

STEPHEN S. LOCKWOOD, PE, PMP

THOMAS M. ECKELS, PE  
THOMAS S. GORTON, PE

JAMES B. HATFIELD, PE  
BENJAMIN F. DAWSON III, PE  
ERIK C. SWANSON, PE, PMP  
DAVID J. PINION, PE  
STEPHEN PUMPLE, M.Eng, MBA, PMP  
CONSULTANTS

HATFIELD & DAWSON  
CONSULTING ELECTRICAL ENGINEERS  
9500 GREENWOOD AVE. N.  
SEATTLE, WASHINGTON 98103

TELEPHONE (206) 783-9151  
FACSIMILE (206) 789-9834  
E-MAIL hatdaw@hatdaw.com

MAURY L. HATFIELD, PE  
(1942-2009)  
PAUL W. LEONARD, PE  
(1925-2011)

## MULTIPLE OWNERSHIP SERVICE CONTOUR ANALYSIS

Prepared for  
BTC USA Holdings Management Inc.  
October 2022

The attached analysis of compliance with the radio multiple ownership rules was prepared in accordance with the Rules and Regulations of the Federal Communications Commission, in connection with applications for assignment and/or transfer of control of several stations in Alaskan communities to BTC USA Holdings Management Inc. These stations are:

<b>Juneau</b>	
KTKU 286A Juneau	Alaska Broadcast Communications
KJNO 630 kHz Juneau	Alaska Broadcast Communications
KSUP 292C3 Juneau	Juneau Alaska Communications
KINY 800 kHz Juneau	Juneau Alaska Communications
KXXJ 1330 kHz Juneau	Juneau Alaska Communications

<b>Ketchikan</b>	
KGTV 294C3 Ketchikan	Alaska Broadcast Communications
KTKN 930 kHz Ketchikan	Alaska Broadcast Communications

<b>Sitka</b>	
KSBZ 276A Sitka	Alaska Broadcast Communications
KIFW 1230 kHz Sitka	Alaska Broadcast Communications

All of these stations operate outside any Nielsen rated market. The stations within each unrated market have common overlap, but there is no overlap with attributable stations in the other communities.

### **Ketchikan Unrated Market Study**

As is demonstrated by the attached map exhibit, there is overlap of the principal community contours of KGTW(FM) and KTKN(AM). §73.3555(a)(2) expressly permits the overlap of two stations in different services if neither of those two stations overlaps a third attributable station in the same service. There are no other attributable stations in the vicinity. Therefore, the Ketchikan cluster complies with the local radio ownership rule without the need for detailed analysis.

### **Sitka Unrated Market Study**

As is demonstrated by the attached map exhibit, there is overlap of the principal community contours of KSBZ(FM) and KIFW(AM). §73.3555(a)(2) expressly permits the overlap of two stations in different services if neither of those two stations overlaps a third attributable station in the same service. There are no other attributable stations in the vicinity. Therefore, the Sitka cluster complies with the local radio ownership rule without the need for detailed analysis.

### **Juneau Unrated Market Study**

Analysis of the Juneau cluster has been made consistent with the Commission's interim rules for unrated markets. The 70 dBu contours of FM stations were determined from the technical data contained in the most recent edition of the FCC FM Database. The listed antenna height above average terrain was used together with topographic data obtained from the digitized 30 second or 3 second database. The 5 mV/m daytime contours of AM stations were determined from the technical data contained in the most recent edition of the FCC AM Database. The listed antenna parameter information was used together with a digitized version of the FCC M-3 or Region II ground conductivity database.

The service contours were plotted using correct map projection mathematics. Those stations whose transmitter sites are within the respective principal community service contours of the stations proposed to be commonly owned have only the sites rather than their contours shown. All contours and enclosed transmitter site locations have been labeled.

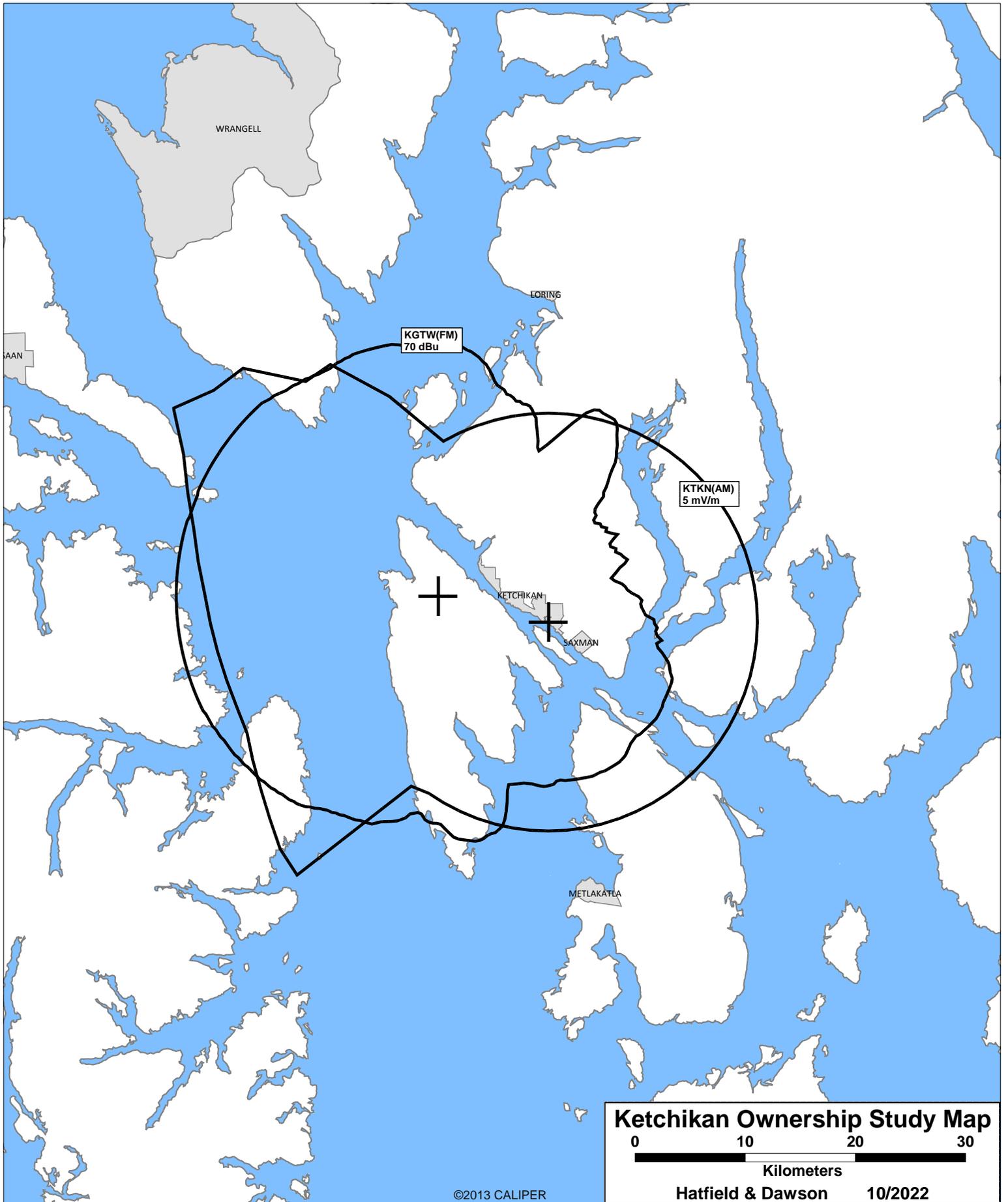
In counting stations providing service to the “market” defined by each of the discrete clusters formed in unrated markets, stations whose transmitter sites are located in excess of 92 km from the perimeter of the common overlap area have been excluded, as have other stations to be commonly-owned but which are not a part of the discrete cluster being studied.

This exhibit evidences at least the minimum number of stations necessary to demonstrate compliance with the rules concerning radio multiple ownership in unrated markets. In order to qualify for common ownership of this 3AM/2FM cluster, there must be at least 10 stations in the relevant “market”. This study demonstrates that there are at least 12 stations in the relevant market.

October 5, 2022

A handwritten signature in black ink, appearing to read "Erik C. Swanson". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Erik C. Swanson

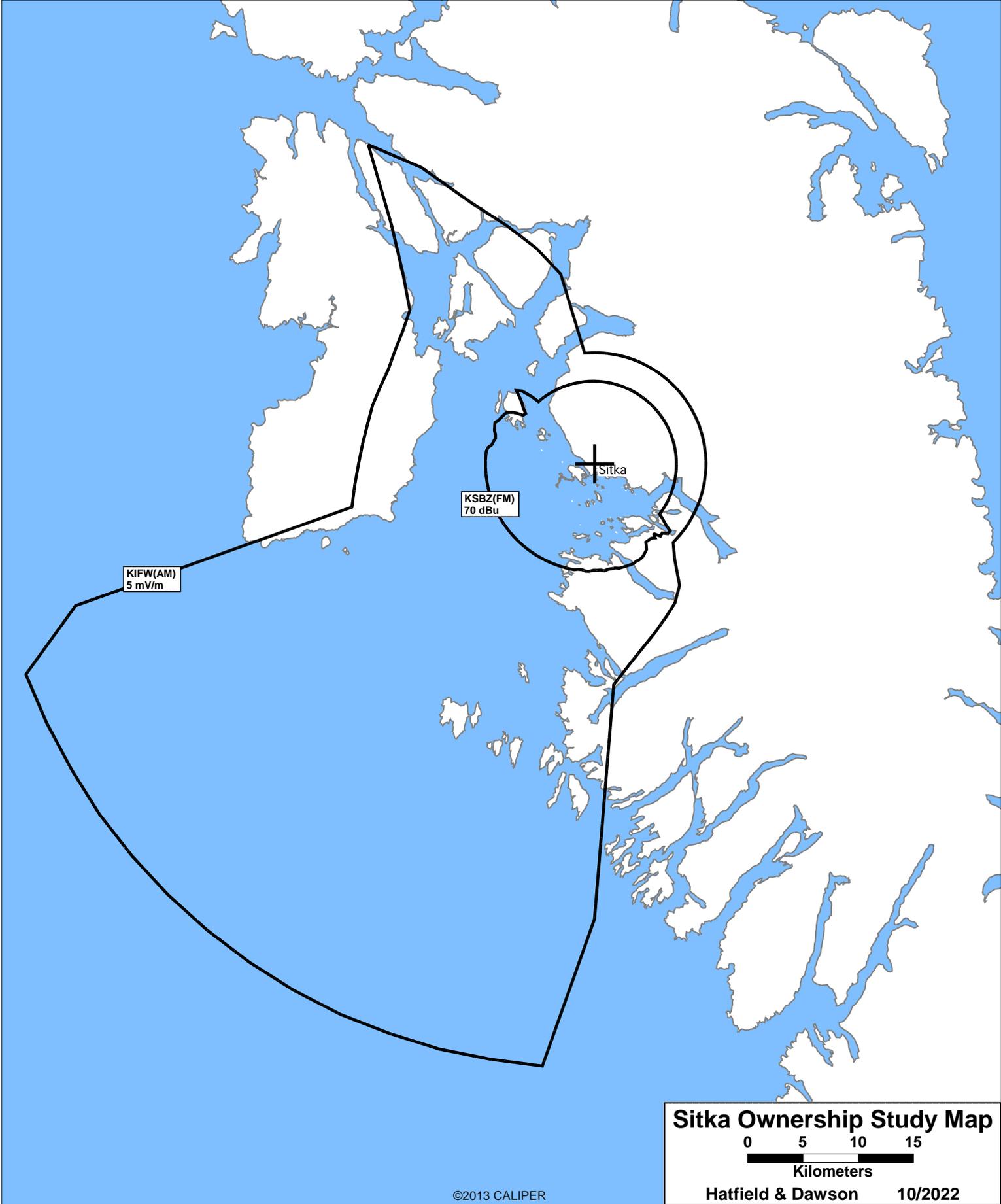


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**Ketchikan Ownership Study Map**

0 10 20 30  
Kilometers

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KIFW(AM)  
5 mV/m

KSBZ(FM)  
70 dBu

Sitka

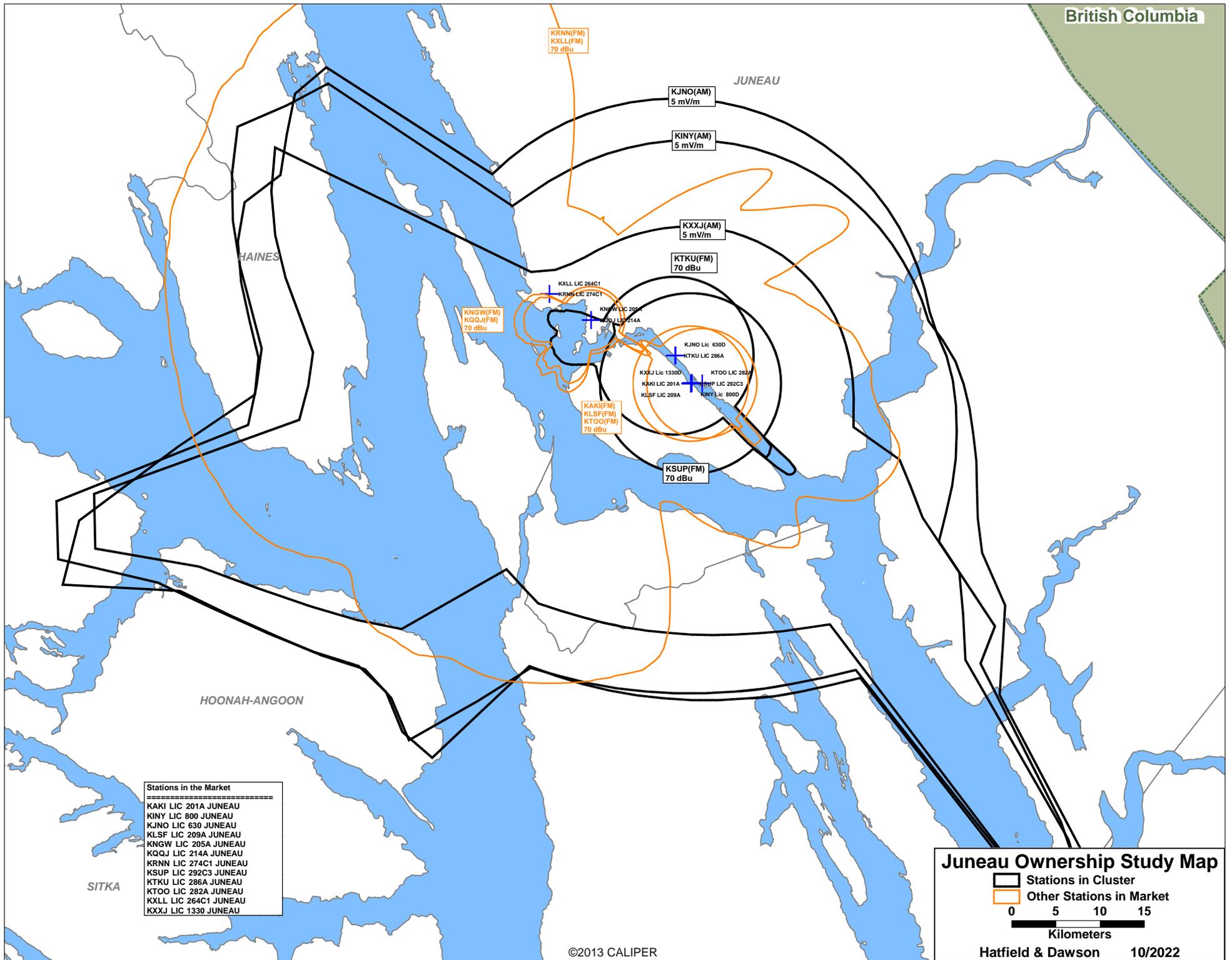
**Sitka Ownership Study Map**

0 5 10 15

Kilometers

Hatfield & Dawson 10/2022

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- Stations in the Market**
- - KAKI LIC 201A JUNEAU
  - KINY LIC 800 JUNEAU
  - KJNO LIC 630 JUNEAU
  - KLSF LIC 209A JUNEAU
  - KNGW LIC 205A JUNEAU
  - KQQJ LIC 214A JUNEAU
  - KRNN LIC 274C1 JUNEAU
  - KSUP LIC 292C3 JUNEAU
  - KTKU LIC 286A JUNEAU
  - KTOO LIC 282A JUNEAU
  - KXLL LIC 264C1 JUNEAU
  - KXXJ LIC 1330 JUNEAU

**Juneau Ownership Study Map**

- Stations in Cluster
- Other Stations in Market

0 5 10 15  
Kilometers

Hatfield & Dawson 10/2022