

## **Section 73.3555(a) Multiple Ownership**

Carroll County Broadcasting, Inc. ("Carroll") is filing a minor modification application to change the transmit location of KESA Channel 265A, Facility ID No. 48520, licensed to Eureka Springs, Arkansas and as such compliance with the Commission's Section 73.3555 Multiple Ownership Rules is required. KESA is not located in or listed as home to any Nielsen Audio Metro. Therefore, a Non-Nielsen Audio Market contour method ownership study is required.

Carroll is also the licensee of KTHS-FM, Facility ID No. 35667, Berryville, AR and KTHS(AM) 1480 kHz Facility ID No. 35668, Green Forest, AR.

Exhibit One shows the principal community contours of the three subject stations that make up the Defined Radio Market. The Defined Radio Market Boundary which is the combined contours of the three subject stations is shaded in green. Overlapping FM station contours are shown in black and overlapping AM station contours are shown in blue. Exhibit Two is a tabulation of the stations in Defined Radio Market.

No stations with transmitters more than 92 km. from the boundary of the common overlap of subject stations will be considered. Further, no other facility of which the principle shareholders of Carroll have an attributable interest has been be considered as a market contributor unless it is a subject station in the radio market under study.

A total of 26 stations make up the Defined Radio Market, There are six AM stations and 20 FM stations including the three subject stations that make up the market boundary.

Section 73.3555(a)(1)(iii) of the Commission's multiple ownership rules states "In a radio market with between 15 and 29 (inclusive) full power, commercial and noncommercial radio stations, a party may have a cognizable interest in not more than 6 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM)". Carroll has an attributable interest in one AM and two FM stations in the Defined Radio Market. Therefore, it is believed that this minor change application for KESA is in compliance with §73.3555(a)(1)(iii) of the rules.

The foregoing technical statement was prepared on behalf of Carroll Radio, Inc. by Donald Lynch of Horizon Broadcast Solutions, LLC, its Technical Consultant. Any information contained herein is true and accurate to the best of my belief and knowledge. All data relating to AM and FM facilities was taken from the FCC CDBS database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.

**KESA**

Eureka Springs, AR  
 BLH20100728ACI  
 Latitude: 36-21-38 N  
 Longitude: 093-44-55 W  
 ERP: 1.30 kW  
 HAAT: 169.39 m  
 Channel: 265  
 Frequency: 100.9 MHz  
 AMSL Height: 560.0 m  
 Elevation: 500.0 m  
 Horiz. Pattern: Directional  
 Vert. Pattern: No  
 Prop Model: None

**KTHS-FM**

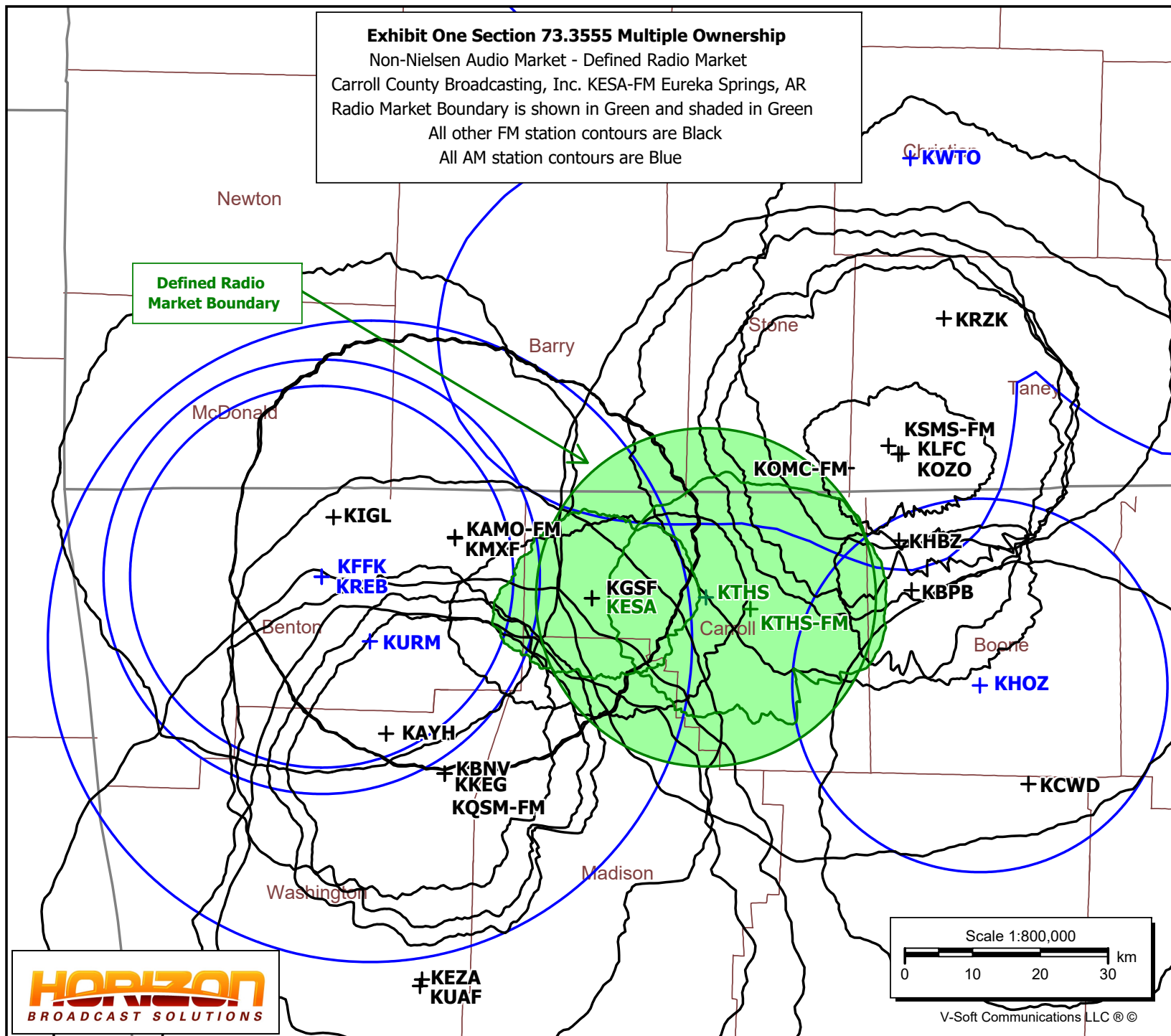
Berryville, AR  
 BLH20141020AAB  
 Latitude: 36-20-45.20 N  
 Longitude: 093-29-17.60 W  
 ERP: 3.20 kW  
 HAAT: 201.0 m  
 Channel: 296  
 Frequency: 107.1 MHz  
 AMSL Height: 591.0 m  
 Elevation: 542.0 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model: None

**KTHS**

Green Forest, AR  
 BL20130822AGH  
 Latitude: 36-21-42 N  
 Longitude: 093-33-40 W  
 Frequency: 1480 KHz  
 Power: 5.0 kW Day

**Exhibit One Section 73.3555 Multiple Ownership**

Non-Nielsen Audio Market - Defined Radio Market  
 Carroll County Broadcasting, Inc. KESA-FM Eureka Springs, AR  
 Radio Market Boundary is shown in Green and shaded in Green  
 All other FM station contours are Black  
 All AM station contours are Blue



## Exhibit Two - Table of Stations Shown

Total number of overlapping contours: 26

### Reference: Defined Market

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KTHS	AM	1480	GREEN FOREST	AR	BL20130822AGH	0.0	0.0
KTHS-FM	FM	296C3	Berryville	AR	BLH20141020AAB	6.8	105.0
KESA	FM	265A	Eureka Springs	AR	BLH20100728ACI	16.8	269.6

**Total Stations in Defined Market: 3**

Overlapping Contours:

### FM Stations:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KLFC	FM	201A	Branson	MO	BLED20020805AAZ	35.8	53.8
KGSF	FM	204C3	Huntsville	AR	BLED20130819ACA	16.8	269.7
KAYH	FM	207C2	Fayetteville	AR	BLED20120925AAD	51.3	247.0
KOZO	FM	209C2	Branson	MO	BLED19980529KB	35.4	53.5
KBNV	FM	211C2	Fayetteville	AR	BLED20000821ABC	46.5	236.1
KSMS-FM	FM	213C2	Point Lookout	MO	BLED19971223KD	35.0	50.4
KUAF	FM	217C0	Fayetteville	AR	BLED20190725AAW	71.2	216.5
KBPB	FM	220A	Harrison	AR	BLED20010503AAM	30.3	88.1
KQSM-FM	FM	221C3	Fayetteville	AR	BLH19960202KA	46.5	236.1
KIGL	FM	227C1	Seligman	MO	BLH19940601KB	56.2	282.3
KAMO-FM	FM	232C2	Rogers	AR	BLH19951206KC	38.1	283.6
KCWD	FM	241C2	Harrison	AR	BMLH20181204AAQ	55.0	120.2
KKEG	FM	252C1	Bentonville	AR	BLH19960813KA	46.5	236.1
KOMC-FM	FM	261C2	Kimberling City	MO	BLH19990510KC	28.2	47.6
KMXF	FM	270C2	Lowell	AR	BLH20130729AOB	38.0	283.4
KHBZ	FM	275C1	Harrison	AR	BLH20130926BCC	29.7	73.7
KRZK	FM	292C2	Branson	MO	BLH19970828KE	54.1	40.6
KEZA	FM	300C	Fayetteville	AR	BLH19820917AU	70.2	216.7

**Total Other FM Stations: 18**

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KWTO	AM	560	SPRINGFIELD	MO	BL19890817AC	71.4	25.1
KURM	AM	790	ROGERS	AR	BL19850122AA	50.0	262.7
KHOZ	AM	900	HARRISON	AR	BL7454	42.4	107.9
KREB	AM	1190	BENTONVILLE-BELLA	AR	BL20060615ADP	56.8	273.2
KFFK	AM	1390	ROGERS	AR	BL20050620AEG	56.8	273.2

**Total Other AM Stations: 5**

**Total number of stations in Defined Market: 26**

Distance and bearing calculations from coordinates: 36-21-42 N, 093-33-40 W

Duopoly Options:

TV: Not Included

FM: 3.16 mV/m (70 dBu); Include NCE

AM: 5.0 mV/m

Stations more than 92 km from the common area were excluded.