

MULTIPLE OWNERSHIP ANALYSIS

P & A MEDIA, LLC.

Prepared By:

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December 2023

I am a Radio Consulting Engineer. My education and experience are a matter of record with the Federal Communications Commission. I have been authorized to prepare this statement and exhibits to review compliance with the multiple ownership rules for P & A Media, LLC. This statement and attached exhibits demonstrate full compliance with the Commission's Multiple Ownership rules.

Proposed Properties being assigned to P & A Media, LLC.

1. P & A Media, LLC to acquire the following:

- | | | |
|----|---------------------------|-------------|
| a. | KIKC(AM), Forsyth, MT | FIN: 48301 |
| b. | KIKC(FM), Forsyth, MT | FIN: 448300 |
| c. | KMTA(AM), Miles City, MT | FIN: 42379 |
| d. | KYUS(FM), Miles City, MT | FIN: 42380 |
| e. | KGCX(FM), Sidney, MT | FIN: 84342 |
| f. | KDSR(FM), Williston, ND | FIN: 56970 |
| g. | KXWI(FM), Williston, ND | FIN: 190377 |
| h. | KXDI(FM), Belfield, ND | FIN: 189497 |
| i. | KQLZ(FM), New England, ND | FIN: 164305 |
| j. | KDZN(FM), Glendive, MT | FIN: 39610 |
| k. | KXGN(AM), Glendive, MT | FIN: 24285 |

The attached exhibits depict the principal community contours of all eleven stations located in North Dakota and Montana under the proposed assignment. **See Figure 1.** The stations are not home to an Arbitron rated market.

There is mutual overlap of the principal community contours of the proposed commonly owned stations which define four unique common overlap groups of stations; the groups are independent groups that do not overlap each other. The groups are defined as follows:

Group #1 Stations (common overlap)

- | | | |
|---|--------------------------|-------------|
| • | KIKC(AM), Forsyth, MT | FIN: 48301 |
| • | KIKC(FM), Forsyth, MT | FIN: 448300 |
| • | KMTA(AM), Miles City, MT | FIN: 42379 |
| • | KYUS(FM), Miles City, MT | FIN: 42380 |

Group #2 Stations (common overlap)

- | | | |
|---|-------------------------|-------------|
| • | KGCX(FM), Sidney, MT | FIN: 84342 |
| • | KDSR(FM), Williston, ND | FIN: 56970 |
| • | KXWI(FM), Williston, ND | FIN: 190377 |

Group #3 Stations (common overlap)

- KXDI(FM), Dickinson, ND FIN: 189497
- KQLZ(FM), Dickinson, ND FIN: 164305

Group #4 Stations (common overlap)

- KDZN(FM), Glendive, MT FIN: 39610
- KXGN(AM), Glendive, MT FIN: 24285

For FM stations, the principal community contour is the predicted 3.16 mV/m (70 dBu) contour computed in accordance with Section 73.313 of the FCC Rules. For AM stations, the principal community contour is the predicted daytime 5.0 mV/m groundwave contour computed in accordance with Section 73.183 of the FCC Rules.

Multiple Ownership Rules

Section 73.3555 of Commission's Rule and Regulations

(a)(1) Local radio ownership rule. A person or single entity (or entities under common control) may have a cognizable interest in licenses for AM or FM radio broadcast stations in accordance with the following limits:

(i) In a radio market with 45 or more full-power, commercial and noncommercial radio stations, not more than 8 commercial radio stations in total and not more than 5 commercial stations in the same service (AM or FM);

(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);

(iii) In a radio market with between 15 and 29 (inclusive) full-power, commercial and noncommercial radio stations, not more than 6 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM);

(iv) In a radio market with 14 or fewer full-power, commercial and noncommercial radio stations, not more than 5 commercial radio stations in total and not more than 3 commercial stations in the same service (AM or FM); provided, however, that no person or single entity (or entities under common control) may have a cognizable interest in more than 50% of the full-power, commercial and noncommercial radio stations in such market unless the combination of stations comprises not more than one AM and one FM station.

GROUP #1

The analysis of **Group 1** herein is subject to the above-noted rules highlighted in bold. Section 73.3555(a)(1)(iv). Two relevant “markets” will exist, **Market #1 and Market #2**. See *Figure MT-1-A and Figure MT-2-A*. The markets are defined by the 70 dbu and 5 mV/m contours of the following stations:

Market #1

KIKC(FM),	Forsyth, MT
KMTA(AM),	Miles City, MT
KYUS(FM),	Miles City, MT

Market #2

KIKC(AM),	Forsyth, MT
KIKC(FM),	Forsyth, MT
KYUS(FM),	Miles City, MT

Market #1 consists of three (3) commercial radio stations under common control. Since no more than 5 commercial radio stations and no more than 3 stations are in the same service, the proponent may control no more than 50% of the stations in the relevant market. In the present case, the combination of stations comprises of only **one (1) AM** stations and **two (2) FM** stations.

A search for other non-commonly owned stations in the region was conducted to determine if at least 3 other FM and AM radio stations provide principal community grade service to a portion of the proposed radio market. Radio stations outside of 92 kilometers were not considered.

The search rendered at **a minimum four (4) additional** licensed stations relevant to the market:

KMCJ(FM),	Colstrip, MT
KYPR(FM),	Miles City, MT
KATL(AM),	Miles City, MT
KQQM(FM),	Miles City, MT

Figure MT-1-B depicts other stations serving the market.

Market #2 consists of three (3) commercial radio stations under common control. Since no more than 5 commercial radio stations and no more than 3 stations are in the same service, the proponent may control no more than 50% of the stations in the relevant market. In the present case, the combination of stations comprises of only **one (1) AM** stations and **two (2) FM** stations.

A search for other non-commonly owned stations in the region was conducted to determine if at least 3 other FM and AM radio stations provide principal community grade service to a portion of the proposed radio market. Radio stations outside of 92 kilometers were not considered.

The search rendered at **a minimum four (4) additional** licensed stations relevant to the market:

KMCJ(FM), Colstrip, MT
KECC(FM), Miles City, MT
KATL(AM), Miles City, MT
KQQM(FM), Miles City, MT

Figure MT-2-B depicts other stations serving the market.

GROUP #2

The analysis of Group 2 herein is subject to the above-noted rules highlighted in bold. Section 73.3555(a)(1)(iv). One relevant worst-case “market” is defined by the following stations in Group 2. **See Figure MT-ND-1-A.** The markets are defined by the 70 dbu contours of the following stations:

KGCX(FM), Sidney, MT
KDSR(FM), Williston, ND
KXWI(FM), Williston, ND

The market consists of three (3) commercial radio stations under common control. Since no more than 5 commercial radio stations and no more than 3 stations are in the same service, the proponent may control no more than 50% of the stations in the relevant market. In the present case, the combination of stations comprises of **three (3)** FM stations.

A search for other non-commonly owned stations in the region was conducted to determine if at least 3 other FM and AM radio stations provide principal community grade service to a portion of the proposed radio market. Radio stations outside of 92 kilometers were not considered.

The search rendered at **a minimum four (4) additional** licensed stations relevant to the market:

KYYZ(FM), Williston, ND
KPPW(FM), Williston, ND
KPPR(FM), Williston, ND
KJND(FM), Williston, ND

Figure MT-ND-1-B depicts other stations serving the market

GROUP #3

The analysis of Group 2 herein is subject to the above-noted rules highlighted in bold. Section 73.3555(a)(1)(iv). One relevant worst-case “market” is defined by the following stations in Group 3. **See Figure ND-3-A.** The markets are defined by the 70 dbu contours of the following stations:

KXDI(FM), Dickinson, ND
KQLZ(FM), Dickinson, ND

The market consists of two (2) commercial radio stations under common control. Since no more than 5 commercial radio stations and no more than 3 stations are in the same service, the proponent may control no more than 50% of the stations in the relevant market. In the present case, the combination of stations comprises of **two (2)** FM stations.

A search for other non-commonly owned stations in the region was conducted to determine if at least 2 other FM and AM radio stations provide principal community grade service to a portion of the proposed radio market. Radio stations outside of 92 kilometers were not considered.

The search rendered at **a minimum three (3) additional** licensed stations relevant to the market:

KZZQ(FM), Richardton, ND
KCAD(FM), Dickinson, ND
KDPR(FM), Dickinson, ND

Figure ND-3-B depicts other stations serving the market

GROUP #4

The analysis of Group 2 herein is subject to the above-noted rules highlighted in bold. Section 73.3555(a)(1)(iv). One relevant worst-case “market” is defined by the following stations in Group 4. **See Figure ND-4-A.** The markets are defined by the 70 dbu contours of the following stations:

KDZN(FM), Glendive, MT
KXGN(AM), Glendive, MT

The market consists of two (2) commercial radio stations under common control. Since no more than 5 commercial radio stations and no more than 3 stations are in the same service, the proponent may control no more than 50% of the stations in the relevant market. In the present case, the combination of stations comprises of **one (1)** AM station and **one (1)** FM station.

Pursuant to Section 73.3555(a)(1)(iv), since the combination of stations comprises of not more than one AM and one FM station, no further analysis is necessary as an AM/FM combination alone is permissible.

CONCLUSION

Based on the information provided herein, the proposed assignment is in full compliance with the Commission's Multiple Ownership limits. Specifically, all of the radio markets consist of 14 or fewer full-power, commercial and noncommercial radio stations, as such, not more than 5 commercial radio stations in total and not more than 3 commercial stations in the same service (AM or FM); provided, however, that no person or single entity (or entities under common control) may have a cognizable interest in more than 50% of the full-power, commercial and noncommercial radio stations in such market unless the combination of stations comprises not more than one AM and one FM station.

Based on my analysis, the proposed assignment is in full compliance with the requirements of § 73.3555(a)(1)(iv).

This statement and attached exhibit was prepared by me or under my direct supervision and is believed to be true and correct.



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Date: December 29, 2023

Proposed Ownership Group Figure 1

FM 70 dBu/AM 5 mV/m Contours



70 dBu (F50,50) contour



KIKC(FM), Forsyth, MT



70 dBu (F50,50) contour



KYUS(FM), Miles City, MT



70 dBu (F50,50) contour



KGCX(FM), Sidney, MT



70 dBu (F50,50) contour



KDSR(FM), Williston, ND



70 dBu (F50,50) contour



KXWI(FM), Williston, ND



70 dBu (F50,50) contour



KXDI(FM), Belfield, ND



70 dBu (F50,50) contour



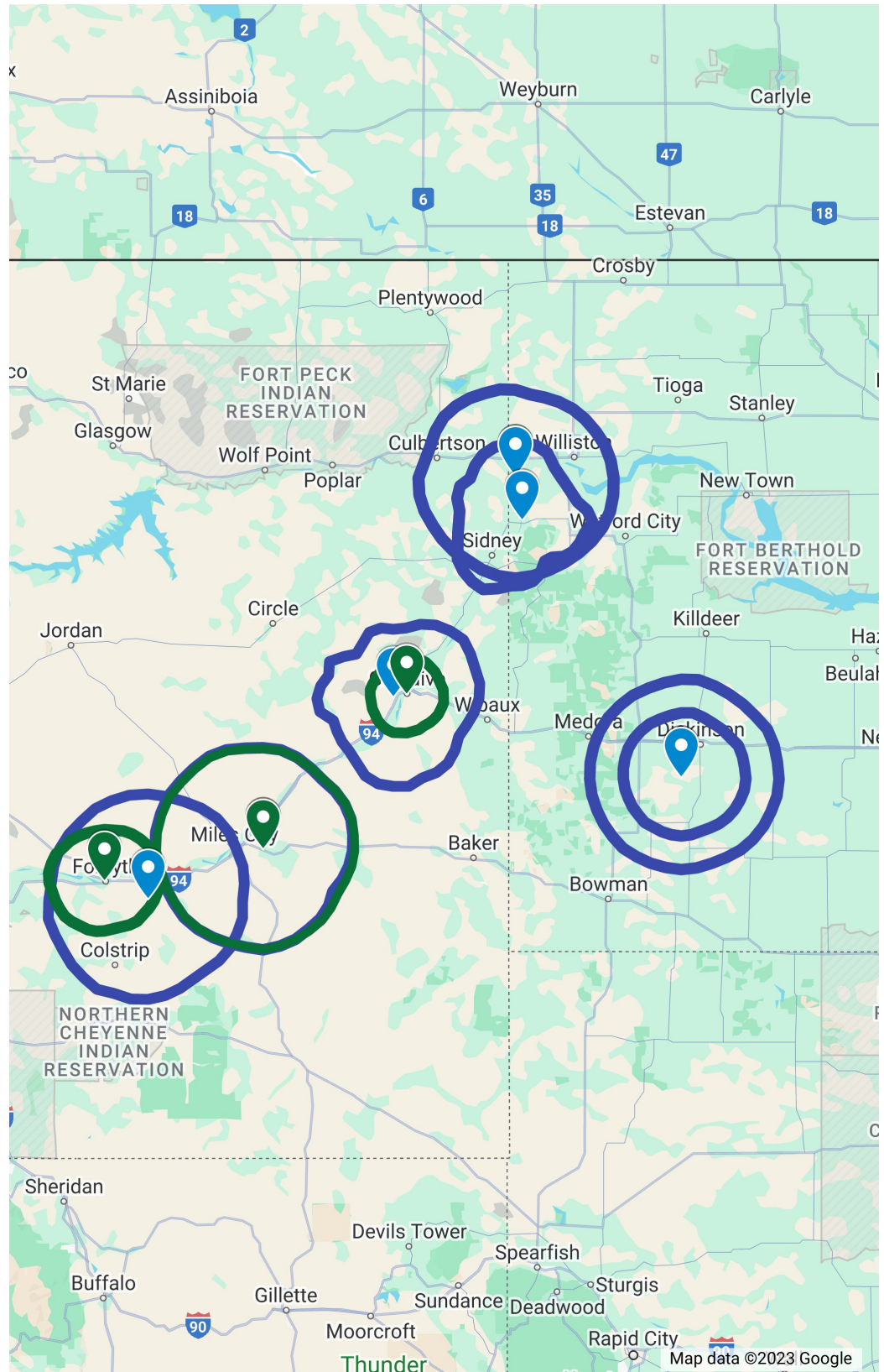
KQLZ(FM), New England, ND



70 dBu (F50,50) contour



KDZN(FM), Glendive, MT



Group 1 Market #1 & Market #2

FM 70 dBu/AM 5 mV/m Contours



70 dBu (F50,50) contour



KIKC(FM), Forsyth, MT



70 dBu (F50,50) contour



KYUS(FM), Miles City, MT



70 dBu (F50,50) contour



KGCX(FM), Sidney, MT



70 dBu (F50,50) contour



KDSR(FM), Williston, ND



70 dBu (F50,50) contour



KXWI(FM), Williston, ND



70 dBu (F50,50) contour



KXDI(FM), Belfield, ND



70 dBu (F50,50) contour



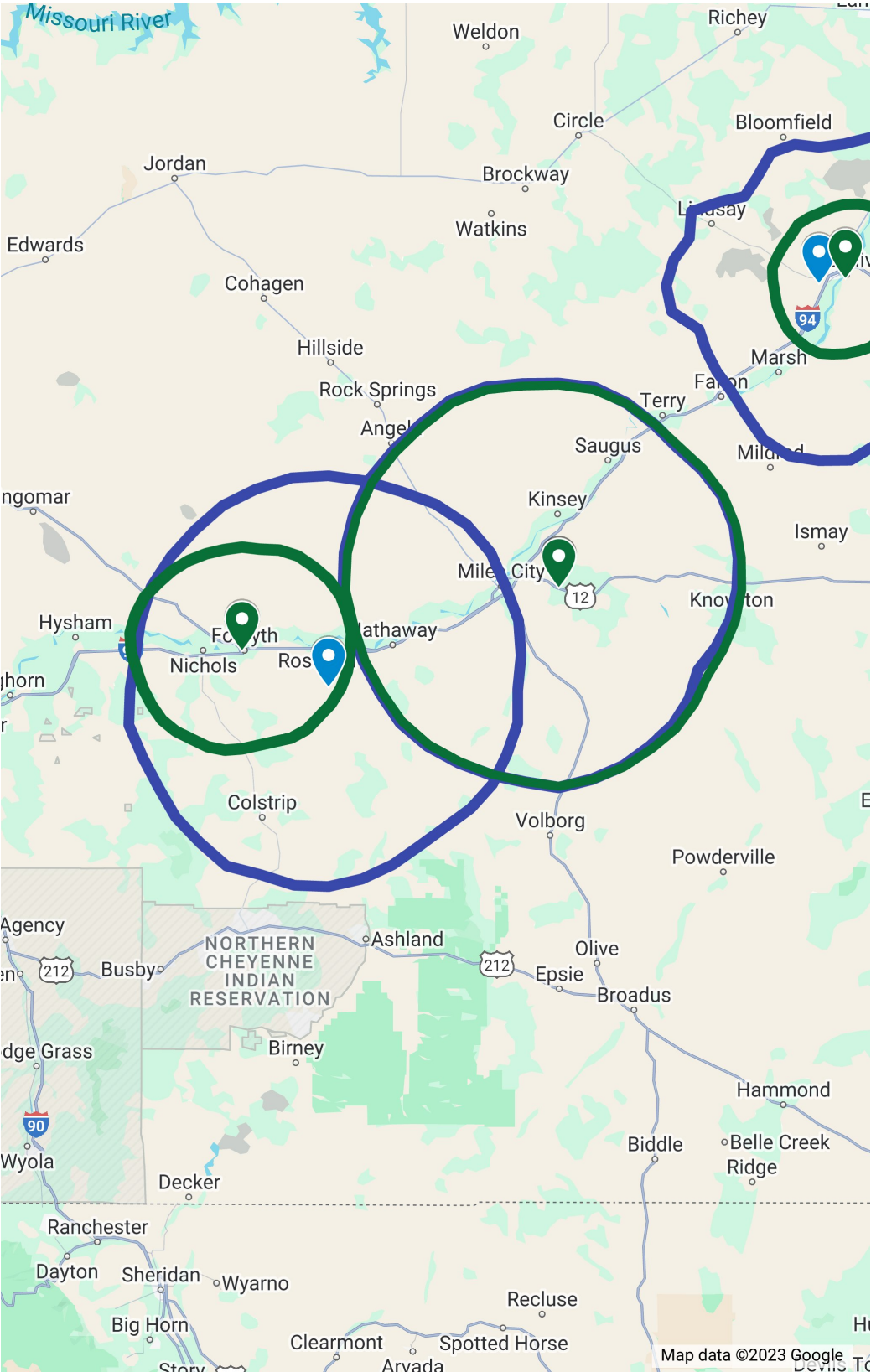
KQLZ(FM), New England, ND



70 dBu (F50,50) contour



KDZN(FM), Glendive, MT



KIKC(AM) 5.0 mV/m Contour



5.0 mV/m contour



KIKC(AM)

KMTA(AM) 5.0 mV/m Countour



5.0 mV/m Contour



KMTA(AM)

KXGN(AM) 5.0 mV/m Contour



5.0 mV/m contour



KXGN(AM)

Group 1 MT-1-B & MT-2-B

FM 70 dBu/AM 5 mV/m Contours



70 dBu (F50,50) contour



70 dBu (F50,50) contour

KIKC(AM) 5.0 mV/m Contour



5.0 mV/m contour



KIKC(AM)

KMTA(AM) 5.0 mV/m Countour



5.0 mV/m Contour



KMTA(AM)

KATL(AM)



KATL, Miles City

KMCJ(FM)



KMCJ, Colstrip, MT

KQQM(FM)

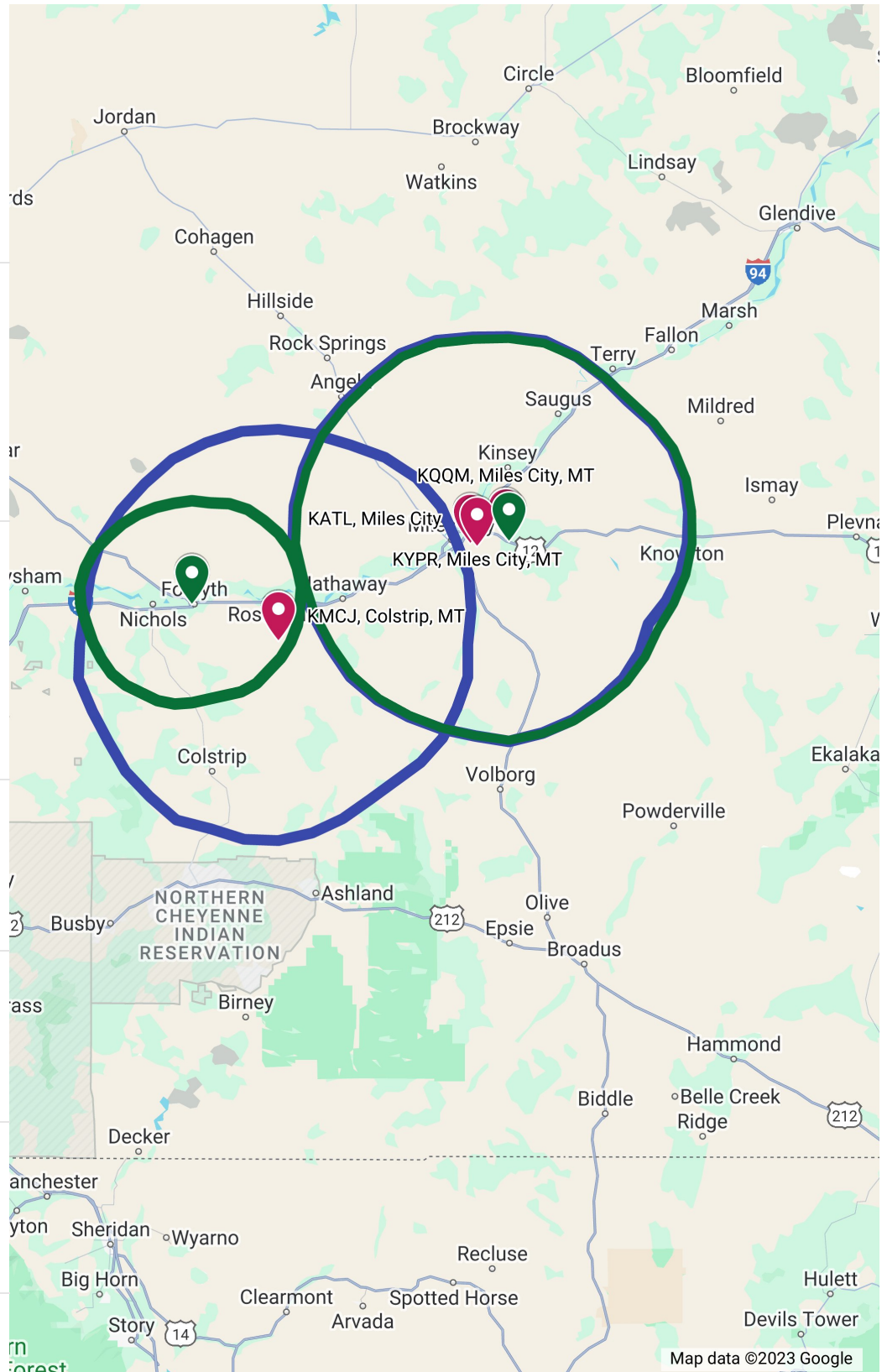


KQQM, Miles City, MT

KYPR(FM)



















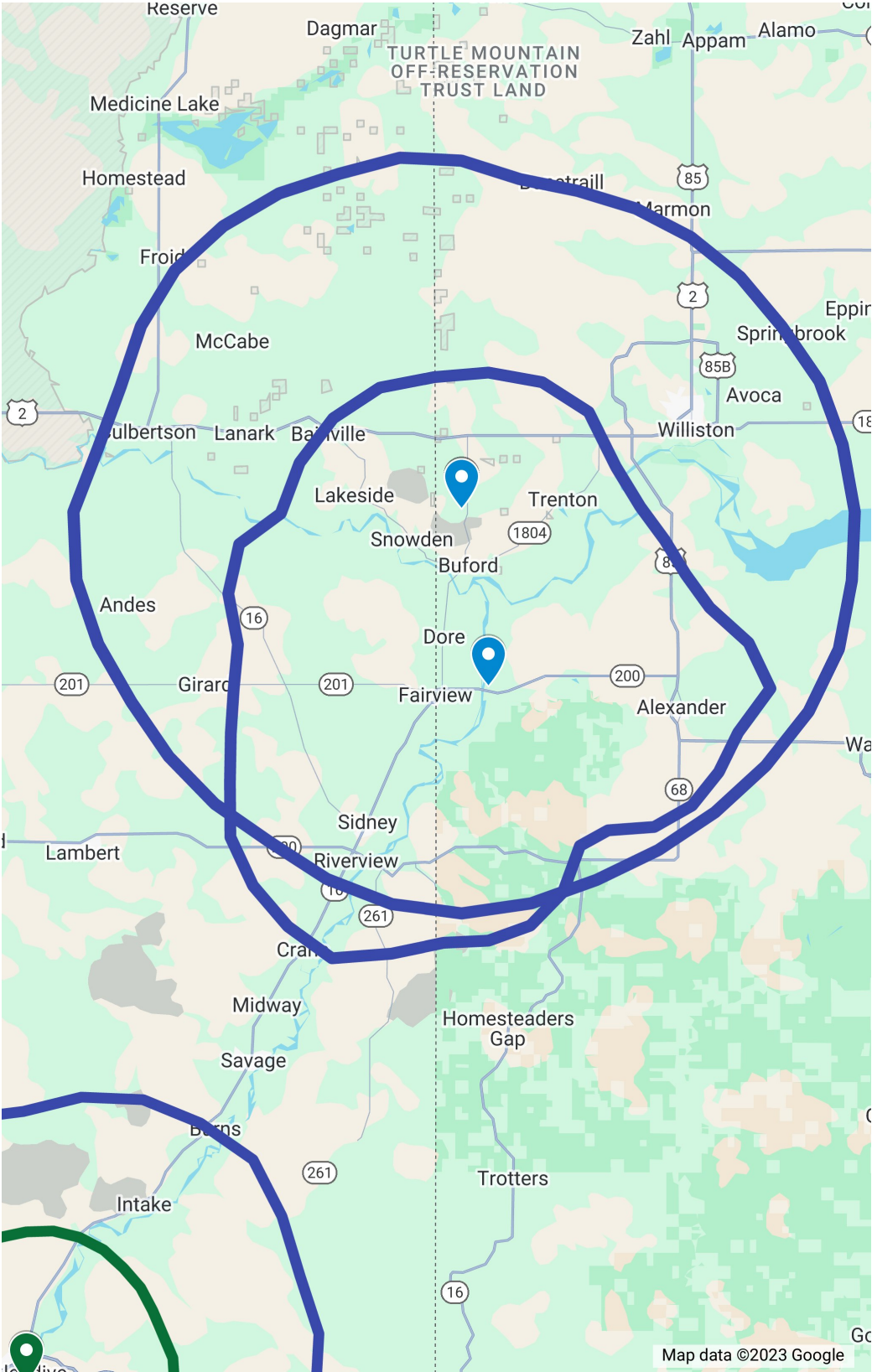
KYPR, Miles City, MT



Group 2 Market #1 & #2 Fig. MT-ND-1-A

FM 70 dBu/AM 5 mV/m Contours

-  70 dBu (F50,50) contour
-  KIKC(FM), Forsyth, MT
-  70 dBu (F50,50) contour
-  KYUS(FM), Miles City, MT
-  70 dBu (F50,50) contour
-  KGCX(FM), Sidney, MT
-  70 dBu (F50,50) contour
-  KDSR(FM), Williston, ND
-  70 dBu (F50,50) contour
-  KXWI(FM), Williston, ND
-  70 dBu (F50,50) contour
-  KXDI(FM), Belfield, ND
-  70 dBu (F50,50) contour
-  KQLZ(FM), New England, ND
-  70 dBu (F50,50) contour
-  KDZN(FM), Glendive, MT



KIKC(AM) 5.0 mV/m Contour



5.0 mV/m contour



KIKC(AM)

KMTA(AM) 5.0 mV/m Countour



5.0 mV/m Contour



KMTA(AM)

KXGN(AM) 5.0 mV/m Contour

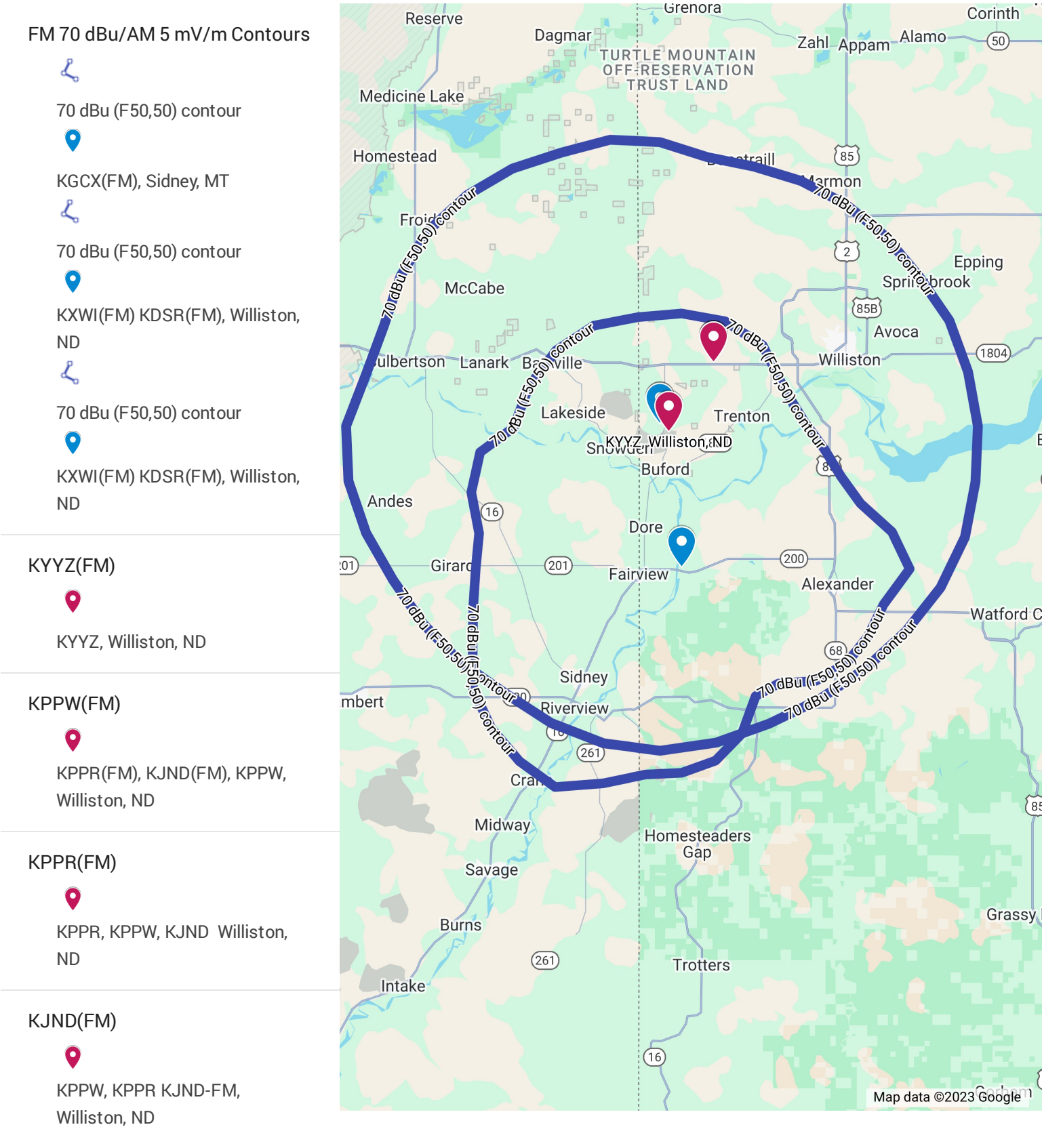


5.0 mV/m contour



KXGN(AM)

Group 2 Figure MT-ND-1-B



Group 3 Market #1 Fig. ND-3-A

FM 70 dBu/AM 5 mV/m Contours



70 dBu (F50,50) contour



KIKC(FM), Forsyth, MT



70 dBu (F50,50) contour



KYUS(FM), Miles City, MT



70 dBu (F50,50) contour



KGCX(FM), Sidney, MT



70 dBu (F50,50) contour



KDSR(FM), Williston, ND



70 dBu (F50,50) contour



KXWI(FM), Williston, ND



70 dBu (F50,50) contour



KXDI(FM), Belfield, ND



70 dBu (F50,50) contour



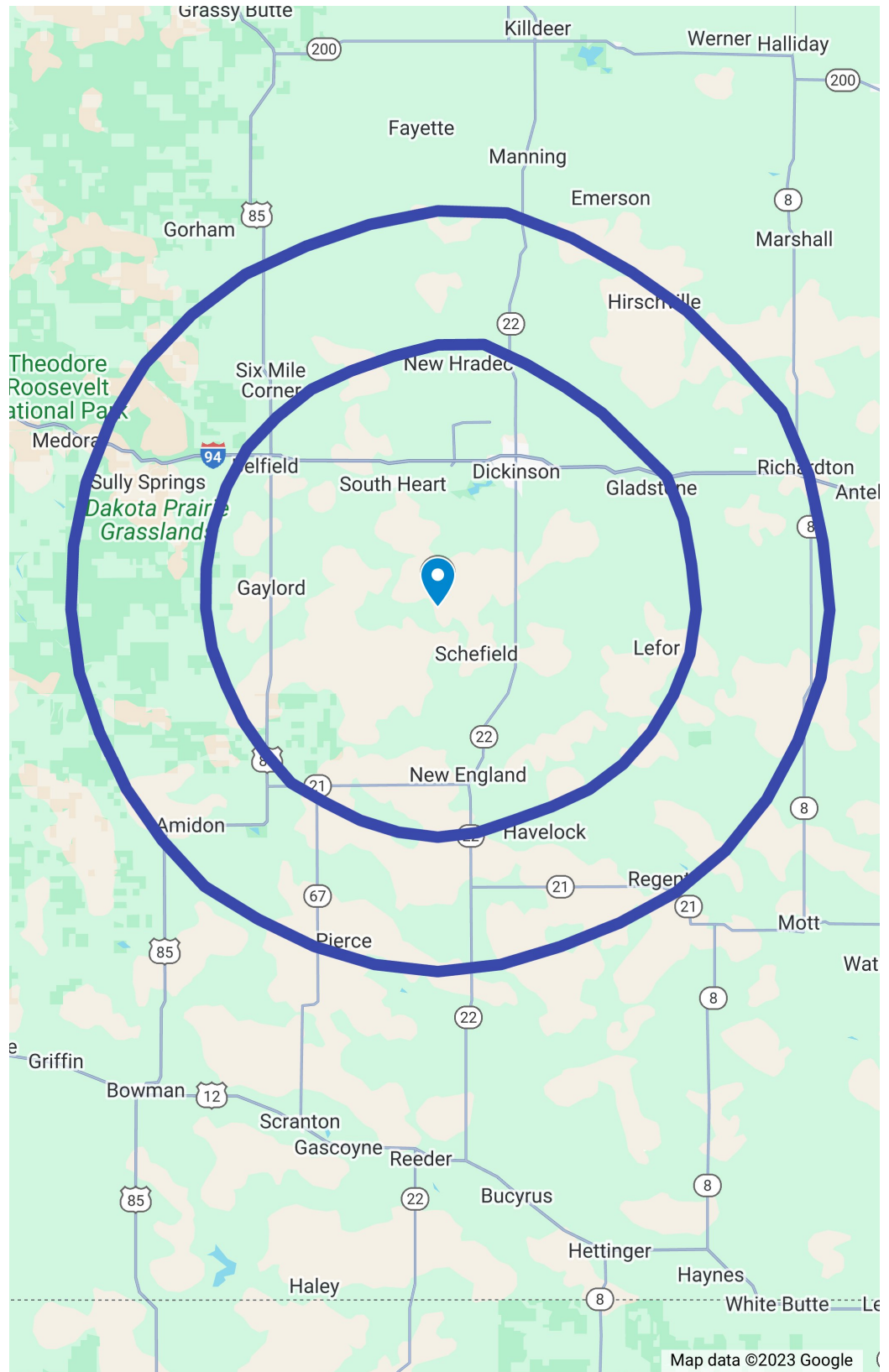
KQLZ(FM), New England, ND



70 dBu (F50,50) contour



KDZN(FM), Glendive, MT



KIKC(AM) 5.0 mV/m Contour



5.0 mV/m contour



KIKC(AM)

KMTA(AM) 5.0 mV/m Countour



5.0 mV/m Contour



KMTA(AM)

KXGN(AM) 5.0 mV/m Contour



5.0 mV/m contour



KXGN(AM)

Group 3 Fig. ND-3-B

FM 70 dBu/AM 5 mV/m Contours



KXDI(FM) 70 dBu (F50,50)
contour



KQLZ(FM) 70 dBu (F50,50)
contour

KZZQ(FM)



KZZQ, Richardton, ND

KCAD(FM)

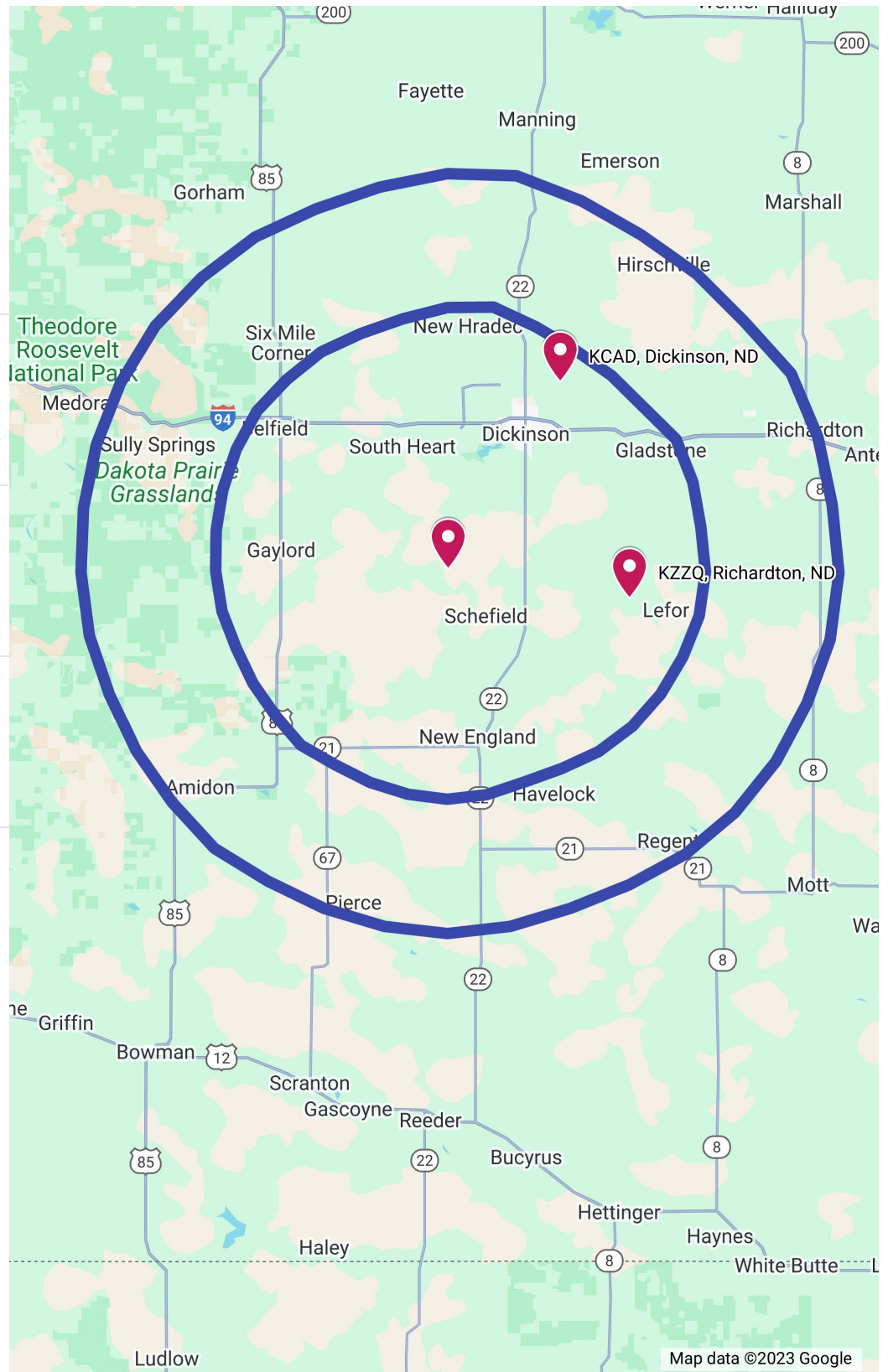


KCAD, Dickinson, ND

KDPR(FM)



KDPR, Dickinson, ND



KIKC(AM) 5.0 mV/m Contour



5.0 mV/m contour



KIKC(AM)

KMTA(AM) 5.0 mV/m Countour



5.0 mV/m Contour



KMTA(AM)

KXGN(AM) 5.0 mV/m Contour



5.0 mV/m contour



KXGN(AM)

Group 4 Market #1 Fig. ND-4-A

