

Technical Report  
In Support of a  
47 C.F.R. Section 73.3555  
Based  
Interim Contour Method Multiple  
Ownership Study

*for*

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Saga Broadcasting, LLC  
Bellingham, WA Region  
“Interim Method Market A”

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*KBAI(AM) - BELLINGHAM, WA (Facility ID: 4633)*  
*KGMI(AM) - BELLINGHAM, WA (Facility ID: 34467)*  
*KPUG(AM) - BELLINGHAM, WA (Facility ID: 58887)*  
*KAFE(FM) - BELLINGHAM, WA (Facility ID: 58886)*  
*KISM(FM) - BELLINGHAM, WA (Facility ID: 34469)*

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**EXPLANATION OF REPORT:** This Technical Report has been prepared to determine the number of commercial and non-commercial principal community contours associated with the Transfer/Assignment applications for the below Saga Broadcasting, LLC stations. These stations comprise the entirety of the Saga Broadcasting, LLC holdings. In this instance, there will be one (1) interim method market and no BIA markets associated with this grouping. Therefore, this common report has been prepared to address the below five (5) Saga Broadcasting, LLC facilities. Ownership studies for other holdings associated with parent company Saga Communications, Inc., have been prepared separately. This Interim Contour-Overlap Methodology Study has been prepared to address the unrated market portions for each filing.

Saga Broadcasting, LLC, presently holds a broadcast interest in five (5) total aural services relevant to these Transfer/Assignment filings. Saga holdings not overlapping these groupings need not be discussed herein. Concerning these relevant holdings, there will be one (1) unique and distinct interim method market within this affected ownership group. "Market A" is comprised of five (5) stations as follows:

<b>"Market A"</b>					
<b>CALL SIGN</b>	<b>CH/FREQ</b>	<b>CITY</b>	<b>STATE</b>	<b>FILE NUMBER</b>	
KBAI (AM)	930	BELLINGHAM	WA	BL20060317AGL	
KGMI (AM)	790	BELLINGHAM	WA	BL20121211ACS	
KPUG (AM)	1170	BELLINGHAM	WA	BMML20100722HYX	
KAFE (FM)	281C	Bellingham	WA	BLH20091204ADR	
KISM (FM)	225C	Bellingham	WA	BMLH20121004AAE	

**EXPLANATION OF METHODOLOGY:** The facilities and results reported herein were taken from current copies of AM and FM computer databases as prepared by the FCC and supplied by V-Soft Communications, LLC. The facilities listed above serve as the basis for the respective principal community contours studied. The accuracy of the results of these studies is understood to be limited to the accuracy of these databases. The FCC databases give no indication of licensed facilities that may be inoperative, construction permit facilities that may now be operating under program test authority (but have not yet been issued a license) or facilities which may have been licensed since the last update. Therefore, some stations may have been included or excluded erroneously. However, unless otherwise indicated, all licensed facilities known to be inoperative and all known applications and construction permit facilities, have been eliminated from consideration in this study.

For AM stations, Map M3 soil conductivity values and the authorized licensed transmitting facilities served as the basis for the computation of the predicted 5.0 mV/m groundwave contour in accordance with 47 C.F.R. Section 73.183 of the FCC Rules. The distance to the contour was computed for seventy-two (72) equally spaced azimuths beginning with 0° True. For FM stations, the authorized Center of Radiation and ERP values were utilized to compute the predicted 3.16 mV/m (70 dBμ) contour as provided in 47 C.F.R. Section 73.313 of the Rules. The predicted FM contours shown in this report are based on seventy-two (72) equally spaced terrain radials beginning with 0° True and assume NED 03 Second Terrain data.

As stated before, there will be one (1) unique and distinct interim method market within this affected ownership group. The interim market has been defined, in accordance with 47 C.F.R. Section 73.3555 of the FCC Rules, as the area within the total perimeter formed by the combined principal community contours of each relevant interim market as noted above.

**EXPLANATION OF RESULTS:** The five (5) stations, under common control and relevant for this ownership group, have been noted in **Exhibit 1.0**. As stated before, no other Saga Broadcasting, LLC holdings, or any other holdings of parent company Saga Communications, Inc., are affected by these stations. To aid in identifying the respective contours, currently controlled AM contours have been shown with solid light red lines. Currently controlled FM contours have been shown with varying-colored solid lines. The “Market A” common overlap area has been designated as well.

For “Market A”, the market defining contours have been shown in **Exhibit 2.0** of this report along with a total number of principal community contours entering the market. The defining contours have been shown with yellow lines on this map. AM contours entering the market have been denoted in blue lines. FM contour entering the market have been shown in red lines. As stated before, the contours shown represent the total number of stations entering or defining the market. Co-owned stations entering the market, but not defining the market have been omitted. Under the current rules, the market falls within the minimum limitations set forth in §73.3555(a)(1)(ii): *In a radio market with between 30 and 44 (inclusive) full-power, commercial and noncommercial radio stations, not more than 7 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM) may be owned.* The principal community contours of thirty-three (33) other stations entering the market are shown in **Exhibit 2.0**. Including the three (3) AM and two (2) FM station(s) which define the market, there are thirty-eight (38) aural services in this market. **Exhibit 2.1** lists the facilities of the individual stations used in this report.

**CERTIFICATION OF TECHNICAL CONSULTANT:** *I declare, under penalty of perjury, that the contents of this report are true and accurate to the best of my knowledge and belief. I further certify I have over twenty-four years of experience as a broadcast technical consultant before the Federal Communications Commission (“the FCC”); and am familiar with the Code of Federal Regulations Title 47 (“the Rules”) as pertaining to this report and its contents herein. The underlying data utilized in this report was taken directly from FCC databases or indirectly through third party software vendors securing data directly from FCC databases. This firm cannot be held liable for errors or omissions resulting from the underlying data. The information contained herein is believed accurate to the date reported below.*

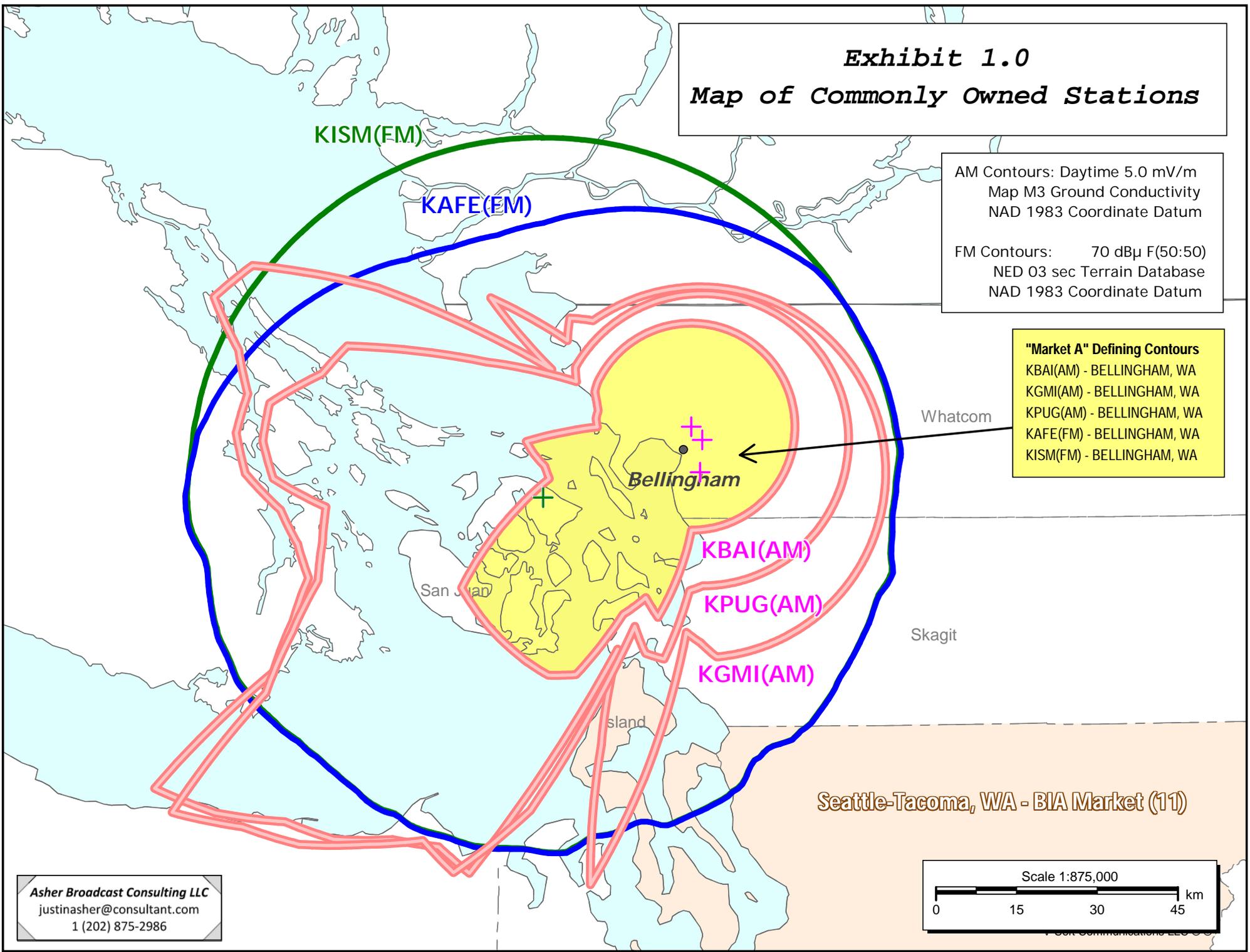
  
Justin W. Asher  
Technical Consultant  
July 3, 2023

**Exhibit 1.0**  
**Map of Commonly Owned Stations**

AM Contours: Daytime 5.0 mV/m  
 Map M3 Ground Conductivity  
 NAD 1983 Coordinate Datum

FM Contours: 70 dBμ F(50:50)  
 NED 03 sec Terrain Database  
 NAD 1983 Coordinate Datum

**"Market A" Defining Contours**  
 KBAI(AM) - BELLINGHAM, WA  
 KGMI(AM) - BELLINGHAM, WA  
 KPUG(AM) - BELLINGHAM, WA  
 KAFE(FM) - BELLINGHAM, WA  
 KISM(FM) - BELLINGHAM, WA



Whatcom

Bellingham

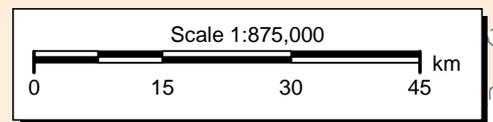
San Juan

Skagit

Island

Seattle-Tacoma, WA - BIA Market (11)

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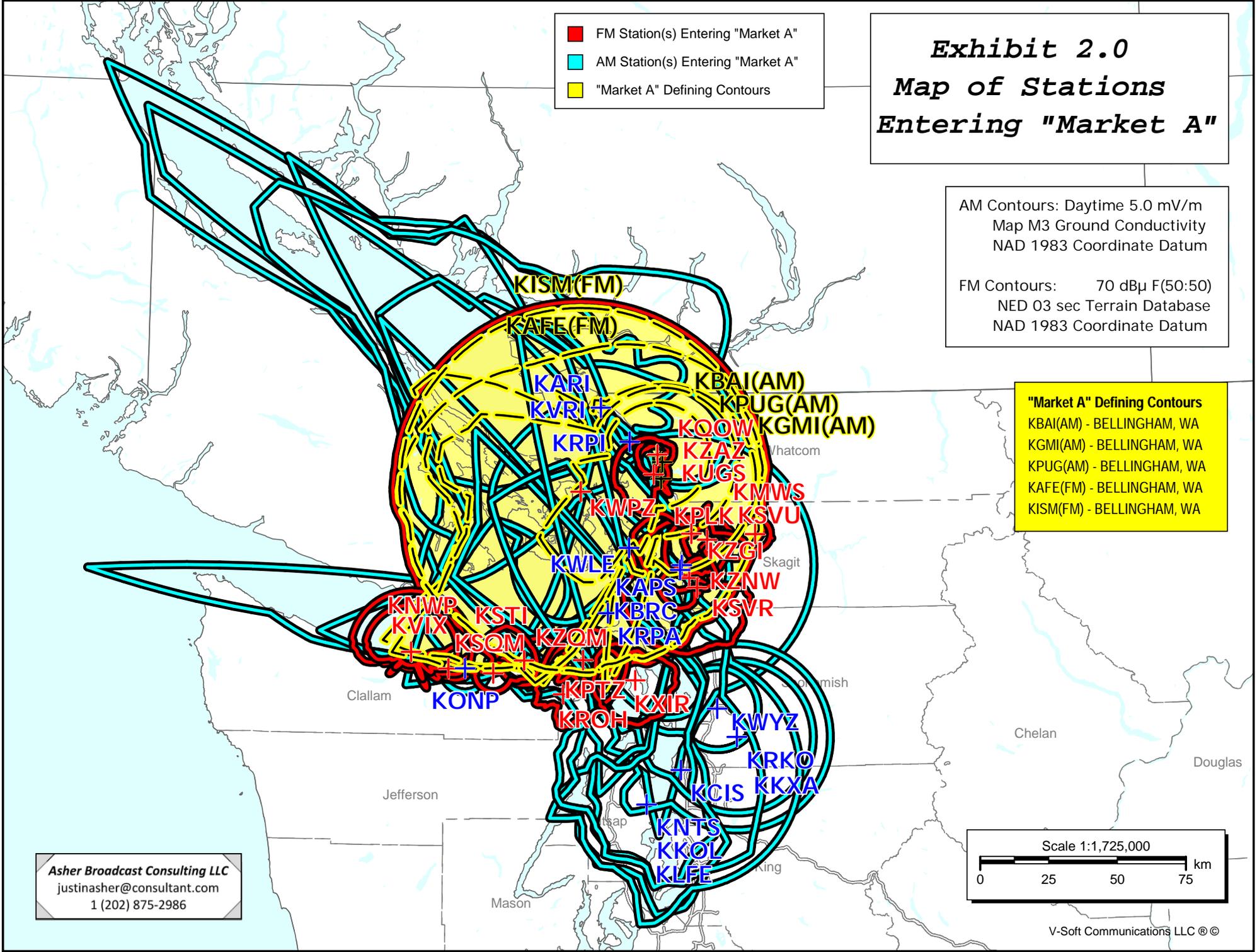
# Exhibit 2.0 Map of Stations Entering "Market A"

- FM Station(s) Entering "Market A"
- AM Station(s) Entering "Market A"
- "Market A" Defining Contours

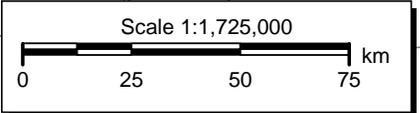
AM Contours: Daytime 5.0 mV/m  
Map M3 Ground Conductivity  
NAD 1983 Coordinate Datum

FM Contours: 70 dBμ F(50:50)  
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**"Market A" Defining Contours**  
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 KAFE(FM) - BELLINGHAM, WA  
 KISM(FM) - BELLINGHAM, WA



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# *Exhibit 2.1*

## *Tabulation of Select Stations Entering "Market A"*

Total number of overlapping contours: 38

Reference:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KBAI (AM)	AM	930	BELLINGHAM	WA	BL20060317AGL	0.0	0.0
KGMI (AM)	AM	790	BELLINGHAM	WA	BL20121211ACS	8.6	169.3
KPUG (AM)	AM	1170	BELLINGHAM	WA	BMML20100722HYX	3.2	140.1
KAFE (FM)	FM	281C	Bellingham	WA	BLH20091204ADR	30.5	244.7
KISM (FM)	FM	225C	Bellingham	WA	BMLH20121004AAE	30.5	244.6

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KPLK	FM	205A	Sedro-Woolley	WA	BLED20131017CGN	31.2	156.2
KUGS	FM	207A	Bellingham	WA	0000130535	7.0	188.8
KVIX	FM	207A	Port Angeles	WA	BLED20050401BGM	114.5	231.5
KMWS	FM	209A	Mount Vernon	WA	BLED20070919AAE	31.2	156.2
KXIR	FM	210A	Freeland	WA	BLED20131030AFJ	82.2	185.5
KSVU	FM	211A	Hamilton	WA	0000157774	45.9	128.7
KNWP	FM	211A	Port Angeles	WA	BLED19980424KD	114.5	231.5
KQOW	FM	212A	Bellingham	WA	BLED20110815AAC	0.5	46.2
KROH	FM	216C2	Port Townsend	WA	BLED20110607ABY	93.4	201.5
KSQM	FM	218A	Sequim	WA	BLED20151112XON	99.1	217.0
KSVR	FM	219A	Mount Vernon	WA	BLED20021112AAQ	46.1	165.3
KZAZ	FM	219A	Bellingham	WA	BLED19910828KA	0.5	46.4
KPTZ	FM	220A	Port Townsend	WA	BLED20130510ACX	79.2	199.9
KSTI	FM	271A	Port Angeles	WA	BLH20141112AMY	108.5	224.5
KZNW	FM	277C3	Oak Harbor	WA	BLH20160511ABF	50.3	163.0
KZQM	FM	285A	Sequim	WA	BLH20171221ACM	88.9	213.0
KZGI	FM	289A	Sedro-Woolley	WA	BLH20170124ABU	35.8	149.1
KWPZ	FM	293C	Lynden	WA	BMLH20081008AJR	30.7	244.6
KKOL	AM	1300	SEATTLE	WA	BMML20190624ACC	127.1	181.7
KCIS	AM	630	EDMONDS	WA	BMML20160224ABI	114.8	175.7
KLFE	AM	1590	SEATTLE	WA	BMML20190624ACF	127.1	181.7
KNTS	AM	1680	SEATTLE	WA	BL20030415ADQ	127.1	181.7
KWYZ	AM	1230	EVERETT	WA	BL13828	94.8	166.6
KKXA	AM	1520	SNOHOMISH	WA	BMML20130207ACJ	106.6	164.1
KRKO	AM	1380	EVERETT	WA	BL20110824BDB	106.5	164.2
KARI	AM	550	BLAINE	WA	BL19821025AG	26.7	310.7
KWLE	AM	1340	ANACORTES	WA	BL12617	35.1	196.8
KAPS	AM	660	MOUNT VERNON	WA	BL19920205AA	41.0	167.2
KRPA	AM	1110	OAK HARBOR	WA	BMML20210601AAK	60.1	197.3
KVRI	AM	1600	BLAINE	WA	BL20020114ABE	26.7	310.7
KBRC	AM	1430	MOUNT VERNON	WA	BL6249	42.6	168.6
KRPI	AM	1550	FERNDALE	WA	BL19890424AI	11.1	296.9
KONP	AM	1450	PORT ANGELES	WA	BL20120426ACS	104.3	222.1

Distance and bearing calculations from coordinates: 48-47-53 N, 122-28-01 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.

**\* Co-owned stations entering, but not defining the market, have been excluded.**

**\* Stations more than 92 km from the common area have been excluded.**