

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
HOCHMAN HAWAII FIVE, INC.

This radio multiple ownership analysis was prepared on behalf of Hochman Hawaii Five, Inc. (herein “Hochman”). Hochman has attributable interest in the stations tabulated below including a proposal to have controlling interest in KRYL. Below is a tabulation of facilities for each station, including KRYL. This analysis was prepared under the FCC “Interim” contour analysis method.\*

Call Sign / Facility ID	Location	Facilities
KQMY / 164113 Licensed Facility	Paia, HI	Channel 271C2 0.33 kW 1796 m
KQMY / 164113 Construction Permit	Paia, HI	Channel 271C1 0.9 kW 1755 m
KONI / 17023 Licensed Facility	Lanai City, HI	Channel 284C 69 kW 696 m
KRKH / 170964 Licensed Facility	Wailea-Makena, HI	Channel 247C2 1.446 kW 696 m
KRYL / 164100 Licensed Facility	Haiku, HI	Channel 293C 69 kW 696 m

The principal community contours (3.16 mV/m for FM stations) of the stations are depicted on a map included herein as Figure 1. Since the principal community contours of all of the stations listed above 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	FM Stations that Define Radio Market
Market 1	KQMY (License & CP), KRKH, KONI, KRYL

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\* 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. The results of the analysis are tabulated below:

Defined Radio Markets	Total Number of Stations in the Radio Market
Market 1	6 AM, 18 FM; 24 Total

Figure 2 is a tabulation of other stations in the defined market. Only known licensed, operating stations were employed for the study. It is noted that the tabulation is not a complete list of all of the other stations in the market, but rather enough stations to show compliance with the FCC’s radio multiple ownership rules. Distances to the AM 5 mV/m coverage contours were predicted using the antenna patterns 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 3.16 mV/m contours were determined based on the method of 47 CFR 73.313. Terrain data was derived from the N.G.D.C. 3 second computer database for each of the FM stations using radials evenly-spaced every 5 degrees of azimuth.

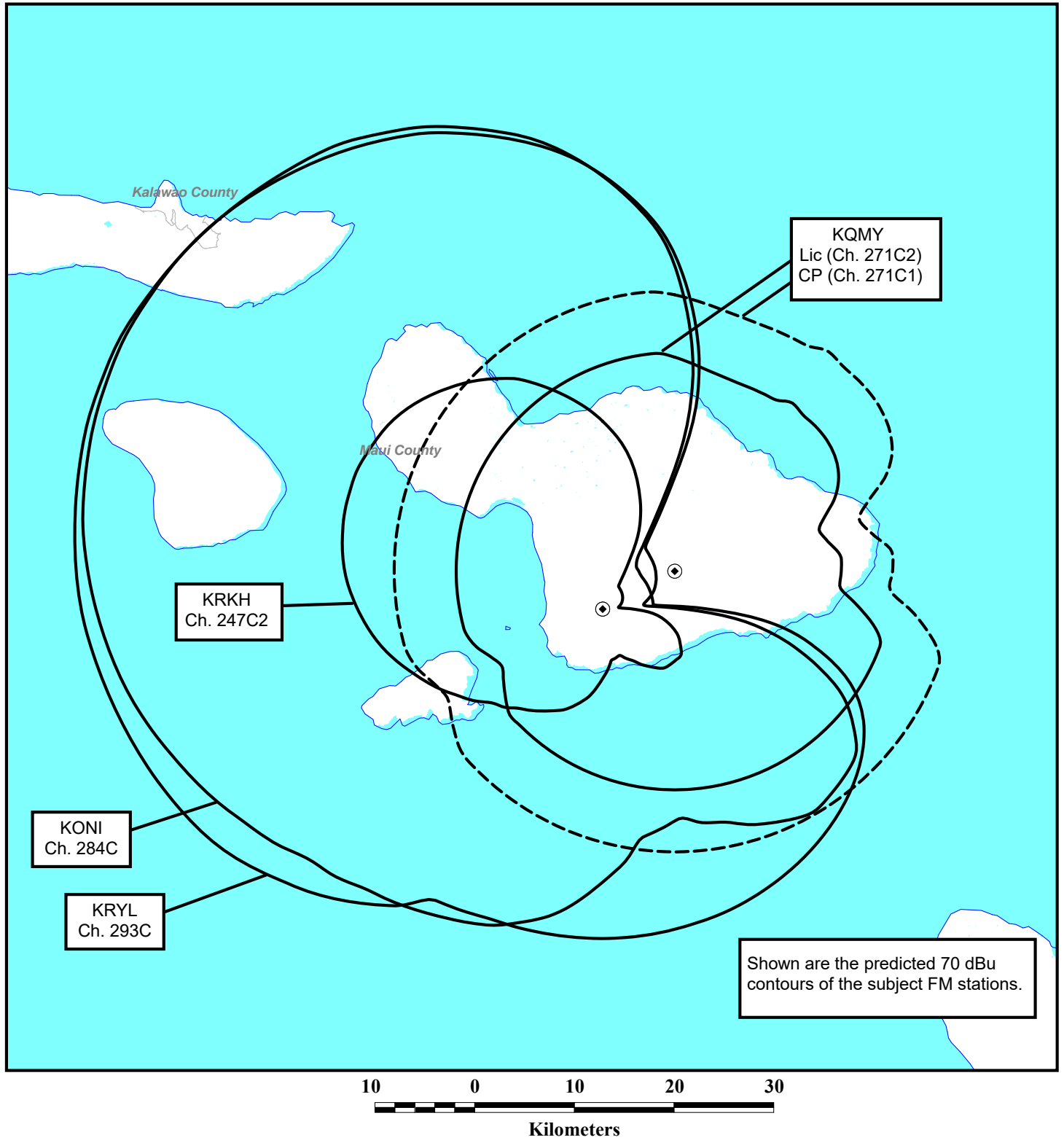
Based on the above, the proposed acquisition complies with Section 73.3555(a) of the FCC Rules.



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## PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

du Treil, Lundin & Rackley, Inc. Sarasota, Florida 34237

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Tabulation of Other Stations Defined in Radio Market 1

<u>AM Stations</u>			
<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency/Channel</u>
KAOI	KIHEI	HI	1110
KUAU	HAIKU	HI	1570
KNUI	WAILUKU	HI	550
KMVI	KAHULUI	HI	900
KCIK	KIHEI	HI	740
<u>KEWE</u>	<u>KAHULUI</u>	<u>HI</u>	<u>1240</u>
<b>Total</b>	<b>6</b>		

<u>FM Stations</u>			
<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency/Channel</u>
KPMW	HALIIMAILE	HI	288 C2
KJKS	KAHULUI	HI	260 C
KLHI-FM	KAHULUI	HI	223 C2
KKHI	KAUNAKAKAI	HI	240 C1
KHEI-FM	KIHEI	HI	298 C2
KMKV	KIHEI	HI	264 C0
KPOA	LAHAINA	HI	228 C
KDLX	MAKAWAO	HI	232 C1
KJMD	PUKALANI	HI	252 C1
KIPM	WAIKAPU	HI	209 C
KKUA	WAILUKU	HI	214 C
KAOI-FM	WAILUKU	HI	236 C1
KMNO	WAILUKU	HI	219 C1
<u>KJHF</u>	<u>KUALAPUU</u>	<u>HI</u>	<u>276 C2</u>
<b>Total</b>	<b>14</b>		