

**Multiple Ownership Compliance**  
**Proposed Assignment of**  
**KBSN(AM), Moses Lake, WA FAC# 35597**  
**KDRM, Moses Lake, WA FAC# 35596**  
**December 22,2022**

An engineering analysis was performed for Jacobs Radio Programming, LLC (“JRPL”) to determine if the assignment of KBSN(AM) and KDRM meets the requirements of Section 73.3555 multiple ownership rules. JRPL is the licensee of the following four FM stations:

Call Sign	City	State	Facility ID.
KCYS	Seaside	OR	78427
KLKY	Stanfield	OR	164091
KWDR	Royal City	WA	166057
KEUB	Gearhart	OR	191527

The principal community 70 dB $\mu$  F(50,50) contours of these four JRPL stations and the 5mV/m contour of AM station KBSN(AM) and the principal community 70 dB $\mu$  F(50,50) contour for KDRM are plotted on the attached contour map. The two proposed stations to be assigned (KBSN and KDRM) mutually intersect to form one “Radio Market”. None of the currently owned JRPL stations are in this “Radio Market”. Since this is not a Metro Market, the interim contour-overlap methodology has been used to determine compliance with Section 73.3555.

**Count of FM Stations in “Radio Market”**

The number of radio stations in the “Radio Market” was determined by counting the authorized FM stations having 70dB $\mu$  F(50,50) contours that intersect the principal community contours which define the “Radio Market”. Only those stations located within 92 kilometers of the perimeter of the mutual overlap area of the respective defined market area were employed in the count of the stations. Distances to the FM contours were determined based on the method of 47 CFR 73.313. This analysis identified 11 FM stations. Please refer to the attached Table of overlapping contours.

**Count of AM Stations in “Radio Market”**

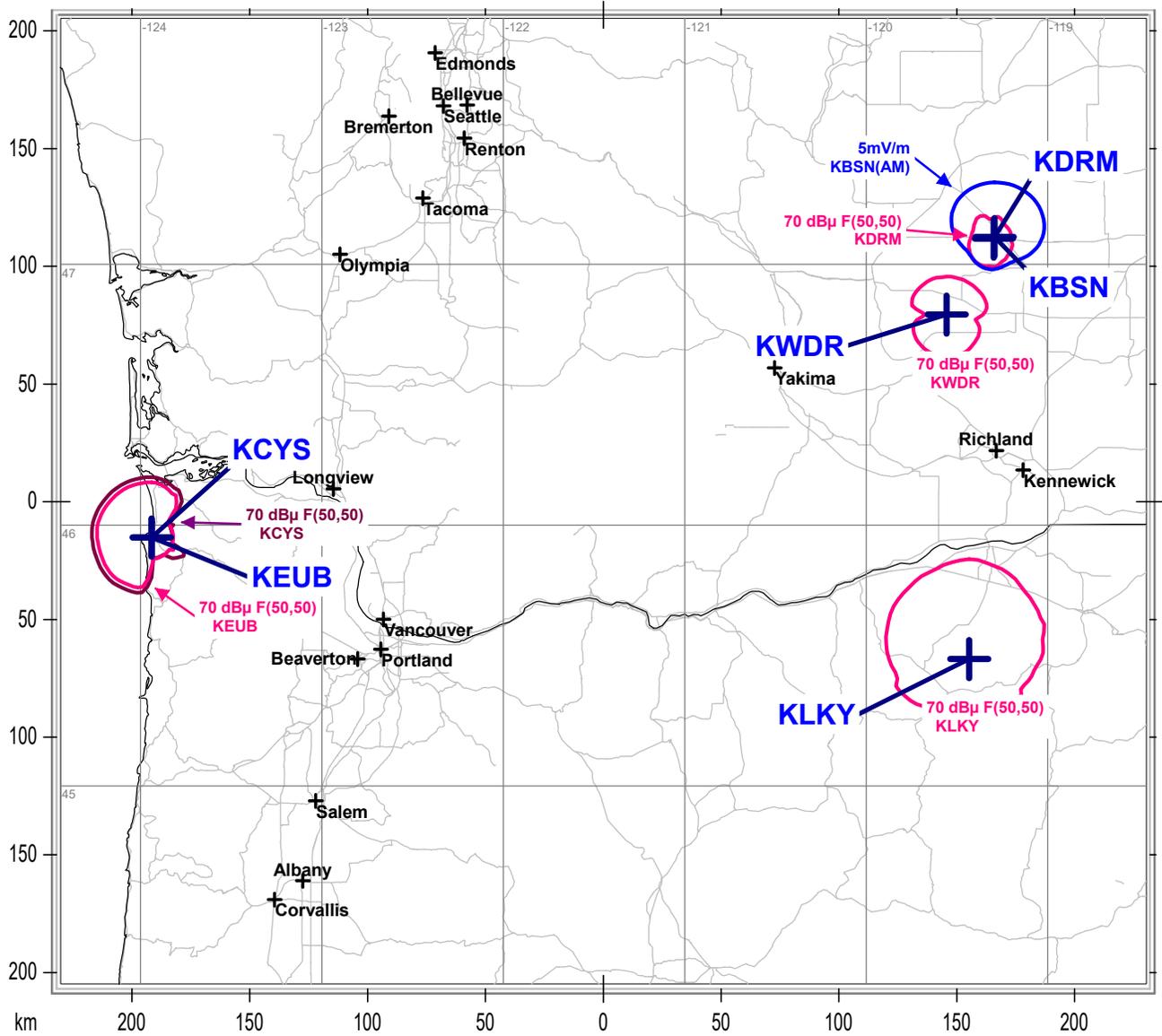
The number of AM radio stations in the “Radio Market” was determined by counting the licensed AM stations having 5 mV/m contours that intersect the principal community contours which define the “Radio Market”. Only those stations located within 92 kilometers of the perimeter of the mutual overlap area of the respective defined market area were employed in the count of the stations. 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. This analysis of AM stations identified four AM stations which are listed on the attached Table of overlapping contours.

**Conclusion**

This analysis identified a total of 14 commercial and non-commercial full powered FM and AM stations in the “Radio Market”. In a radio market with 14 or less commercial and noncommercial educational full-power radio stations, JRPL may have a cognizable interest in up to 5 commercial radio stations, not more than 3 of which are in the same service (AM or FM) as long as this number is less than 50% of the total number of stations in the market.

The results of this analysis indicate that the proposed assignment of KBSN(AM) and KDRM will meet the Multiple Ownership requirements of Section 73.3555(a) of the FCC Rules.

### Jacobs Radio Programming Facilities Contour Map



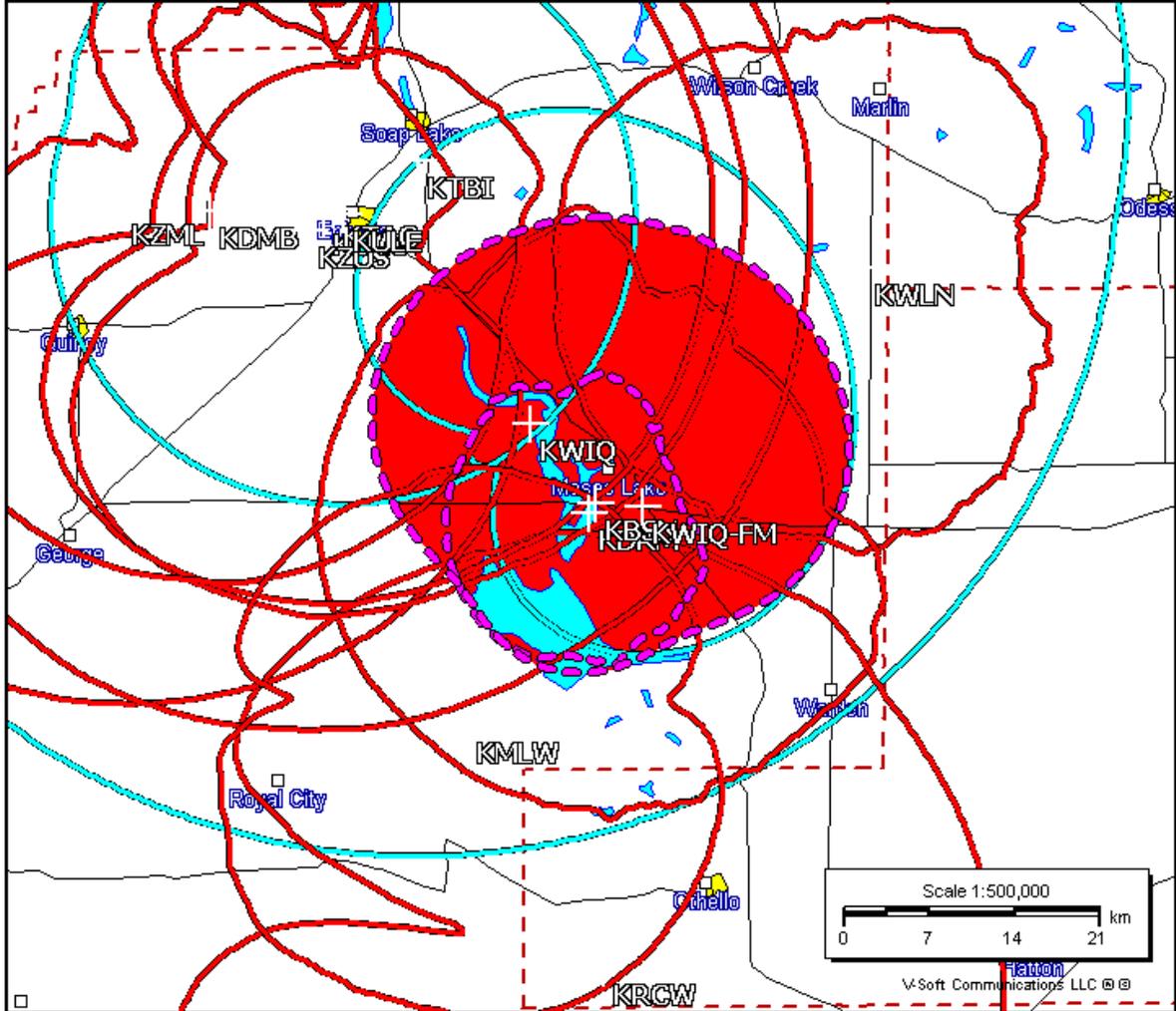
KCYS, KLKY, KWDR, KEUB & Proposed KBSN(AM), KDRM

State Borders Highways Lat/Lon Grid

Map Scale: 1:2863862 1 cm = 28.64 km V/H Size: 410.59 x 460.76 km

Gene Wisniewski

**Contour Overlap Map Proposed Assignment KBSN(AM) & KDRM  
December 22, 2022**



- Transmitters
- REF
  - KMLW (202)
  - KDMB (204)
  - KLW5 (218)
  - KZUS (222)
  - KTAC (230)
  - KZML (240)
  - KRCW (242)
  - KWIQ-FM (263)
  - KWLN (277)
  - KULE
  - KTBI
  - KWIQ

Total number of overlapping contours: 14

Reference:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
KDRM	FM	257A Moses Lake	WA	BLH19801112AJ	0.0	0.0
KBSN	AM	1470 MOSES LAKE	WA	BL	0.8	30.0

Overlapping Contours:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
KMLW	FM	202C3 Moses Lake	WA	BLED19970512KC	20.1	210.0
KDMB	FM	204C2 Moses Lake	WA	BLED20130711AAQ	39.5	308.5
KLWS	FM	218C2 Moses Lake	WA	BLED19970609KD	32.3	318.0
KZUS	FM	222C2 Ephrata	WA	BLH19990108KA	32.4	315.3
KTAC	FM	230C3 Ephrata	WA	BLH20020618AAE	32.4	319.8
KZML	FM	240C2 Quincy	WA	BLH20030321ABM	45.4	303.1
KRCW	FM	242C2 Royal City	WA	BLH19990910AAE	37.0	178.2
KWIQ-FM	FM	263C2 Moses Lake	WA	BLH20130819ABK	4.3	83.8
KWLN	FM	277C3 Wilson Creek	WA	BLH20050112ADA	30.0	48.3
KULE	AM	730 EPHRATA	WA	BL20040427ABP	31.5	320.5
KTBI	AM	810 EPHRATA	WA	BL19921209AA	31.9	334.1
KWIQ	AM	1020 MOSES LAKE NORTH	WA	BMML20150227ACW	8.7	326.5

Distance and bearing calculations from coordinates: 47-05-53.50 N, 119-17-51 W

Duopoly Options:

TV: Not Included

FM: 3.16 mV/m (70 dBu); Include NCE

AM: 5.0 mV/m

Stations more than 92 km from the common area were excluded.