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## **MULTIPLE OWNERSHIP SERVICE CONTOUR ANALYSIS**

**Prepared for  
Cochise Media Licenses, LLC  
March 2016**

The attached analysis of compliance with the radio multiple ownership rules was prepared in accordance with the Rules and Regulations of the Federal Communications Commission, in connection with an application for modification of the construction permit for a new FM station at Dove Creek, Colorado (Facility ID #190470).

### **Unrated Market**

The proposed facility will operate outside any Nielsen rated market, but the proposed facility has principal community contour overlap with attributable station KDVC(FM) Dove Creek.<sup>1</sup>

All of these stations operate outside any market rated by Nielsen. Therefore, analysis has been made consistent with the Commission's interim rules for unrated markets. The 70 dBu contours of FM stations were determined from the technical data contained in the most recent edition of the FCC FM Database. The listed antenna height above average terrain was used together with topographic data obtained from the digitized 30 second or 3 second database. The 5 mV/m daytime contours of AM stations were determined from the technical data contained in the most recent edition of the FCC AM Database. The listed antenna parameter information was used

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<sup>1</sup> KDVC holds a construction permit for relocation some 125 kilometers north, relicensed to Loma, Colorado. The KDVC construction permit facility has been constructed and the license application is pending as BLH-20110427AAT. The KDVC facility at Loma does not have principal community contour overlap with the proposed facility.

Program test authority and grant of the license at Loma have been held up, pending the activation of a new station licensed to Dove Creek. While licensing of the new Dove Creek station proposed herein will resolve that issue, out of an abundance of caution the instant ownership study assumes that both stations remain licensed at Dove Creek.

together with a digitized version of the FCC M-3 or Region II ground conductivity database.

The service contours were plotted using correct map projection mathematics. Those stations whose transmitter sites are within the respective principal community service contours of the stations proposed to be commonly owned have only the sites rather than their contours shown. All contours and enclosed transmitter site locations have been labeled. A list of all stations considered is included with this statement.

In counting stations providing service to the "market" defined by each of the discrete clusters formed in unrated markets, stations whose transmitter sites are located in excess of 92 km from the perimeter of the common overlap area have been excluded, as have other stations to be commonly-owned but which are not a part of the discrete cluster being studied.

This exhibit evidences at least the minimum number of stations necessary to demonstrate compliance with the rules concerning radio multiple ownership in unrated markets. In order to qualify for common ownership of this OAM/2FM cluster, there must be at least 4 stations in the relevant "market". This study demonstrates that there are at least 5 stations in the relevant market.

March 11, 2016

A handwritten signature in black ink, appearing to read "Erik C. Swanson". The signature is fluid and cursive, with the first name "Erik" and last name "Swanson" clearly distinguishable.

Erik C. Swanson

Hatfield & Dawson Consulting Engineers

