

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS

This radio multiple ownership analysis was prepared on behalf of Diamond Shores Broadcasting, LLC which has attributable interest in the stations tabulated below and is proposing to acquire FM station WKLO. Below is a tabulation of facilities for each station. 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
WUME-FM / 28600 Licensed Facility	Paoli, IN	Channel 237A 3 kW 86 m
WSEZ(AM) / 28601 Licensed Facility	Paoli, IN	1560 kHz, 0.25 kW-D, ND
WZZB(AM) / 58381 Licensed Facility	Seymour, IN	1390 kHz, 1 kW-D, ND
WXKU-FM / 3347 Licensed Facility	Austin, IN	Channel 224A 3.6 kW 129 m
<i>WKLO(FM) / 88536</i> <i>Licensed Facility</i>	<i>Hardinsburg, IN</i>	<i>Channel 245A 3.5 kW 132 m</i>

The principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) of these stations are depicted on a map included herein as Figure 1. Since the principal community contours of WKLO(FM), WUME-FM and WSEZ(AM) 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	WSEZ	WKLO, WUME-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	3 AM, 5 FM; 8 Total

Figure 2 depicts the principal community contours of other FM stations in the defined radio market. Figure 3 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)(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). In addition, no entity may have a cognizable interest in more than 50% of the full-power, commercial and noncommercial radio stations in such a market unless the combination of stations comprises not more

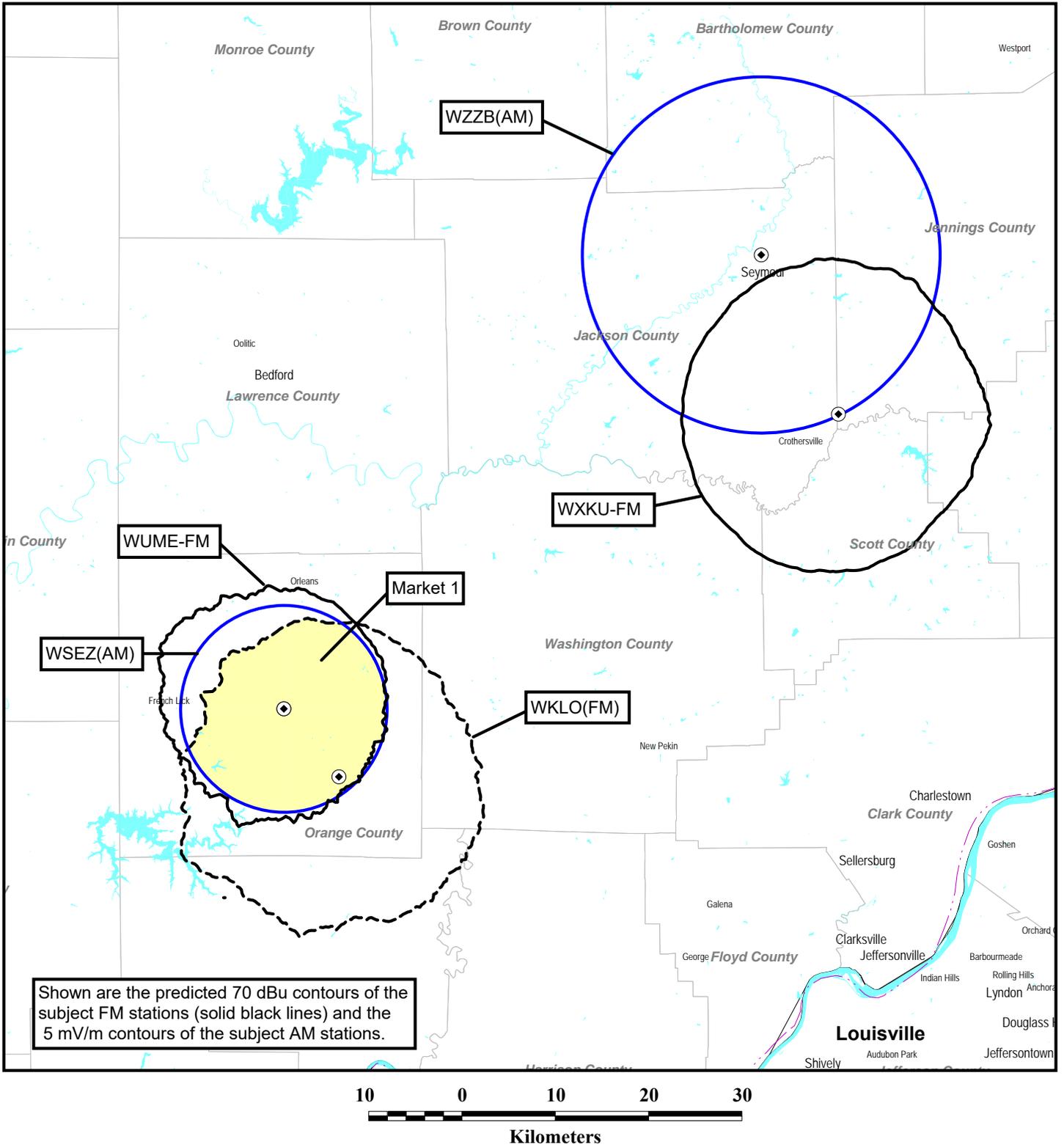
than one AM and one FM station. Therefore, ownership of the aforementioned stations complies with Section 73.3555(a)(1)(iv) of the FCC Rules.



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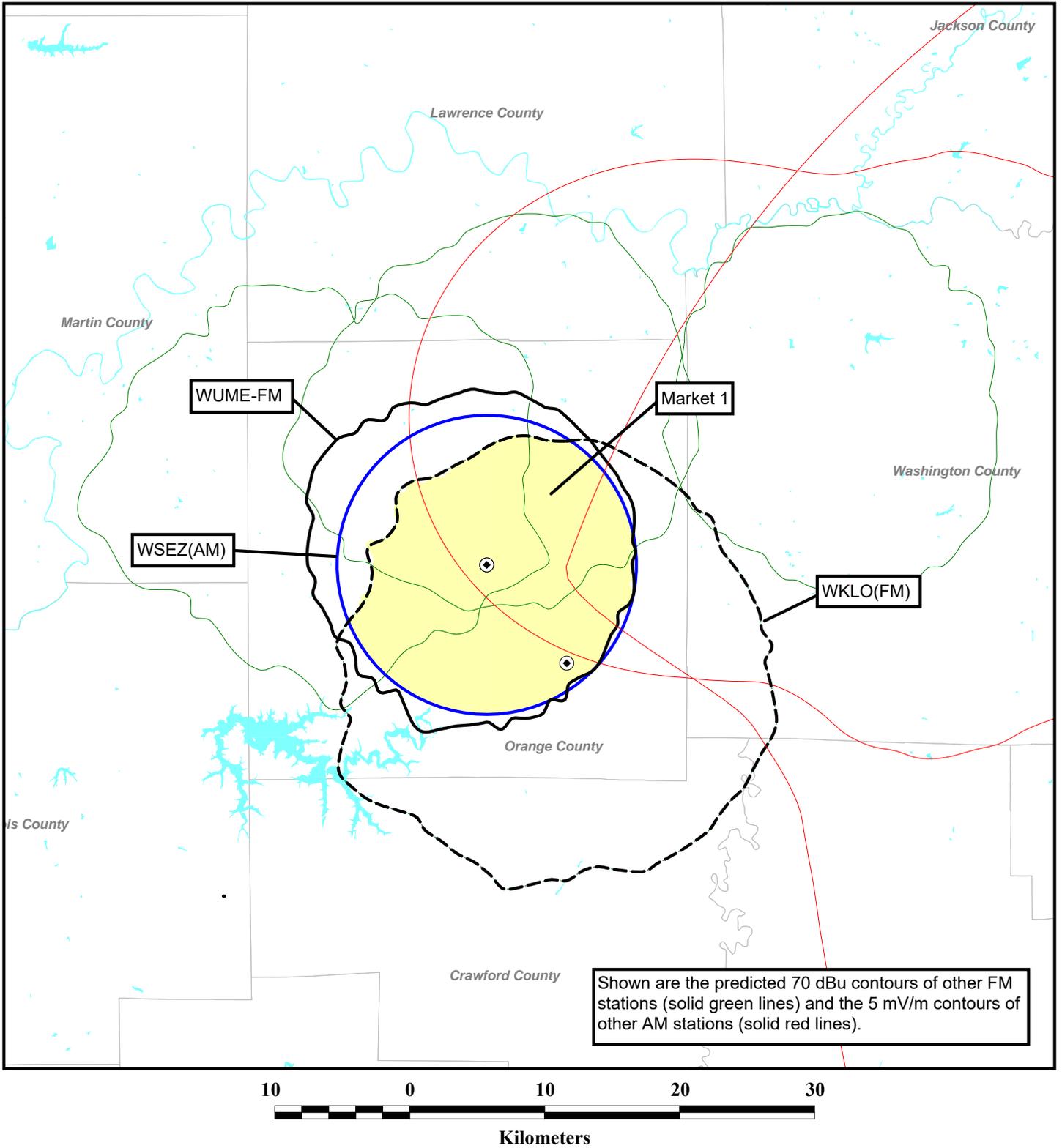
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March 17, 2022



PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

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



**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>
WFLQ	FRENCH LICK	IN	MOD	261 A
WKLO	HARDINSBURG	IN	L2C	245 A
WPHZ	ORLEANS	IN	L2C	273 A
WUME-FM	PAOLI	IN	L2C	237 A
WSLM-FM	SALEM	IN	L2C	250 A

Total 5

AM Contours

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Status</u>	<u>Ch./Freq.</u>
WSEZ	PAOLI	IN	Lic	1560
WHAS	LOUISVILLE	KY	Lic	840
WSLM	SALEM	IN	Lic	1220

Total 3