

MULTIPLE OWNERSHIP REPORT

OPUS BROADCASTING SYSTEMS, INC.

March 21, 2023

SUMMARY

A Multiple Ownership study has been completed on behalf of Opus Broadcasting Systems, Inc. (Opus), using the Modified Contour Method. Opus currently owns 3 FM and 2 AM stations, and is the proposed assignee for an additional in-market FM station. **This study confirms that the proposed assignment complies with the Multiple Ownership Rules contained in 47 CFR §73.3555.** There are 39 stations in the market, which would permit Opus to own a total of 7 stations, with not more than 4 in the same service (AM or FM).

BACKGROUND

Opus is currently licensed with the following stations:

| <u>CALL</u> | <u>CH/FREQ</u> | <u>SERVICE</u> | <u>COMMUNITY</u> | <u>STATE</u> |
|-------------|----------------|----------------|------------------|--------------|
| KRVC | 255 | FM | Hornbrook | CA |
| KROG | 245 | FM | Grants Pass | OR |
| KCNA | 274 | FM | Cave Junction | OR |
| KRTA | 610 | AM | Medford | OR |
| KEZX | 730 | AM | Medford | OR |

Opus proposes to add the following, for a total of 4 FM and 2 AM stations:

| | | | | |
|------|-----|----|-------------|----|
| KORJ | 249 | FM | Butte Falls | OR |
|------|-----|----|-------------|----|

METHODOLOGY

1. Principal Community Contours are employed, to determine station overlaps (FM: 3.16mv/m (70dBu); AM: 5mv/m).
2. All full-power AM and FM stations, commercial and non-commercial, are included.

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3. Since the applicant's stations are completely outside any Nielson radio market (as reported by BIA/Kelsey), the Modified Contour Method is employed to determine the number of stations in the market.¹ Applicable elements of the method are included below.

4. The co-owned stations, both existing and proposed, that have an area of Mutual Overlap, define the nexus for the "radio market", for purposes of this study.

5. All other AM and FM stations that have any overlap with any of the co-owned stations, are considered to be within the "market", *provided* that the transmitter site is 92km or less from the area of Mutual Overlap.

6. The resultant station list determines the total market size for evaluating compliance with §73.3555.

The Opus proposal to acquire KORJ would bring their total to 6 radio facilities, with 4 being FM stations.

EXHIBITS

Exhibit E-1 shows the existing Opus stations, and the proposed station to be acquired - KORJ. The Area of Mutual Overlap is shaded in blue. All stations within the defined "market" must have transmitter sites within 92km of this blue area.

Exhibit E-2 shows all the in-market stations. The existing and proposed Opus stations are indicated by dashed contours.

¹This method was defined in the Report and Order and Notice of Proposed Rulemaking, FCC 03-127, Adopted Jun 2, 2003, reviewed and clarified in News Release FCC Sets Limits on Media Concentration, Released June 2, 2003, and further confirmed in the Second Report and Order, FCC 16-107, Adopted August 10, 2016.

NON-OPUS IN-MARKET STATIONS as of 03/21/2023

| <u>CALL</u> | <u>CH/FREQ</u> | <u>SERVICE</u> | <u>COMMUNITY</u> | <u>STATE</u> |
|-------------|----------------|----------------|-------------------|--------------|
| KNYR | 217 | FM | Yreka | CA |
| KSYC-FM | 280 | FM | Yreka | CA |
| KSRG | 202 | FM | Ashland | OR |
| KYSO | 204 | FM | Selma | OR |
| KSMF | 206 | FM | Ashland | OR |
| KSKQ | 208 | FM | Ashland | OR |
| KSOR | 211 | FM | Ashland | OR |
| KLXG | 216 | FM | Grants Pass | OR |
| KDXA | 217 | FM | Glendale | OR |
| KDOV | 219 | FM | Medford | OR |
| KWRZ | 222 | FM | Canyonville | OR |
| KTMT-FM | 229 | FM | Medford | OR |
| KRRM | 234 | FM | Rogue River | OR |
| KBOY-FM | 239 | FM | Medford | OR |
| KLDR | 252 | FM | Harbeck-Fruitdale | OR |
| KCMD | 257 | FM | Grants Pass | OR |
| KRWQ | 262 | FM | Gold Hill | OR |
| KLMD | 266 | FM | Talent | OR |
| KCMX-FM | 270 | FM | Ashland | OR |
| KLDZ | 278 | FM | Medford | OR |
| KKMX | 282 | FM | Tri City | OR |
| KAKT | 286 | FM | Phoenix | OR |
| KYVL | 292 | FM | Eagle Point | OR |
| KIFS | 298 | FM | Ashland | OR |
| KSYC | 1490 | AM | Yreka | CA |
| KMED | 1440 | AM | Medford | OR |
| KCMX | 880 | AM | Phoenix | OR |
| KFJL | 1400 | AM | Central Point | OR |
| KAPL | 1300 | AM | Phoenix | OR |
| KTMT | 580 | AM | Ashland | OR |
| KSJK | 1230 | AM | Talent | OR |
| KAJO | 1270 | AM | Grants Pass | OR |
| KAGI | 930 | AM | Grants Pass | OR |

| | |
|------------------------------------|----|
| Existing & Proposed Opus Stations: | 6 |
| Non-Opus In-Market Stations | 33 |
| ----- | |
| TOTAL In-Market Stations | 39 |

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EXHIBIT E-1 OPUS BROADCASTING SYSTEMS EXISTING STATIONS WITH KORJ ADDED

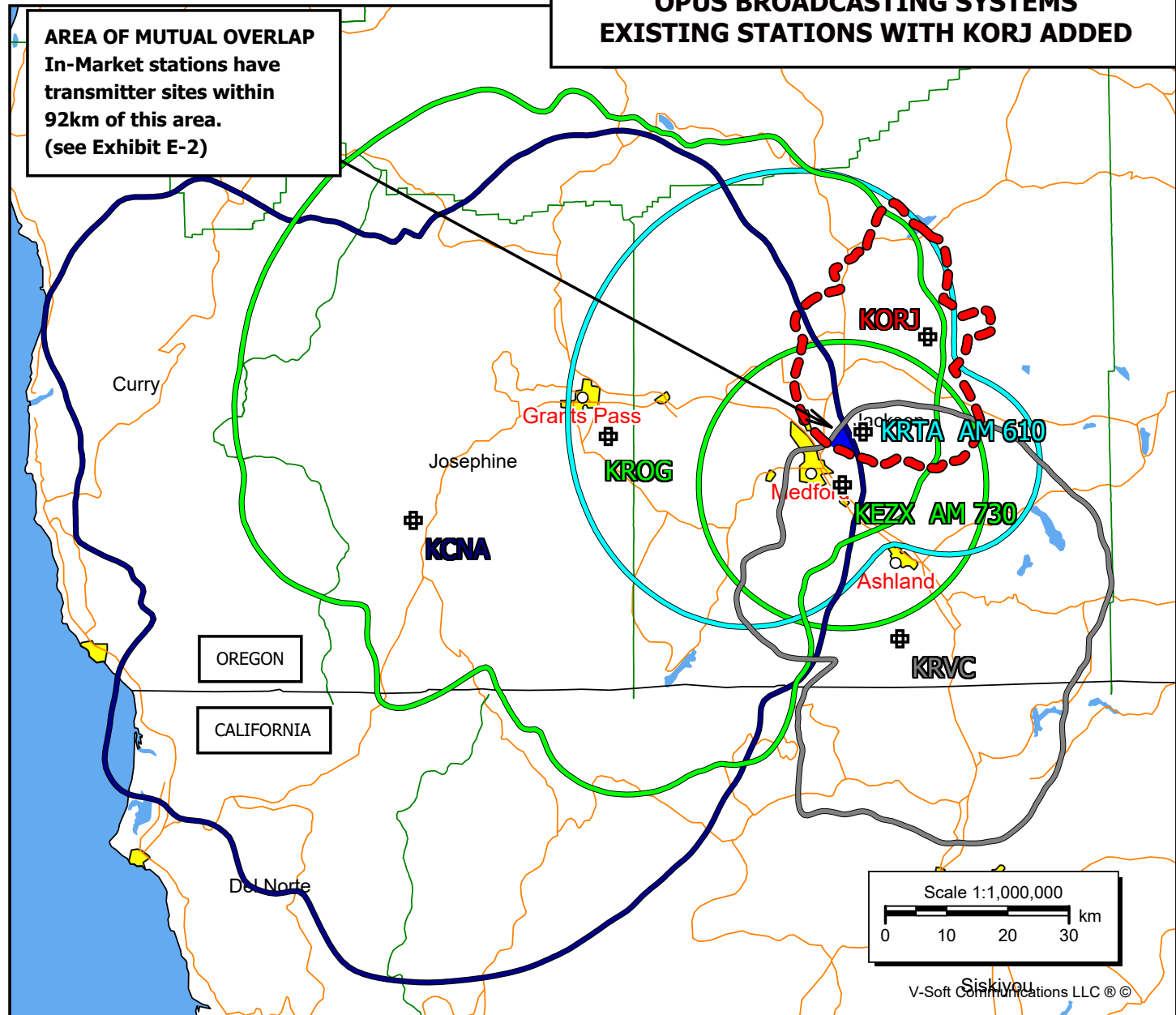
KORJ
BLH20161020ABS
Latitude: 42-31-34.90 N
Longitude: 122-38-29 W
ERP: 1.80 kW
Channel: 249
Frequency: 97.7 MHz

■ KORJ (249)
■ KRVC (255)
■ KROG (245)
■ KCNA (274)
■ KRTA AM 610
■ KEZX AM 730

PRINCIPAL COMMUNITY
CONTOURS EMPLOYED
FM: 3.16mv/m (70dBu)
AM: 5mv/m

Study Date: 03/21/2023
AM Data Date: 03/21/2023
FM Data Date: 03/21/2023

AREA OF MUTUAL OVERLAP
In-Market stations have
transmitter sites within
92km of this area.
(see Exhibit E-2)



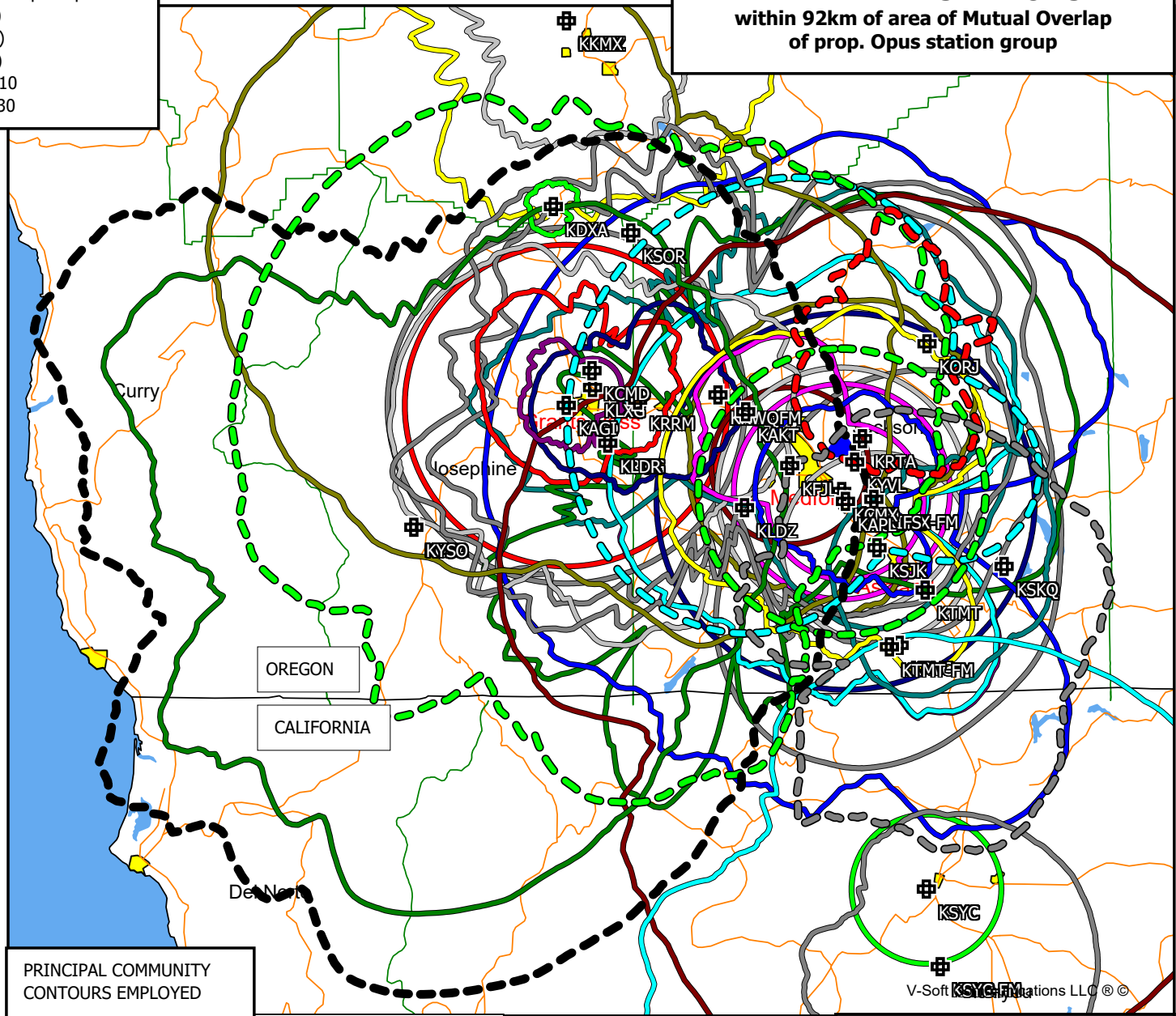
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- REF
- KNYR (217)
- KSYC-FM (280)
- KSRG (202)
- KYSO (204)
- KSMF (206)
- KSKQ (208)
- KSOR (211)
- KLXG (216)
- KDXA (217)
- KDOV (219)
- KWRZ (222)
- KTMT-FM (229)
- KRRM (234)
- KBOY-FM (239)
- KLDR (252)
- KCMD (257)
- KRWQ (262)
- KLMD (266)
- KCMX-FM (270)
- KLDZ (278)
- KKMx (282)
- KAKT (286)
- KYVL (292)
- KIFS (298)
- KSYC
- KMED
- KCMX
- KFJL
- KAPL
- KTMT
- KSJK
- KAJO
- KAGI

Opus' Reference Stations
(dashed contours)

KORJ (249) Prop. Acquisition
 KRVC (255)
 KROG (245)
 KCNA (274)
 KRTA AM 610
 KEZX AM 730

EXHIBIT E-2
IN-MARKET STATIONS
 within 92km of area of Mutual Overlap
 of prop. Opus station group



PRINCIPAL COMMUNITY
 CONTOURS EMPLOYED

Study Date: 03/21/2023
 AM Data Date: 03/21/2023
 FM Data Date: 03/21/2023

Scale 1:1,000,000
 0 10 20 30 km

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