

Engineering Exhibit
Radio Multiple Ownership Study
prepared for
Premier Broadcasters, Inc.

This statement is provided to support a minor modification of FM Station Construction Permit application on behalf of *Premier Broadcasters, Inc.* (“*Premiere*”), the proposed assignee (file# 0000177508) of an authorization for unbuilt digital FM station KVNW, Channel 225C3, Facility ID 189494, Napavine, WA. KVNW is located in the same region as *Premiere’s* two existing radio stations. This statement addresses the minor modification proposal’s compliance with the FCC’s radio multiple ownership rules. Including KVNW, *Premier* proposes to be the licensee of the three radio stations in the region as listed below.

Premier Broadcasters, Inc. Proposed Radio Stations

Call Sign	Ch/Freq.	Fac ID	Location
KITI-FM	236A	53396	Winlock, WA
KITI	1420	53398	Centralia - Chehalis, WA
KVNW	225C3	189494	Napavine, WA

The FCC established a means of evaluating radio station multiple ownership issues utilizing existing Nielsen Audio and BIA market data for markets with established geographic boundaries and a separate “interim” means for evaluating radio station multiple ownership issues beyond established radio market geographic boundaries (FCC 03-127, released July 2, 2003). The three subject radio stations are neither home to nor licensed to any Nielsen Audio Metro. Accordingly, demonstration of compliance with the local radio ownership rule requires an analysis under the FCC’s interim contour-overlap methodology.

Contour Overlap Analysis: A “market” is defined as the area encompassed by the overlapping principal community contours of the radio stations of which an entity is proposing to have common ownership interest or attribution. The attached Figure 1 supplies the principal community coverage contours for *Premiere’s* two existing radio stations with that of KVNW.

The KITI(AM) and KITI-FM facilities have principal community contour overlap with KVNW. This overlap results in common ownership of two FM stations and one AM station in a

single radio market. The market is bounded by the union of the KITI(AM) and KVNW(FM) principal community contours.

Figure 2 and the associated Table 1 show that there are a total of 14 licensed radio stations that provide principal community contour service to some portion of the market and are located within 92 km of the common overlap area. In a market with 14 or fewer radio stations, under §73.3555(a)(1)(iv) an entity may own a total of five radio stations, three of which may be in the same service, provided that the count of commonly owned stations does not exceed 50 percent of the total number. Thus, the proposed common ownership of two FM stations and one AM station is in compliance with §73.3555(a).

List of Attachments

Figure 1	Radio Multiple Ownership Overview
Figure 2	Principal Community Contours Overlapping Market
Table 1	Radio Market Station Listing

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Figure 1
Radio Multiple Ownership Overview

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September, 2022

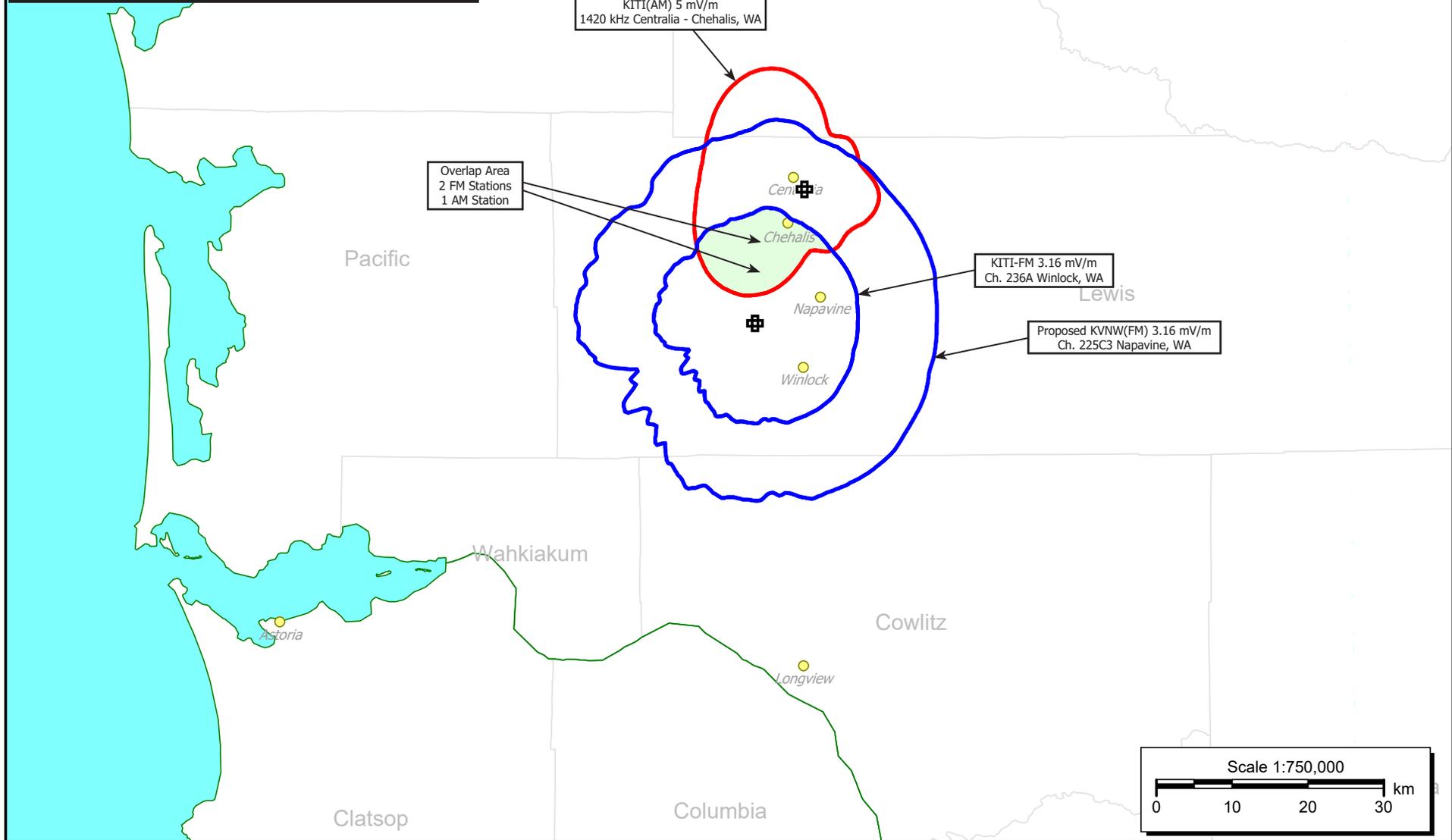
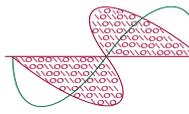


Figure 2 Principal Community Contours Overlapping Market

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September, 2022



Chesapeake RF Consultants, LLC
Radiofrequency Consulting Engineers
Digital Television and Radio

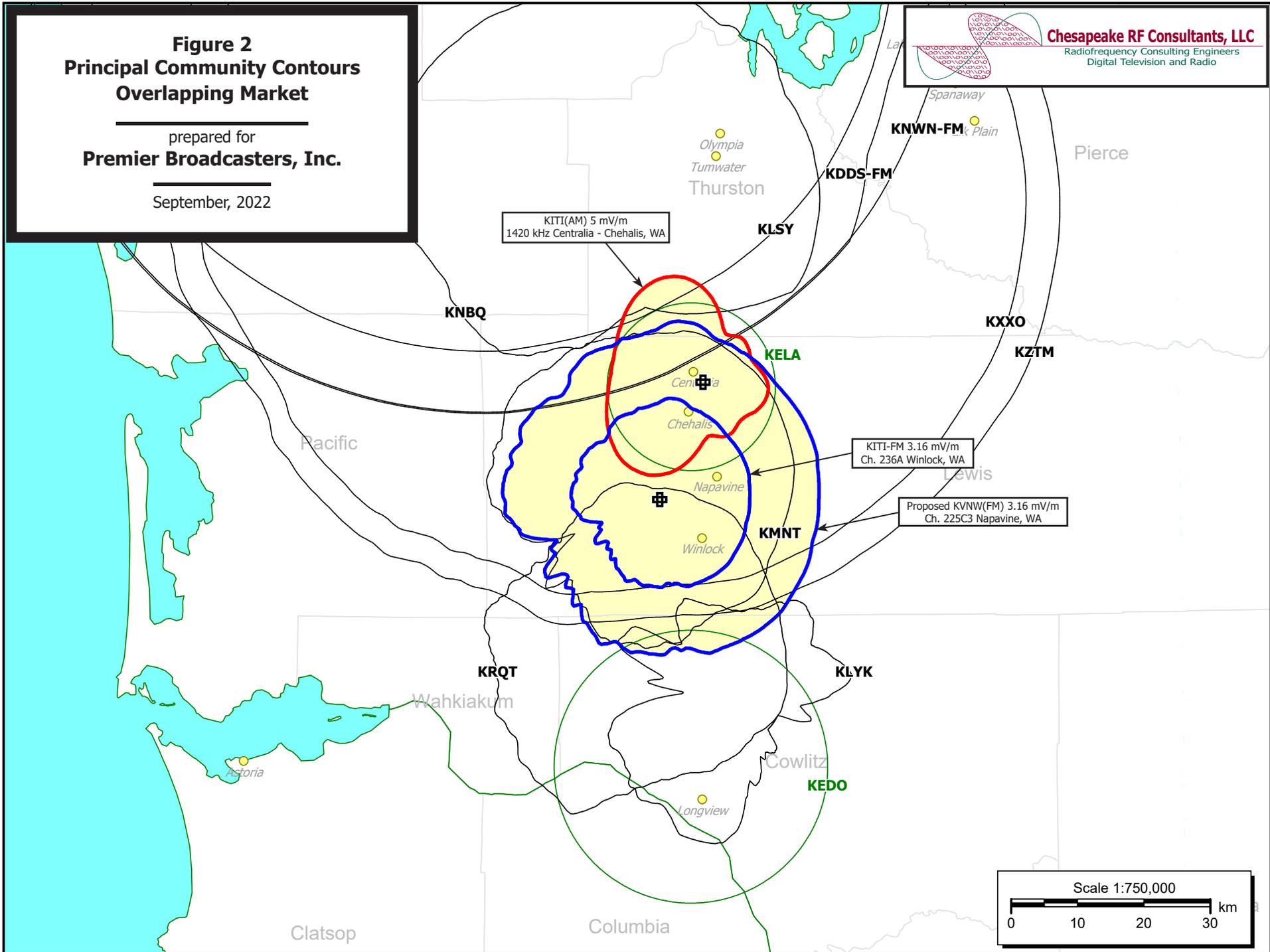


Table 1
Radio Market Station Listing
Premier Broadcasters, Inc.



Market Definition: Proposed Commonly Owned Stations

Count	Call Sign	Ch/freq	Fac ID	Location
1	KITI-FM	236A	53396	Winlock, WA
2	KITI	1420	53398	Centralia - Chehalis, WA
3	KVNW	225C3	189494	Napavine, WA

Market Stations - Overlapping Principal Community Contours

Count	Call Sign	Ch/freq	Fac ID	Location
4	KEDO	1270	2814	Longview, WA
5	KDDS-FM	257C	33622	Elma, WA
6	KELA	1470	32996	Centralia - Chehalis, WA
7	KLSY	229C0	164149	Belfair, WA
8	KLYK	233A	71007	Kelso, WA
9	KMNT	282C3	162476	Chehalis, WA
10	KNBQ	253C2	189496	Central Park, WA
11	KNWN-FM	249C	51167	Oakville, WA
12	KRQT	296C3	2813	Castle Rock, WA
13	KXXO	241C	67027	Olympia, WA
14	KZTM	275C	33829	Mckenna, WA

14 Total Number of Stations in Market