

**Engineering Statement**  
**Interim Contour Overlap Radio Multiple Ownership Showing**  
**in Support of Application for Assignment of Southwind Broadcasting LLC Radio Stations**

prepared September 2021 for  
**Central Plains Finance LLC**

**Introduction**

This Statement is supplied for *Central Plains Finance, LLC* (“*Central Plains Finance*”) in support of a pending application to acquire *Southwind Broadcasting, LLC* (“*Southwind*”), which is now in receivership. *Southwind* is the licensee for eight (8) full-service radio stations in western Kansas as tabulated below. *Central Plains Finance* is wholly owned by Murfin Inc. (“*Murfin*”). *Murfin* has attributable ownership interests in a number of other stations in the general Kansas, Missouri & Oklahoma region. The currently owned *Murfin* stations are tabulated separately below.

***Southwind Radio Stations***

*Southwind* holds licenses for eight full-service radio stations and two FM translators. For the purposes of Radio Multiple Ownership compliance, FM translators are not considered herein. Based on information from BIA, none of the eight stations listed here are in an FCC defined geographic or Nielsen market:

Call	City, State	Facility ID
KBUF (AM)	Holcomb, KS	33689
KHGN (FM)	Hugoton, KS	199
KKJQ (FM)	Garden City, KS	33690
KSKL (FM)(Lic.)	Scott City, KS	71853
KSKL (FM)(CP)	Scott City, KS	71853
KSKZ (FM)	Copeland, KS	60873
KSSA (FM)	Ingalls, KS	77873
KULY (AM)	Ulysses, KS	198
KWKR (FM)	Leoti, KS	67042

***Central Plains Finance, Murfin, Inc and Others with Related Attributable Ownership Interest***

Based on information provided by *Central Plains Finance* and their representatives, *Central Plains Finance* is wholly owned by *Murfin, Inc.* While *Central Plains Finance* has no attributable ownership in any other full-service radio stations, *Murfin* and its principals have attributable

**Engineering Statement (Continued)**  
**Interim Contour Overlap Radio Multiple Ownership Considerations**  
**Central Plains Finance LLC**

ownership interest in a number of other stations. *Murfin* has a controlling attributable interest in *My Town Media, Inc.* and *Post Rock Radio, LLC*. An attributable principal of *Murfin*, Mr. Robert Young, has attributable ownership interest in one station. Another entity considered, is Mr. William Wachter, a principal of *My Town* and of *Post Rock* but not of *Central Plains Finance* or *Murfin*. Mr. William Wachter is a principal of *One Media, Inc.* and has attributable ownership interest in *Bluff City Radio, LLC*, *Blue Sky Media, LLC*, and *Chisolm Trail Communications, LLC*. The various stations considered here as having some attributable ownership interest possibly relevant to *Central Plains Finance* and *Murfin* and its stations are all listed below. For details regarding extent of ownership, representatives of *Central Plains Finance* have submitted information as a separate exhibit. The listing here is strictly to determine which stations warrant consideration with regard to potential contour overlap with any *Central Plains Finance/Southwind* station. A number of the stations mentioned, as noted in the list, are more than 500 km from the *Central Plains Finance/Southwind* cluster and are thus not shown on any of the included maps:

***My Town Media, Inc. & Post Rock Radio, LLC:***

Call	City, State	Facility ID	Licensee
KIND(AM)	Independence, KS	9799	My Town Media, Inc
KKOY(AM)	Chanute, KS	48292	My Town Media, Inc
KBIK(FM)	Independence, KS	9793	My Town Media, Inc
KEKS(FM)	Olpe, KS	166016	My Town Media, Inc
KHST(FM)	Lamar, MO	34541	My Town Media, Inc
KIND-FM	Elk City, KS	171002	My Town Media, Inc
KINZ(FM)	Humboldt, KS	87299	My Town Media, Inc
KKOY-FM	Chanute, KS	48291	My Town Media, Inc
KQZQ(FM)	Kiowa, KS	164275	My Town Media, Inc
KSNP(FM)	Burlington, KS	12206	My Town Media, Inc
KWXD(FM)	Asbury, MO	28689	My Town Media, Inc
KKDT(FM)	Burdett, KS	164130	Post Rock Radio, LLC
KXNC(FM)	Ness City, KS	154131	Post Rock Radio, LLC

**Engineering Statement (Continued)**  
**Interim Contour Overlap Radio Multiple Ownership Considerations**  
**Central Plains Finance LLC**

*My Town Media, Inc.* also holds licenses for three (3) FM Translators. For the purposes of Radio Multiple Ownership compliance, FM translators are not considered herein.

***Mr. Robert Young***

***(A principal in Murfin, Inc. parent entity of Central Plains Finance)***

Call	City, State	Facility ID	Licensee
KHDL(FM)	Americus, KS	191544	Mr. Robert Young

***Mr. William Wachter, One Media, Inc.,***

***Blue Sky Radio, LLC & Bluff City Radio, LLC, & Chisolm Trail Communications, LLC***

***(A principal of One Media Inc. as well as My Town Media, Inc. and Post Rock Radio, LLC but not of Central Plains Finance or Murfin, Inc.)***

Call	City, State	Facility	Licensee
KBZI(FM)	Mooreland, OK	191542	One Media, Inc.**
KRZD(AM)	Springfield, MO	17137	One Media, Inc.
KMML(FM)	Cimarron, KS	164238	One Media, Inc.
KSHQ(FM)	Deerfield, MO	190419	One Media, Inc.
KWKN(FM)	Wakeeney, KS	190424	One Media, Inc.
KALV(AM)	Alva, OK	43280	Blue Sky Media, LLC
KRDR(FM)	Alva, OK	190420	Blue Sky Media, LLC
*KDPX(FM)*	Pine Bluff, AR	190418	Bluff City Radio, LLC
*KPBA(FM)*	Pine Bluff, AR	190417	Bluff City Radio, LLC
*KTPB(FM)*	Altheimer, AR	190416	Bluff City Radio, LLC
*KTRN(FM)*	White Hall, AR	4127	Bluff City Radio, LLC
*KITT(FM)*	Meridian, TX	198784	Chisolm Trail Communications, LLC
*KOME-FM*	Tolar, TX	165950	Chisolm Trail Communications, LLC

*\* Stations more than 500 km from Southwind/Central Plains Finance Cluster not shown on overview, Map Figure 1 herein.*

**Engineering Statement (Continued)**  
**Interim Contour Overlap Radio Multiple Ownership Considerations**  
**Central Plains Finance LLC**

The Commission issued a Report and Order and Notice of Proposed Rulemaking (“R&O”)<sup>1</sup> for various multiple ownership issues. The R&O establishes a means of evaluating radio station multiple ownership issues utilizing existing Nielsen Audio<sup>®2</sup> and BIA<sup>®</sup> MEDIA Access Pro<sup>TM3</sup> market data for analysis of markets with established geographic boundaries.<sup>4</sup> There is a separate “interim” means for evaluating radio station multiple ownership issues beyond established Nielsen Audio radio markets. At this time, pursuant to information provided by BIA, the eight stations *Central Plains Finance* is proposing to acquire lie outside any Nielsen or FCC defined geographic market. Thus, use of the interim contour overlap method is applied herein to demonstrate that the *Central Plains Finance* proposed acquisition of the eight *Southwind* stations will comply with FCC Radio Multiple Ownership Rules.

Pursuant to §73.3555 of the Commission’s Rules, the number of stations that a licensee may own is based on the total number of stations in that particular market, regardless of the study methodology employed. There is also a limit on how many stations each licensee may own in any one service (AM or FM).

- Markets with 45 or more stations are limited to 8 total stations and 5 in any one service.
- Markets with 30-44 stations are limited to 7 total stations and 4 in any one service.
- Markets with 15-29 stations are limited to 6 total stations and 4 in any one service.
- Markets with 14 or fewer stations are limited to 5 total stations and 3 in any one service, but not more than 50% of the market stations.
- (2) Overlap between two stations in different services is permissible if neither of those two stations overlaps a third station in the same service.

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<sup>1</sup> Report and Order in MB Docket No. 02-277 and MM Docket Nos. 01-235, 01-317, and 00-244, and Notice of Proposed Rulemaking for MB Docket 03-130 FCC-03-127, (adopted June 2, 2003)(released July 2, 2003).

<sup>2</sup> Nielsen Audio is a registered mark of Nielsen Holdings, N.V.

<sup>3</sup> MEDIA Access Pro is a trademark of BIA<sup>®</sup> Financial Network Inc.

<sup>4</sup> As an initial matter, the geographical boundaries of a market are established by reference to the boundaries of the markets established by Nielsen Audio. Within that market, the FCC requires that the BIA count of stations operating in the market be employed.

**Engineering Statement (Continued)**  
**Interim Contour Overlap Radio Multiple Ownership Considerations**  
**Central Plains Finance LLC**

**Interim Method - Introduction**

Under the current Rules, any station with a principal community beyond the geographic boundary of a Nielsen Audio Metro shall be studied under the Commission’s “interim” contour overlap methodology. A “market” is defined as the area encompassed by the principal community contours of radio stations for which common ownership is proposed<sup>5</sup> and which have a mutual area of principal community contour overlap.

**Interim Method – The Markets**

The principal community contours of the eight (8) *Southwind* stations *Central Plains Finance* is proposing to acquire along with many of the stations listed herein with some related common attributable ownership interest are shown on **Map Figure 1** to identify any potential contour overlap that may exist. Stations too distant to be included on this map are more than 500 km from any point in the *Central Plains Finance* cluster of eight. Of the twenty-three other stations shown on **Map Figure 1**, only one stations shares any principal community contour overlap with the *Central Plains Finance* cluster, KMML(FM), Cimarron, KS, Fac. ID: 164238. **Map Figure 2** is provided to illustrate the principal community contours of *Central Plains Finance*’s proposed commonly owned stations with KMML(FM) on a more localized scale.

One of the *Central Plains Finance* stations (KSKL(FM)) has been issued a construction permit to relocate to the same tower as KWKR(FM). Potential markets to be evaluated must therefore be considered for both the licensed and authorized facilities for KSKL(FM). Attached as **Map Figures 3 & 4** are copies of **Map Figure 2** showing the “core” common overlap areas; where **Map Figure 3** considers the licensed KSKL(FM), and **Map Figure 4** considers the authorized, CP facility of KSKL(FM).

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<sup>5</sup> Order in Implementation of Sections 202(a) and 202(b)(1) of the Telecommunications Act of 1996 (Broadcast Radio Ownership) FCC 96-90, released March 8, 1996 and Memorandum Opinion and Order in Revision of Radio Rules and Policies 7 FCC Rcd 6387, 6395 para. 39 (1992).

**Engineering Statement (Continued)**  
**Interim Contour Overlap Radio Multiple Ownership Considerations**  
**Central Plains Finance LLC**

Market 1 is created by the principal community contour overlap of four (FM) and one (1) AM station with some common attributable ownership, (KBUF)(AM), KKJQ(FM), KMML(FM), KSKZ(FM), and KSSA(FM)). Market 2A is created by the principal community contour overlap of two (2) FM stations and one (1) AM station with some common attributable ownership, (KBUF)(AM), KSKL(FM)(as Licensed), and KWKR(FM)). Market 2B is created by the principal community contour overlap of two (2) FM stations and one (1) AM station with some common attributable ownership, (KBUF)(AM), KSKL(FM)(as authorized by CP), and KWKR(FM)). Market 3 is created by the principal community contour overlap of two (2) AM stations with some common attributable ownership, (KBUF)(AM), and KULY(AM). Market 4 is created by the principal community contour overlap of one (1) FM station and one (1) AM station with some common attributable ownership interest, (KULY(AM) and KHGN(FM)), as KULY(AM) also shares principal community contour overlap with another station in the same service with proposed common attributable ownership interest (KBUF)(AM)).

**Map Figure 5** illustrates an “interim” contour overlap study of Market 1, five (5) licensed stations sharing some common “core” overlap area (KBUF)(AM), KKJQ(FM), KMML(FM), KSKZ(FM), and KSSA(FM). The “market boundary,” a composite of the perimeters of all five stations’ principal community contours, is shaded in yellow. The “core” common overlap area is shaded in green. Included on **Map Figure 5** are all of the neighboring full-service radio station principal community coverage contours that overlap any portion of the market. **Map Figure 5** lists 8 AM stations and 21 FM stations that overlap some portion of the market. Of those stations, four (4) are noted in the legend with the symbol “†††.” These four stations overlap Market 1 but may not be counted toward the market total as they have some common attributable ownership interest but do not comprise the instant market. Thus, there are a total of 25 stations in the market, five of which *Central Plains Finance* is proposing to acquire (four FM stations and one AM station). Market 1 of the *Central Plains Finance* proposed acquisition complies with FCC Rules, which state that a licensee may own up to six stations or four stations in any one service in markets with 15 to 29 stations. A station count of 25 supports ownership of five stations where four are in the same service.

**Engineering Statement (Continued)**  
**Interim Contour Overlap Radio Multiple Ownership Considerations**  
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**Map Figure 6** illustrates an “interim” contour overlap study of Market 2A, three (2) licensed stations sharing some common “core” overlap area (KBUF)(AM), KSKL(FM)(as licensed), and KWKR(FM). The “market boundary,” a composite of the perimeters of all three stations’ principal community contours, is shaded in yellow. The “core” common overlap area is shaded in green. Included on **Map Figure 6** are all of the neighboring full-service radio station principal community coverage contours that overlap any portion of the market. **Map Figure 6** lists 6 AM stations and 17 FM stations that overlap some portion of the market. Of those stations, six (6) are noted in the legend with the symbol “‡‡.” These six stations overlap Market 2A but may not be counted toward the market total as they have some common attributable ownership interest but do not comprise the instant market. Thus, there are a total of 17 stations in the market, three (3) of which *Central Plains Finance* is proposing to acquire (two FM stations and one AM station). Market 2A of the *Central Plains Finance* proposed acquisition complies with FCC Rules, which state that a licensee may own up to six stations or four stations in any one service in markets with 15 to 29 stations. A station count of 17 supports ownership of three stations where two are in the same service.

**Map Figure 7** illustrates an “interim” contour overlap study of Market 2B, two licensed and one authorized Construction Permit stations sharing some common “core” overlap area (KBUF)(AM), KSKL(FM)(as authorized by CP), and KWKR(FM). The “market boundary,” a composite of the perimeters of all three stations’ principal community contours, is shaded in yellow. The “core” common overlap area is shaded in green. Included on **Map Figure 7** are all of the neighboring full-service radio station principal community coverage contours that overlap any portion of the market. **Map Figure 7** lists 6 AM stations and 16 FM stations that overlap some portion of the market. Of those stations, five (5) are noted in the legend with the symbol “‡‡.” These five stations overlap Market 2B but may not be counted toward the market total as they have some common attributable ownership interest but do not comprise the instant market. Thus, there are a total of 17 stations in the market, three (3) of which *Central Plains Finance* is proposing to acquire (two FM stations and one AM station). Market 2B of the *Central Plains Finance* proposed acquisition complies with FCC Rules, which state that a licensee may own up to six stations or four stations in any one service in

**Engineering Statement (Continued)**  
**Interim Contour Overlap Radio Multiple Ownership Considerations**  
**Central Plains Finance LLC**

markets with 15 to 29 stations. A station count of 17 supports ownership of three stations where two are in the same service.

**Map Figure 8** illustrates an “interim” contour overlap study of Market 3, two licensed stations sharing some common “core” overlap area (KBUF)(AM) and KULY(AM). The “market boundary,” a composite of the perimeters of the two stations principal community contours, is shaded in yellow. The “core” common overlap area is shaded in green. Included on **Map Figure 8** are all of the neighboring full-service radio station principal community coverage contours that overlap any portion of the market. **Map Figure 8** lists 6 AM stations and 18 FM stations that overlap some portion of the market. Of those stations, eight (8) are noted in the legend with the symbol “‡‡.” These eight stations overlap Market 3 but may not be counted toward the market total as they have some common attributable ownership interest but do not comprise the instant market. Thus, there are a total of 16 stations in the market, two (2) of which *Central Plains Finance* is proposing to acquire. Market 3 of the *Central Plains Finance* proposed acquisition complies with FCC Rules, which state that a licensee may own up to six stations or four stations in any one service in markets with 15 to 29 stations. A station count of 16 supports ownership of two stations in the same service (in this case AM stations).

**Map Figure 9** illustrates an “interim” contour overlap study of Market 4, two licensed stations sharing some common “core” overlap area (KULY)(AM) and KHGN(FM). The “market boundary,” a composite of the perimeters of the two stations principal community contours, is shaded in yellow. The “core” common overlap area is shaded in green. Included on **Map Figure 9** are all of the neighboring full-service radio station principal community coverage contours that overlap any portion of the market. **Map Figure 8** lists 5 AM stations and 8 FM stations that overlap some portion of the market. Of those stations, one (1) is noted in the legend with the symbol “‡‡.” This station overlaps Market 4 but may not be counted toward the market total as it has some common attributable ownership interest but does not comprise the instant market. Thus, there are a total of 12 stations in the market, two (2) of which *Central Plains Finance* is proposing to acquire (one AM station and one FM station). Market 4 of the *Central Plains Finance* proposed acquisition complies with FCC Rules, which state that markets with 14 or fewer stations are limited to 5 total stations and 3 in any one

**Engineering Statement (Continued)**  
**Interim Contour Overlap Radio Multiple Ownership Considerations**  
**Central Plains Finance LLC**

service, but not more than 50% of the market. A station count of 13 supports ownership of one AM station and one FM station when one of the two overlaps a third stations in the same service and that market (Market 3) also complies with FCC Radio Multiple Ownership rules and where *Central Plains Finance* does not have some common attributable ownership in more than 50 percent of the stations in the market.

**Methodology**

In preparing the attached maps and tables, pertinent station data were extracted from the Commission's engineering databases. For AM stations, these included the operating power, radiation efficiency, directional antenna data (where appropriate), and geographic coordinates. The distances to the 5 mV/m contours were then determined using the digitized version of the *Atlas of Ground Conductivity* published in 1981 by the International Telecommunication Union along with a computer program which simulates the FCC's AM groundwave propagation curves. For the FM stations, pertinent data for determining the distances to the contour included the antenna elevation above mean sea level, geographic coordinates, effective radiated power, and, where appropriate, directional antenna patterns. The requisite 3.16 mV/m (70 dB $\mu$ ) contours were determined using digitized 3 arc-second U.S.G.S. terrain data along radials spaced every degree from the transmitter site and an implementation of the Commission's TVFMFS computer program which simulates the FM propagation curves. The detailed distances to the principal community contours were then used with a GIS mapping program to generate the attached maps.

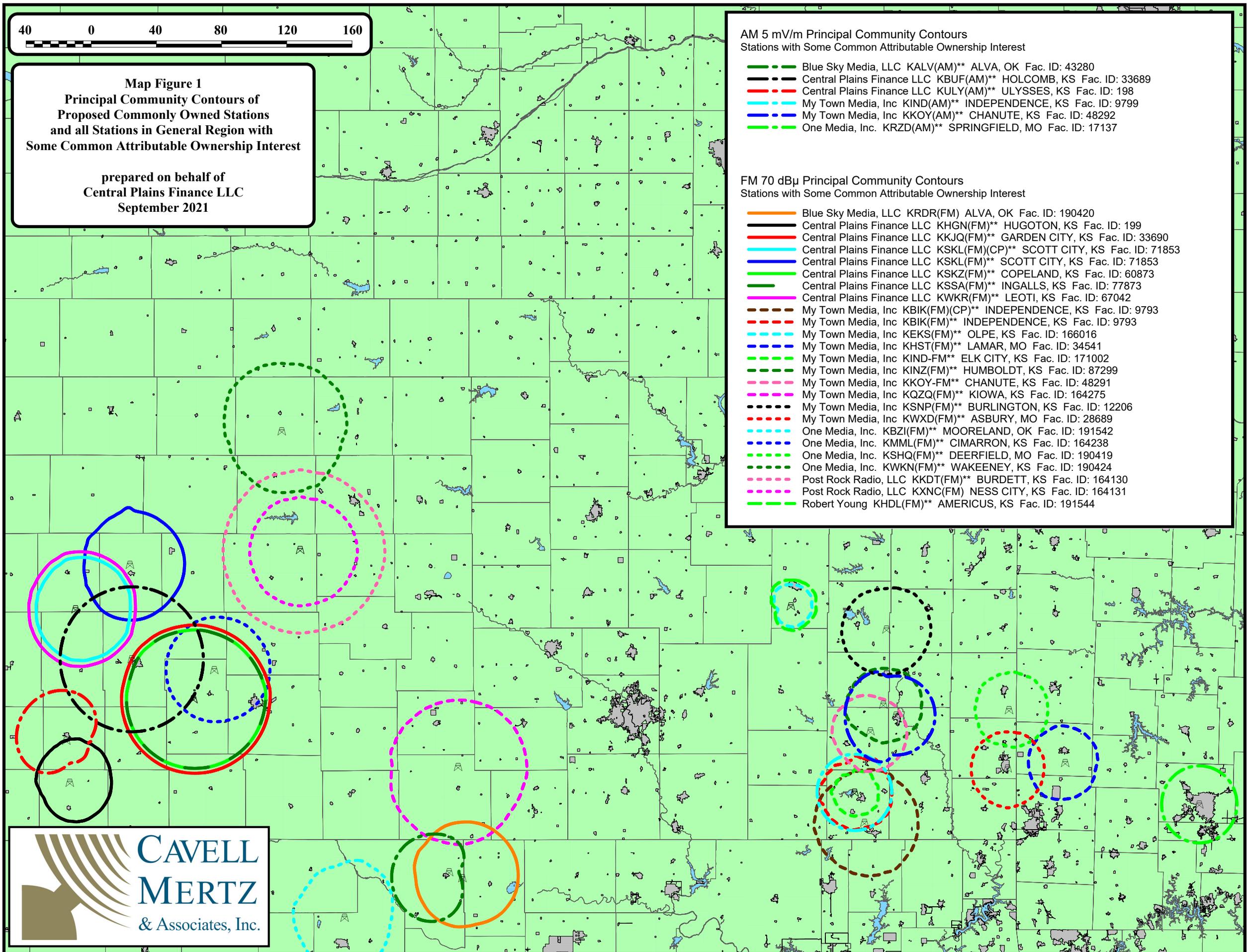
**Conclusion**

As shown herein, *Central Plains Finance, LLC's* proposed acquisition of the eight (8) *Southwind Broadcasting, LLC* stations KBUF(AM), KHGN(FM), KKJQ(FM), KSKL(FM)(Lic. & CP), KSKZ(FM), KSSA(FM), KULY(AM), and KWKR(FM) complies with §73.3555 of the Commission's Rules regarding the multiple ownership of radio stations. This conclusion was based on the interim, contour-overlap method.



**Map Figure 1**  
**Principal Community Contours of**  
**Proposed Commonly Owned Stations**  
**and all Stations in General Region with**  
**Some Common Attributable Ownership Interest**

prepared on behalf of  
**Central Plains Finance LLC**  
 September 2021



**AM 5 mV/m Principal Community Contours**  
 Stations with Some Common Attributable Ownership Interest

- Blue Sky Media, LLC KALV(AM)\*\* ALVA, OK Fac. ID: 43280
- Central Plains Finance LLC KBUF(AM)\*\* HOLCOMB, KS Fac. ID: 33689
- Central Plains Finance LLC KULY(AM)\*\* ULYSSES, KS Fac. ID: 198
- My Town Media, Inc KIND(AM)\*\* INDEPENDENCE, KS Fac. ID: 9799
- My Town Media, Inc KKOY(AM)\*\* CHANUTE, KS Fac. ID: 48292
- One Media, Inc. KRZD(AM)\*\* SPRINGFIELD, MO Fac. ID: 17137

**FM 70 dBµ Principal Community Contours**  
 Stations with Some Common Attributable Ownership Interest

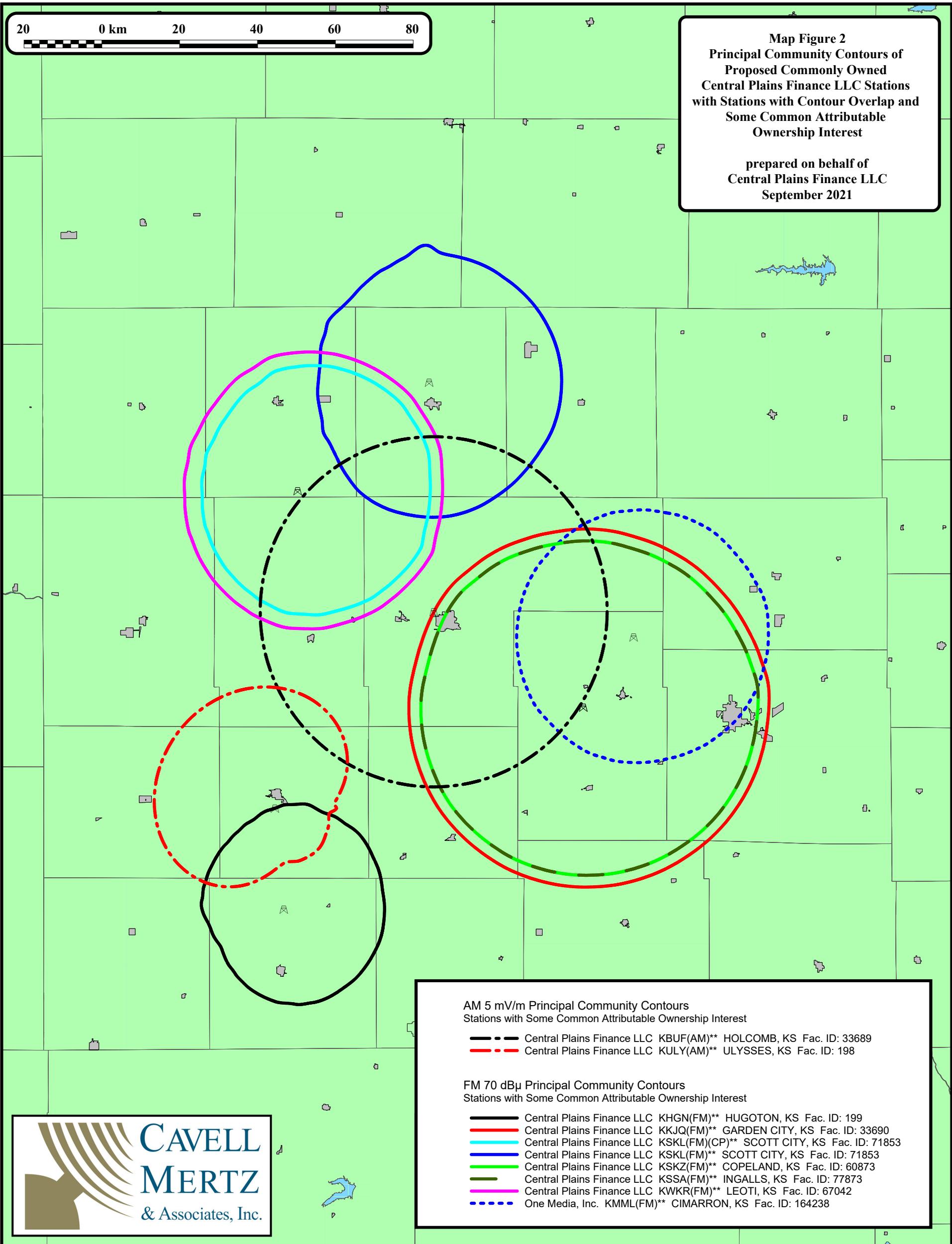
- Blue Sky Media, LLC KRDR(FM) ALVA, OK Fac. ID: 190420
- Central Plains Finance LLC KHGN(FM)\*\* HUGOTON, KS Fac. ID: 199
- Central Plains Finance LLC KKJQ(FM)\*\* GARDEN CITY, KS Fac. ID: 33690
- Central Plains Finance LLC KSKL(FM)(CP)\*\* SCOTT CITY, KS Fac. ID: 71853
- Central Plains Finance LLC KSKL(FM)\*\* SCOTT CITY, KS Fac. ID: 71853
- Central Plains Finance LLC KSKZ(FM)\*\* COPELAND, KS Fac. ID: 60873
- Central Plains Finance LLC KSSA(FM)\*\* INGALLS, KS Fac. ID: 77873
- Central Plains Finance LLC KWKR(FM)\*\* LEOTI, KS Fac. ID: 67042
- My Town Media, Inc KBIK(FM)(CP)\*\* INDEPENDENCE, KS Fac. ID: 9793
- My Town Media, Inc KBIK(FM)\*\* INDEPENDENCE, KS Fac. ID: 9793
- My Town Media, Inc KEKS(FM)\*\* OLPE, KS Fac. ID: 166016
- My Town Media, Inc KHST(FM)\*\* LAMAR, MO Fac. ID: 34541
- My Town Media, Inc KIND-FM\*\* ELK CITY, KS Fac. ID: 171002
- My Town Media, Inc KINZ(FM)\*\* HUMBOLDT, KS Fac. ID: 87299
- My Town Media, Inc KKOY-FM\*\* CHANUTE, KS Fac. ID: 48291
- My Town Media, Inc KQZQ(FM)\*\* KIOWA, KS Fac. ID: 164275
- My Town Media, Inc KSNP(FM)\*\* BURLINGTON, KS Fac. ID: 12206
- My Town Media, Inc KWXD(FM)\*\* ASBURY, MO Fac. ID: 28689
- One Media, Inc. KBZI(FM)\*\* MOORELAND, OK Fac. ID: 191542
- One Media, Inc. KMML(FM)\*\* CIMARRON, KS Fac. ID: 164238
- One Media, Inc. KSHQ(FM)\*\* DEERFIELD, MO Fac. ID: 190419
- One Media, Inc. KWKN(FM)\*\* WAKEENEY, KS Fac. ID: 190424
- Post Rock Radio, LLC KKDT(FM)\*\* BURDETT, KS Fac. ID: 164130
- Post Rock Radio, LLC KXNC(FM) NESS CITY, KS Fac. ID: 164131
- Robert Young KHDL(FM)\*\* AMERICUS, KS Fac. ID: 191544



20 0 km 20 40 60 80

**Map Figure 2**  
**Principal Community Contours of**  
**Proposed Commonly Owned**  
**Central Plains Finance LLC Stations**  
**with Stations with Contour Overlap and**  
**Some Common Attributable**  
**Ownership Interest**

prepared on behalf of  
**Central Plains Finance LLC**  
 September 2021



**AM 5 mV/m Principal Community Contours**

Stations with Some Common Attributable Ownership Interest

- Central Plains Finance LLC KBUF(AM)\*\* HOLCOMB, KS Fac. ID: 33689
- Central Plains Finance LLC KULY(AM)\*\* ULYSSES, KS Fac. ID: 198

**FM 70 dBμ Principal Community Contours**

Stations with Some Common Attributable Ownership Interest

- Central Plains Finance LLC KHGN(FM)\*\* HUGOTON, KS Fac. ID: 199
- Central Plains Finance LLC KKJQ(FM)\*\* GARDEN CITY, KS Fac. ID: 33690
- Central Plains Finance LLC KSKL(FM)(CP)\*\* SCOTT CITY, KS Fac. ID: 71853
- Central Plains Finance LLC KSKL(FM)\*\* SCOTT CITY, KS Fac. ID: 71853
- Central Plains Finance LLC KSKZ(FM)\*\* COPELAND, KS Fac. ID: 60873
- Central Plains Finance LLC KSSA(FM)\*\* INGALLS, KS Fac. ID: 77873
- Central Plains Finance LLC KWKR(FM)\*\* LEOTI, KS Fac. ID: 67042
- One Media, Inc. KMML(FM)\*\* CIMARRON, KS Fac. ID: 164238



20 0 km 20 40 60 80

**Map Figure 3**  
**Principal Community Contours of**  
**Proposed Commonly Owned**  
**Central Plains Finance LLC Stations**  
**with KSKL(FM)(Lic), omitting KSKL(FM)(CP),**  
**with Stations with Contour Overlap and**  
**Some Common Attributable**  
**Ownership Interest**

prepared on behalf of  
Central Plains Finance LLC  
September 2021

Market 2A  
KBUF(AM), KSKL(FM)(Lic)  
& KWKR(FM)

Market 1  
KBUF(AM), KKJQ(FM), KMML(FM),  
KSKZ(FM) & KSSA(FM)

Market 3  
KBUF(AM) & KULY(AM)

Market 4  
KULY(AM) & KHGN(FM)

**AM 5 mV/m Principal Community Contours**  
Stations with Some Common Attributable Ownership Interest

- Central Plains Finance LLC KBUF(AM)\*\* HOLCOMB, KS Fac. ID: 33689
- Central Plains Finance LLC KULY(AM)\*\* ULYSSES, KS Fac. ID: 198

**FM 70 dBμ Principal Community Contours**  
Stations with Some Common Attributable Ownership Interest

- Central Plains Finance LLC KHGN(FM)\*\* HUGOTON, KS Fac. ID: 199
- Central Plains Finance LLC KKJQ(FM)\*\* GARDEN CITY, KS Fac. ID: 33690
- Central Plains Finance LLC KSKL(FM)\*\* SCOTT CITY, KS Fac. ID: 71853
- Central Plains Finance LLC KSKZ(FM)\*\* COPELAND, KS Fac. ID: 60873
- Central Plains Finance LLC KSSA(FM)\*\* INGALLS, KS Fac. ID: 77873
- Central Plains Finance LLC KWKR(FM)\*\* LEOTI, KS Fac. ID: 67042
- One Media, Inc. KMML(FM)\*\* CIMARRON, KS Fac. ID: 164238



20 0 km 20 40 60 80

**Map Figure 4**  
**Principal Community Contours of**  
**Proposed Commonly Owned**  
**Central Plains Finance LLC Stations**  
**with KSKL(FM)(CP), Omitting KSKL(FM)(Lic),**  
**with Stations with Contour Overlap and**  
**Some Common Attributable**  
**Ownership Interest**

prepared on behalf of  
Central Plains Finance LLC  
September 2021

Market 2B  
KBUF(AM), KSKL(FM)(CP)  
& KWKR(FM)

Market 1  
KBUF(AM), KKJQ(FM), KMML(FM),  
KSKZ(FM) & KSSA(FM)

Market 3  
KBUF(AM) & KULY(AM)

Market 4  
KULY(AM) & KHGN(FM)

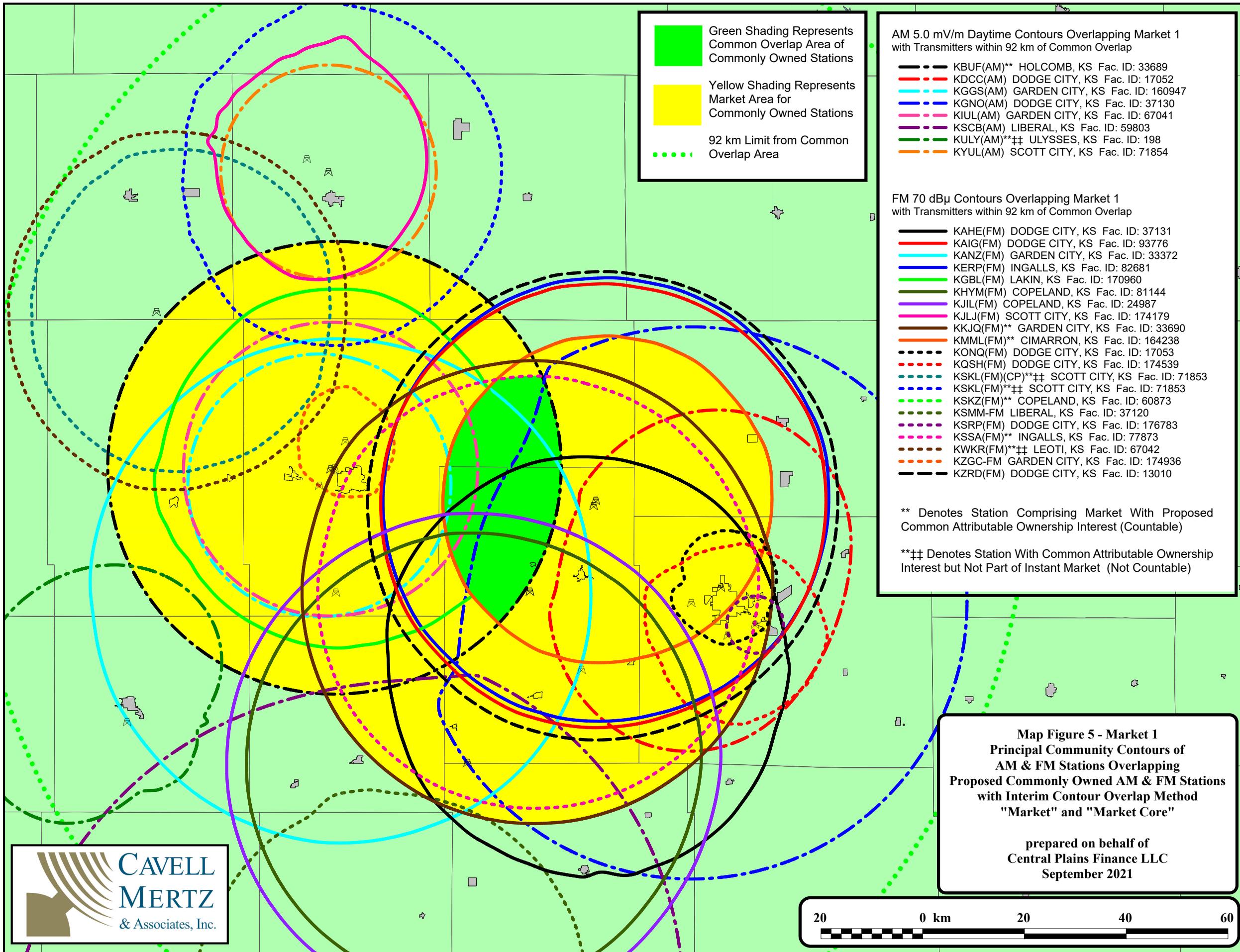
**AM 5 mV/m Principal Community Contours**  
Stations with Some Common Attributable Ownership Interest

- Central Plains Finance LLC KBUF(AM)\*\* HOLCOMB, KS Fac. ID: 33689
- Central Plains Finance LLC KULY(AM)\*\* ULYSSES, KS Fac. ID: 198

**FM 70 dBu Principal Community Contours**  
Stations with Some Common Attributable Ownership Interest

- Central Plains Finance LLC KHGN(FM)\*\* HUGOTON, KS Fac. ID: 199
- Central Plains Finance LLC KKJQ(FM)\*\* GARDEN CITY, KS Fac. ID: 33690
- Central Plains Finance LLC KSKL(FM)(CP)\*\* SCOTT CITY, KS Fac. ID: 71853
- Central Plains Finance LLC KSKZ(FM)\*\* COPELAND, KS Fac. ID: 60873
- Central Plains Finance LLC KSSA(FM)\*\* INGALLS, KS Fac. ID: 77873
- Central Plains Finance LLC KWKR(FM)\*\* LEOTI, KS Fac. ID: 67042
- One Media, Inc. KMML(FM)\*\* CIMARRON, KS Fac. ID: 164238





Green Shading Represents Common Overlap Area of Commonly Owned Stations  
 Yellow Shading Represents Market Area for Commonly Owned Stations  
 92 km Limit from Common Overlap Area

AM 5.0 mV/m Daytime Contours Overlapping Market 1 with Transmitters within 92 km of Common Overlap

- KBUF(AM)\*\* HOLCOMB, KS Fac. ID: 33689
- KDCC(AM) DODGE CITY, KS Fac. ID: 17052
- KGGS(AM) GARDEN CITY, KS Fac. ID: 160947
- KGNO(AM) DODGE CITY, KS Fac. ID: 37130
- KIUL(AM) GARDEN CITY, KS Fac. ID: 67041
- KSCB(AM) LIBERAL, KS Fac. ID: 59803
- KULY(AM)\*\*‡‡ ULYSSES, KS Fac. ID: 198
- KYUL(AM) SCOTT CITY, KS Fac. ID: 71854

FM 70 dBµ Contours Overlapping Market 1 with Transmitters within 92 km of Common Overlap

- KAHE(FM) DODGE CITY, KS Fac. ID: 37131
- KAIG(FM) DODGE CITY, KS Fac. ID: 93776
- KANZ(FM) GARDEN CITY, KS Fac. ID: 33372
- KERP(FM) INGALLS, KS Fac. ID: 82681
- KGBL(FM) LAKIN, KS Fac. ID: 170960
- KHYM(FM) COPELAND, KS Fac. ID: 81144
- KJIL(FM) COPELAND, KS Fac. ID: 24987
- KJLJ(FM) SCOTT CITY, KS Fac. ID: 174179
- KKJQ(FM)\*\* GARDEN CITY, KS Fac. ID: 33690
- KMML(FM)\*\* CIMARRON, KS Fac. ID: 164238
- KONQ(FM) DODGE CITY, KS Fac. ID: 17053
- KQSH(FM) DODGE CITY, KS Fac. ID: 174539
- KSKL(FM)(CP)\*\*‡‡ SCOTT CITY, KS Fac. ID: 71853
- KSKL(FM)\*\*‡‡ SCOTT CITY, KS Fac. ID: 71853
- KSKZ(FM)\*\* COPELAND, KS Fac. ID: 60873
- KSMM-FM LIBERAL, KS Fac. ID: 37120
- KSRP(FM) DODGE CITY, KS Fac. ID: 176783
- KSSA(FM)\*\* INGALLS, KS Fac. ID: 77873
- KWKR(FM)\*\*‡‡ LEOTI, KS Fac. ID: 67042
- KZGC-FM GARDEN CITY, KS Fac. ID: 174936
- KZRD(FM) DODGE CITY, KS Fac. ID: 13010

\*\* Denotes Station Comprising Market With Proposed Common Attributable Ownership Interest (Countable)  
 \*\*‡‡ Denotes Station With Common Attributable Ownership Interest but Not Part of Instant Market (Not Countable)

**Map Figure 5 - Market 1**  
**Principal Community Contours of**  
**AM & FM Stations Overlapping**  
**Proposed Commonly Owned AM & FM Stations**  
**with Interim Contour Overlap Method**  
**"Market" and "Market Core"**  
  
 prepared on behalf of  
 Central Plains Finance LLC  
 September 2021



Green Shading Represents Common Overlap Area of Commonly Owned Stations

Yellow Shading Represents Market Area for Commonly Owned Stations

92 km Limit from Common Overlap Area

**AM 5.0 mV/m Daytime Contours Overlapping Market 2A with Transmitters within 92 km of Common Overlap**

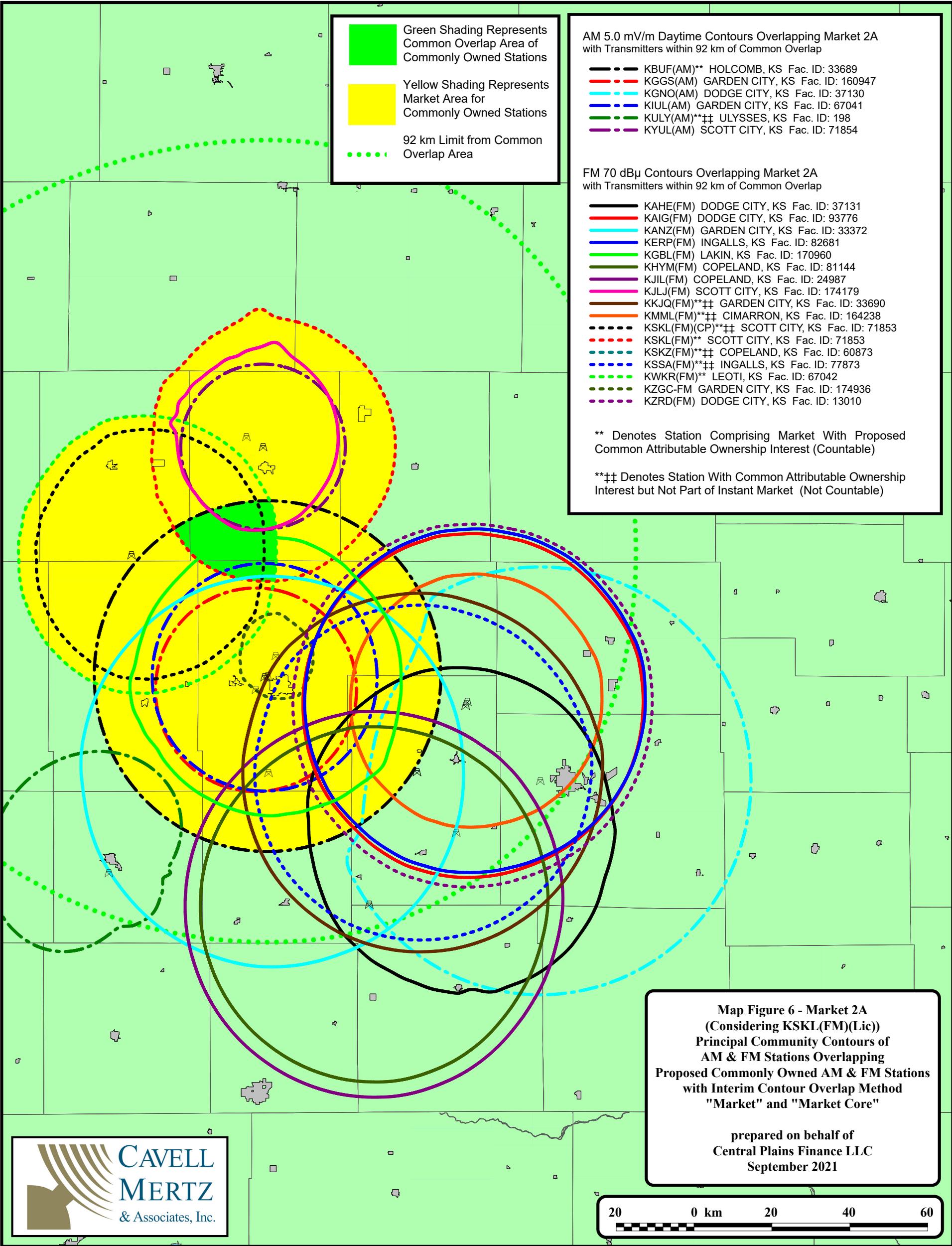
- KBUF(AM)\*\* HOLCOMB, KS Fac. ID: 33689
- - - KGGG(AM) GARDEN CITY, KS Fac. ID: 160947
- - - KGNO(AM) DODGE CITY, KS Fac. ID: 37130
- - - KIUL(AM) GARDEN CITY, KS Fac. ID: 67041
- - - KULY(AM)\*\*†† ULYSSES, KS Fac. ID: 198
- - - KYUL(AM) SCOTT CITY, KS Fac. ID: 71854

**FM 70 dBµ Contours Overlapping Market 2A with Transmitters within 92 km of Common Overlap**

- KAHE(FM) DODGE CITY, KS Fac. ID: 37131
- KAIG(FM) DODGE CITY, KS Fac. ID: 93776
- KANZ(FM) GARDEN CITY, KS Fac. ID: 33372
- KERP(FM) INGALLS, KS Fac. ID: 82681
- KGBL(FM) LAKIN, KS Fac. ID: 170960
- KHYM(FM) COPELAND, KS Fac. ID: 81144
- KJIL(FM) COPELAND, KS Fac. ID: 24987
- KJLJ(FM) SCOTT CITY, KS Fac. ID: 174179
- KKJQ(FM)\*\*†† GARDEN CITY, KS Fac. ID: 33690
- KMML(FM)\*\*†† CIMARRON, KS Fac. ID: 164238
- - - KSKL(FM)(CP)\*\*†† SCOTT CITY, KS Fac. ID: 71853
- - - KSKL(FM)\*\* SCOTT CITY, KS Fac. ID: 71853
- - - KSKZ(FM)\*\*†† COPELAND, KS Fac. ID: 60873
- - - KSSA(FM)\*\*†† INGALLS, KS Fac. ID: 77873
- - - KWKR(FM)\*\* LEOTI, KS Fac. ID: 67042
- - - KZGC-FM GARDEN CITY, KS Fac. ID: 174936
- - - KZRD(FM) DODGE CITY, KS Fac. ID: 13010

\*\* Denotes Station Comprising Market With Proposed Common Attributable Ownership Interest (Countable)

\*\*†† Denotes Station With Common Attributable Ownership Interest but Not Part of Instant Market (Not Countable)



**Map Figure 6 - Market 2A (Considering KSKL(FM)(Lic))**  
**Principal Community Contours of AM & FM Stations Overlapping Proposed Commonly Owned AM & FM Stations with Interim Contour Overlap Method "Market" and "Market Core"**

prepared on behalf of  
 Central Plains Finance LLC  
 September 2021



Green Shading Represents Common Overlap Area of Commonly Owned Stations

Yellow Shading Represents Market Area for Commonly Owned Stations

92 km Limit from Common Overlap Area

AM 5.0 mV/m Daytime Contours Overlapping Market 2B with Transmitters within 92 km of Common Overlap

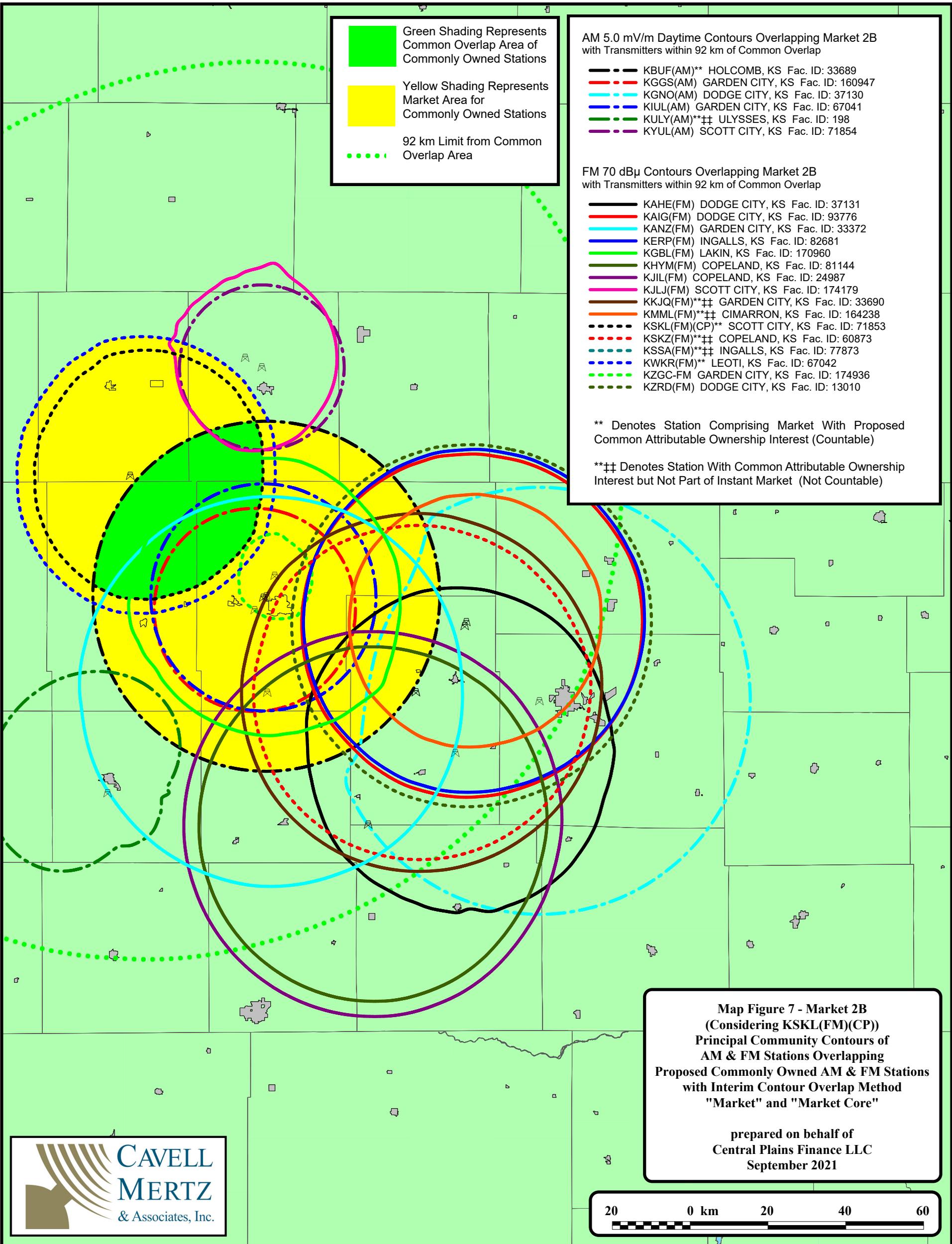
- KBUF(AM)\*\* HOLCOMB, KS Fac. ID: 33689
- KGGG(AM) GARDEN CITY, KS Fac. ID: 160947
- KGNO(AM) DODGE CITY, KS Fac. ID: 37130
- KIUL(AM) GARDEN CITY, KS Fac. ID: 67041
- KULY(AM)\*\*†† ULYSSES, KS Fac. ID: 198
- KYUL(AM) SCOTT CITY, KS Fac. ID: 71854

FM 70 dBµ Contours Overlapping Market 2B with Transmitters within 92 km of Common Overlap

- KAHE(FM) DODGE CITY, KS Fac. ID: 37131
- KAIG(FM) DODGE CITY, KS Fac. ID: 93776
- KANZ(FM) GARDEN CITY, KS Fac. ID: 33372
- KERP(FM) INGALLS, KS Fac. ID: 82681
- KGBL(FM) LAKIN, KS Fac. ID: 170960
- KHYM(FM) COPELAND, KS Fac. ID: 81144
- KJIL(FM) COPELAND, KS Fac. ID: 24987
- KJLJ(FM) SCOTT CITY, KS Fac. ID: 174179
- KKJQ(FM)\*\*†† GARDEN CITY, KS Fac. ID: 33690
- KMML(FM)\*\*†† CIMARRON, KS Fac. ID: 164238
- KSKL(FM)(CP)\*\* SCOTT CITY, KS Fac. ID: 71853
- KSKZ(FM)\*\*†† COPELAND, KS Fac. ID: 60873
- KSSA(FM)\*\*†† INGALLS, KS Fac. ID: 77873
- KWKR(FM)\*\* LEOTI, KS Fac. ID: 67042
- KZGC-FM GARDEN CITY, KS Fac. ID: 174936
- KZRD(FM) DODGE CITY, KS Fac. ID: 13010

\*\* Denotes Station Comprising Market With Proposed Common Attributable Ownership Interest (Countable)

\*\*†† Denotes Station With Common Attributable Ownership Interest but Not Part of Instant Market (Not Countable)



**Map Figure 7 - Market 2B  
(Considering KSKL(FM)(CP))  
Principal Community Contours of  
AM & FM Stations Overlapping  
Proposed Commonly Owned AM & FM Stations  
with Interim Contour Overlap Method  
"Market" and "Market Core"**

prepared on behalf of  
Central Plains Finance LLC  
September 2021



Green Shading Represents Common Overlap Area of Commonly Owned Stations

Yellow Shading Represents Market Area for Commonly Owned Stations

92 km Limit from Common Overlap Area

AM 5.0 mV/m Daytime Contours Overlapping Market 3 with Transmitters within 92 km of Common Overlap

- KBUF(AM)\*\* HOLCOMB, KS Fac. ID: 33689
- KGGG(AM) GARDEN CITY, KS Fac. ID: 160947
- KIUL(AM) GARDEN CITY, KS Fac. ID: 67041
- KSCB(AM) LIBERAL, KS Fac. ID: 59803
- KULY(AM)\*\* ULYSSES, KS Fac. ID: 198
- KYUL(AM) SCOTT CITY, KS Fac. ID: 71854

FM 70 dBu Contours Overlapping Market 3 with Transmitters within 92 km of Common Overlap

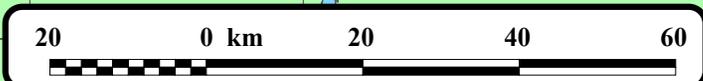
- KAHE(FM) DODGE CITY, KS Fac. ID: 37131
- KAIG(FM) DODGE CITY, KS Fac. ID: 93776
- KANZ(FM) GARDEN CITY, KS Fac. ID: 33372
- KERP(FM) INGALLS, KS Fac. ID: 82681
- KGBL(FM) LAKIN, KS Fac. ID: 170960
- KHGN(FM)\*\*†† HUGOTON, KS Fac. ID: 199
- KHYM(FM) COPELAND, KS Fac. ID: 81144
- KJIL(FM) COPELAND, KS Fac. ID: 24987
- KJLJ(FM) SCOTT CITY, KS Fac. ID: 174179
- KKJQ(FM)\*\*†† GARDEN CITY, KS Fac. ID: 33690
- KMML(FM)\*\*†† CIMARRON, KS Fac. ID: 164238
- KSKL(FM)(CP)\*\*†† SCOTT CITY, KS Fac. ID: 71853
- KSKL(FM)\*\*†† SCOTT CITY, KS Fac. ID: 71853
- KSKZ(FM)\*\*†† COPELAND, KS Fac. ID: 60873
- KSSA(FM)\*\*†† INGALLS, KS Fac. ID: 77873
- KWKR(FM)\*\*†† LEOTI, KS Fac. ID: 67042
- KZGC-FM GARDEN CITY, KS Fac. ID: 174936
- KZRD(FM) DODGE CITY, KS Fac. ID: 13010

\*\* Denotes Station Comprising Market With Proposed Common Attributable Ownership Interest (Countable)

\*\*†† Denotes Station With Common Attributable Ownership Interest but Not Part of Instant Market (Not Countable)

**Map Figure 8 - Market 3  
Principal Community Contours of  
AM & FM Stations Overlapping  
Proposed Commonly Owned AM & FM Stations  
with Interim Contour Overlap Method  
"Market" and "Market Core"**

prepared on behalf of  
Central Plains Finance LLC  
September 2021

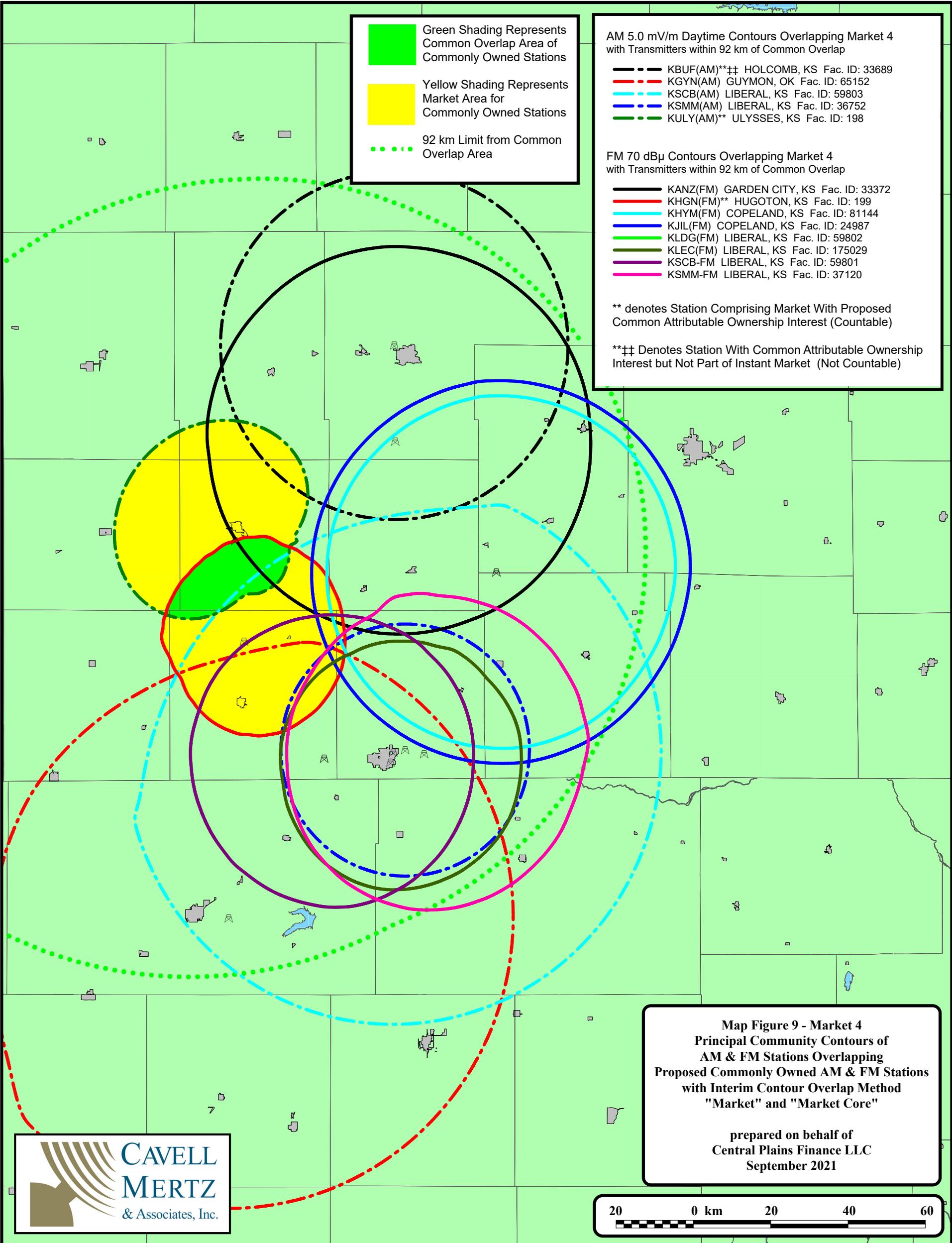


 Green Shading Represents Common Overlap Area of Commonly Owned Stations  
 Yellow Shading Represents Market Area for Commonly Owned Stations  
 92 km Limit from Common Overlap Area

**AM 5.0 mV/m Daytime Contours Overlapping Market 4 with Transmitters within 92 km of Common Overlap**  
 - - - KBUF(AM)\*\*‡‡ HOLCOMB, KS Fac. ID: 33689  
 - - - KGYN(AM) GUYMON, OK Fac. ID: 65152  
 - - - KSCB(AM) LIBERAL, KS Fac. ID: 59803  
 - - - KSMM(AM) LIBERAL, KS Fac. ID: 36752  
 - - - KULY(AM)\*\* ULYSSES, KS Fac. ID: 198

**FM 70 dBµ Contours Overlapping Market 4 with Transmitters within 92 km of Common Overlap**  
 — KANZ(FM) GARDEN CITY, KS Fac. ID: 33372  
 — KHGN(FM)\*\* HUGOTON, KS Fac. ID: 199  
 — KHYM(FM) COPELAND, KS Fac. ID: 81144  
 — KJIL(FM) COPELAND, KS Fac. ID: 24987  
 — KLDG(FM) LIBERAL, KS Fac. ID: 59802  
 — KLEC(FM) LIBERAL, KS Fac. ID: 175029  
 — KSCB-FM LIBERAL, KS Fac. ID: 59801  
 — KSMM-FM LIBERAL, KS Fac. ID: 37120

\*\* denotes Station Comprising Market With Proposed Common Attributable Ownership Interest (Countable)  
 \*\*‡‡ Denotes Station With Common Attributable Ownership Interest but Not Part of Instant Market (Not Countable)



**Map Figure 9 - Market 4**  
**Principal Community Contours of**  
**AM & FM Stations Overlapping**  
**Proposed Commonly Owned AM & FM Stations**  
**with Interim Contour Overlap Method**  
**"Market" and "Market Core"**  
  
 prepared on behalf of  
 Central Plains Finance LLC  
 September 2021

