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MULTIPLE OWNERSHIP SERVICE CONTOUR ANALYSIS

Prepared for
Townsquare License, LLC
December 2023

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 an application for minor modification of AM station KFLD 870 kHz at Pasco, Washington. The attached Ownership Overview Map demonstrates that the proposed KFLD facility has principal community contour overlap with the following attributable stations:¹

KONA	610 kHz	Kennewick-Richland-Pasco
KORD-FM	274C0	Richland
KXRX	246C0	Walla Walla
KZHR	223C1	Dayton
KONA-FM	287C	Kennewick
KEYW	252C1	Pasco

Unrated Market

These stations operate outside any market rated by Nielsen. Therefore, analysis 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

¹ There is no principal community contour overlap with the attributable stations in Townsquare's Yakima, Washington cluster, to the west.

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. A list of all stations considered is included with this statement.

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.

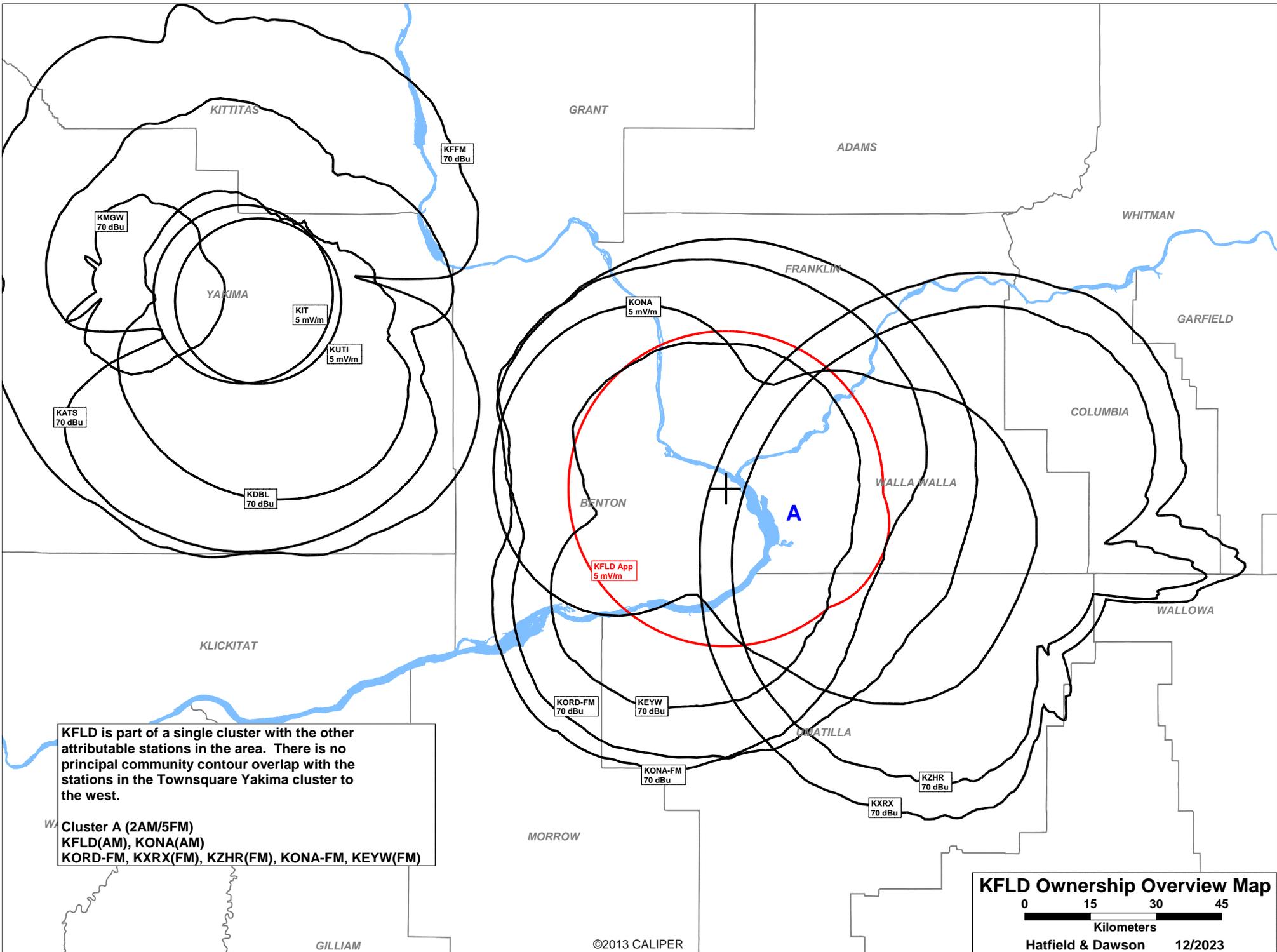
These stations form a single cluster of stations for ownership purposes. This exhibit evidences at least the minimum number of stations necessary to demonstrate compliance with the rules concerning radio multiple ownership in unrated markets. In order to qualify for common ownership of this 2AM/5FM cluster, there must be at least 45 stations in the relevant “market”. This study demonstrates that there are at least 47 stations in the relevant market.

December 21, 2023

A handwritten signature in black ink, appearing to read 'Erik C. Swanson', written in a cursive style.

Erik C. Swanson

Hatfield & Dawson Consulting Engineers



KFLD is part of a single cluster with the other attributable stations in the area. There is no principal community contour overlap with the stations in the Townsquare Yakima cluster to the west.

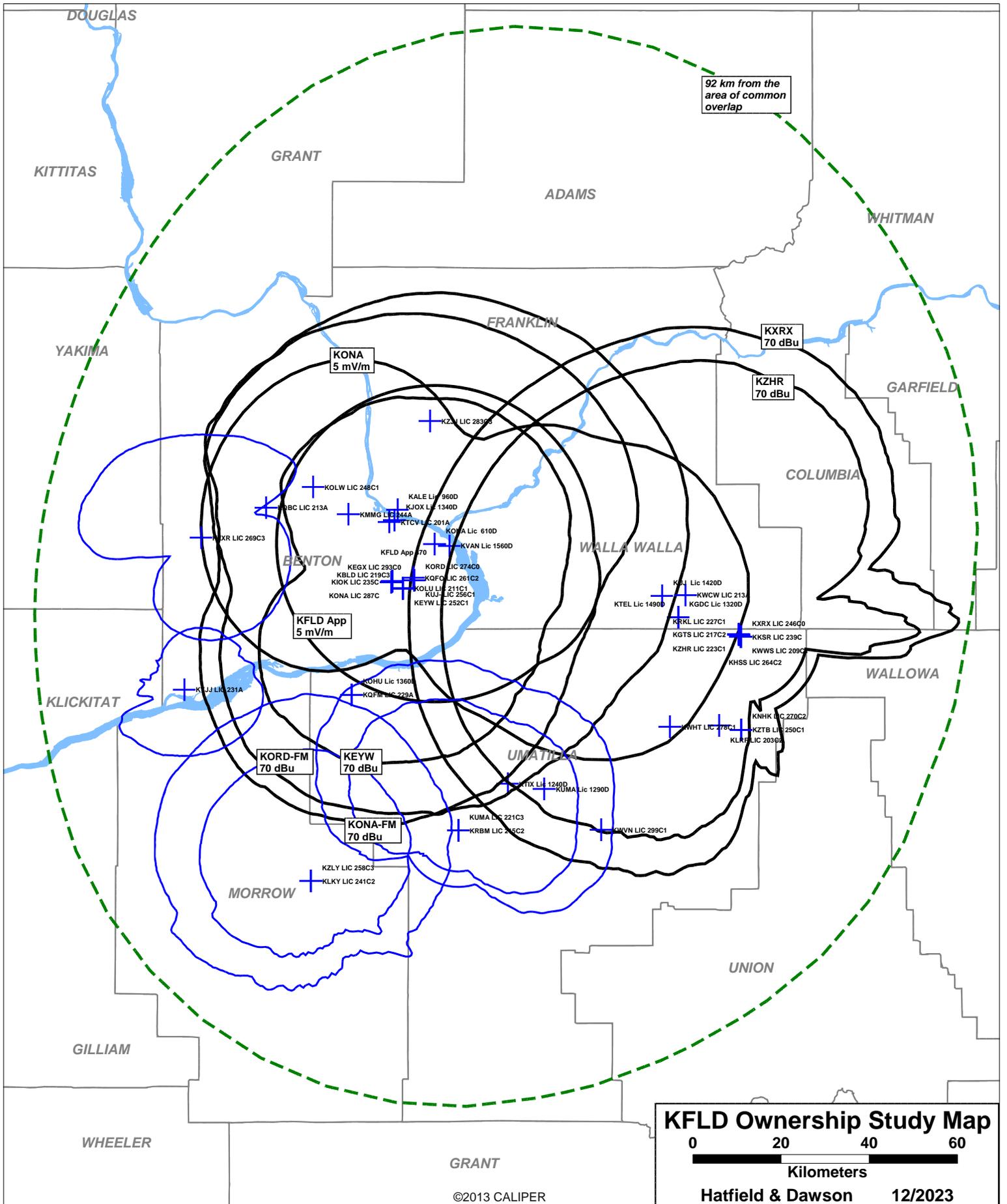
Cluster A (2AM/5FM)
 KFLD(AM), KONA(AM)
 KORD-FM, KXRX(FM), KZHR(FM), KONA-FM, KEYW(FM)

KFLD Ownership Overview Map

0 15 30 45
 Kilometers
 Hatfield & Dawson 12/2023

Stations in the Market

KFLD App 870D	PASCO
KALE Lic 960D	RICHLAND
KGDC Lic 1320D	WALLA WALLA
KJOX Lic 1340D	KENNEWICK
KOHU Lic 1360D	HERMISTON
KONA Lic 610D	KENNEWICK-RICHLAND-PASCO
KTEL Lic 1490D	WALLA WALLA
KTIX Lic 1240D	PENDLETON
KUJ Lic 1420D	WALLA WALLA
KUMA Lic 1290D	PENDLETON
KVAN Lic 1560D	BURBANK
KBLD LIC 219C3	KENNEWICK
KEGX LIC 293C0	RICHLAND
KEYW LIC 252C1	PASCO
KFAE LIC 206C	RICHLAND
KGDN LIC 267C3	PASCO
KGTS LIC 217C2	COLLEGE PLACE
KHSS LIC 264C2	ATHENA
KIOK LIC 235C	RICHLAND
KKSR LIC 239C	WALLA WALLA
KLKY LIC 241C2	STANFIELD
KLRF LIC 203C2	MILTON-FREEWATER
KMMG LIC 244A	BENTON CITY
KNHK LIC 270C2	WESTON
KOLU LIC 211C1	PASCO
KOLW LIC 248C1	BASIN CITY
KONA LIC 287C	KENNEWICK
KORD LIC 274C0	RICHLAND
KQBC LIC 213A	BENTON CITY
KQFM LIC 229A	HERMISTON
KQFO LIC 261C2	PASCO
KRBM LIC 215C2	PENDLETON
KRKL LIC 227C1	WALLA WALLA
KTCV LIC 201A	KENNEWICK
KUJ-FM LIC 256C1	BURBANK
KUMA LIC 221C3	PILOT ROCK
KWCW LIC 213A	WALLA WALLA
KWHT LIC 278C1	PENDLETON
KWVN LIC 299C1	PENDLETON
KWWS LIC 209C1	WALLA WALLA
KXRX LIC 246C0	WALLA WALLA
KYJJ LIC 231A	BOARDMAN
KZHR LIC 223C1	DAYTON
KZJJ LIC 283C3	MESA
KZLY LIC 258C3	IONE
KZTB LIC 250C1	MILTON-FREEWATER
KZXR LIC 269C3	PROSSER



92 km from the area of common overlap

KONA
5 mV/m

KXRX
70 dBu

KZHR
70 dBu

KFLD App
5 mV/m

KORD-FM
70 dBu

KEYW
70 dBu

KONA-FM
70 dBu

KFLD Ownership Study Map

0 20 40 60

Kilometers

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