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## **MULTIPLE OWNERSHIP ANALYSIS**

**Prepared for  
South Sound Broadcasting, LLC  
September 2009**

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 BPH-20090626AAO for minor modification of FM station KOMO-FM on Channel 249C at Oakville, Washington.

The only other station in the vicinity which is directly attributable to South Sound is KLSY on Channel 300A South Bend. The original BPH-20090626AAO filing included a demonstration that the combination of KOMO-FM and KLSY is in compliance with the rules concerning radio multiple ownership in unrated markets.

This additional showing reflects the fact that KOMO-FM is being operated by Fisher Broadcasting under an LMA. Fisher also has an attributable interest in three other stations in the vicinity, each of which has principal community contour overlap with KOMO-FM:

KVI(AM)	570 kHz	Seattle
KOMO(AM)	1000 kHz	Seattle
KPLZ-FM	268C	Seattle

The Fisher stations do not have principal community contour overlap with KLSY, and KLSY does not operate within the Seattle-Tacoma Arbitron market.

### **Rated Market Analysis**

Fisher's stations KVI(AM), KOMO(AM), and KPLZ-FM are licensed to communities located within the Seattle-Tacoma Arbitron rated market. While KOMO-FM is licensed to a community outside

that market, it provides service to that market. In order for a single entity to have a cognizable interest in this 2AM/2FM cluster, §73.3555(a) requires that there must be at least 8 stations in the relevant market. BIA reports that there are at least 70 commercial and non-commercial radio stations which are considered “home” to the Seattle-Tacoma market. Therefore the proposed modification of KOMO-FM is in compliance with §73.3555(a) with regard to the rated Seattle-Tacoma market.

### **Unrated Market Analysis**

KOMO-FM is licensed to a community in Grays Harbor County, which is not within any Arbitron-rated market. Accordingly, an additional ownership 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 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 do not have overlap with 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 2AM/2FM cluster, there must be at least 8 stations in the

relevant “market”. This study demonstrates that there are at least 38 stations in the relevant market.

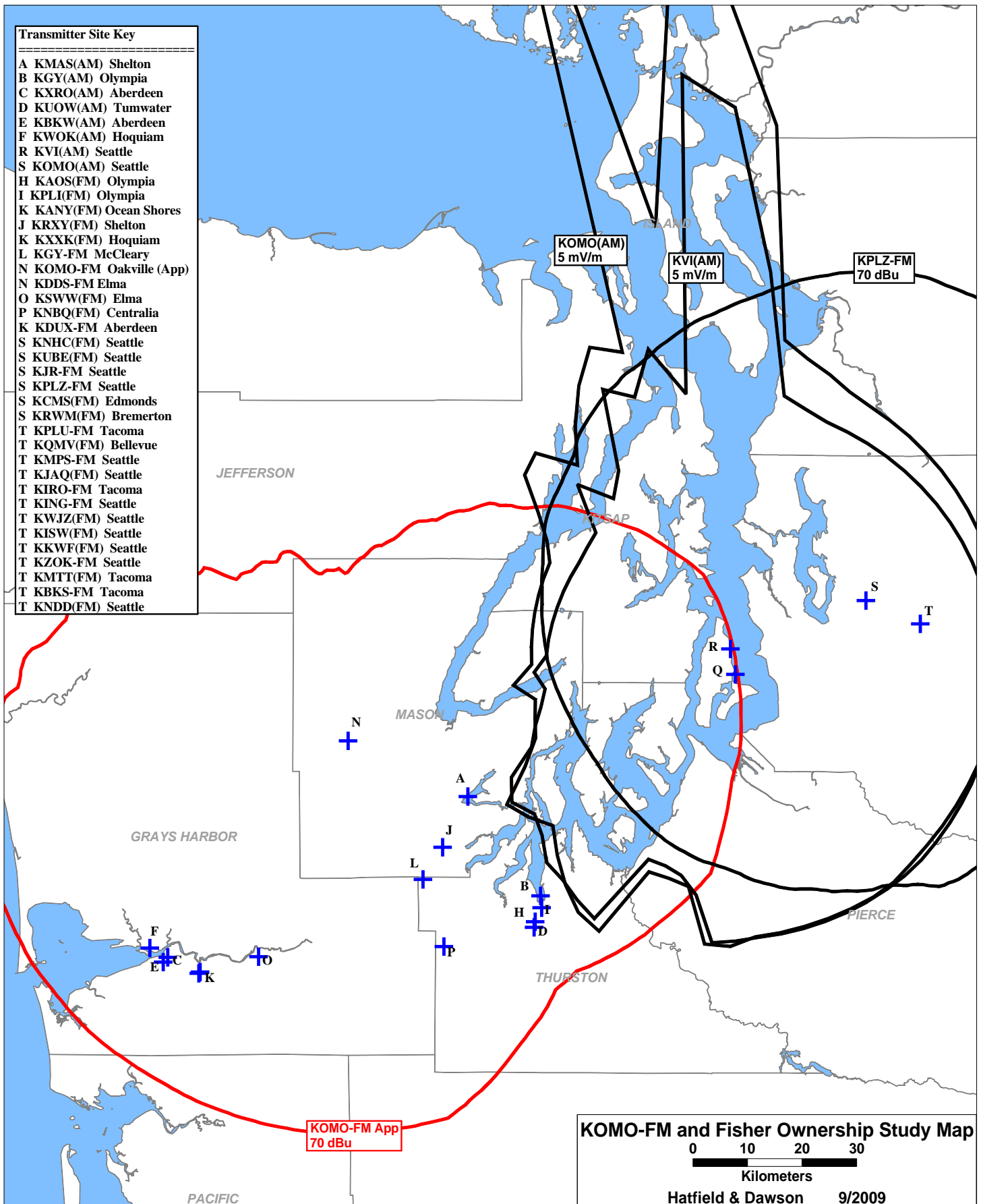
September 14, 2009



Erik C. Swanson, P.E.

# Transmitter Site Key

A KMAS(AM) Shelton  
 B KGY(AM) Olympia  
 C KXRO(AM) Aberdeen  
 D KUOW(AM) Tumwater  
 E KBKW(AM) Aberdeen  
 F KWOK(AM) Hoquiam  
 R KVI(AM) Seattle  
 S KOMO(AM) Seattle  
 H KAOS(FM) Olympia  
 I KPLI(FM) Olympia  
 K KANY(FM) Ocean Shores  
 J KRXY(FM) Shelton  
 K KXXK(FM) Hoquiam  
 L KGY-FM McCleary  
 N KOMO-FM Oakville (App)  
 N KDDS-FM Elma  
 O KSWW(FM) Elma  
 P KNBQ(FM) Centralia  
 K KDUX-FM Aberdeen  
 S KNHC(FM) Seattle  
 S KUBE(FM) Seattle  
 S KJR-FM Seattle  
 S KPLZ-FM Seattle  
 S KCMS(FM) Edmonds  
 S KRWM(FM) Bremerton  
 T KPLU-FM Tacoma  
 T KQMV(FM) Bellevue  
 T KMPS-FM Seattle  
 T KJAO(FM) Seattle  
 T KIRO-FM Tacoma  
 T KING-FM Seattle  
 T KWJZ(FM) Seattle  
 T KISW(FM) Seattle  
 T KKWF(FM) Seattle  
 T KZOK-FM Seattle  
 T KMTT(FM) Tacoma  
 T KBKS-FM Tacoma  
 T KNDD(FM) Seattle



## KOMO-FM and Fisher Ownership Study Map

0 10 20 30  
 Kilometers

Hatfield & Dawson 9/2009