

MULTIPLE OWNERSHIP SHOWING

APPLICANT: De La Hunt Media, Inc.

July, 2021



STATEMENT OF CYNTHIA M. JACOBSON, P.E.
IN SUPPORT OF A
MULTIPLE OWNERSHIP SHOWING

Applicant: De La Hunt Media, Inc.

I am a Radio Engineer. My education and experience are a matter of record with the Federal Communications Commission. I am a Registered Professional Engineer in the Commonwealth of Virginia, Registration No. 0402027914.

I have been authorized to prepare this statement and exhibits in support of an Assignment of License.

This statement and attached exhibits demonstrate compliance with the Commission's Multiple Ownership rules.

A total of six stations are considered under common control. Bemidji Radio, Inc. which Edward Paul De La Hunt is the licensee of KKWB(FM), Kelliher, Minnesota, Facility Id #165963¹. It is proposed to purchase the following five stations along with associated FM translators.

CALL	SERVICE	CITY, STATE	FACILITY ID
KPRM	AM	Park Rapids, MN	15975
KDKK	FM	Park Rapids, MN	16433
KXKK	FM	Park Rapids, MN	4830
K263BR	FX	Park Rapids, MN	143001

¹ De La Hunt Media, Inc. (formerly Bemidji Radio, Inc.) is owned by Edward P. De La Hunt (51%) and Tamara A. De La Hunt (49%). Edward P. De La Hunt is the licensee of FM Translator, K276EP, Bemidji, Minnesota, Facility ID 149170.

MULTIPLE OWNERSHIP SHOWING
PAGE 2

KAKK	AM	Walker, MN	28655
K242AY	FX	Walker, MN	143005
K229DJ	FX	Walker, MN	202648
KQKK	FM	Walker, MN	9032
K234CQ	FX	Staples, MN	142821

De La Hunt Broadcasting Corporation is the licensee of KPRM(AM) and KDKK(FM), Park Rapids, Minnesota. EC Broadcasting, with Edward P. De La Hunt, Sr. and Carol J. De La Hunt as partners, is the licensee of FM station, KXKK, Park Rapids, Minnesota. Edward P. De La Hunt, Sr. is the licensee and sole owner of KAKK(AM), Walker, Minnesota. Carol J. De La Hunt is the licensee of KQKK(FM), Walker, Minnesota. The proposal described herein is in the name of De La Hunt Media, Inc. in which stations KPRM(AM), KDKK(FM), KXKK(FM), KAKK(AM) and KQKK(FM) will be acquired by De La Hunt Media, Inc.² See Figure 1 depicting the principal community contours of these stations.

For the FM stations considered herein, 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 the AM stations considered herein, the principal community contour is the predicted daytime 5.0 mV/m groundwave contour computed in accordance with

² Also includes the sale of FM translator stations: K236BR, Park Rapids, MN; K242AY, Walker, MN; K229DJ, Walker, MN; and K234CQ, Staples, MN.

MULTIPLE OWNERSHIP SHOWING
PAGE 3

Section 73.183 of the FCC Rules. All AM and FM facilities were calculated every 5 degrees of azimuth. All AM and FM facilities represented herein are operating commercial radio stations.

There are two different “markets” with 4 commercial radio stations. There will be no market in which there will be 5 commercial radio stations under common control. Analysis of the markets containing 4 stations would represent the worst case scenario. As a result, two separate markets are considered in this study. Figure 2 is an enlarged map depicting these markets which contain 4 stations.

MARKET #4A

KPRM(AM), Park Rapids, Minnesota;

KAKK(AM), Walker, Minnesota;

KDKK(FM), Park Rapids, Minnesota; and

KXKK(FM), Park Rapids, Minnesota.

At least 5 FM and 3 AM radio stations (in addition to the subject stations and applications) provide principal community grade service to a portion of the proposed radio market. Since no more than 5 commercial radio stations and no more than 3 stations are in the same service, and since the proponent would not control more than 50% of the stations in the relevant market, the proponent complies with the Commission's Rules.

MULTIPLE OWNERSHIP SHOWING
PAGE 4

MARKET #4B

KPRM(AM), Park Rapids, Minnesota;

KAKK(AM), Walker, Minnesota;

KDKK(FM), Park Rapids, Minnesota; and

KQKK(FM), Walker, Minnesota.

At least 6 FM and 2 AM radio stations (in addition to the subject stations and applications) provide principal community grade service to a portion of the proposed radio market. Since no more than 5 commercial radio stations and no more than 3 stations are in the same service, and since the proponent would not control more than 50% of the stations in the relevant market, the proponent complies with the Commission's Rules.

Attached as Figure 3, is a tabulation of those AM and FM facilities which serve each market.

It is demonstrated herein that Section 73.3555 of the Rules is met. This statement and the attached exhibits have been prepared by me and believed to be true and correct.

Dated: July 22, 2021

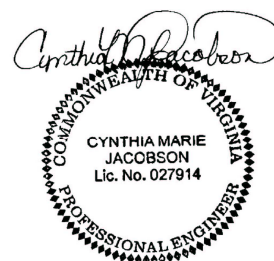
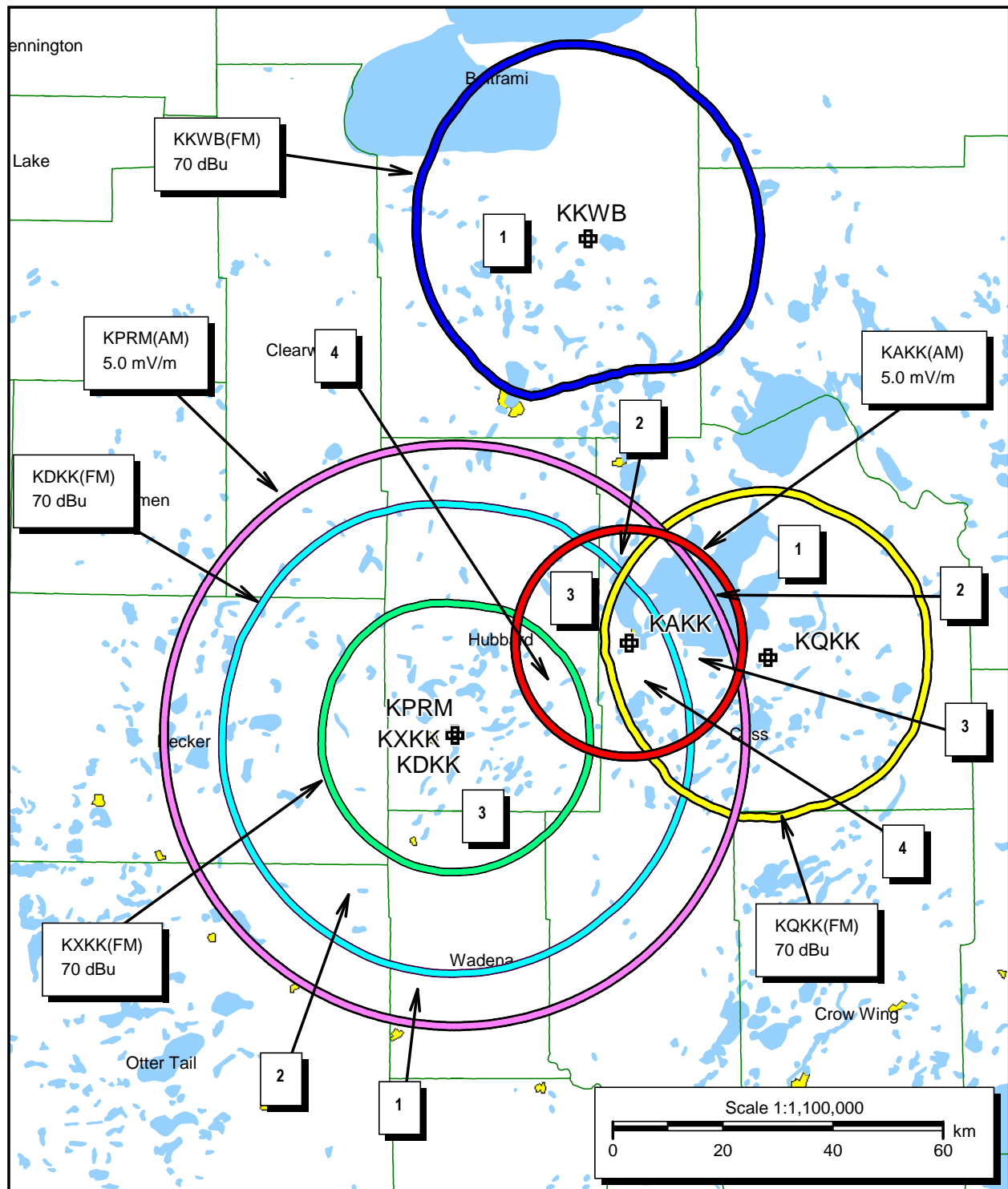


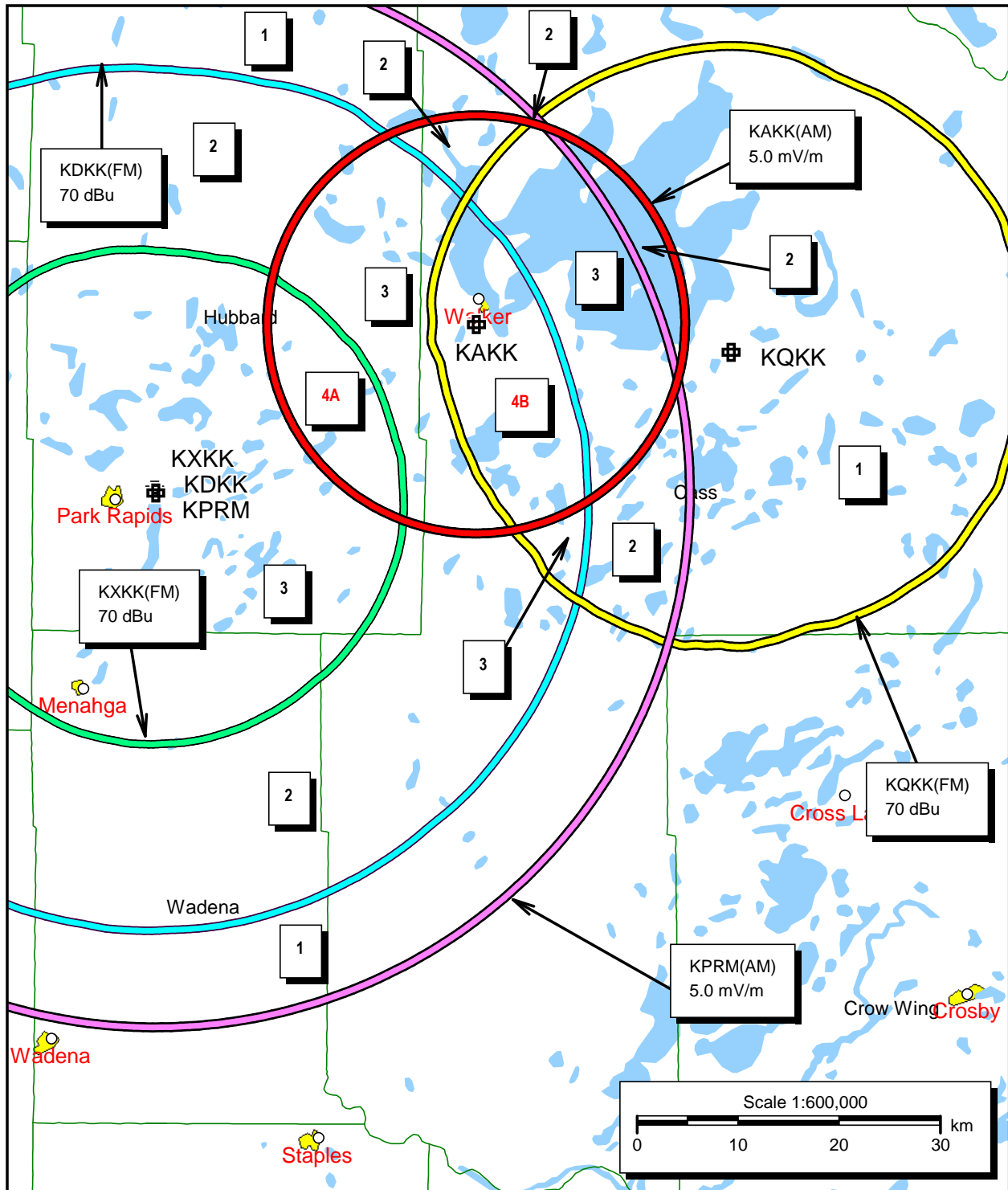
FIGURE 1



MULTIPLE OWNERSHIP STUDY
JULY, 2021



FIGURE 2



MULTIPLE OWNERSHIP STUDY
EXPANDED
JULY, 2021

FIGURE 3

**MULTIPLE OWNERSHIP SHOWING
OTHER STATIONS SERVING MARKET(S)**

#	CALL	CITY, STATE	FREQ.	FACILITIES	LATITUDE, LONGITUDE
1	KKWS(FM)	Wadena, MN	290C1	100 kW, 171 M HAAT	46 35 59, 94 54 04
2	KWAD(AM)	Wadena, MN	920 kHz	1 kW, DA-N-U	46 22 13, 95 09 13
3	KKBJ(AM)	Bemidji, MN	1360 kHz	5 kW D/2.5 kW N, DA-N	47 26 32, 94 51 57
4	KRCQ(FM)	Detroit Lakes, MN	272C2	50 kW, 126 M HAAT	46 43 19, 95 50 37
5	KLLZ-FM	Walker, MN	256C1	100 kW, 154 M HAAT	47 12 52, 94 55 18
6	KKZY(FM)	Bemidji, MN	238C1	100 kW, 129 M HAAT	47 22 12, 94 52 54
7	KBHP(FM)	Bemidji, MN	266C1	100 kW, 159 M HAAT	47 22 11, 94 52 54
8	KPMI(AM)	Bemidji, MN	1300 kHz	2.5 kW D/0.6 kW N, DA-N-U	47 26 32, 94 51 57