

Multiple Ownership (Missoula, MT)

The Commission requires the submission of a contour overlap analysis to demonstrate compliance with the local radio ownership rule for stations that are licensed to communities outside of a Nielsen Audio market. As described in the attached contour-based analysis prepared by W. Jeffrey Reynolds of du Treil, Lundin & Rackley, Inc., the transaction complies with the Commission's rules. In the defined radio market created using the contour overlap analysis, there are 36 radio stations. Therefore, common ownership of seven radio stations, no more than four in the same service, is permitted. Upon consummation of the proposed transaction, Townsquare will have an attributable interest in seven stations in the market (3 AM stations and 4 FM stations), which is permitted under the local radio ownership rule. As discussed in more detail in the Comprehensive Exhibit, six stations in the market (2 AM stations and 4 FM stations) will be divested to third parties.

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
KBAZ(FM) / 4700 Licensed Facility	Hamilton, MT	Channel 241C 53 kW 637 m
KGGL(FM) / 63874 Licensed Facility	Missoula, MT	Channel 227C 43 kW 777 m
KYSS-FM / 71759 Licensed Facility	Missoula, MT	Channel 235C 63 kW 729 m
KZOQ-FM / 32385 Licensed Facility	Missoula, MT	Channel 261C1 13.5 kW 641 m
KMPT(AM) / 71754 Licensed Facility	East Missoula, MT	930 kHz, 5 kW-D/1 kW-N, DA-N
KGVO(AM) / 71751 Licensed Facility	Missoula, MT	1290 kHz, 5 kW-U, DA-N
KGRZ(AM) / 63879 Licensed Facility	Missoula, MT	1450 kHz, 1 kW-U, ND1

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 seven (7) 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:

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

Defined Radio Market	Stations that Define the Radio Market	
	AM Stations	FM Station
Market 1	KMPT, KGVO, KGRZ	KBAZ, KGGL, KYSS-FM, KZOQ-FM

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, 30 FM, 36 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).

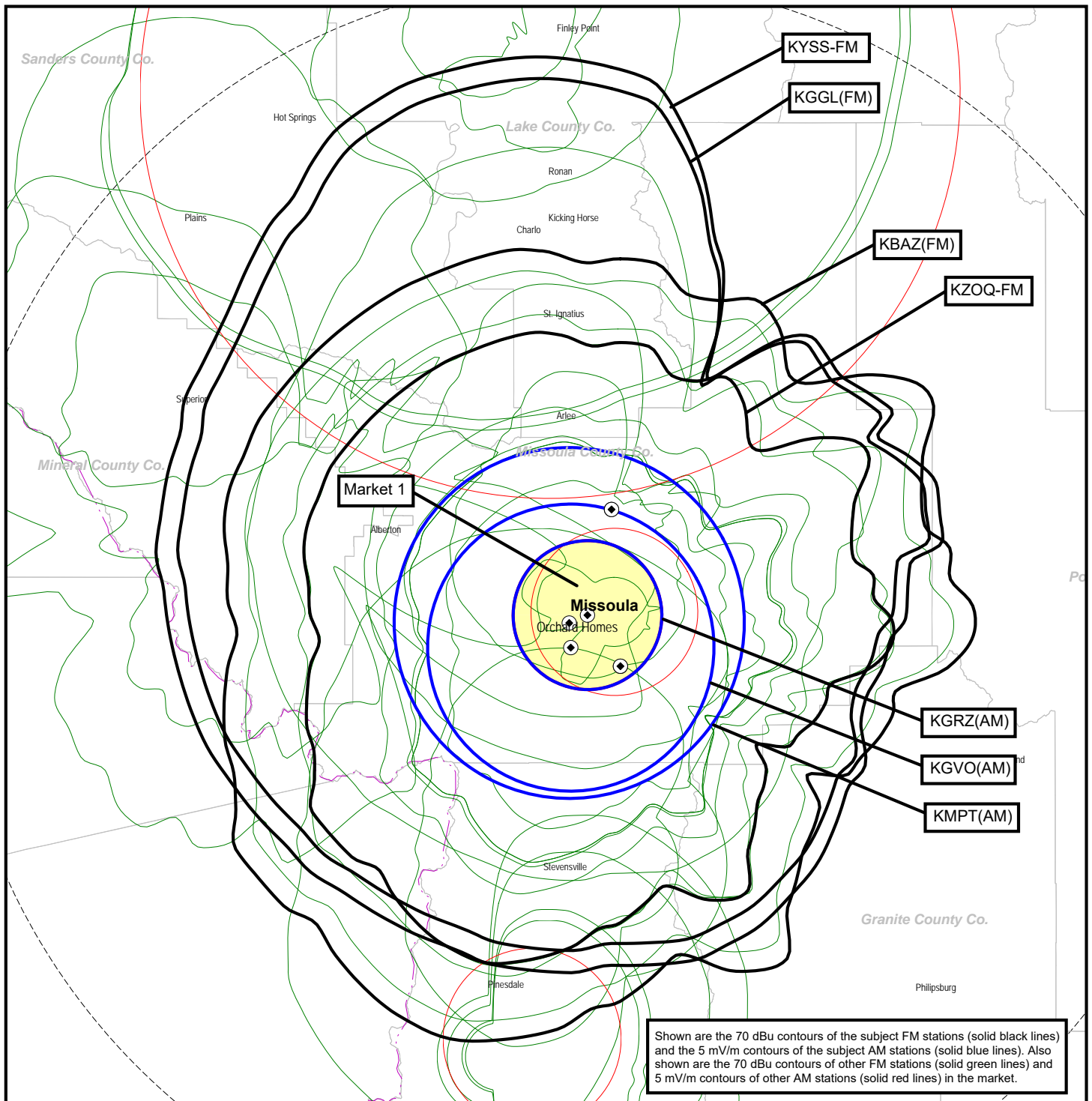
Therefore, ownership of the aforementioned stations complies with Section 73.3555(a)(1)(ii) of the FCC Rules.



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March 22, 2022



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>
KJFT	ARLEE	MT	L2C	212 C3
KIBG	BIGFORK	MT	L2C	264 C
KYMI	CHARLO	MT	L2C	248 C2
KHDV	DARBY	MT	MOD	300 C3
KDTR	FLORENCE	MT	L2C	277 C2
KAMM-FM	FRENCHTOWN	MT	AMD	268 C1
KBAZ	HAMILTON	MT	L2C	242 C
KMZO	HAMILTON	MT	L2C	214 A
KUFN	HAMILTON	MT	L2C	220 A
KHKM	HAMILTON	MT	MOD	254 C1
KDXT	LOLO	MT	L2C	250 C3
KBGA	MISSOULA	MT	L2C	210 A
KGGL	MISSOULA	MT	L2C	227 C
KJCG	MISSOULA	MT	L2C	202 C2
KMZL	MISSOULA	MT	L2C	216 C1
KUFM	MISSOULA	MT	L2C	206 C
KYJK	MISSOULA	MT	L2C	290 C2
KYSS-FM	MISSOULA	MT	L2C	235 C
KZOQ-FM	MISSOULA	MT	L2C	261 C1
KMSO	MISSOULA	MT	MOD	273 C0
KQRK	PABLO	MT	L2C	259 C2
KXDR	PINESDALE	MT	L2C	294 C0
KPLG	PLAINS	MT	MOD	218 C1
KMBM	POLSON	MT	L2C	214 A
KPJH	POLSON	MT	AMD	208 A
KKMT	RONAN	MT	MOD	222 C
KQEZ	ST. REGIS	MT	L2C	257 C2
KKVU	STEVENSVILLE	MT	AMD	283 C1
KENR	SUPERIOR	MT	L2C	298 C1
<u>KXEH</u>	<u>VICTOR</u>	<u>MT</u>	<u>L2C</u>	<u>204 A</u>
Total 30				

AM Contours

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Status</u>	<u>Ch./Freq.</u>
KERR	POLSON	MT	Lic	750
KMPT	EAST MISSOULA	MT	Lic	930
KLYQ	HAMILTON	MT	Lic	1240
KGVO	MISSOULA	MT	Lic	1290
KYLT	MISSOULA	MT	Lic	1340
KGRZ	MISSOULA	MT	Lic	1450
Total 6				