

OWNERSHIP COMPLIANCE

KSGG's proposed city of license Soledad, CA is part of the Salinas Nielsen rated market. Therefore, a BIA listing is attached showing that the applicant, Dimes Media Corporation, owns three attributable stations in that listing - KSGG (not yet listed by BIA), KRKC(AM) and KRKC-FM. A total of two (2) FMs and one (1) AM is permissible in a market of fifty-one (51) stations.

Furthermore, a contour overlap ownership analysis is also provided in the event KSGG is not now considered a part of the Nielsen Salinas market. That analysis shows a two station AM-FM market (KSGG and KRKC(AM)) in a total market of twenty-nine (29).

In either event, the proposed KSGG city of license change is compliant with Commission ownership rules.

FCC Geographic Market Definition for Monterey-Salinas-Santa Cruz, CA

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market		Designntn Date	Home Mkt Rank	Owner	City & State of License	County of License
KARW	FM	97.9	C	Chrst/Altve	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	Prunedale Educational Association	Salinas, CA	Monterey
KAZU	FM	90.3	NC	Nws/Tlk/Inf	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	University Corporation at Monterey Bay	Pacific Grove, CA	Monterey
KBCD	FM	89.3	NC	DARK	Monterey-Salinas-Santa Cruz, CA				97	Eschaton Foundation	Santa Cruz, CA	Santa Cruz
KBCZ	FM	89.3	NC	Variety	Monterey-Salinas-Santa Cruz, CA			07/31/2012	97	Boulder Creek Recreation & Park District	Boulder Creek, CA	Santa Cruz
KCDU	FM	101.7	C	CHR	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	Stephens Family Limited Partnership	Carmel, CA	Monterey
KCTZ	FM	90.3	NC	Span/Chrst	Monterey-Salinas-Santa Cruz, CA			04/30/2013	97	Iglesia de Jesucristo En King City, CA Inc	San Lucas, CA	Monterey
KDBV	AM	980	C	Span/Chrst	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	Centro Cristiano Vida Abundante Inc	Salinas, CA	Monterey
KDFG	FM	103.9	C	Classical	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	p University of Southern California	Seaside, CA	Monterey
KDON	FM	102.5	C	Rhymc/CHR	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	iHeartMedia Inc	Salinas, CA	Monterey
KDRH	FM	91.3	NC	Span/Chrst	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	Association for Community Education	King City, CA	Monterey
KEXA	FM	93.9	C	Span/Relgn	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	Inspiration Media Network LLC	King City, CA	Monterey
KFER	FM	89.9	NC	DARK	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	Santa Cruz Educational Broadcasting Foundation	Santa Cruz, CA	Santa Cruz
KFRS	FM	89.9	NC	Religion	Monterey-Salinas-Santa Cruz, CA			05/20/2005	97	Family Stations Incorporated	Soledad, CA	Monterey
KHDC	FM	90.9	NC	Span/Varty	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	Radio Bilingue Inc	Chualar, CA	Monterey
KHIP	FM	104.3	C	Clsc Rock	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	Stephens Family Limited Partnership	Gonzales, CA	Monterey
KION	AM	1460	C	News/Talk	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	iHeartMedia Inc	Salinas, CA	Monterey
KKHK	FM	95.5	C	Adult Hits	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	Stephens Family Limited Partnership	Carmel, CA	Monterey
KKMC	AM	880	NC	Span/Relgn	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	El Sembrador Ministries	Gonzales, CA	Monterey
KLOK	FM	99.5	C	Mexican	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	Entravision Communications Corp	Greenfield, CA	Monterey
KLVM	FM	88.9	NC	ChrContem	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	Educational Media Foundation	Santa Cruz, CA	Santa Cruz
KMBX	AM	700	C	Grupr/Cmbi	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	Entravision Communications Corp	Soledad, CA	Monterey
KMJV	FM	106.3	C	Mexican	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	California Ortiz & 2 Media LLC	Soledad, CA	Monterey
KMLY	FM	95.1	C	Mexcn/Olde	Monterey-Salinas-Santa Cruz, CA			07/12/2012	97	Lazer Broadcasting Corporation	Gonzales, CA	Monterey
KNBI	AM	1240	C	Clsc Hits	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	Mount Wilson FM Broadcasters Inc	Monterey, CA	Monterey
KNBX	FM	91.7	NC	Nws/Tlk/Jaz	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	KCBX Inc	San Ardo, CA	Monterey
KNVM	FM	89.7	NC	Chrst/CIHts	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	Educational Media Foundation	Prunedale, CA	Monterey
KOCN	FM	105.1	C	R&B Oldies	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	iHeartMedia Inc	Pacific Grove, CA	Monterey
KOMY	AM	1340	C	News/Talk	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	Zwerling Broadcasting Systems	La Selva Beach, CA	Santa Cruz
KPIG	FM	107.5	C	AAA/Amerc	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	Stephens Family Limited Partnership	Freedom, CA	Santa Cruz
KPRC	FM	100.7	C	Span/AdHts	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	iHeartMedia Inc	Salinas, CA	Monterey
KRAY	FM	103.5	C	Mexican	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	California Ortiz & 2 Media LLC	Salinas, CA	Monterey
KRKC	AM	1490	C	Country	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	Dimes Media Corporation	King City, CA	Monterey
KRKC	FM	102.1	C	CIHts/Pop	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	Dimes Media Corporation	King City, CA	Monterey
KRML	AM	1410	C	AAA	Monterey-Salinas-Santa Cruz, CA			07/02/2003	97	KRML Radio LLC	Carmel, CA	Monterey

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

FCC Geographic Market Definition for Monterey-Salinas-Santa Cruz, CA

Call Letters	AM/FM	Freq	Type	Station	Format	Home Market	Market			City & State of License	County of License
							Designn Date	Home Mkt Rank	Owner		
KRXX	AM	540	NC	Span/Reign	Monterey-Salinas-Santa Cruz, CA	Monterey-Salinas-Santa Cruz, CA	07/02/2003	97	El Sembrador Ministries	Carmel Valley, CA	Monterey
KSCO	AM	1080	C	News/Talk	Monterey-Salinas-Santa Cruz, CA	Monterey-Salinas-Santa Cruz, CA	07/02/2003	97	Zwerling Broadcasting Systems	Santa Cruz, CA	Santa Cruz
KSEA	FM	107.9	C	Mexican	Monterey-Salinas-Santa Cruz, CA	Monterey-Salinas-Santa Cruz, CA	07/02/2003	97	Chavez Radio Group	Greenfield, CA	Monterey
KSES	FM	107.1	C	Grupr/Cmbi	Monterey-Salinas-Santa Cruz, CA	Monterey-Salinas-Santa Cruz, CA	07/02/2003	97	Entravision Communications Corp	Seaside, CA	Monterey
KSGZ	FM	98.7	C	Span/AdHts	Monterey-Salinas-Santa Cruz, CA	Monterey-Salinas-Santa Cruz, CA	09/07/2016	97	Lazer Broadcasting Corporation	Greenfield, CA	Monterey
KSPB	FM	91.9	NC	Variety	Monterey-Salinas-Santa Cruz, CA	Monterey-Salinas-Santa Cruz, CA	07/02/2003	97	Robert Louis Stevenson School	Pebble Beach, CA	Monterey
KSQD	FM	90.7	NC	Variety	Monterey-Salinas-Santa Cruz, CA	Monterey-Salinas-Santa Cruz, CA	07/02/2003	97	Natural Bridges Media	Santa Cruz, CA	Santa Cruz
KSQL	FM	99.1	C	Mexican	Monterey-Salinas-Santa Cruz, CA	Monterey-Salinas-Santa Cruz, CA	07/02/2003	97	Univision (New)	Santa Cruz, CA	Santa Cruz
KSUR	AM	630	C	Oldies	Monterey-Salinas-Santa Cruz, CA	Monterey-Salinas-Santa Cruz, CA	07/02/2003	97	Mount Wilson FM Broadcasters Inc	Monterey, CA	Monterey
KTGE	AM	1570	C	Mex/Rch/Ol	Monterey-Salinas-Santa Cruz, CA	Monterey-Salinas-Santa Cruz, CA	07/02/2003	97	p Big Radio Pro Inc	Salinas, CA	Monterey
KTOM	FM	92.7	C	Country	Monterey-Salinas-Santa Cruz, CA	Monterey-Salinas-Santa Cruz, CA	07/02/2003	97	iHeartMedia Inc	Marina, CA	Monterey
KWAV	FM	96.9	C	AC	Monterey-Salinas-Santa Cruz, CA	Monterey-Salinas-Santa Cruz, CA	07/02/2003	97	Stephens Family Limited Partnership	Monterey, CA	Monterey
KXSM	FM	93.1	C	Mexican			07/01/2020	0	Lazer Broadcasting Corporation	Chualar, CA	Monterey
KXZM	FM	93.7	C	Mexican	San Jose, CA	San Jose, CA	07/06/2012	38	Lazer Broadcasting Corporation	Felton, CA	Santa Cruz
KYAA	AM	1200	NC	Religion	Monterey-Salinas-Santa Cruz, CA	Monterey-Salinas-Santa Cruz, CA	07/02/2003	97	Immaculate Heart Media Inc	Soquel, CA	Santa Cruz
KZBV	FM	91.3	NC	ChrsContem	Monterey-Salinas-Santa Cruz, CA	Monterey-Salinas-Santa Cruz, CA	05/15/2013	97	Aware FM Inc	Carmel Valley, CA	Monterey
KZSC	FM	88.1	NC	Variety	Monterey-Salinas-Santa Cruz, CA	Monterey-Salinas-Santa Cruz, CA	07/02/2003	97	University of California Regents	Santa Cruz, CA	Santa Cruz

Number of Stations in Geographic Market 51

Previous Stations in Geographic Market

Contour Overlap Ownership Study

Although KSGG, licensed to King City, and the proposed city of license Soledad are both located in the Salinas Nielsen rated market, it is unclear whether KSGG is currently considered a part of that market since it is not in the BIA listing.

Therefore, this contour overlap study is provided in an abundance of caution for the market formed by the modification of KSGG(FM) 284A to Soledad, CA.

A reference plot of the relevant commonly owned stations (exhibit E-1) includes the following stations:

KSGG(FM) 284A Soledad, CA	FCC Facility I.D.	762378
KPYG(FM) 235B1 Cayucos, CA		9851
KRKC-FM 271B King City, CA		34885
KRKC(AM) 1490 kHz King City, CA		54554
KWWV(FM) 291B1 Santa Margarita, CA		25960
KXDZ(FM) 263A Templeton, CA		70781
KXTZ(FM) 237A Pismo Beach, CA		30108
KYNS(AM) 1340 kHz San Luis Obispo, CA		73039

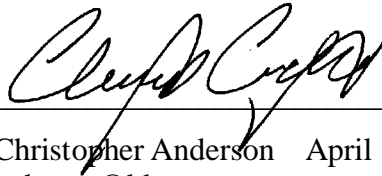
The following exhibits include the city grade contours, 3.16 mV/m (70 dBu) (FM) and 5 mV/m (AM), of all stations intersecting any of the mutually overlapping stations, including noncommercial facilities, and exclude any stations with a transmitter site greater than 92 km from any portion of the

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mutually overlapping area, as well as any commonly owned stations which do not mutually overlap the defined market. A reference plot of the stations is shown in exhibit E-1.

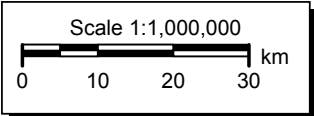
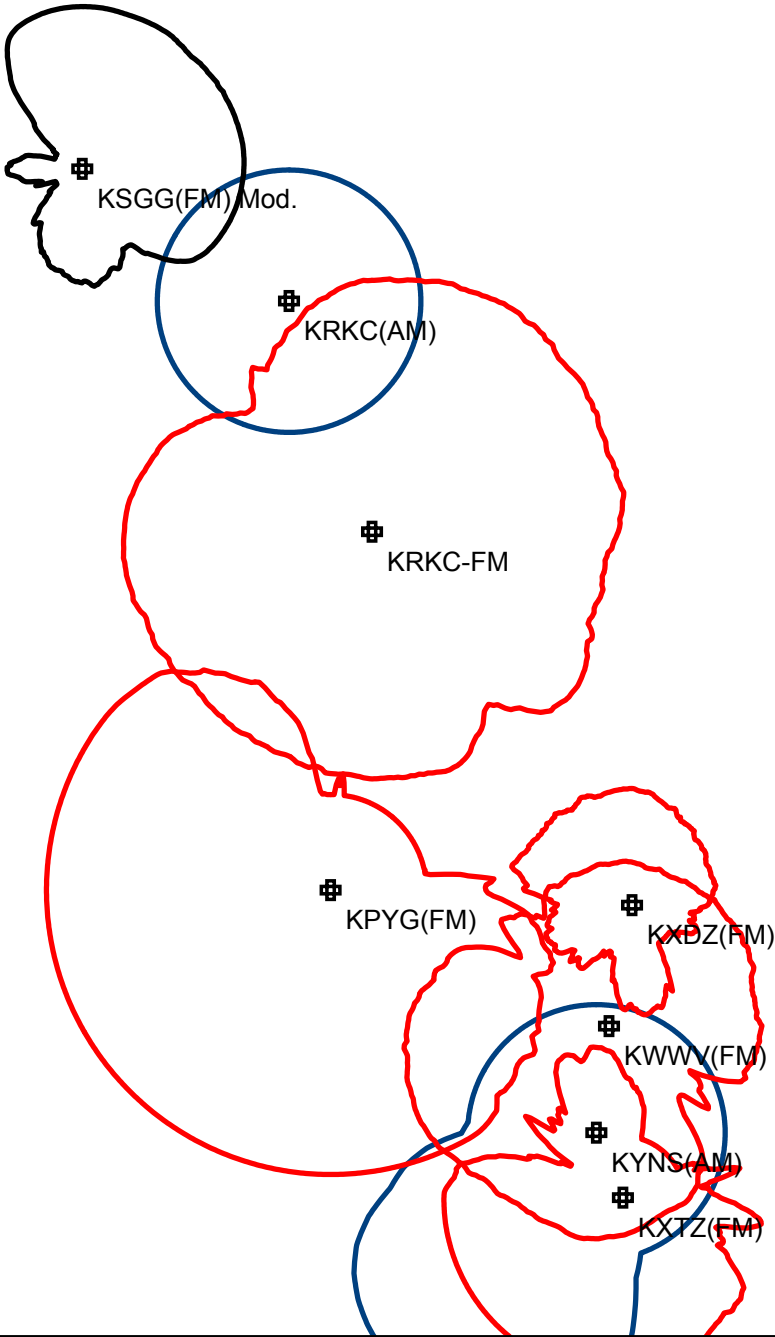
The common ownership forms a single 2 station AM-FM market (KSGG-KRKC(AM)) of 29 stations, which is plotted and listed in exhibits E-2 and E-3. Following the rules provided by CFR §73.3555(a)(1)(iii), the common ownership of the stations in the defined markets is permissible.



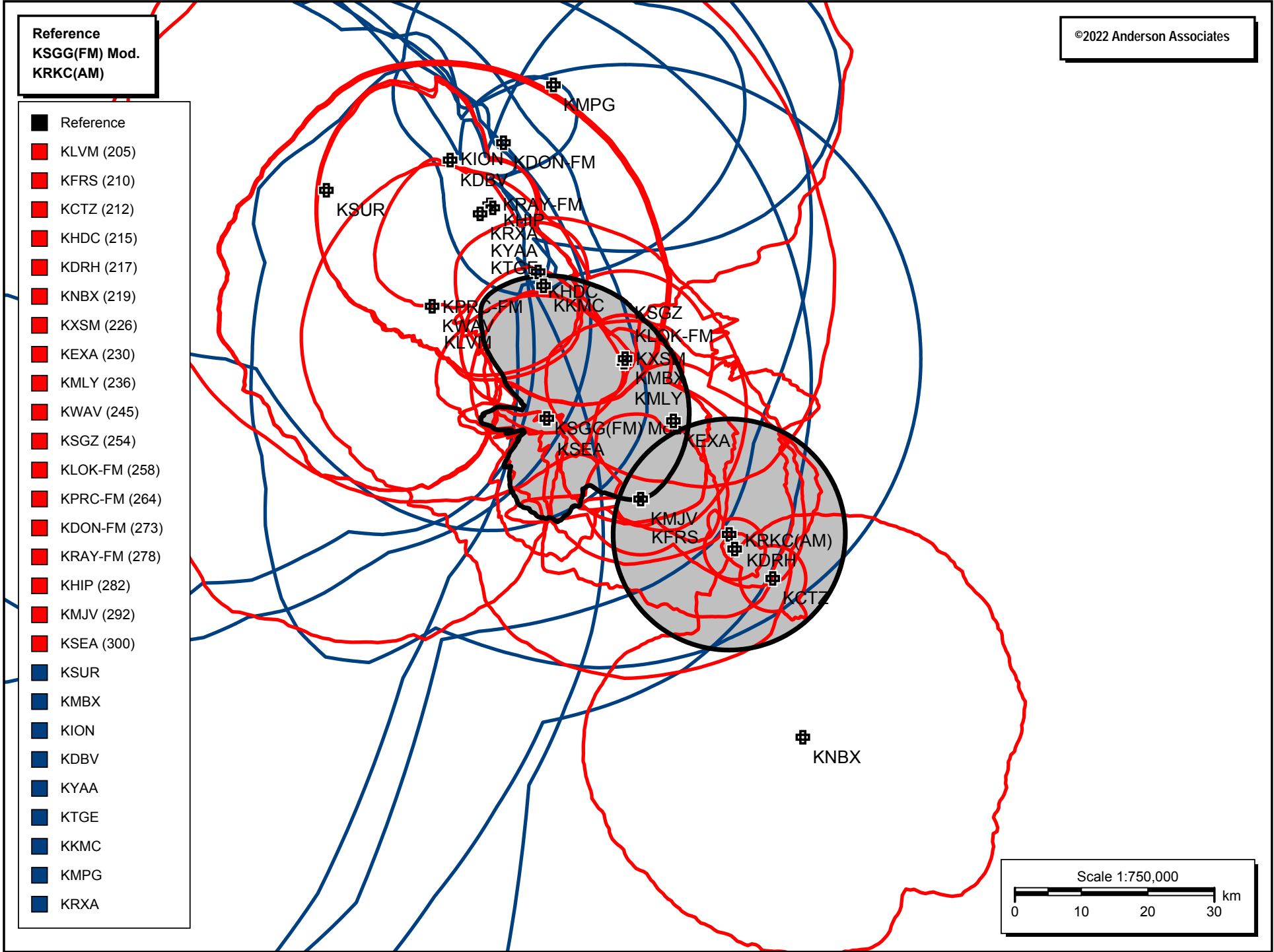
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E-2 KSGG(FM) 284A Mod. Ownership Market Plot

Scale 1:750,000
0 10 20 30 km

E-3 KSGG(FM) 284A Mod. Ownership Market list

Total number of overlapping contours: 29 Single AM-FM overlap is permissible.

Reference:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
KSGG(FM) Mod	FM	284A King City	CA	0000186666	0.0	0.0
KRKC(AM)	AM	1490 KING CITY	CA	BL9656	32.5	122.3

Overlapping Contours:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
KLVM	FM	205B Santa Cruz	CA	BLED19930524KB	24.1	314.3
KFRS	FM	210A Soledad	CA	BLED20020408ABB	18.7	130.5
KCTZ	FM	212A San Lucas	CA	BLED20180802AAC	41.6	125.2
KHDC	FM	215A Chualar	CA	BLED19810708AC	22.1	356.5
KDRH	FM	217A King City	CA	BLED20130115ACG	34.4	124.7
KNBX	FM	219B San Ardo	CA	BLED20170227AAB	61.4	141.1
KXSM	FM	226A Chualar	CA	BLH20170531ADD	14.4	53.8
KEXA	FM	230B1 King City	CA	BLH19871223KC	19.0	91.0
KMLY	FM	236A Gonzales	CA	BLH20170131ABI	14.4	53.8
KWAV	FM	245B Monterey	CA	BMLH20041028AIK	24.1	314.3
KSGZ	FM	254A Greenfield	CA	BLH20170531ADE	14.4	53.8
KLOK-FM	FM	258B Greenfield	CA	BLH19920723KB	14.7	52.3
KPRC-FM	FM	264B Salinas	CA	BMLH20020226AAC	24.1	314.3
KDON-FM	FM	273B Salinas	CA	BLH20040723ABH	42.0	351.0
KRAY-FM	FM	278A Salinas	CA	BLH19930616KC	33.2	344.9
KHIP	FM	282A Gonzales	CA	BMLH19980709KB	32.7	345.5
KMJV	FM	292A Soledad	CA	BLH19971222KF	18.6	130.6
KSEA	FM	300B1 Greenfield	CA	BLH19980911KE	0.0	9.2
KSUR	AM	630 MONTEREY	CA	BL5672	47.7	315.9
KMBX	AM	700 SOLEDAD	CA	BL19901121AH	14.8	52.5
KION	AM	1460 SALINAS	CA	BL19991116BDI	41.5	339.4
KDBV	AM	980 SALINAS	CA	BL19990601DC	41.5	339.4
KYAA	AM	1200 SOQUEL	CA	BML20201014ABJ	32.4	341.9
KTGE	AM	1570 SALINAS	CA	BL19910402AC	32.4	341.9
KKMC	AM	880 GONZALES	CA	BML20201020AAB	20.0	358.5
KMPG	AM	1520 HOLLISTER	CA	BL20001220ACQ	50.2	1.0
KRXA	AM	540 CARMEL VALLEY	CA	BML20130516AOS	32.3	341.9

Distance and bearing calculations from coordinates: 36-22-58.80 N, 121-25-43.90 W

Duopoly Options:

TV: Not Included

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

AM: 5.0 mV/m

Stations more than 92 km from the common area were excluded.