

ENGINEERING STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS

This radio multiple ownership analysis was prepared to demonstrate that ownership of the following stations complies with the FCC’s “Interim” contour analysis method.¹ Specifically, the following stations were analyzed:

Call Sign / Facility ID	Location	Facilities
KWES(AM) / 160917 Licensed Facility	Ruidoso, NM	1450 kHz, 1 kW-D/0.91 kW-N, ND
KBUY(AM) / 70826 Licensed Facility	Ruidoso, NM	1360 kHz, 5 kW-D/0.2 kW-N, ND
KWES-FM / 70824 Licensed Facility	Ruidoso, NM	Channel 228C3 25 kW 57 m

The principal community contours of these stations are depicted on a map included herein as Figure 1. Since the principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) of the stations above are all involved in common overlap, an ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

Radio Markets

The “radio market” applicable to common ownership of the subject stations are defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. As listed in the Table below, there is one (1) defined “radio market” formed by the subject stations:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Station
Market 1	KWES, KBUY	KWES-FM

¹ See Report and Order and Notice of Proposed Rulemaking, MB Docket 02-277, FCC 03-127, Released July 2, 2003.

Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating stations having principal community contours that overlap or intersect the principal community contours, which define the radio market. Only those stations located within 92 km of the perimeter of the mutual overlap area of the defined market area were employed in the count of stations. Commonly owned stations, other than those that form the market in question were not considered in the count of stations in the defined market. The results of the analysis are tabulated below:

Defined Radio Markets	Total Number of Stations in the Radio Market
Market 1	3 AM, 7 FM; 10 Total

Figure 2 is a map depicting the radio market along with the principal community contours of other AM and FM stations in the defined market. Figure 3 is a tabulation of other stations in the defined markets. Only known licensed, operating stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission’s AM database and the appropriate Ground Wave Field Strength versus Distance Graph of 47 CFR 73.184. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR 73.313. Terrain data was derived from the USGS 1-second computer database for each of the FM stations using radials evenly-spaced every 5 degrees of azimuth.

Pursuant to Section 73.3555(a)(1)(iv), in a radio market with 14 or fewer full-power, commercial and noncommercial radio stations, an entity may have a cognizable interest in up to 5 commercial radio stations in total, with not more than 3 commercial stations in the same service (AM or FM). Furthermore, an entity may have a cognizable interest in no more than 50% of the full-power commercial and

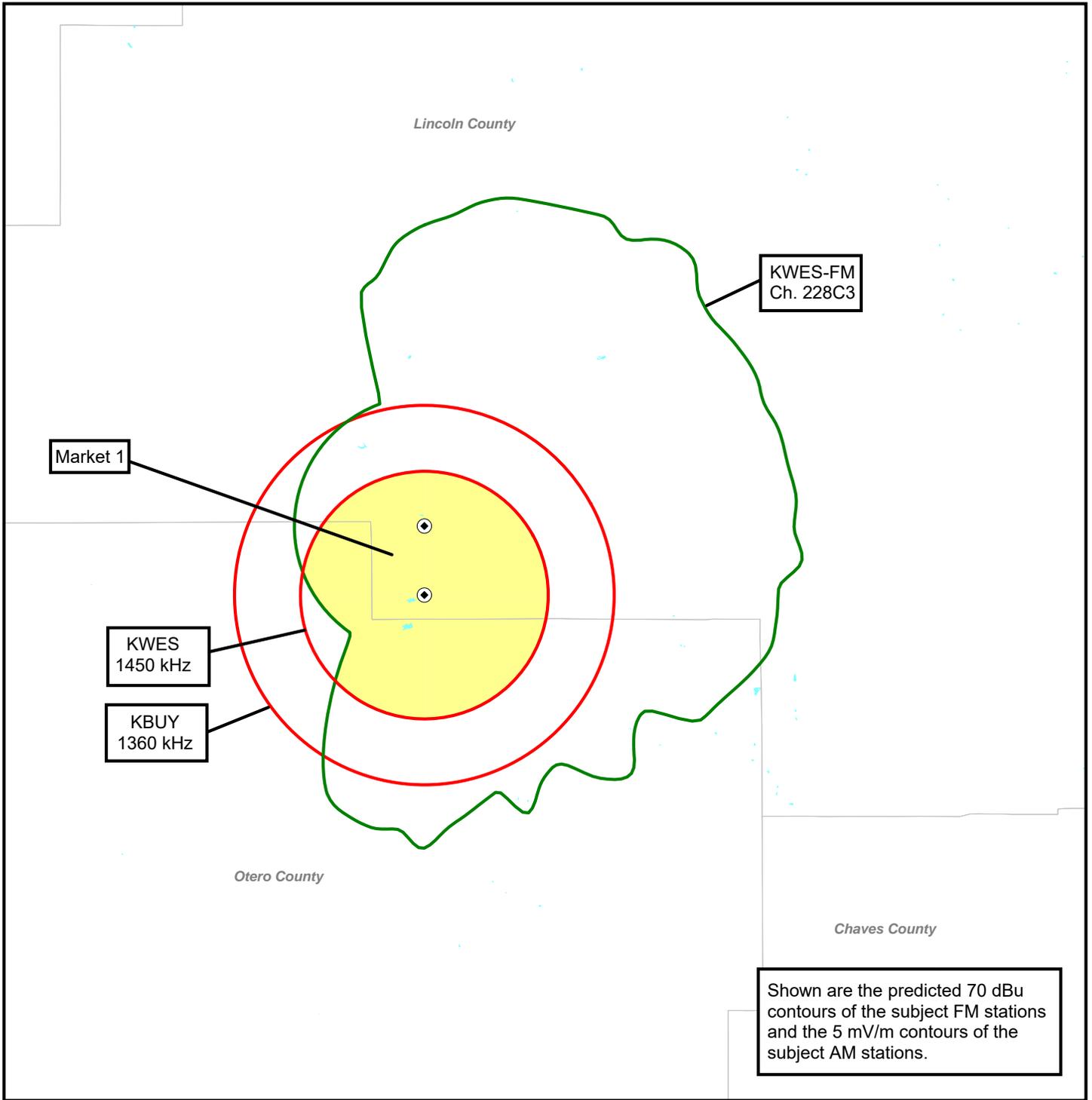
noncommercial radio stations in the market. Therefore, ownership of the aforementioned stations complies with Section 73.3555(a)(1)(iv) of the FCC Rules.



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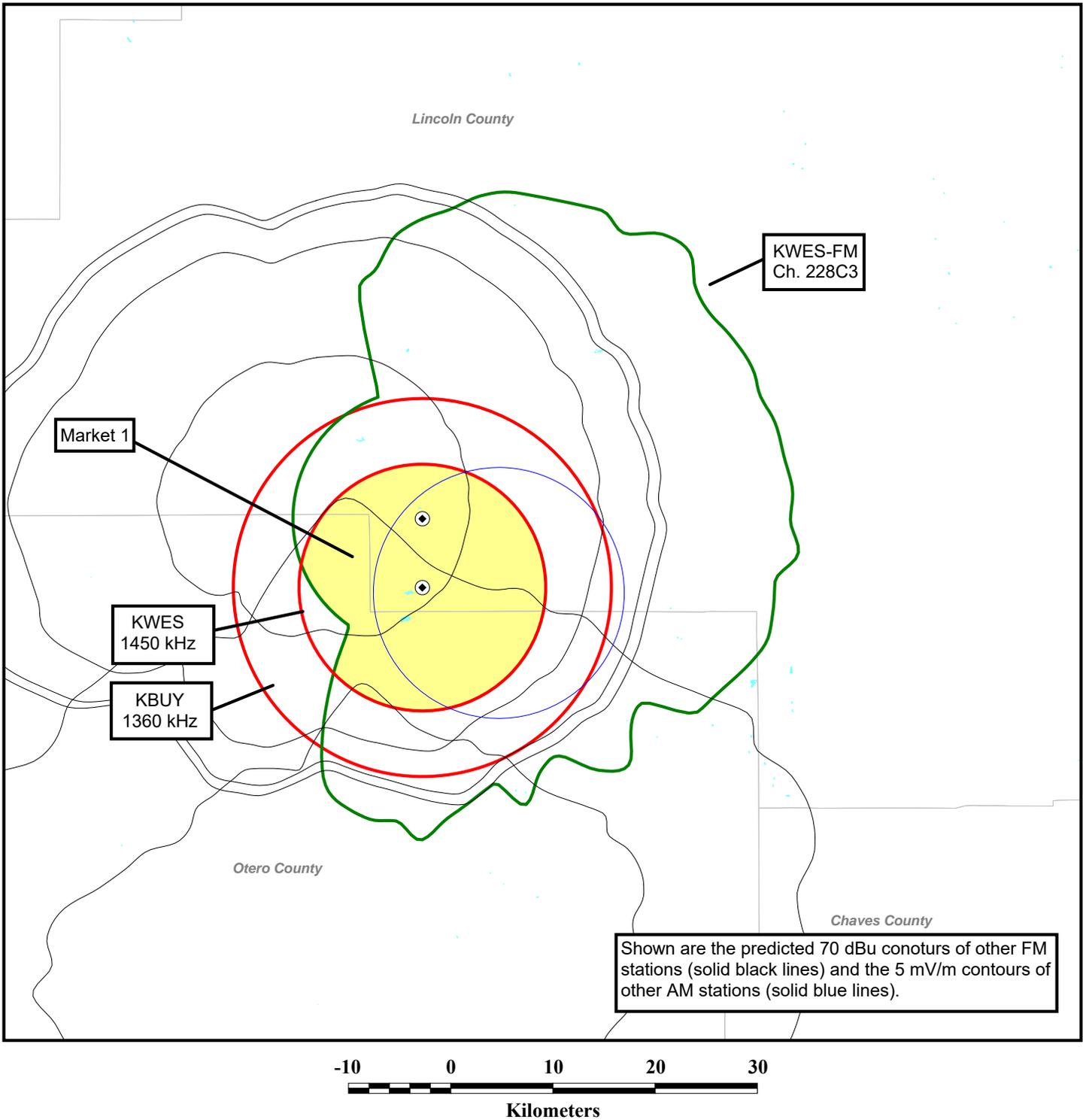
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PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

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**PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS
AND OF OTHER AM AND FM STATIONS IN THE MARKET**

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Figure 3

Tabulation of Other AM/FM Stations in the Radio Market

<u>FM Stations</u>				
<u>CALLSIGN</u>	<u>CITY</u>	<u>STATE</u>	<u>STATUS</u>	<u>Channel</u>
KNMB	Captain	NM	License	244 C1
KHII	Cloudcroft	NM	License	205 C2
KTMN	Cloudcroft	NM	License	250 C1
KENG	Ruidoso	NM	License	203 C3
KIDX	Ruidoso	NM	License	268 C2
<u>KKLB</u>	<u>Ruidoso</u>	<u>NM</u>	<u>License</u>	<u>217 C2</u>
Total	6			

<u>AM Stations</u>				
<u>CALLSIGN</u>	<u>CITY</u>	<u>STATE</u>	<u>STATUS</u>	<u>Freq.</u>
<u>KRUI</u>	<u>Ruidoso Downs</u>	<u>NM</u>	<u>License</u>	<u>1490</u>
Total	1			