

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.<sup>1</sup> Specifically, the following stations were analyzed:

Call Sign / Facility ID	Location	Facilities
KKWN(FM) / 5284 Licensed Facility	Cashmere, WA	Channel 294A 6 kW -73 m
KQBG(FM) / 63882 Licensed Facility	Rock Island, WA	Channel 258A 5.3 kW (DA) -25 m
KWWW-FM / 59050 Licensed Facility	Quincy, WA	Channel 244A 0.44 kW 315 m
KYSN(FM) / 63883 Licensed Facility	East Wenatchee, WA	Channel 249A 6 kW -30 m
KPQ-FM / 71524 Licensed Facility	Wenatchee, WA	Channel 271C 35 kW 809 m
KYSP(AM) / 59049 Licensed Facility	Wenatchee, WA	1340 kHz, 1 kW-U, ND
KPQ(AM) / 71715 Licensed Facility	Wenatchee, WA	560 kHz, 5 KW-U, DA-N
KWNC(AM) / 29647 Licensed Facility	Quincy, WA	1370 kHz, 1 kW-D, ND

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 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 are two (2) defined “radio markets” formed by the subject stations:

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

Defined Radio Market	Stations that Define the Radio Market	
	AM Stations	FM Station
Market 1	KPQ, KYSP	KPQ-FM, KQBG, KKWN, KYSN
Market 2	KPQ, KWNC	KPQ-FM, KWWW-FM, KYSN

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	13 AM, 38 FM, 51 Total
Market 2	13 AM, 27 FM, 40 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 is a tabulation of the AM and FM stations in the defined radio markets depicted on Figures 2 and 3. 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.

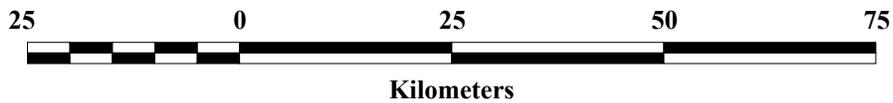
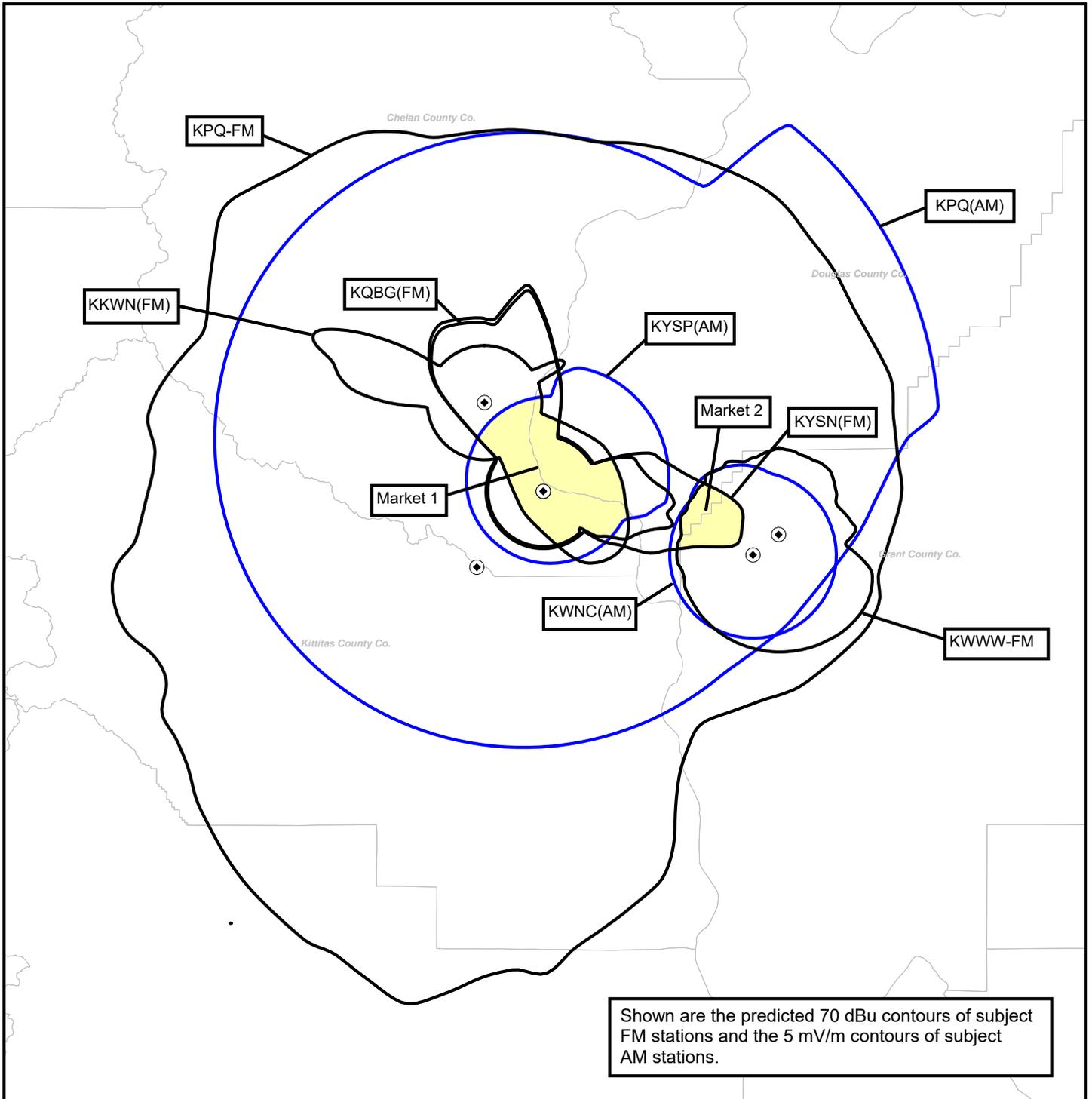
Pursuant to Section 73.3555(a)(1)(ii), in a radio market with between 30 and 44 (inclusive) full-power, commercial and noncommercial radio stations, an entity may have a cognizable interest in up to 7 commercial radio stations in total, with not more than 4 commercial stations in the same service (AM or FM). Therefore, ownership of the aforementioned stations complies with Section 73.3555(a)(1)(ii) of the FCC Rules.



W. Jeffrey Reynolds

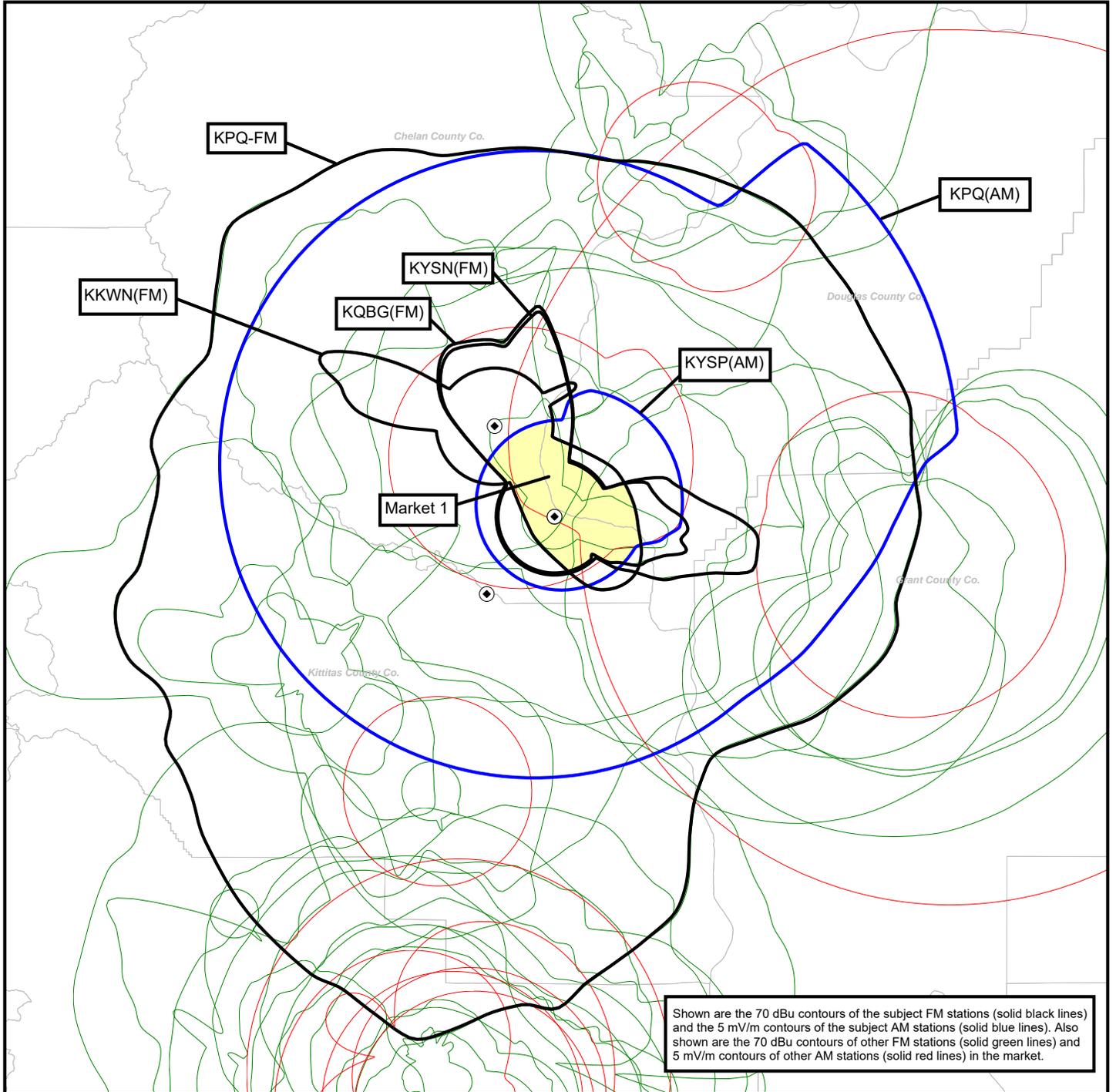
du Treil, Lundin & Rackley, Inc.  
5212 Station Way  
Sarasota, Florida 34233  
(941)329-6013

March 16, 2022



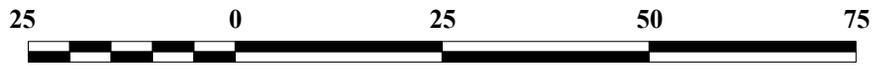
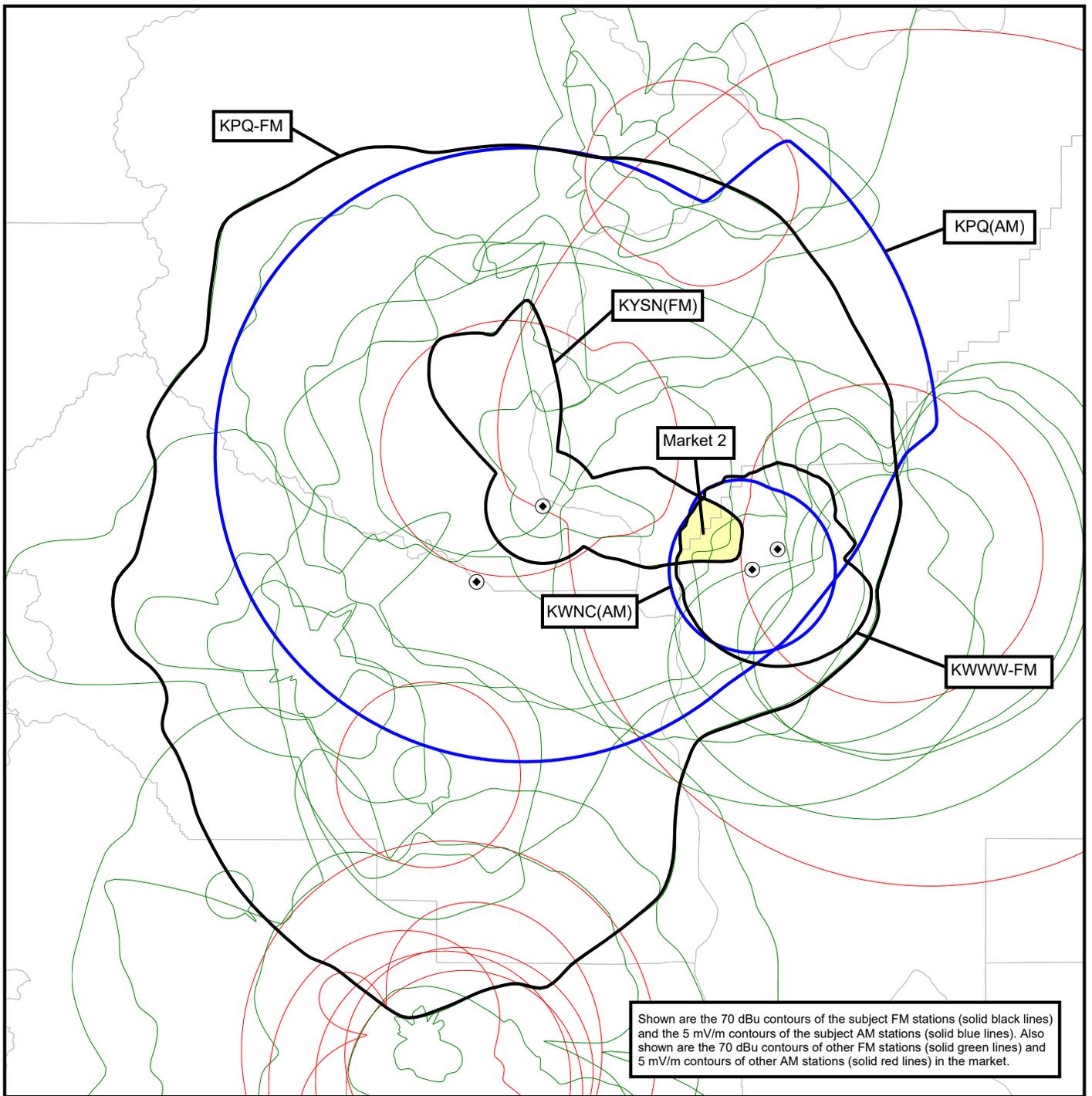
## **PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS**

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



Kilometers

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

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

**Taulation of Stations in Radio Markets**

**MARKET 1**

**FM CONTOURS**

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Status</u>	<u>Ch./Freq.</u>
KPBW	BREWSTER	WA	L2C	220 C2
<b>KKWN</b>	<b>CASHMERE</b>	<b>WA</b>	<b>L2C</b>	<b>294 A</b>
KOZI-FM	CHELAN	WA	L2C	228 A
KXAA	CLE ELUM	WA	AMD	262 A
<b>KYSN</b>	<b>EAST WENATCHEE</b>	<b>WA</b>	<b>L2C</b>	<b>249 A</b>
KLUW	EAST WENATCHEE	WA	AMD	201 A
KCSH	ELLENSBURG	WA	L2C	205 A
KCWU	ELLENSBURG	WA	L2C	201 A
KNWR	ELLENSBURG	WA	L2C	214 C1
KXLE-FM	ELLENSBURG	WA	AMD	237 C1
KTAC	EPHRATA	WA	L2C	230 C3
KZUS	EPHRATA	WA	L2C	222 C2
KOHO-FM	LEAVENWORTH	WA	AMD	266 C2
KHNW	MANSON	WA	L2C	202 A
KZAL	MANSON	WA	L2C	234 C3
KDMB	MOSES LAKE	WA	L2C	204 C2
KLWS	MOSES LAKE	WA	L2C	218 C2
KZTA	NACHES	WA	L2C	245 C2
KMGW	NACHES	WA	MOD	257 A
KSBC	NILE	WA	L2C	202 A
KZML	QUINCY	WA	AMD	240 C2
<b>KQBG</b>	<b>ROCK ISLAND</b>	<b>WA</b>	<b>MOD</b>	<b>258 A</b>
KYKV	SELAH	WA	L2C	276 C2
KDBL	TOPPENISH	WA	MOD	225 C2
KYTR	UNION GAP	WA	L2C	201 A
KSOH	WAPATO	WA	L2C	208 C2
KKRV	WENATCHEE	WA	L2C	284 C2
KPLW	WENATCHEE	WA	L2C	210 C1
<b>KPQ-FM</b>	<b>WENATCHEE</b>	<b>WA</b>	<b>MOD</b>	<b>271 C</b>
KATS	YAKIMA	WA	L2C	233 C1
KFFM	YAKIMA	WA	L2C	297 C
KNWY	YAKIMA	WA	L2C	212 C3
KXDD	YAKIMA	WA	L2C	281 C1
KYPL	YAKIMA	WA	L2C	216 C1
KYVT	YAKIMA	WA	L2C	203 A
KDNA	YAKIMA	WA	MOD	220 C1
KHHK	YAKIMA	WA	MOD	259 C3
<u>KRSE</u>	<u>YAKIMA</u>	<u>WA</u>	<u>MOD</u>	<u>289 C1</u>

**Total 38**

**AM CONTOURS**

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Status</u>	<u>Ch./Freq.</u>
KOZI	CHELAN	WA	Lic	1230
KXLE	ELLENSBURG	WA	Lic	1240
KTBI	EPHRATA	WA	Lic	810
KULE	EPHRATA	WA	Lic	730
KTCR	SELAH	WA	Lic	980
KDYK	UNION GAP	WA	Lic	1020
KKRT	WENATCHEE	WA	Lic	900
<b>KYSP</b>	<b>WENATCHEE</b>	<b>WA</b>	<b>Lic</b>	<b>1340</b>
<b>KPQ</b>	<b>WENATCHEE</b>	<b>WA</b>	<b>Lic</b>	<b>560</b>
KIT	YAKIMA	WA	Lic	1280
KUTI	YAKIMA	WA	Lic	1460
KBBO	YAKIMA	WA	Lic	1390
<u>KYAK</u>	<u>YAKIMA</u>	<u>WA</u>	<u>Lic</u>	<u>930</u>
<b>Total 13</b>				

**MARKET 2**

**FM CONTOURS**

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Status</u>	<u>Ch./Freq.</u>
KPBW	BREWSTER	WA	L2C	220 C2
KOZI-FM	CHELAN	WA	L2C	228 A
<b>KYSN</b>	<b>EAST WENATCHEE</b>	<b>WA</b>	<b>L2C</b>	<b>249 A</b>
KCSH	ELLENSBURG	WA	L2C	205 A
KCWU	ELLENSBURG	WA	L2C	201 A
KNWR	ELLENSBURG	WA	L2C	214 C1
KTAC	EPHRATA	WA	L2C	230 C3
KZUS	EPHRATA	WA	L2C	222 C2
KHNW	MANSON	WA	L2C	202 A
KZAL	MANSON	WA	L2C	234 C3
KDMB	MOSES LAKE	WA	L2C	204 C2
KLWS	MOSES LAKE	WA	L2C	218 C2
KSBC	NILE	WA	L2C	202 A
<b>KWWW-FM</b>	<b>QUINCY</b>	<b>WA</b>	<b>L2C</b>	<b>244 A</b>
KYKV	SELAH	WA	L2C	276 C2
KYTR	UNION GAP	WA	L2C	201 A
KKRV	WENATCHEE	WA	L2C	284 C2
KPLW	WENATCHEE	WA	L2C	210 C1
<b>KPQ-FM</b>	<b>WENATCHEE</b>	<b>WA</b>	<b>MOD</b>	<b>271 C</b>
KFFM	YAKIMA	WA	L2C	297 C
KHHK	YAKIMA	WA	MOD	259 C3
KRSE	YAKIMA	WA	MOD	289 C1
KLUW	EAST WENATCHEE	WA	AMD	201 A
KOHO-FM	LEAVENWORTH	WA	AMD	266 C2
KXAA	CLE ELUM	WA	AMD	262 A

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Status</u>	<u>Ch./Freq.</u>
KXLE-FM	ELLENSBURG	WA	AMD	237 C1
<u>KZML</u>	<u>QUINCY</u>	<u>WA</u>	<u>AMD</u>	<u>240 C2</u>
<b>Total 27</b>				

**AM CONTOURS**

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Status</u>	<u>Ch./Freq.</u>
KOZI	CHELAN	WA	Lic	1230
KXLE	ELLENSBURG	WA	Lic	1240
KTBI	EPHRATA	WA	Lic	810
KULE	EPHRATA	WA	Lic	730
<b>KWNC</b>	<b>QUINCY</b>	<b>WA</b>	<b>Lic</b>	<b>1370</b>
KTCR	SELAH	WA	Lic	980
KDYK	UNION GAP	WA	Lic	1020
KKRT	WENATCHEE	WA	Lic	900
<b>KPQ</b>	<b>WENATCHEE</b>	<b>WA</b>	<b>Lic</b>	<b>560</b>
KIT	YAKIMA	WA	Lic	1280
KUTI	YAKIMA	WA	Lic	1460
KBBO	YAKIMA	WA	Lic	1390
<u>KYAK</u>	<u>YAKIMA</u>	<u>WA</u>	<u>Lic</u>	<u>930</u>
<b>Total 13</b>				