

STEPHEN S. LOCKWOOD, PE, PMP

---

THOMAS M. ECKELS, PE  
ERIK C. SWANSON, PE, PMP  
THOMAS S. GORTON, PE

---

JAMES B. HATFIELD, PE  
BENJAMIN F. DAWSON III, PE  
STEPHEN PUMPLE, M.Eng, MBA, PMP  
CONSULTANTS

HATFIELD & DAWSON  
CONSULTING ELECTRICAL ENGINEERS  
9500 GREENWOOD AVE. N.  
SEATTLE, WASHINGTON 98103

TELEPHONE (206) 783-9151

E-MAIL hatdaw@hatdaw.com

---

MAURY L. HATFIELD, PE  
(1942-2009)  
PAUL W. LEONARD, PE  
(1925-2011)

## **MULTIPLE OWNERSHIP SERVICE CONTOUR ANALYSIS**

**Prepared for  
Townsquare License, LLC  
January 2024**

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 KDXU at St. George, Utah. The proposed facility will have principal community contour overlap with the following attributable stations (although not all in the same location):

KDXU	890 kHz	St. George
KSUB	590 kHz	Cedar City <sup>1</sup>
KHKR	1210 kHz	Washington
KXFF	291C1	Colorado City
KIYK	297C2	St. George
KXBN	221C	Cedar City
KREC	251C	Brian Head
KCIN	235C1	Cedar City

### **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

---

<sup>1</sup> KSUB holds a construction permit, only to make changes to the nighttime operation. Consequently, the KSUB construction permit has no bearing on this ownership study.

FM Database. The listed antenna height above average terrain was used together with 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 which are attributable but which are not a part of the discrete cluster being studied.

The modified KDXU facility, along with the other attributable stations in the vicinity, form three separate station clusters for ownership evaluation purposes. These clusters are depicted on the attached ownership overview map. The following study evidences at least the minimum number of stations necessary to demonstrate compliance with the rules concerning radio multiple ownership in unrated markets.

**Cluster A: KDXU(AM) App, KSUB(AM), KHKR(AM), KREC(FM), KXBN(FM), KXFF(FM)**

In order to qualify for common ownership of this 3AM/3FM cluster, there must be at least 15 stations in the relevant “market”. This study demonstrates that there are at least 25 stations in the relevant market.

**Cluster B: KDXU(AM) App, KSUB(AM), KHKR(AM), KREC(FM), KIYK(FM), KXFF(FM)**

In order to qualify for common ownership of this 3AM/3FM cluster, there must be at least 15 stations in the relevant “market”. This study demonstrates that there are at least 25 stations in the relevant market.

**Cluster C: KDXU(AM) App, KSUB(AM), KREC(FM), KXBN(FM), KCIN(FM)**

In order to qualify for common ownership of this 2AM/3FM cluster, there must be at least 10 stations in the relevant “market”. This study demonstrates that there are at least 25 stations in the relevant market.

January 25, 2024

A handwritten signature in black ink, appearing to read "Erik C. Swanson". The signature is fluid and cursive, with the first name "Erik" being more prominent and the last name "Swanson" following in a similar style.

Erik C. Swanson







