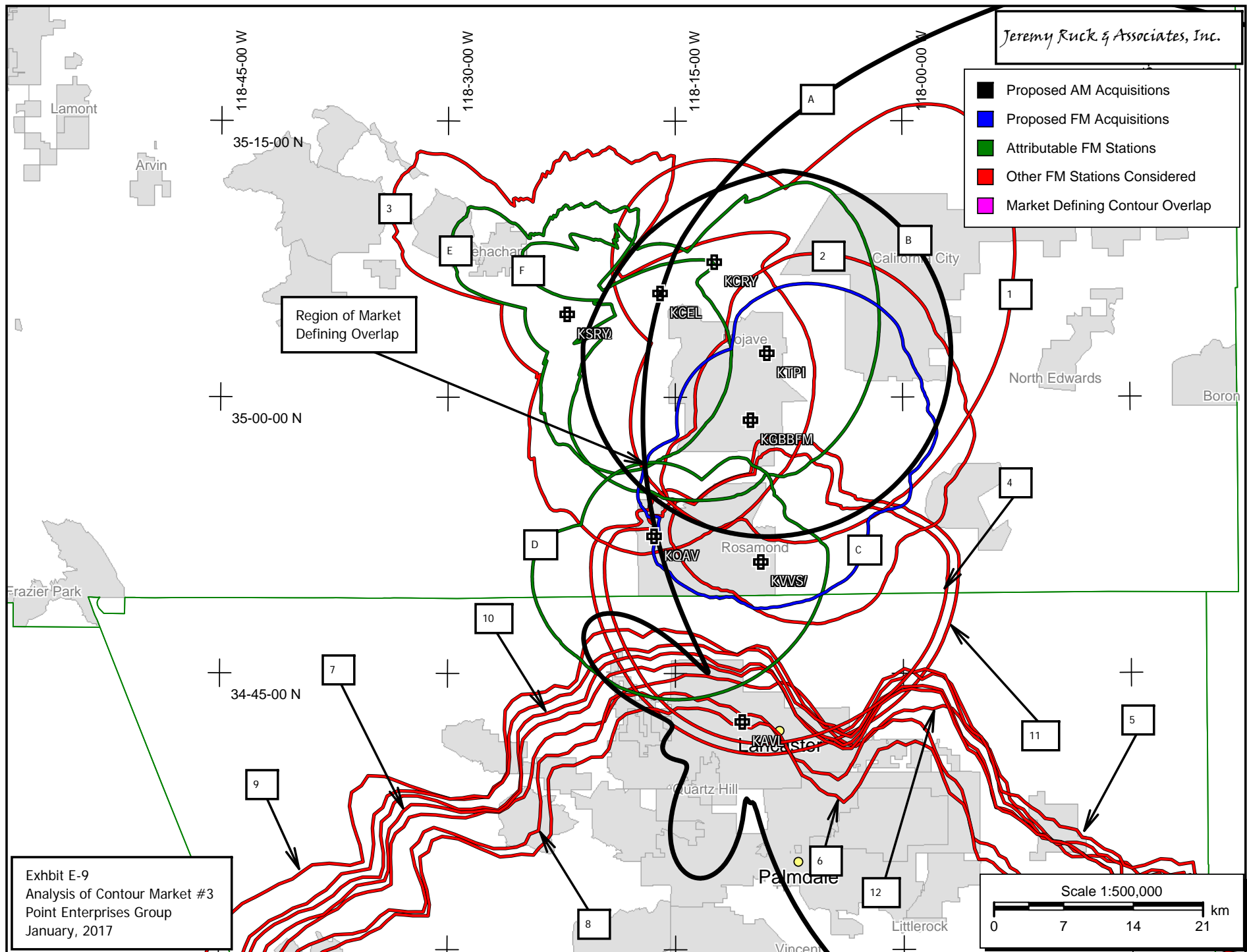












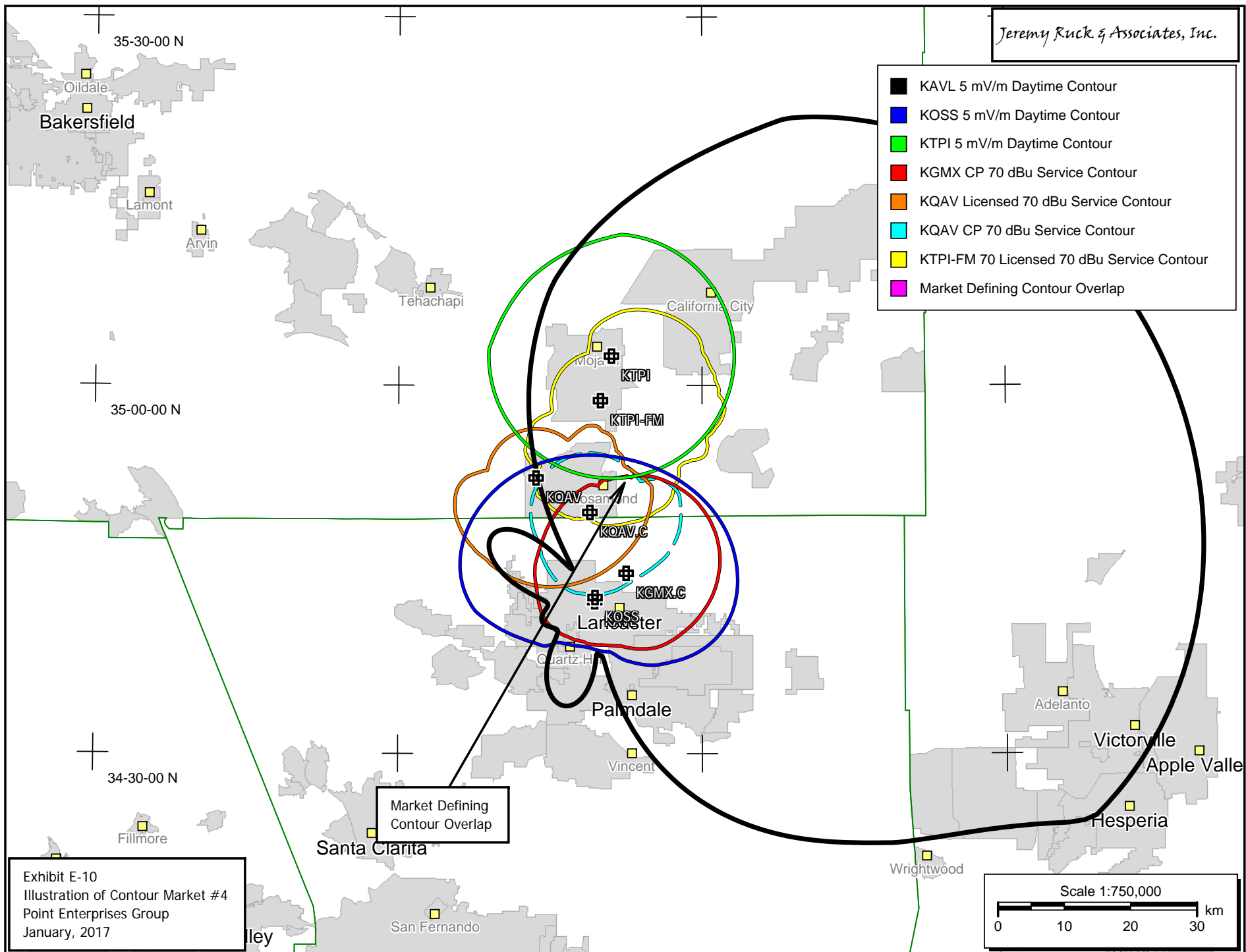


Exhibit E-10
Illustration of Contour Market #4
Point Enterprises Group
January, 2017

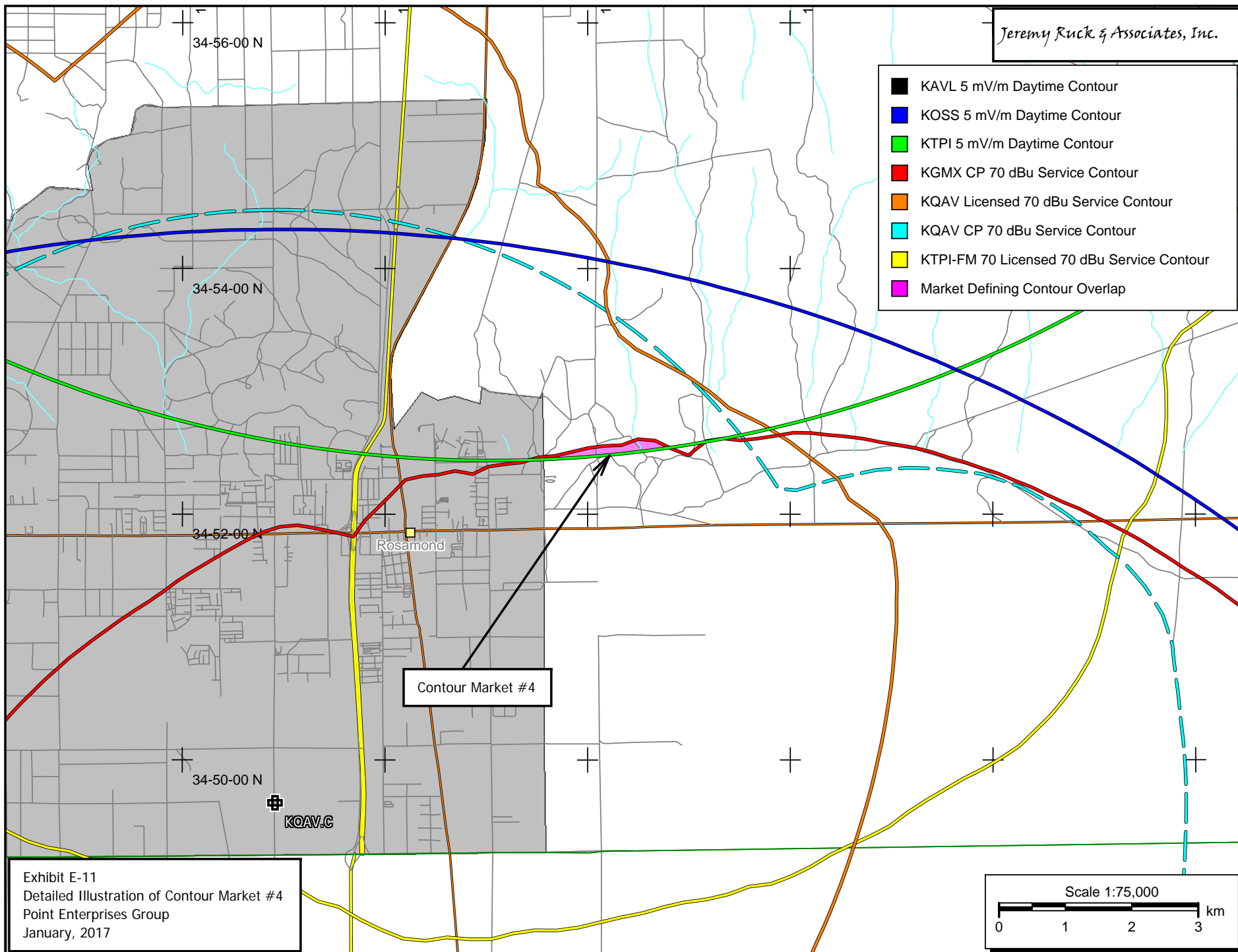


Exhibit E-11
Detailed Illustration of Contour Market #4
Point Enterprises Group
January, 2017

