

TECHNICAL EXHIBIT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
POWELL BROADCASTING COMPANY, INC.

This radio multiple ownership analysis was prepared on behalf of Powell Broadcasting Company, Inc. (herein “Powell”) in accordance with FCC Rule Section 73.3555 under the “Interim Contour-overlap Methodology.” Powell seeks to acquire ownership of FM radio stations KZSR, Onawa, Iowa and KKYY, Whiting, Iowa. As a result of this acquisition, Powell would have common ownership interests in the following six radio stations.

Call Sign	City of License	Facilities
KSCJ (AM)	SIOUX CITY, IA	1360 KHZ, LIC, 5 KW-U, DA-N
KLEM (AM)	LE MARS, IA	1410 KHZ, LIC, 1 KW-D, 50 W-N, ND2
KKMA (FM)	LE MARS, IA	CHANNEL 258C1, LIC (BLH-19781206AE)
KZSR (FM)	ONAWA, IA	CHANNEL 272C1, LIC (BLH-19951120KG)
KKYY (FM)	WHITING, IA	CHANNEL 267C2, LIC (BLH-20011002AAS)
KSUX (FM)	WINNEBAGO, NE	CHANNEL 289C2, LIC (BLH-19910327KA)

The principal community contours of all of these stations are depicted on a map attached as Figure 1. The radio multiple ownership analysis considers only those stations with overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations).

Radio Markets

Under the Interim Contour-overlap Methodology, a radio market is defined as the area encompassed by the mutually overlapping principal community contours of the proposed commonly owned stations. As listed in the table below, there are two defined radio markets formed by the subject stations:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market A	KLEM, KSCJ	KKMA, KSUX, KKYY
Market B	KSCJ	KKMA, KSUX, KZSR, KKYY

Count of Stations in Defined Markets

The total number of radio stations in each radio market was determined by counting the operating stations that have principal community contours that intersect the principal community contours that define the radio market. Only those stations located within 92 km of the perimeter of the mutual overlap areas of the defined markets were employed in the count of stations. Commonly owned stations, other than those that form the market in question, were not considered in the count of total stations in the markets. Figure 2, attached, is a tabulation of radio stations identified in each radio market.\* Only licensed, operating stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's AM database and the appropriate Ground Wave Field Strength versus Distance Graph described in Section 73.184 of the FCC Rules. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method outlined in Section 73.313 of the FCC Rules. Terrain data were derived from the U.S.G.S. 3-second computer database for each of the FM stations using radials evenly-

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\* The lists are not necessarily exhaustive. There may be additional stations in the markets that are not listed in Figure 2.

spaced every 10 degrees of azimuth. A summary of the numbers of stations in the radio markets is provided in the following table.

Defined Radio Market	Number of Stations in Radio Market
Market A	5 AM; 17 FM; 22 Total
Market B	4 AM; 18 FM; 22 Total

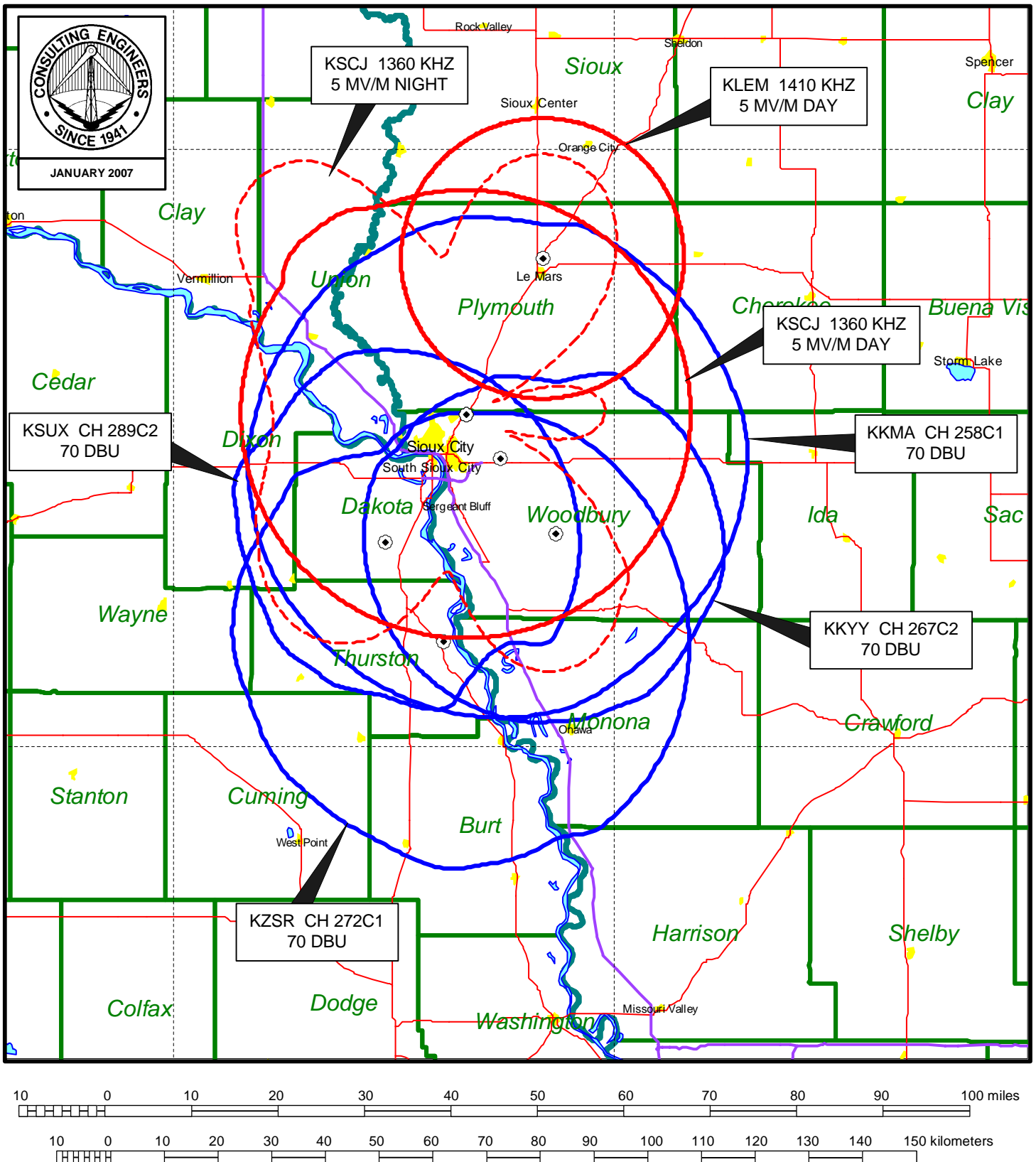
Based on the above, it is concluded that the proposed combination of commonly-owned stations complies with Section 73.3555(a) of the FCC Rules.

David E. Dickmann

du Treil, Lundin & Rackley, Inc.  
201 Fletcher Ave.  
Sarasota, Florida 34237

January 3, 2007

Figure 1



# **PREDICTED PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS** **POWELL BROADCASTING COMPANY, INC.**

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

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Tabulation of Stations in Radio Markets

<b>Market A</b>	
Number	Station
<b>AM Stations</b>	
1	KMNS, SIOUX CITY, IA, 620 KHZ*
2	KTFJ, DAKOTA CITY, NE, 1250 KHZ
3	KWSL, SIOUX CITY, IA, 1470 KHZ
4	KLEM, LE MARS, IA, 1410 KHZ
5	KSCJ, SIOUX CITY, IA, 1360 KHZ
<b>FM Stations</b>	
1	KILV, CASTANA, IA, CHANNEL 298
2	KDCR, SIOUX CENTER, IA, CHANNEL 203
3	KSOU-F, SIOUX CENTER, IA, CHANNEL 230
4	KGLI, SIOUX CITY, IA, CHANNEL 238
5	KSEZ, SIOUX CITY, IA, CHANNEL 250
6	KTFC, SIOUX CITY, IA, CHANNEL 277
7	KWIT, SIOUX CITY, IA, CHANNEL 212
8	KAYA, HUBBARD, NE, CHANNEL 217
9	KXNE-F, NORFOLK, NE, CHANNEL 207
10	KSFT-F, SOUTH SIOUX CITY, NE, CHANNEL 296
11	KTCH-F, WAYNE, NE, CHANNEL 285
12	KUSD, VERMILLION, SD, CHANNEL 209
13	KVHT, VERMILLION, SD, CHANNEL 292
14	WNAX-F, YANKTON, SD, CHANNEL 281
15	KKMA, LE MARS, IA, CHANNEL 258
16	KKYY, WHITING, IA, CHANNEL 267
17	KSUX, WINNEBAGO, NE, CHANNEL 289

\*It is noted that KMNS has an application for license to cover its CP on file with the FCC. FCC action on this KMNS application will not change this ownership analysis.

Market B	
Number	Station
AM Stations	
1	KMNS, SIOUX CITY, IA, 620 KHZ*
2	KTFJ, DAKOTA CITY, NE, 1250 KHZ
3	KWSL, SIOUX CITY, IA, 1470 KHZ
4	KSCJ, SIOUX CITY, IA, 1360 KHZ
FM Stations	
1	KILV, CASTANA, IA, CHANNEL 298
2	KDCR, SIOUX CENTER, IA, CHANNEL 203
3	KSOU-F, SIOUX CENTER, IA, CHANNEL 230
4	KGLI, SIOUX CITY, IA, CHANNEL 238
5	KSEZ, SIOUX CITY, IA, CHANNEL 250
6	KTFC, SIOUX CITY, IA, CHANNEL 277
7	KWIT, SIOUX CITY, IA, CHANNEL 212
8	KAYA, HUBBARD, NE, CHANNEL 217
9	KXNE-F, NORFOLK, NE, CHANNEL 207
10	KSFT-F, SOUTH SIOUX CITY, NE, CHANNEL 296
11	KTCH-F, WAYNE, NE, CHANNEL 285
12	KUSD, VERMILLION, SD, CHANNEL 209
13	KVHT, VERMILLION, SD, CHANNEL 292
14	WNAX-F, YANKTON, SD, CHANNEL 281
15	KKMA, LE MARS, IA, CHANNEL 258
16	KKYY, WHITING, IA, CHANNEL 267
17	KSUX, WINNEBAGO, NE, CHANNEL 289
18	KZSR, ONAWA, IA, CHANNEL 272

\* It is noted that KMNS has an application for license to cover its CP on file with the FCC. FCC action on this KMNS application will not change this ownership analysis.