

DELAWDER COMMUNICATIONS, INC.

P.O. Box 1095
Ashburn, Virginia 20146-1095
(703) 299-9222

ENGINEERING REPORT

**Multiple Ownership Study for KAYF(FM) and KRWN(FM)
Contingent Minor Change Applications**

MULTIPLE OWNERSHIP SERVICE CONTOUR STUDY

1. This Multiple Ownership Study has been prepared on behalf of Winton Radio Broadcasting Co., LLC (“Winton”) in support of Winton’s contingency minor change applications that propose KAYF(FM) to channel 225C2 (from channel 223A with a site change) and KRWN(FM) to channel 223C1 (from channel 225C1).

2. Both KAYF(FM) and KRWN(FM) are located in the Durango, CO and Farmington, NM Area that is well beyond any Arbitron-rated Market. Furthermore, only KAYF(FM) proposes any new service area by the proposed minor change contingency applications; therefore, (while applicable also to KRWN) this Showing is made to demonstrate Multiple Ownership Compliance of KAYF on channel 225C2 (as proposed) by Winton.

Findings

3. Winton owns the following eight FM and AM stations in the Durango, CO and Farmington, NM Area that are part of three separate market clusters (based on the un-rated methodology for multiple ownership study):

	<u>KAYF Market Clusters</u>
KAYF(FM)(prop), Bayfield, CO, 225C2	#1, #2 and #3
KRWN(FM)(prop), Farmington, NM, 223C1	#2
KISZ-FM, Cortez, CO, 250C	#1, #2 and #3
KRTZ(FM), Cortez, CO, 254C	#1
KPTE(FM), Durango, CO, 259C2	#1, #2 and #3
KVFC(AM), Cortez, CO, 740 kHz	None
KDGO(AM), Durango, CO, 1240 kHz	#3
KENN(AM), Farmington, NM, 1390 kHz	None

4. Figure EE-1, attached, shows the community service contours (3.16 mV/m {70 dBu} for FM stations and 5 mV/m for AM stations) for the above Winton FM and AM

stations. Figures EE-2A through EE-2C show the makeup of the three market clusters that are associated with the KAYF(FM) channel upgrade proposal. Each market cluster is made up of the following Winton stations (the “numerator” for each market cluster):

Market Cluster #1: 4 FMs and 0 AMs

Market Cluster #2: 4 FMs and 0 AMs

Market Cluster #3: 3 FMs and 1 AM

5. As demonstrated by Figures EE-3A through EE-3D, attached, the following 28 licensed “denominator” FM and AM stations have community service contours (3.16 mV/m {70 dBu} for FM stations and 5 mV/m for AM stations) that overlap some portion of Market Clusters #1, #2 and #3 ¹:

Stations with Contour Overlap (“Denominator” of Ownership Study)

- KLLV(AM), Breen, CO, 550 kHz
- KIUP(AM), Durango, CO, 930 kHz
- KNDN(AM), Farmington, NM, 960 kHz
- KRZE(AM), Farmington, NM, 1280 kHz
- KCQL(AM), Aztec, NM, 1340 kHz
- KUSW(FM), Flora Vista, NM, 201C3
- KTDU(FM), Durango, CO, 203A
- KNMI(FM), Farmington, NM, 205C2
- KDNG(FM), Durango, CO, 207A
- KTCF(FM), Dolores, CO, 208A
- KUUT(FM), Farmington, NM, 209A
- KUTE(FM), Ignacio, CO, 211C1
- KZET(FM), Cortez, CO, 213C1
- KSJE(FM), Farmington, NM, 215C3
- KSUT(FM), Ignacio, CO, 217C2
- KSJD(FM), Cortez, CO, 218A
- KTGW(FM), Fruitland, NM, 219C3
- KDUR(FM), Durango, CO, 220A
- KKDC(FM), Dolores, CO, 227C2
- KWYK-FM, Aztec, NM, 235C1
- KPCL(FM), Farmington, NM, 239C1

¹ All FM and AM stations are located with 92 kilometers of the perimeter of each market cluster, as required by the study methodology.

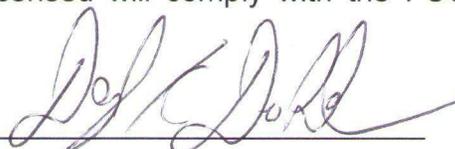
- KDAG(FM), Farmington, NM, 245C0
- KRSJ(FM), Durango, CO, 263C1
- KIQX(FM), Durango, CO, 267C1
- KTRA-FM, Farmington, NM, 271C
- KAZX(FM), Kirtland, NM, 275C0
- KKFG(FM), Bloomfield, NM, 283C
- KLJH(FM), Bayfield, CO, 296C

6. With the denominator of each market cluster also including four Winton stations, *the denominator total for each market cluster (Markets #1, #2 and #3) equals 32*. Based on 47 CFR Section 73.3555(a)(1)(ii), a radio market with between 30 and 44 (inclusive) full-power stations is permitted up to 7 commercial radio stations with 4 allowed in the same AM or FM service. Each Winton Market Cluster, therefore, meets the Section 73.3555 requirements regarding multiple ownership.

7. For all FM station facilities of this report, each 70 dBu contour was determined using the methodology of 47 CFR Section 73.313 based on the most-recent technical data contained in the FCC's Database. A digitized 3 arc-second terrain database with an azimuth increment of one degree is used for each FM contour distance calculation.

8. For all AM station facilities of this report, each 5 mV/m contour (using M3 conductivity data only) was determined using the methodology of 47 CFR Sections 73.183 and 73.184 based on the most-recent technical data for the licensed daytime (or unlimited) facility as contained in the FCC's Database. An azimuth increment of five degrees is used for each AM contour distance calculation.

9. Based on this instance analysis, it is concluded that those stations to be owned or controlled by Winton Road Broadcasting Co., LLC once the contingency applications of WATF(FM) and KRWN(FM) are granted and licensed will comply with the FCC Radio Multiple Ownership Rules.



Darryl K. DeLawder, President

Date: 5-25-2013

FIGURE EE-1: Winton Road Broadcasting Co., LLC FM and AM Stations-- Contour Service (70 dBu F50,50 for FMs; 5 mV/m Daytime Groundwave for AMs)

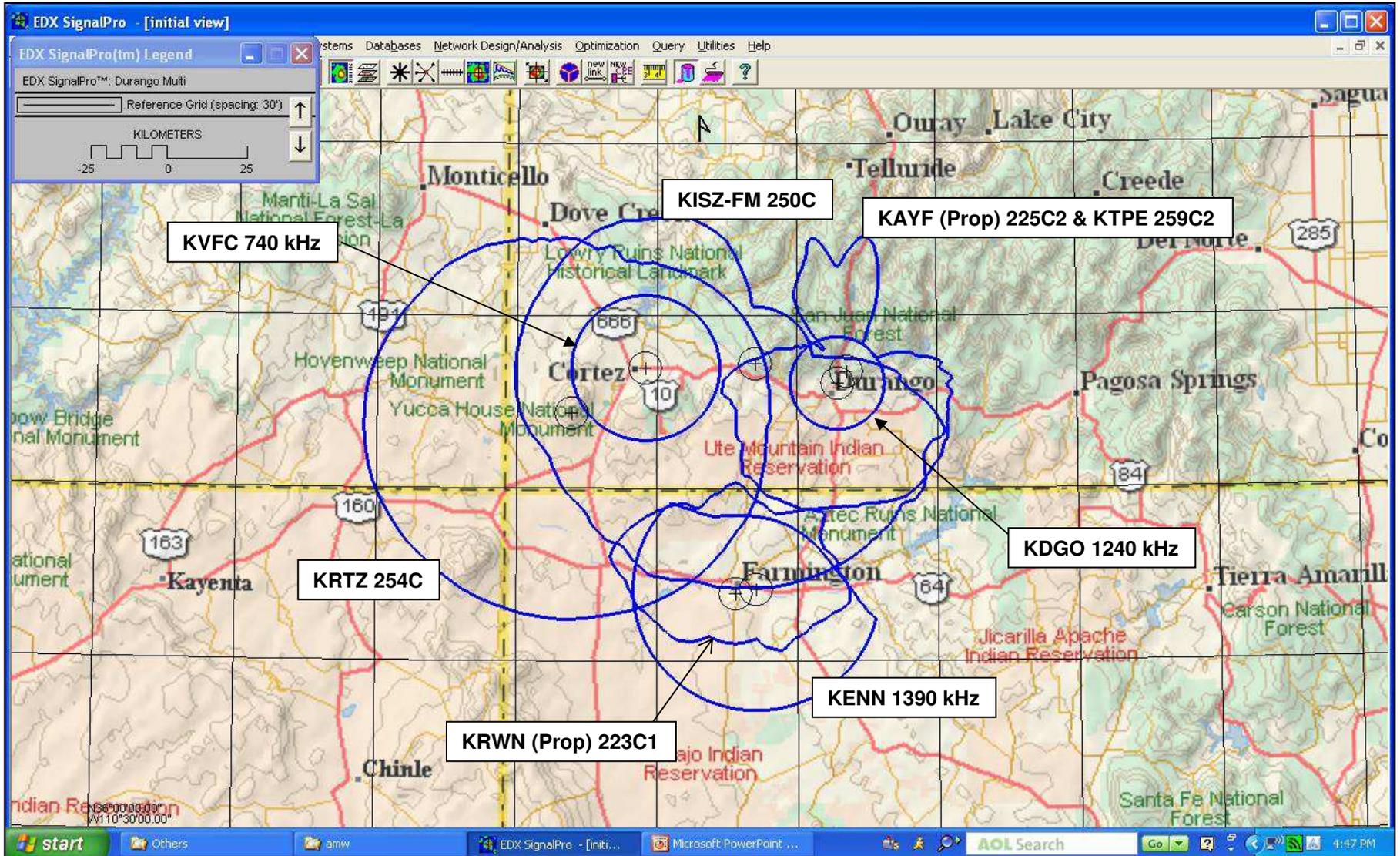


FIGURE EE-2A: Winton Road Broadcasting Co., LLC Market Cluster #1 FM and AM Stations (Contours: 70 dBu F50,50 for FM; 5 mV/m Daytime Groundwave for AMs)

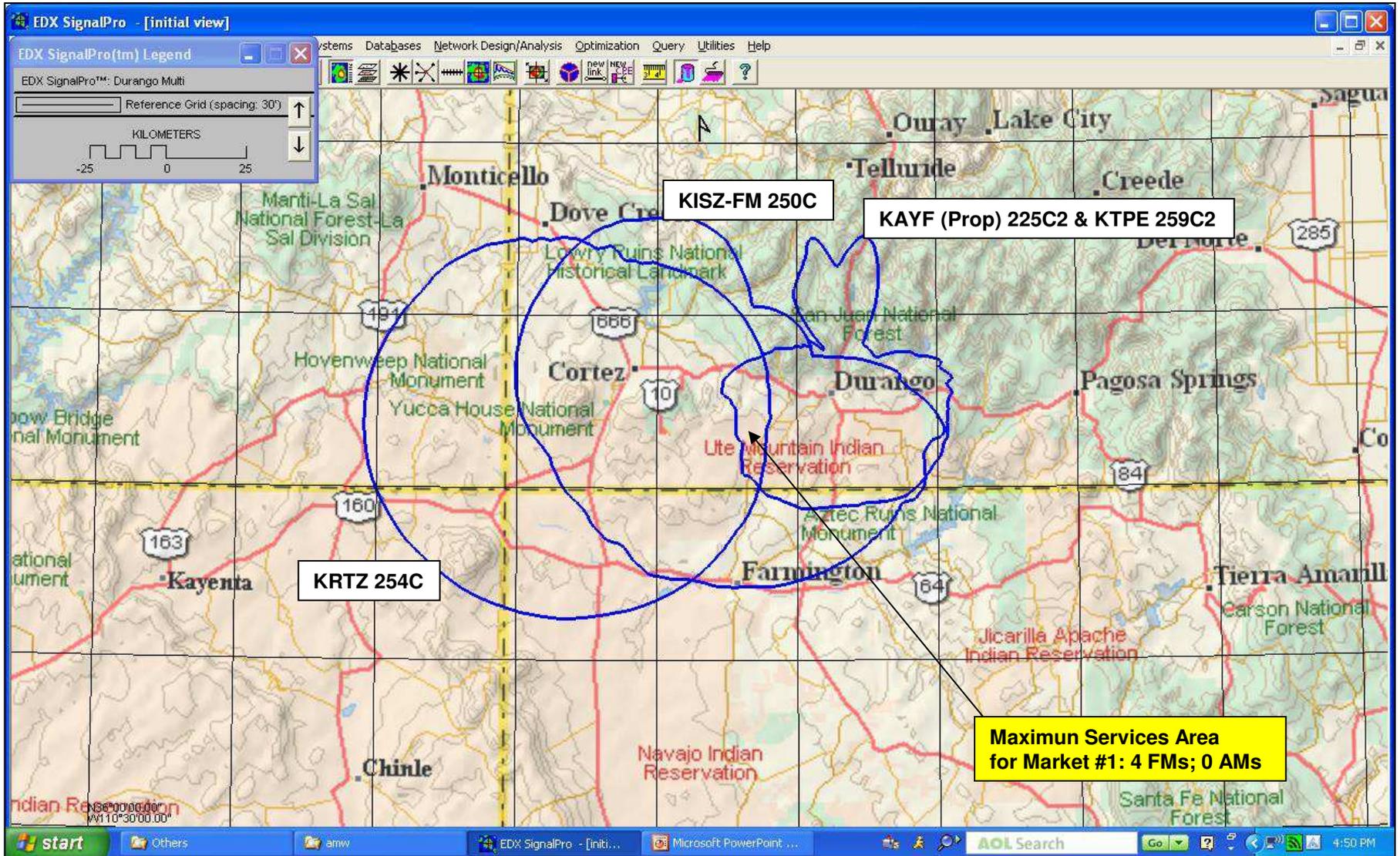


FIGURE EE-2B: Winton Road Broadcasting Co., LLC Market Cluster #2 FM and AM Stations (Contours: 70 dBu F50,50 for FMs; 5 mV/m Daytime Groundwave for AMs)

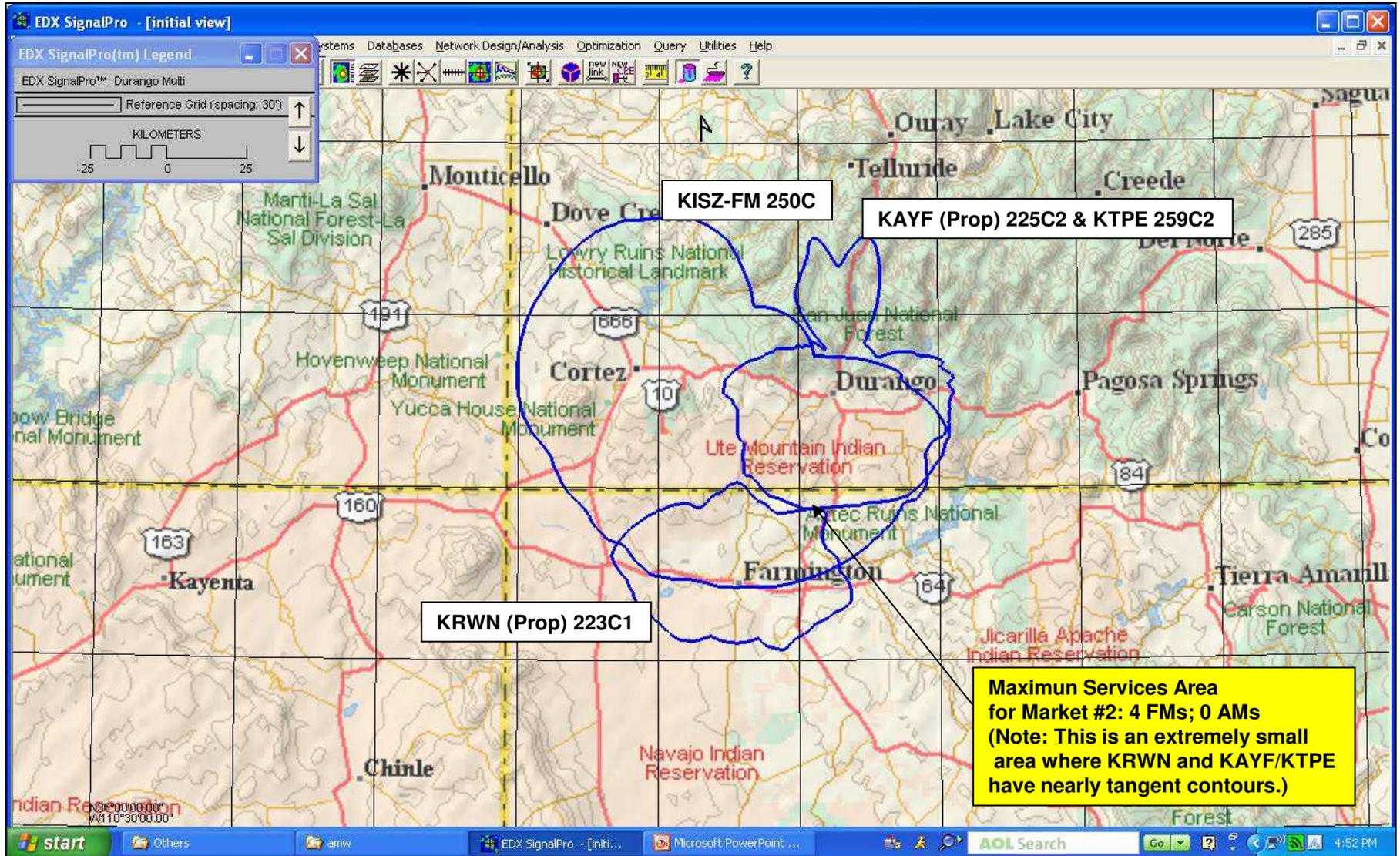


FIGURE EE-2C: Winton Road Broadcasting Co., LLC Market Cluster #3 FM and AM Stations (Contours: 70 dBu F50,50 for FMs; 5 mV/m Daytime Groundwave for AMs)

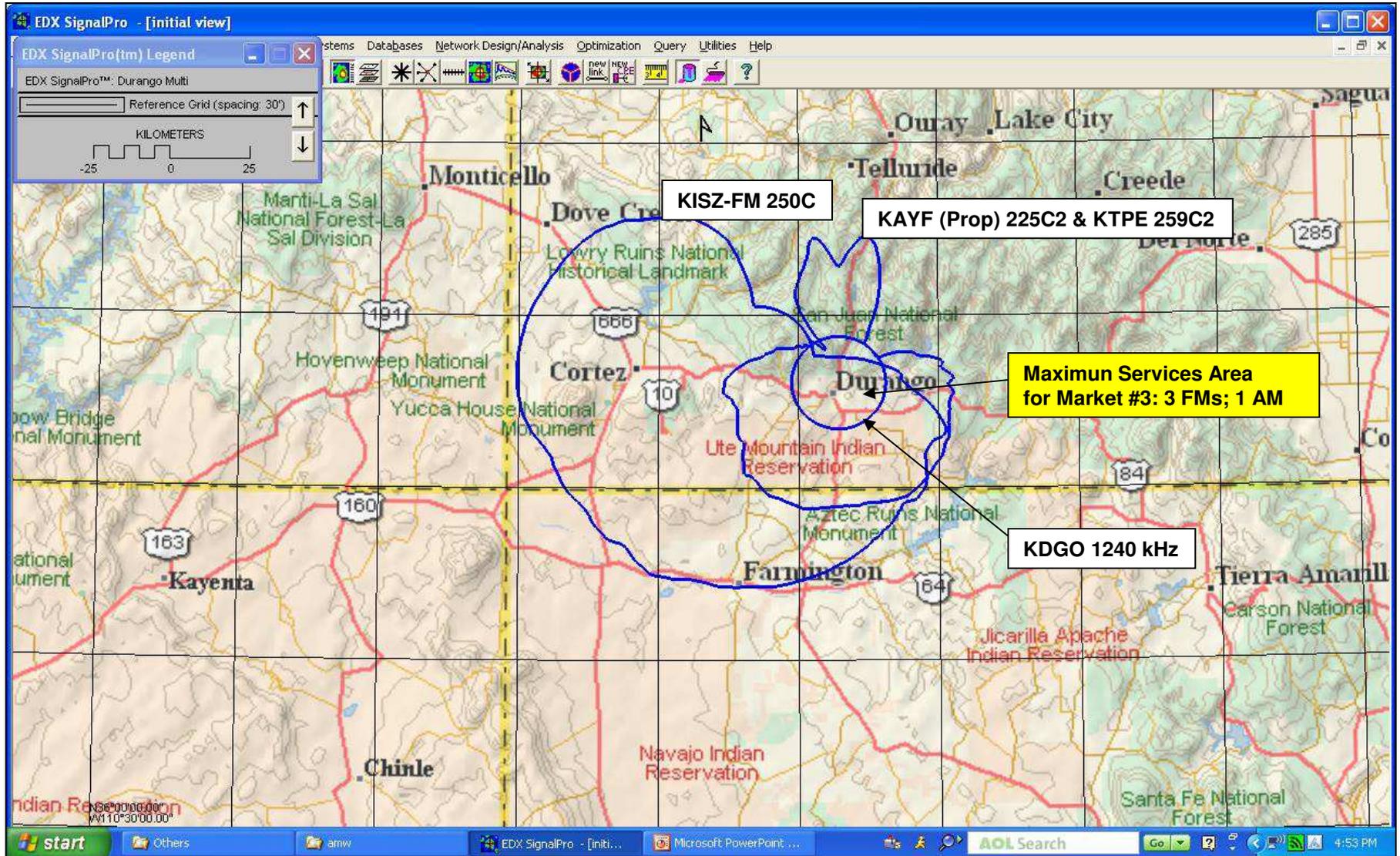


FIGURE EE-3B: First Set of 3 of FM Stations (Owned by Others) that are Part of Market Clusters #1, #2 and #3 (Contours: 70 dBu F50,50)

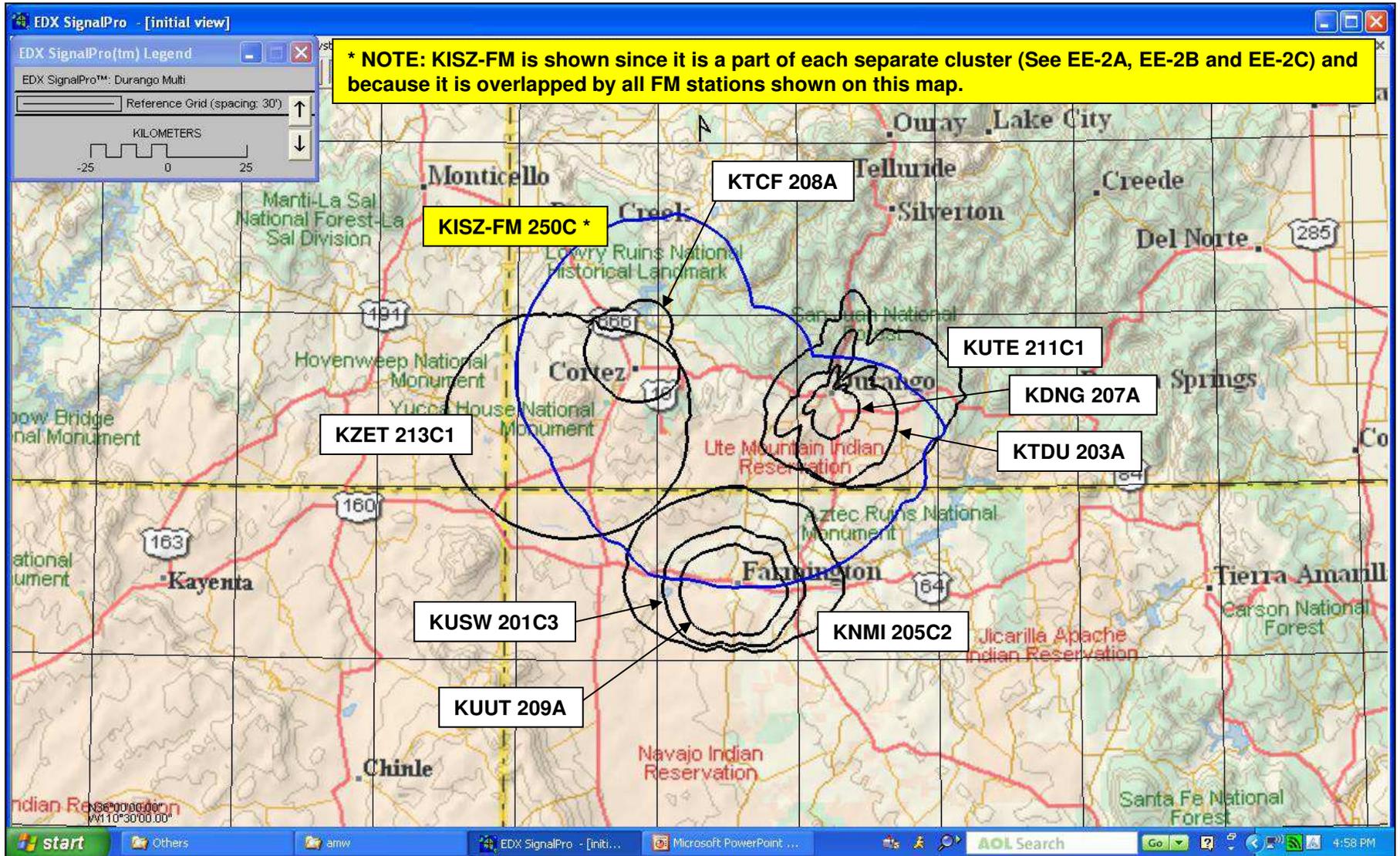


FIGURE EE-3C: Second Set of 3 of FM Stations (Owned by Others) that are Part of Market Clusters #1, #2 and #3 (Contours: 70 dBu F50,50)

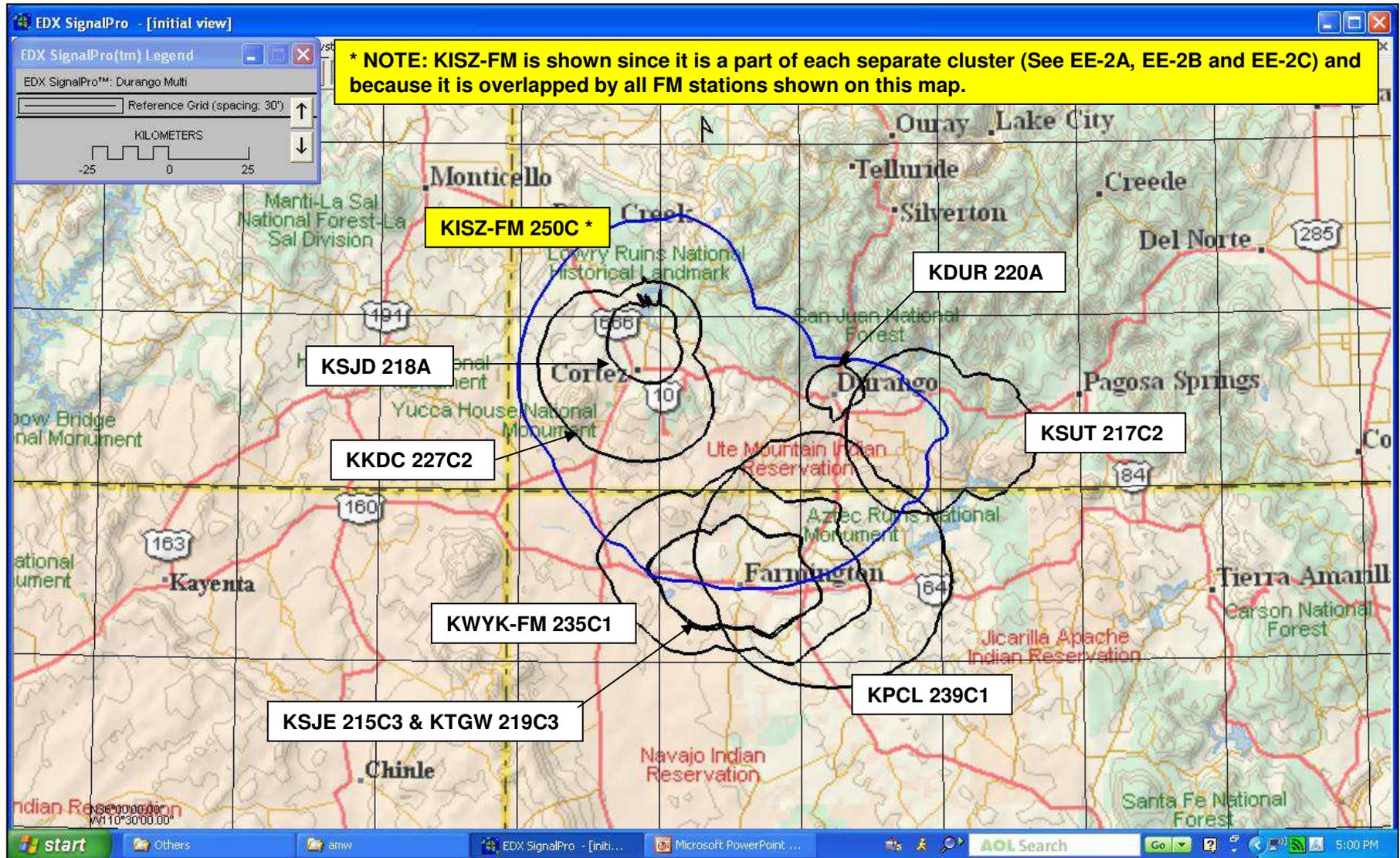


FIGURE EE-3D: Third Set of 3 of FM Stations (Owned by Others) that are Part of Market Clusters #1, #2 and #3 (Contours: 70 dBu F50,50)

