

TECHNICAL 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
KAAK(FM) / 63872 Licensed Facility	Great Falls, MT	Channel 255C1 100 kW 147 m
KLFM(FM) / 56665 Licensed Facility	Great Falls, MT	Channel 225C1 100 kW 125 m
KMON-FM / 62331 Licensed Facility	Great Falls, MT	Channel 233C1 100 kW 151 m
KVVR(FM) / 84237 Licensed Facility	Dutton, MT	Channel 250C1 100 kW 218 m
KMON(AM) / 62330 Licensed Facility	Great Falls, MT	560 kHz, 5 kW-U, DA-N

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 all five (5) stations are 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 the Radio Market	
	AM Stations	FM Station
Market 1	KMON	KAAK, KLFM, KMON-FM, KVVR

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	6 AM, 26 FM, 32 Total

Figure 1 also depicts the principal community contours of other FM stations in the defined market. Figure 2 is a tabulation of the AM and FM stations in the defined market. Only known licensed, operating AM and FM 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)(ii), in a radio market with between 30 and 44 (inclusive) full-power, commercial and noncommercial radio stations, an entity may have a cognizable interest in up to 7 commercial radio stations in total, with not more than 4 commercial stations in the same service (AM or FM).

Therefore, ownership of the aforementioned stations complies with Section 73.3555(a)(1)(ii) of the FCC Rules.

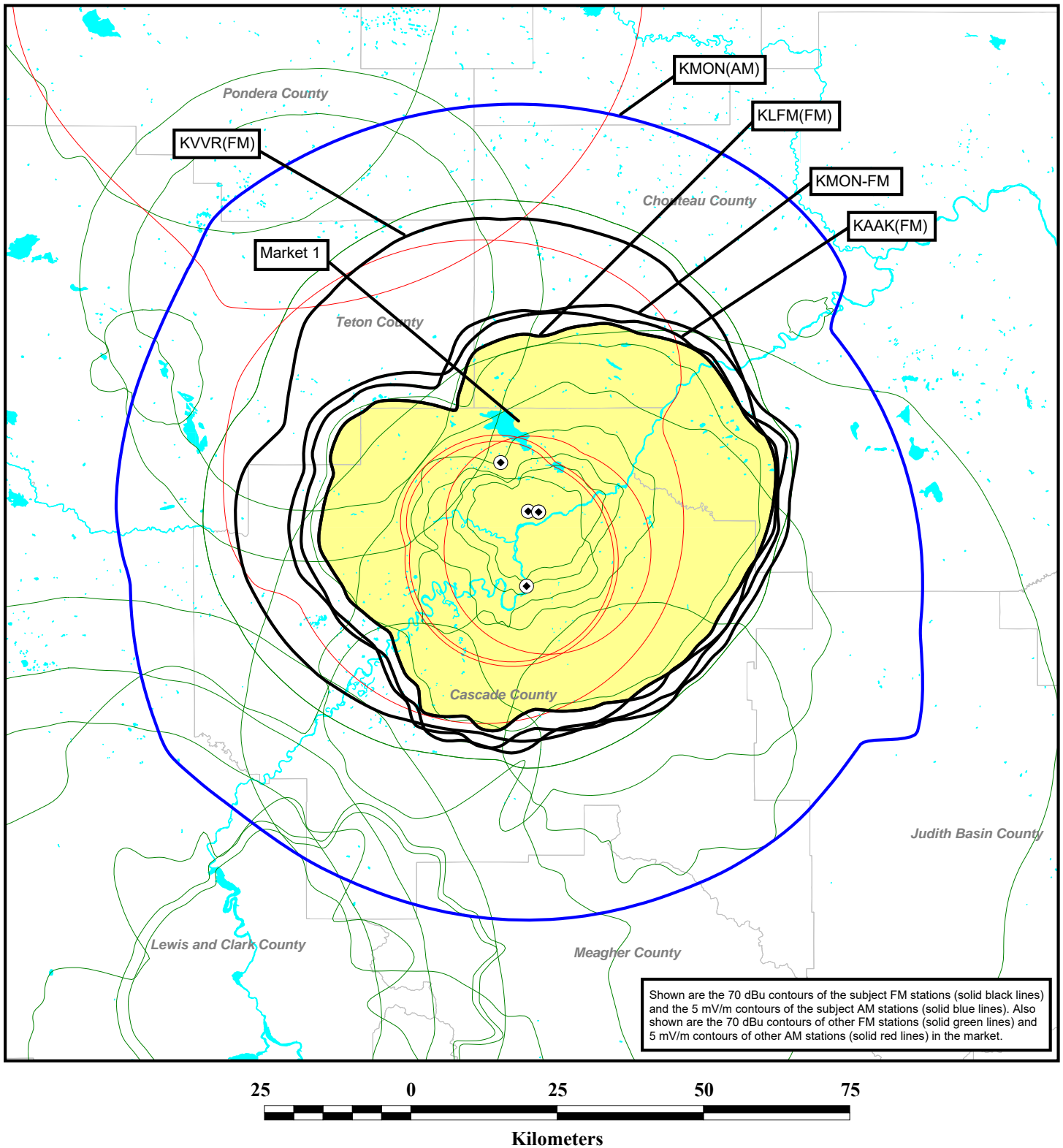
A handwritten signature in black ink, appearing to read "W. Jeffrey Reynolds". The signature is fluid and cursive, with the first name "W." being more distinct than the last name.

W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
5212 Station Way
Sarasota, Florida 34233
(941)329-6013

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Figure 1



MARKET 1 **PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS** **AND OF OTHER AM AND FM STATIONS IN THE MARKET**

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

Taulation of Stations in Radio Market

Market 1

FM Contours

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Status</u>	<u>Ch./Freq.</u>
KGFJ	BELT	MT	L2C	201 C2
KIKF	CASCADE	MT	AMD	285 C
KUDI	CHOTEAU	MT	L2C	204 A
KTZZ	CONRAD	MT	L2C	229 C1
KVVR	DUTTON	MT	AMD	250 C1
KINX	FAIRFIELD	MT	MOD	274 C1
KYPZ	FORT BENTON	MT	L2C	241 A
KAAK	GREAT FALLS	MT	L2C	255 C1
KAFH	GREAT FALLS	MT	L2C	218 A
KGFA	GREAT FALLS	MT	L2C	214 A
KGFC	GREAT FALLS	MT	L2C	205 A
KGPR	GREAT FALLS	MT	L2C	210 C3
KLFM	GREAT FALLS	MT	L2C	225 C1
KMON-FM	GREAT FALLS	MT	L2C	233 C1
KFRW	GREAT FALLS	MT	MOD	220 C2
KLSK	GREAT FALLS	MT	MOD	262 C1
KBLL	HELENA	MT	L2C	258 C1
KVCM	HELENA	MT	L2C	276 C1
KZMT	HELENA	MT	MOD	266 C
KMTX	HELENA	MT	AMD	287 C0
KMXM	HELENA VALLEY NE	MT	MOD	272 C2
KYPX	HELENA VALLEY SE	MT	MOD	293 C2
KQDI-FM	HIGHWOOD	MT	L2C	291 C1
KZIN-FM	SHELBY	MT	MOD	244 C1
KIMO	TOWNSEND	MT	L2C	297 C
<u>KWGF</u>	<u>VAUGHN</u>	<u>MT</u>	<u>L2C</u>	<u>269 C1</u>

Total 26

AM Contours

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Status</u>	<u>Ch./Freq.</u>
KEIN	GREAT FALLS	MT	Lic	1310
KQDI	GREAT FALLS	MT	Lic	1450
KXGF	GREAT FALLS	MT	Lic	1400
KMON	GREAT FALLS	MT	Lic	560
KHTC	MALMSTROM AFB	MT	Lic	1490
<u>KSEN</u>	<u>SHELBY</u>	<u>MT</u>	<u>Lic</u>	<u>1150</u>

Total 6