

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS

This radio multiple ownership analysis was prepared on behalf of Anderson Radio Broadcasting, Inc. which has attributable interest in the stations tabulated below and is proposing to acquire FM stations KENR and KXDR and AM stations KYLT and KLYQ. Below is a tabulation of facilities for each station. 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
KKMT(FM) / 2205 Licensed Facility	Ronan, MT	Channel 222C 60 kW 707 m
KIBG(FM) / 83460 Licensed Facility	Bigfork, MT	Channel 264C 85 kW 646 m
KZXT / 164302 Licensed Facility	Eureka, MT	Channel 228A 2 kW -210 m
KQEZ(FM) / 164303 Licensed Facility	St. Regis, MT	Channel 257C2 14.5 kW 277 m
KQEZ(FM) / 164303 Authorized Facility	St. Regis, MT	Channel 257C2 14/5 kW 250 m
KQRK(FM) / 165376 Licensed Facility	Pablo, MT	Channel 259C2 1.8 kW 644 m
KERR(AM) / 2208 Licensed Facility	Polson, MT	750 kHz, 50 kW-D/1 kW-N, DA-N
KQDE(AM) / 160700 Licensed Facility	Evergreen, MT	1340 kHz, 1 KW-D/0.67 kW-N, ND2
<i>KENR(FM) / 88404 Licensed Facility</i>	<i>Superior, MT</i>	<i>Channel 298C1 100 kW 260 m</i>
<i>KXDR(FM) / 89040 Licensed Facility</i>	<i>Pinesdale, MT</i>	<i>Channel 294C0 38 kW 637 m</i>
<i>KYLT(AM) / 32389 Licensed Facility</i>	<i>Missoula, MT</i>	<i>1340 kHz, 1 kW-U, ND</i>
<i>KLYQ(AM) / 4699 Licensed Facility</i>	<i>Hamilton, MT</i>	<i>1240 kHz, 1 kW-U, ND</i>

Since the principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) of some of the stations above are involved in common overlap, an ownership study was prepared in accordance with the Federal Communications Commission

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

multiple ownership rules as outlined in Section 73.3555. The principal community contours of those stations involved in contour overlap are depicted on a map included herein as Figure 1.

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 four (4) defined “radio markets” formed by the subject stations:

Defined Radio Market	Stations that Define the Radio Market	
	AM Stations	FM Station
Market 1	KERR	KIBG, KKMT, KENR, KXDR
Market 2	KERR	KQEZ, KIBG, KKMT, KENR
Market 3	KERR	KQEZ, KENR, KXDR
Market 4	KYLT	KQEZ, KXDR, KENR

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	4 AM, 22 FM, 26 Total
Market 2	4 AM, 22 FM, 26 Total
Market 3	4 AM, 21 FM, 25 Total
Market 4	4 AM, 19 FM, 23 Total

Figure 2 depicts radio markets 1-3 and the principal community contours of other AM and FM stations in the defined markets. It is noted that the other AM and FM stations depicted on Figure 2 are common to all 3 markets, i.e. they all overlap some portion of all 4 markets and are also located within 92 km of the perimeter of the mutual overlap area of all 4 defined market areas. Figure 3 depicts radio market 4 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 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.

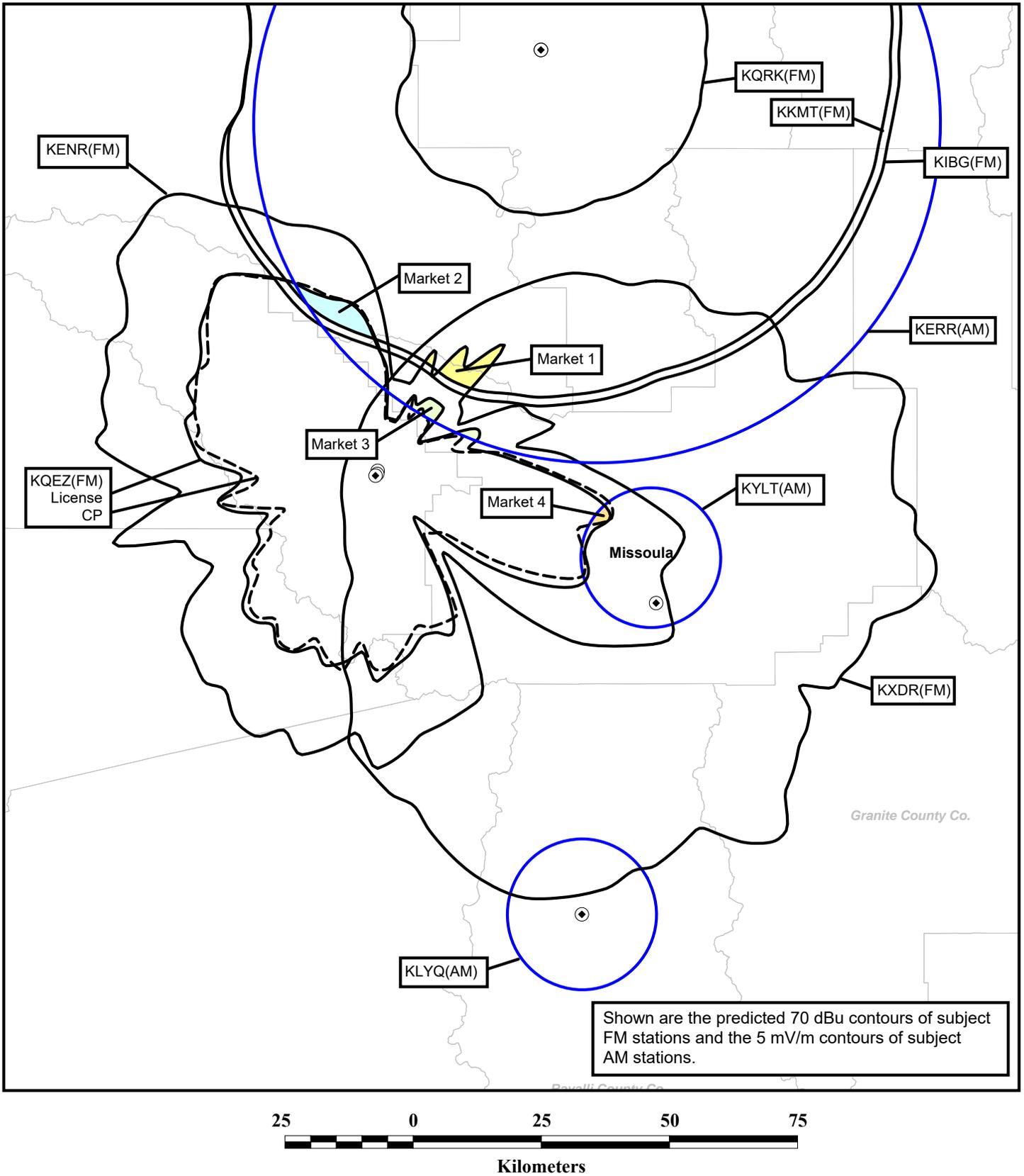
Pursuant to Section 73.3555(a)(1)(iii), in a radio market with between 15 and 29 (inclusive) full-power, commercial and noncommercial radio stations, an entity may have a cognizable interest in up to 6 commercial radio stations in total, with not more than 4 commercial stations in the same service (AM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



W. Jeffrey Reynolds

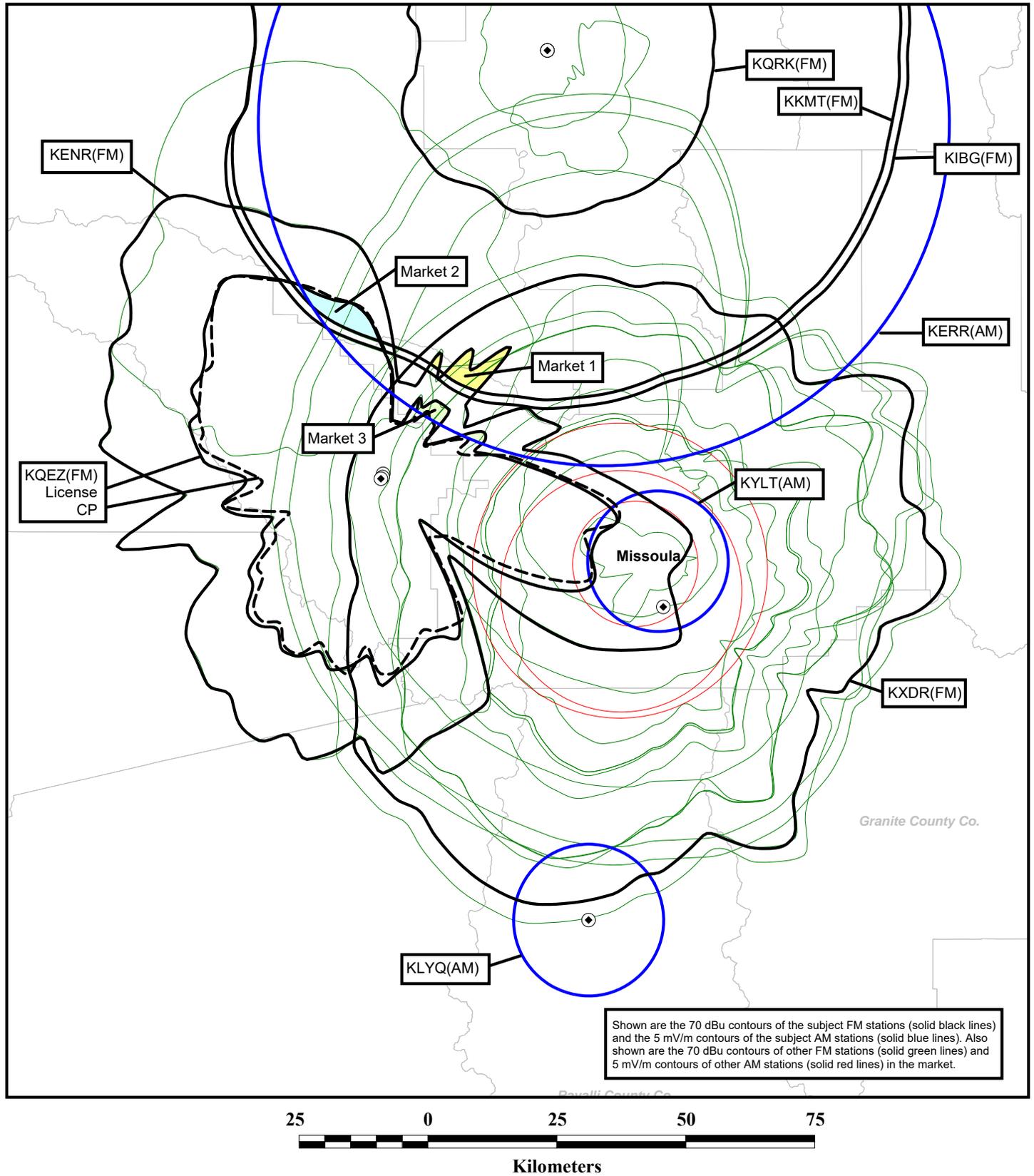
du Treil, Lundin & Rackley, Inc.
5212 Station Way
Sarasota, Florida 34233
(941)329-6013

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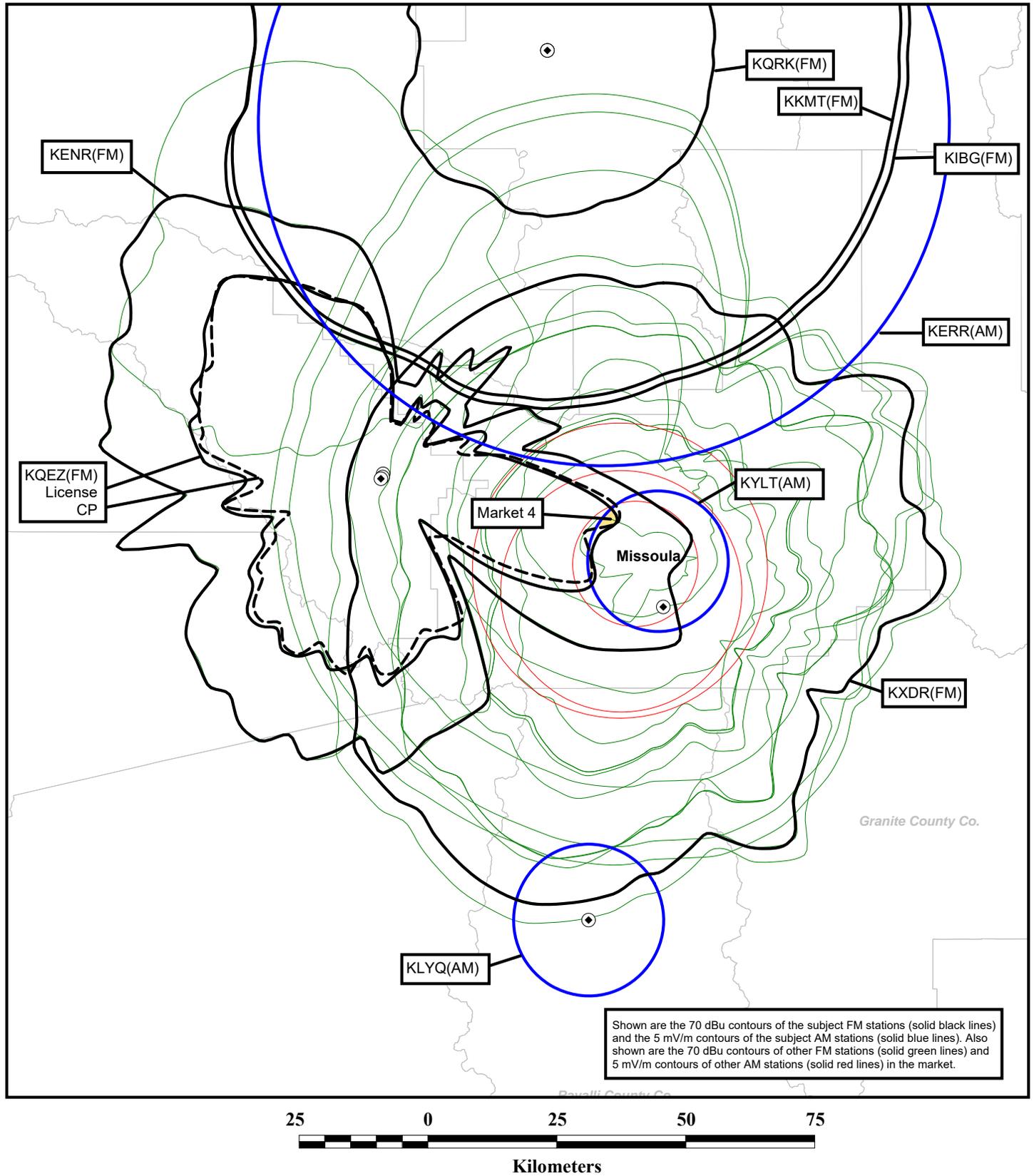
PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

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



**MARKETS 1-3
PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS
AND OF OTHER AM AND FM STATIONS IN THE MARKET**

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



**MARKET 4
PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS
AND OF OTHER AM AND FM STATIONS IN THE MARKET**

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

Tabulation of Other Stations in Defined Radio Markets

MARKETS 1-3

FM Stations

<u>Call Sign</u>	<u>Status</u>	<u>Community of License</u>	<u>State</u>	<u>Freq./Channel</u>
KJFT	L2C	ARLEE	MT	212 C3
KYMI	L2C	CHARLO	MT	248 C2
KDTR	L2C	FLORENCE	MT	277 C2
KAMM-FM	AMD	FRENCHTOWN	MT	268 C1
KBAZ	L2C	HAMILTON	MT	242 C
KBGA	L2C	MISSOULA	MT	210 A
KGGL	L2C	MISSOULA	MT	227 C
KJCG	L2C	MISSOULA	MT	202 C2
KMZL	L2C	MISSOULA	MT	216 C1
KUFM	L2C	MISSOULA	MT	206 C
KYJK	L2C	MISSOULA	MT	290 C2
KYSS-FM	L2C	MISSOULA	MT	235 C
KZOQ-FM	L2C	MISSOULA	MT	261 C1
KMSO	MOD	MISSOULA	MT	273 C0
KPLG	MOD	PLAINS	MT	218 C1
KMBM	L2C	POLSON	MT	214 A
KPJH	AMD	POLSON	MT	208 A
<u>KKVU</u>	<u>AMD</u>	<u>STEVENSVILLE</u>	<u>MT</u>	<u>283 C1</u>

Total 18

AM Stations

<u>Call Sign</u>	<u>Status</u>	<u>Community of License</u>	<u>State</u>	<u>Freq./Channel</u>
KMPT	Lic	EAST MISSOULA	MT	930
KGVO	Lic	MISSOULA	MT	1290
<u>KGRZ</u>	<u>Lic</u>	<u>MISSOULA</u>	<u>MT</u>	<u>1450</u>

Total 3

MARKET 4

FM Stations

<u>Call Sign</u>	<u>Status</u>	<u>Community of License</u>	<u>State</u>	<u>Freq./Channel</u>
KJFT	L2C	ARLEE	MT	212 C3
KYMI	L2C	CHARLO	MT	248 C2
KDTR	L2C	FLORENCE	MT	277 C2
KAMM-FM	AMD	FRENCHTOWN	MT	268 C1
KBAZ	L2C	HAMILTON	MT	242 C
KBGA	L2C	MISSOULA	MT	210 A
KGGL	L2C	MISSOULA	MT	227 C
KJCG	L2C	MISSOULA	MT	202 C2
KMZL	L2C	MISSOULA	MT	216 C1

<u>Call Sign</u>	<u>Status</u>	<u>Community of License</u>	<u>State</u>	<u>Freq./Channel</u>
KUFM	L2C	MISSOULA	MT	206 C
KYJK	L2C	MISSOULA	MT	290 C2
KYSS-FM	L2C	MISSOULA	MT	235 C
KZOQ-FM	L2C	MISSOULA	MT	261 C1
KMSO	MOD	MISSOULA	MT	273 C0
KPLG	MOD	PLAINS	MT	218 C1
<u>KKVU</u>	<u>AMD</u>	<u>STEVENSVILLE</u>	<u>MT</u>	<u>283 C1</u>
Total 16				

AM Stations

<u>Call Sign</u>	<u>Status</u>	<u>Community of License</u>	<u>State</u>	<u>Freq./Channel</u>
KMPT	Lic	EAST MISSOULA	MT	930
KGVO	Lic	MISSOULA	MT	1290
<u>KGRZ</u>	<u>Lic</u>	<u>MISSOULA</u>	<u>MT</u>	<u>1450</u>
Total 3				