

**DELAWDER COMMUNICATIONS, INC.**

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**ENGINEERING REPORT**

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**Multiple Ownership Study of Winton Road Broadcasting Co., LLC Radio Stations**

**MULTIPLE OWNERSHIP SERVICE CONTOUR STUDY**

1. This Multiple Ownership Study has been prepared in support of the assignment of commercial radio stations owned by Winton Road Broadcasting Co., LLC ("Winton Road") to Hutton Broadcasting, LLC ("Hutton Broadcasting").

**Findings**

2. Winton Road owns the following six FM and three AM stations in the Durango (CO), Cortez (CO) and Farmington (NM) Areas:

KPTE(FM), Bayfield, CO, 225C2  
KRWN(FM), Farmington, NM, 223C1  
KISZ-FM, Cortez, CO, 250C  
KRTZ(FM), Cortez, CO, 254C  
KKDG(FM), Durango, CO, 259C2  
KPRT-FM, Kirtland, NM, 300A  
KVFC(AM), Cortez, CO, 740 kHz  
KDGO(AM), Durango, CO, 1240 kHz  
KENN(AM), Farmington, NM, 1390 kHz

3. The nine Winton Roads community service contours (aka "city grade" contours) are shown on Figure E1, attached. (The city grade contours are the 3.16 mV/m {70 dBu} for FM stations and 5 mV/m for AM stations.) Figure E1 also shows two areas, identified by a red "A" and a red "B". These are the largest area "Cluster" of FM stations that are licensed to Winton Road – four FM's being the largest number in both cases. A label for each cluster is included on Figure E1 that identifies the FM and AM stations that make up each cluster. In no case is any cluster area of the nine Winton Road stations made up of more than 4 FM stations and 1 AM station. For a highest level cluster, the numerator of this multiple ownership study is represented by 4 FM stations and 1 AM station.

4. From Figure E1, it is established that Winton Road FM station KISZ-FM 250C is part of any station cluster associated with Winton Road. As demonstrated by Figure E2, attached, the following 18 licensed “denominator” FM stations have 70 dBu F50,50 city grade service contours<sup>1</sup> that overlap some portion of KISZ-FM (and, thus, are part of the denominator of any cluster associated with Winton Road):

Stations with Contour Overlap (“Denominator” of Ownership Study)

- KUSW(FM), Flora Vista, NM, 201C3
- KLCQ(FM), Durango, CO, 203A
- KNMI(FM), Farmington, NM, 205C2
- KDNG(FM), Durango, CO, 207A
- KTCF(FM), Dolores, CO, 208A
- KUUT(FM), Farmington, NM, 209A
- KZET(FM), Towaoc, CO, 213C1
- KSJE(FM), Farmington, NM, 215C3
- KSJD(FM), Cortez, CO, 218A
- KTGW(FM), Fruitland, NM, 219C3
- KDUR(FM), Durango, CO, 220A
- KKDC(FM), Dolores, CO, 227C2
- KWYK-FM, Aztec, NM, 235C1
- KPCL(FM), Farmington, NM, 239C1
- KRSJ(FM), Durango, CO, 263C1
- KZNM(FM), Towaoc, CO, 265C1
- KIQX(FM), Durango, CO, 267C1
- KXRC(FM), Durango, CO, 287C3

5. *None of the above stations are licensed to the assignee, Hutton Broadcasting.* Based on 47 CFR Section 73.3555(a)(1)(iii), a radio market with between 15 and 29 (inclusive) full-power stations is permitted up to 6 commercial radio stations with 4 allowed in the same AM or FM service. Each Winton Road Market Cluster, therefore, will meet the Section 73.3555 requirements regarding multiple ownership. (Note that there possibly other FM and AM stations that could be included in the denominator. The above 18 stations represent three stations more than necessary to establish compliance with the multiple ownership rules.)

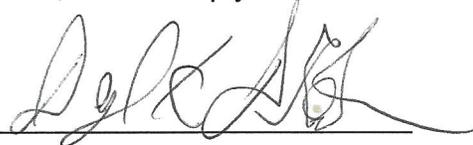
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<sup>1</sup> All FM stations are located with 92 kilometers of the perimeter of each market cluster, as required by the study methodology.

6. For all FM station facilities identified in this report, each 70 dBu contour was determined using the methodology of 47 CFR Section 73.313 based on the most-recent technical data contained in the FCC's Database. A digitized 3 arc-second terrain database with an azimuth increment of five degrees is used for each FM contour distance calculation.

7. For all AM station facilities identified in this report, each 5 mV/m contour (using M3 conductivity data only) was determined using the methodology of 47 CFR Sections 73.183 and 73.184 based on the most-recent technical data for the licensed daytime (or unlimited) facility as contained in the FCC's Database. An azimuth increment of five degrees is used for each AM contour distance calculation.

8. A separate Figure EE1 map exhibit demonstrates that the city grade contours of all Winton Road stations do not intersect with any city grade contour of a Hutton Broadcasting station. (The distance gap between the easternmost Winton Road city grade contour and the westernmost Hutton Broadcasting city grade contour is at least 100 kilometers.) Therefore, based on this instance analysis, it is concluded that those stations currently licensed to Winton Road Broadcasting Co., LLC comply with the FCC Radio Multiple Ownership Rules.



Darryl K. DeLawder, President

Date: May 9, 2023