

Multiple Ownership (St. George, Utah)

The Commission requires the submission of a contour overlap analysis to demonstrate compliance with the local radio ownership rule for stations that are licensed to communities outside of a Nielsen Audio market. As described in the attached contour-based analysis prepared by W. Jeffrey Reynolds of du Treil, Lundin & Rackley, Inc., the transaction complies with the Commission's rules. The analysis omits the KCIN(FM) facilities authorized by Construction Permit File No. BPH-20190924ACU (the "CP"). CCR-St. George IV, LLC, the proposed assignor, will not be constructing the facilities authorized by the CP and Townsquare License, LLC, the proposed assignee, hereby commits to relinquish the CP upon consummation of the transaction.

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS

This radio multiple ownership analysis was prepared to demonstrate that ownership of the following stations complies with the FCC’s “Interim” contour analysis method.¹ Specifically, the following stations were analyzed:

Call Sign / Facility ID	Location	Facilities
KCIN(FM) / 35392 Licensed Facility	Cedar City, UT	Channel 235C1 55 kW -37 m
KIYK(FM) / 60457 Licensed Facility	St. George, UT	Channel 297C2 2 kW 568.4 m
KREC(FM) / 6784 Licensed Facility	Brian Head, UT	Channel 251C 56 kW 770 m
KXBN(FM) / 61386 Licensed Facility	Cedar City, UT	Channel 221C 100 kW 532 m
KXFF(FM) / 69623 Licensed Facility	Colorado City, AZ	Channel 291C1 35 kW 347 m
KDXU(AM) / 60454 Licensed Facility	St. George, UT	890 kHz, 10 kW-U, DA-N
KHKR(AM) / 55398 Licensed Facility	Washington, UT	1210 kHz, 10 KW-D/0.231 kW-N, ND2
KSUB(AM) / 61384 Licensed Facility	Cedar City, UT	590 kHz, 5 kW-D/1 kW-N, DA-N

The principal community contours of these stations are depicted on a map included herein as Figure 1.² Since the principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) of the stations above are 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

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

² The authorized (CP) operation of KCIN (File No. BPH-20190924ACU) has been excluded from this analysis.

community contours of the stations proposed to be commonly owned. As listed in the Table below, there are three (3) defined “radio markets” formed by the subject stations:

Defined Radio Market	Stations that Define the Radio Market	
	AM Stations	FM Station
Market 1	KDXU, KSUB	KREC, KCIN, KXBN
Market 2	KHKR, KDXU, KSUB	KXFF, KREC, KXBN
Market 3	KHKR, KDXU, KSUB	KXFF, KIYK, KREC

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, 18 FM, 23 Total
Market 2	6 AM, 21 FM, 27 Total
Market 3	6 AM, 21 FM, 27 Total

Figure 2 depicts radio market 1 and the principal community contours of other AM and FM stations in the defined market. Figure 3 depicts radio market 2 and the principal community contours of other AM and FM stations in the defined market. Figure 4 depicts radio market 3 and the principal community contours of other AM and FM stations in the defined market. Figure 5 is a tabulation of the AM and FM stations in the defined radio markets depicted on Figures 2, 3 and 4. Only known licensed, operating AM and FM 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.

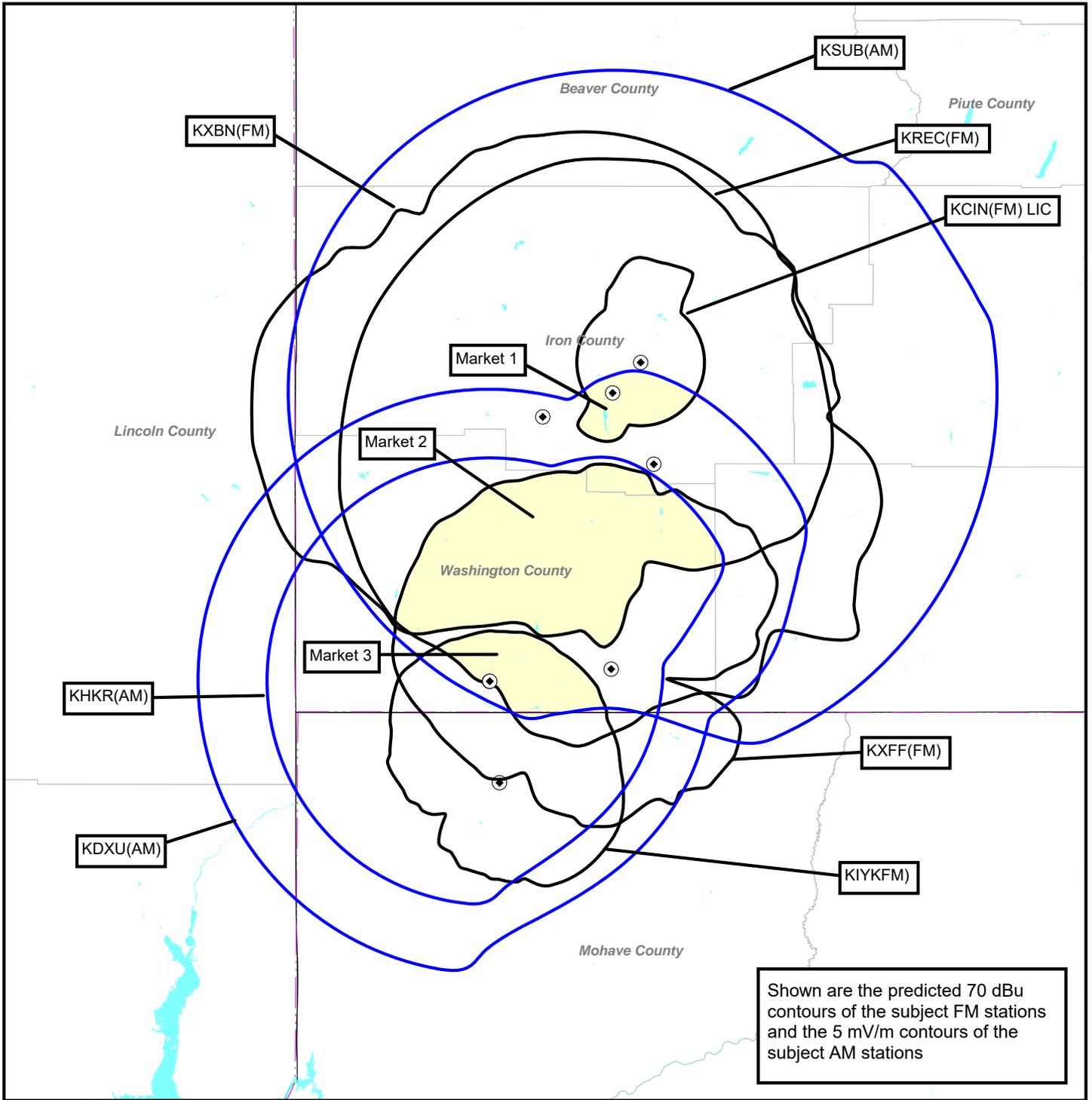
Pursuant to Section 73.3555(a)(1)(iii), in a radio market with between 15 and 29 (inclusive) full-power, commercial and noncommercial radio stations, an entity may have a cognizable interest in up to 6 commercial radio stations in total, with not more than 4 commercial stations in the same service (AM or FM). Therefore, ownership of the aforementioned stations complies with Section 73.3555(a)(1)(iii) of the FCC Rules.



W. Jeffrey Reynolds

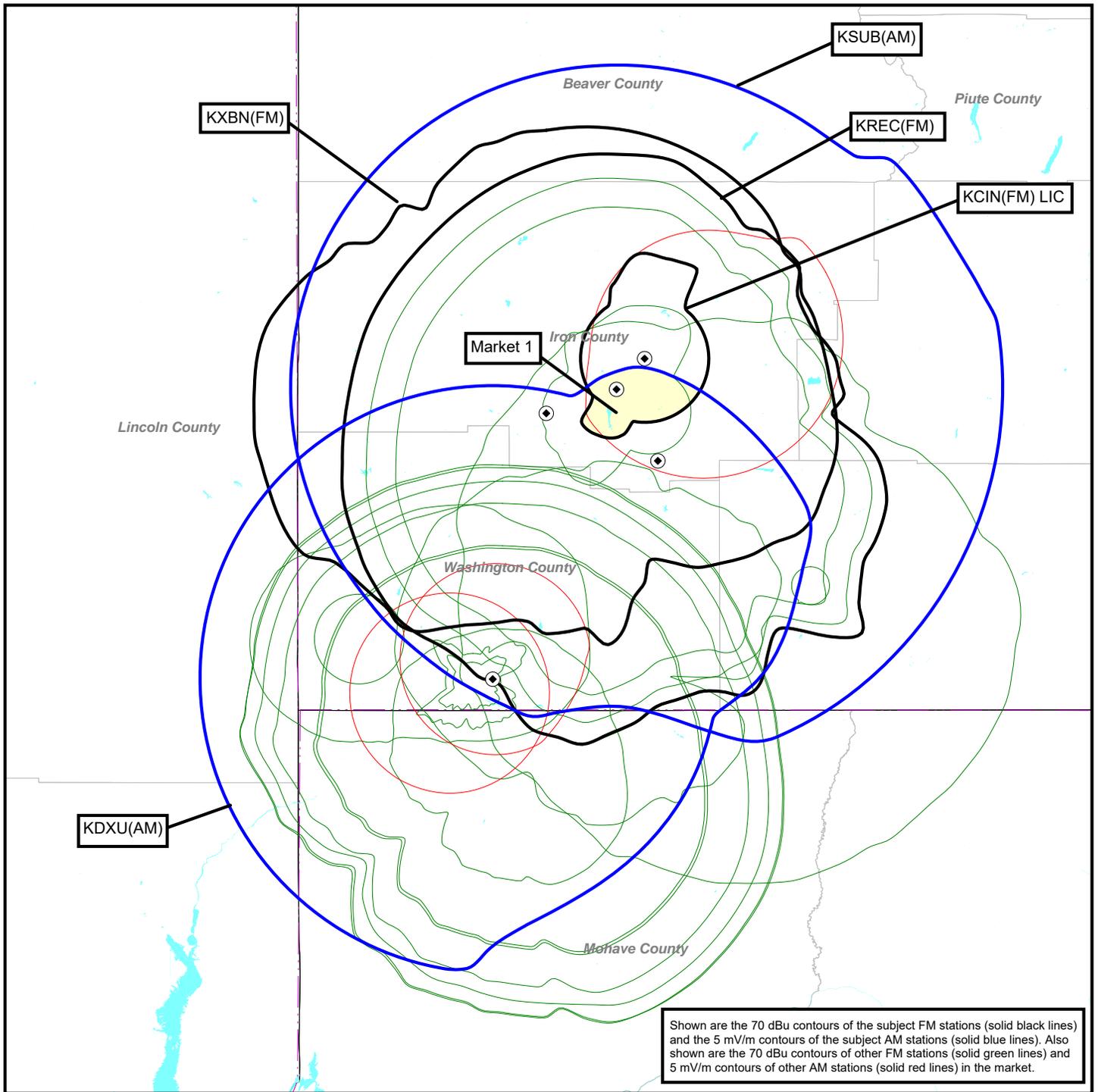
du Treil, Lundin & Rackley, Inc.
5212 Station Way
Sarasota, Florida 34233
(941)329-6013

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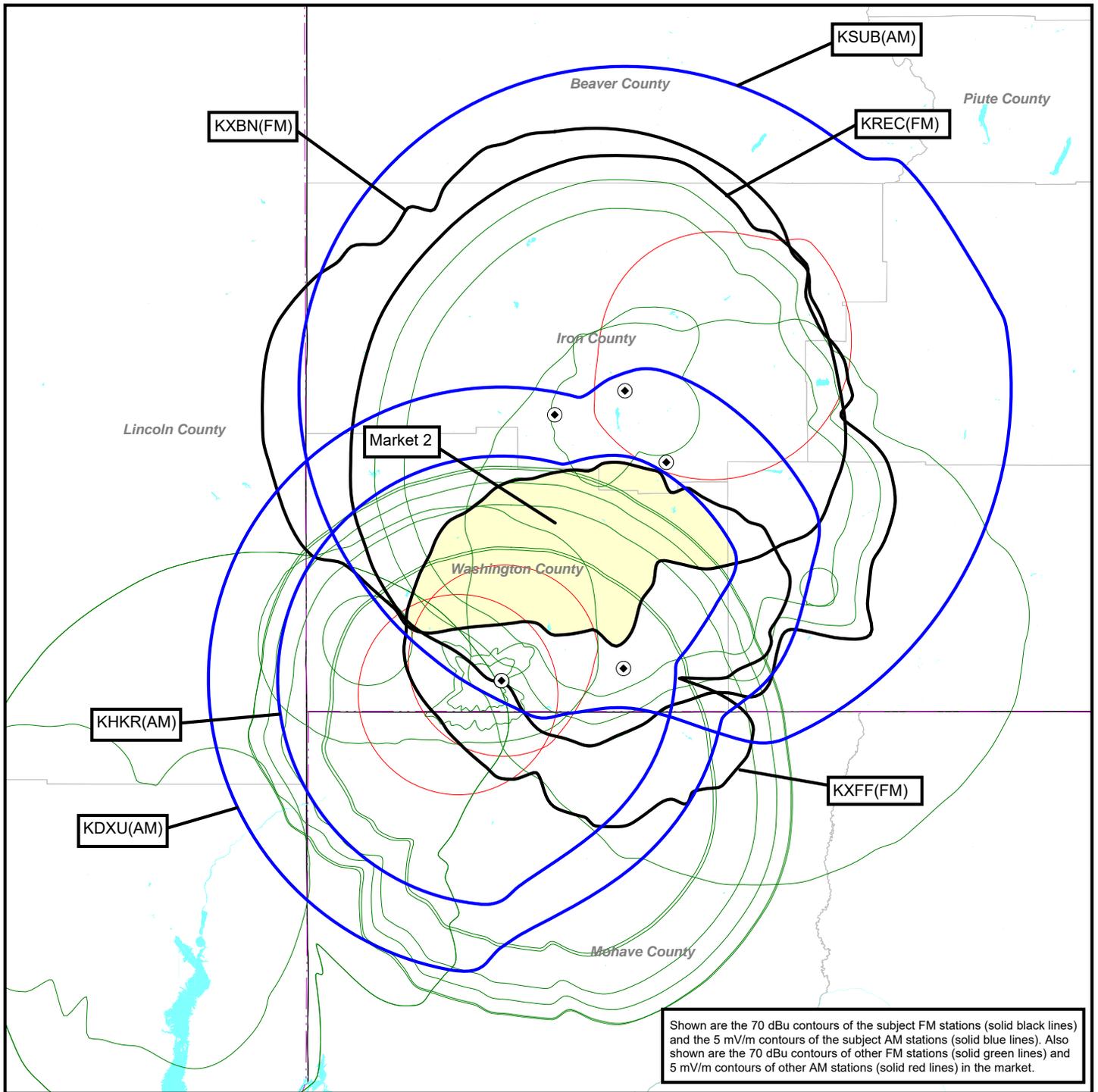
PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

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

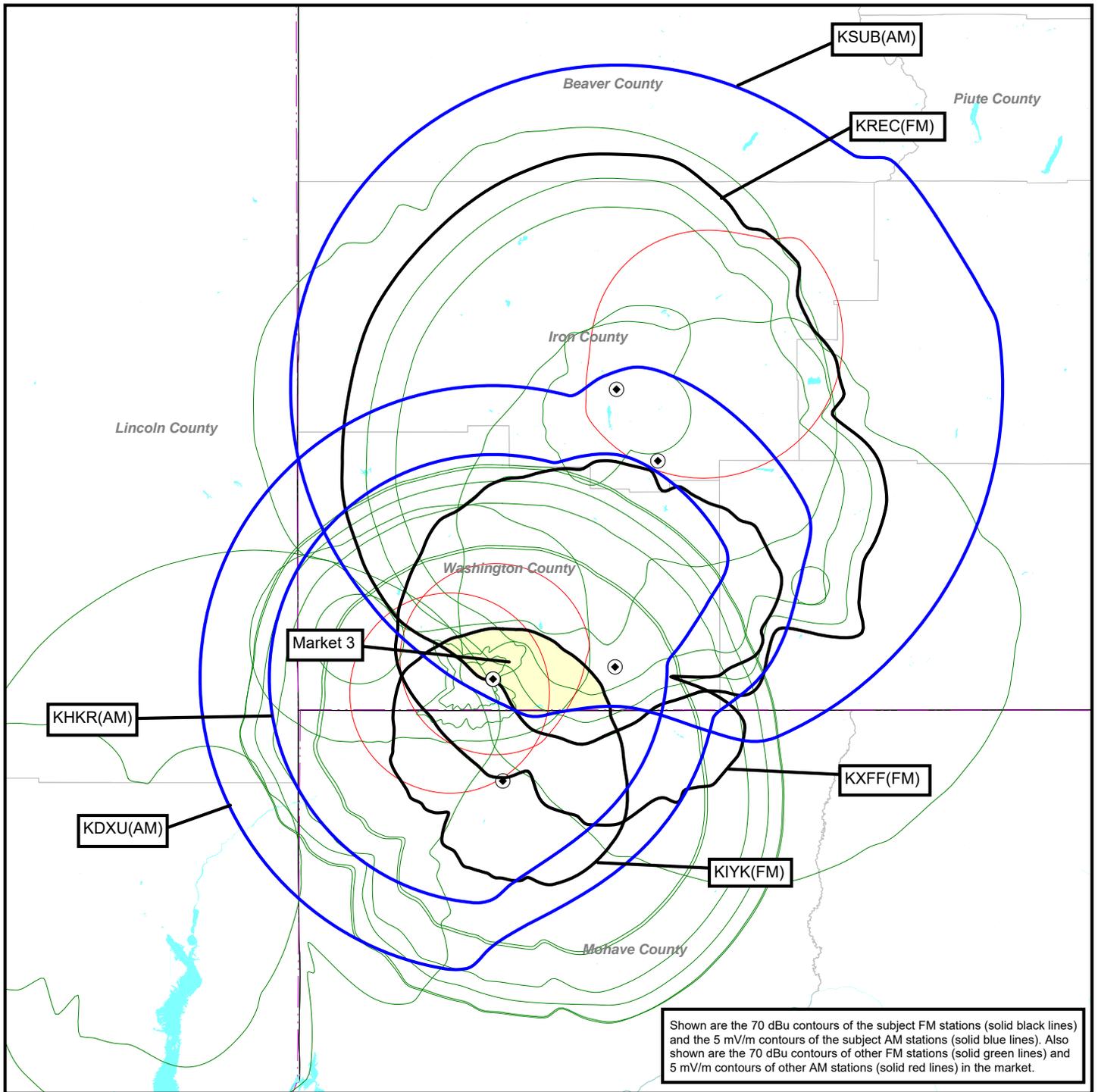


**MARKET 1
PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS
AND OF OTHER AM AND FM STATIONS IN THE MARKET**

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



**MARKET 2
PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS
AND OF OTHER AM AND FM STATIONS IN THE MARKET**



**MARKET 3
PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS
AND OF OTHER AM AND FM STATIONS IN THE MARKET**