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MULTIPLE OWNERSHIP SERVICE CONTOUR ANALYSIS

**Prepared for
Cochise Media Licenses LLC
April 2019**

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 a minor change application for station KFMR to operate on Channel 247C3 at Central Heights-Midland City, Arizona.

Unrated Market

KFMR will operate outside any Nielsen rated market, but the proposed facility has principal community contour overlap with attributable station KCDX(FM) Florence.

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 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.

The attached map demonstrates that the proposed KFMR facility forms two discrete clusters with licensed and CP facilities of KCDX. 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.

Cluster A: KFMR, KCDX License

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 OAM/2FM cluster, there must be at least 4 stations in the relevant “market”. This study demonstrates that there are at least 8 stations in the relevant market.

Cluster B: KFMR, KCDX CP

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 OAM/2FM cluster, there must be at least 4 stations in the relevant “market”. This study demonstrates that there are at least 8 stations in the relevant market.

In this case, a single study map is sufficient to demonstrate compliance for both scenarios, as the list of “denominator” stations has been limited to those FM stations with transmitter sites inside the proposed KFMR facility’s 70 dBu contour. Additional stations could be counted in each market, should the Commission require a more comprehensive analysis.

April 23, 2019

A handwritten signature in black ink, appearing to read "Erik C. Swanson". The signature is fluid and cursive, with the first name "Erik" and last name "Swanson" clearly distinguishable.

Erik C. Swanson

Hatfield & Dawson Consulting Engineers

Stations in the Market
 KCDX LIC 276C1 FLORENCE
 KFMR APP 247C3 CENTRAL HEIGHTS-MIDLAND CITY
 KIKO LIC 243C2 CLAYPOOL
 KLKA LIC 203C1 GLOBE
 KQMR LIC 262C GLOBE
 KQSS LIC 270A MIAMI
 KRDE LIC 231C1 SAN CARLOS
 KVJC LIC 220C2 GLOBE

KCDX 70 dBu
License

KFMR 70 dBu
Application

KQSS LIC 270A

KVJC LIC 220C2
 KFMR APP 247C3
 KQMR LIC 262C
 KCDX LIC 276C1
 KIKO LIC 243C2
 KRDE LIC 231C1
 KLKA LIC 203C1

NAVAJO

MARICOPA

GRAHAM

PINAL

PIMA

KCDX 70 dBu
CP

KFMR 247C3 Ownership Study Map

0 20 40 60
 Kilometers

Hatfield & Dawson 4/2019