

CONTOUR REPORT

This technical report is provided to demonstrate FCC local radio ownership rule compliance for certain aural broadcast markets formed by the proposed FCC Form 301 facilities modifications of KMLK(FM), currently licensed to Noalmark Broadcasting Corporation (“Noalmark”), and KLBQ(FM), which Noalmark proposes to acquire by means of an FCC Form 314 application filed on August 9, 2016 (“314 Application”) with the Commission, as well as Noalmark’s proposed acquisition of KDMS(AM) by means of the 314 Application.¹ This report illustrates the requisite contour analysis to define the markets created by Noalmark’s stations after consummation of the Form 314 Application, and demonstrates that, with the proposed modifications, Noalmark would fully comply with Section 73.3555(a) of the Commission’s rules.

Contour-Defined Markets

Six contour-defined markets are part of the study, as listed in Table 1 below. As demonstrated by this study, each of the combinations in the contour-defined markets complies with Section 73.3555(a) of the Commission’s rules.

The table below contains an overview of the stations that, upon Noalmark’s acquisition of KLBQ and KDMS, will be commonly owned by Noalmark in each market and the total number of stations in the market for purposes of analysis under the Commission’s local radio ownership rules. Further discussion concerning compliance in each market follows.

Table1

<u>Defined Markets</u>	<u>Commonly Owned Stations</u>	<u>Number of Stations in Market*</u>
Market 1	2 FMs; 1 AM	19
Market 2	2 FMs; 1 AM	18
Market 3	3 FMs	14
Market 4	4 FMs; 2 AMs	20
Market 5	4 FMs; 2 AMs	21
Market 6	4 FMs; 1 AM	22

*Note: Not a complete count of all stations in the market

¹ This technical report is being submitted contemporaneously with the Form 301 applications for both KMLK and KLBQ, as well as the Form 314 Application.

Market 1: This market is defined by Noalmark's proposed common ownership of 2 FM radio stations and 1 AM radio station:

KIXB(FM), El Dorado, AR, Facility ID 48946;
KVMZ(FM), Waldo, AR, Facility ID 86171; and
KVMA(AM), Magnolia, AR, Facility ID 39618

None of these stations is "home" to or located geographically within a Nielsen Metro, therefore a contour based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission's rules. As demonstrated below, this market contains more than 19 full power radio stations, allowing common ownership of 6 stations, no more than 4 of which may be in the same service. Thus, Noalmark's proposed ownership of 3 stations, 2 of which are in the same service, complies with the local radio ownership rule.

Market 2: This market is defined by Noalmark's proposed common ownership of 2 FM radio stations and 1 AM radio station:

KIXB(FM), El Dorado, AR, Facility ID 48946;
KMRX(FM), El Dorado, AR, Facility ID 35010; and
KVMA(AM), Magnolia, AR, Facility ID 39618

None of these stations is "home" to or located geographically within a Nielsen Metro, therefore a contour based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission's rules. As demonstrated below, this market contains more than 18 full power radio stations, allowing common ownership of 6 stations, no more than 4 of which may be in the same service. Thus, Noalmark's proposed ownership of 3 stations, 2 of which are in the same service, complies with the local radio ownership rule.

Market 3: This market is defined by Noalmark's proposed common ownership of 3 FM radio stations:

KAGL(FM), El Dorado, AR, Facility ID 48949;
KELD-FM, Hampton, AR, Facility ID 61239; and
KMRX(FM), El Dorado, AR, Facility ID 35010

None of these stations is “home” to or located geographically within a Nielsen Metro, therefore a contour based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission’s rules. As demonstrated below, this market contains at least 14 full power radio stations, allowing common ownership of 5 stations and not more than (i) 3 stations in the same service and (ii) 50% of the stations in the market. Thus, Noalmark’s proposed ownership of 3 stations FM stations in this market complies with the local radio ownership rule.

Market 4: This market is defined by Noalmark’s proposed common ownership of 4 FM radio stations and 2 AM radio stations:

KAGL(FM), El Dorado, AR, Facility ID 48949;
 KELD-FM, Hampton, AR, Facility ID 61239;
 KIXB(FM), El Dorado, AR, Facility ID 48946;
 KMRX(FM), El Dorado, AR, Facility ID 35010;
 KELD(AM), El Dorado, AR, Facility ID 48945; and
 KDMS(AM), El Dorado, AR, Facility ID 19089

None of these stations is “home” to or located geographically within a Nielsen Metro, therefore a contour based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission’s rules. As demonstrated below, this market contains more than 20 full power radio stations, allowing common ownership of 6 stations, no more than 4 of which may be in the same service. Thus, Noalmark’s proposed ownership of 6 stations, 4 of which are in the same service, complies with the local radio ownership rule.

Market 5: This market is defined by Noalmark’s proposed common ownership of 4 FM radio stations and 2 AM radio stations:

KAGL(FM), El Dorado, AR, Facility ID 48949;
 KIXB(FM), El Dorado, AR, Facility ID 48946;
 KMRX(FM), El Dorado, AR, Facility ID 35010;
 KELD(AM), El Dorado, AR, Facility ID 48945; and
 KLBQ(FM)[Proposed], El Dorado, AR, Facility ID 19090
 KDMS(AM), El Dorado, AR, Facility ID 19089

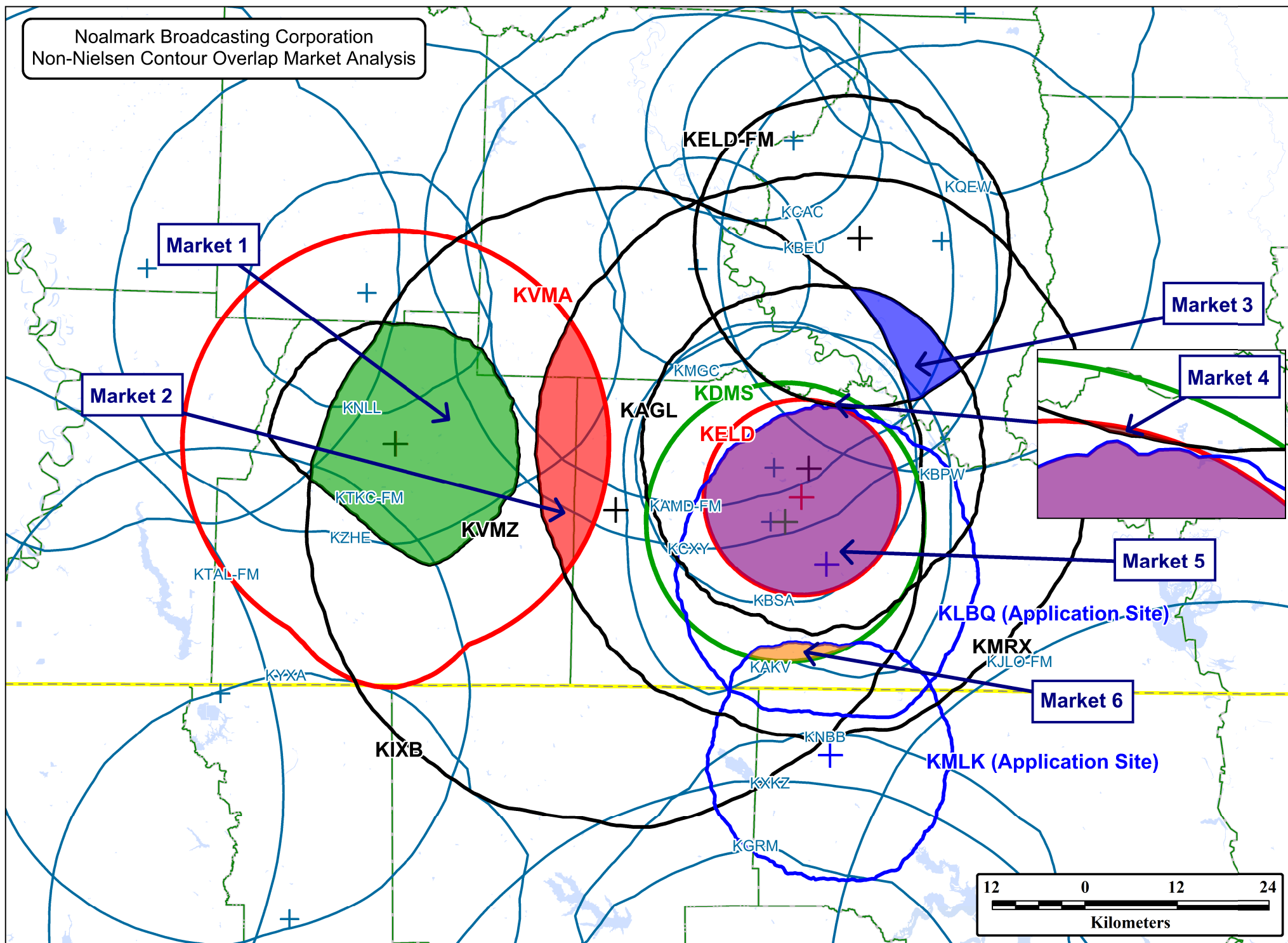
None of these stations is “home” to or located geographically within a Nielsen Metro, therefore a contour based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission’s rules. As demonstrated below, this market contains more than 21 full power radio stations, allowing common ownership of 6 stations, no more than 4 of which may be in the same service. Thus, Noalmark’s proposed ownership of 6 stations, 4 of which are in the same service, complies with the local radio ownership rule.

Market 6: This market is defined by Noalmark’s proposed common ownership of 4 FM radio stations and 1 AM radio station:

KIXB(FM), El Dorado, AR, Facility ID 48946;
KMRX(FM), El Dorado, AR, Facility ID 35010;
KLBBQ(FM)[Proposed], El Dorado, AR, Facility ID 19090;
KMLK(FM)[Proposed], Junction City, AR, Facility ID 85169; and
KDMS(AM), El Dorado, AR, Facility ID 19089

None of these stations is “home” to or located geographically within a Nielsen Metro, therefore a contour based ownership study is necessary to determine compliance with Section 73.3555(a) of the Commission’s rules. As demonstrated below, this market contains more than 22 full power radio stations, allowing common ownership of 6 stations, no more than 4 of which may be in the same service. Thus, Noalmark’s proposed ownership of 5 stations, 4 of which are in the same service, complies with the local radio ownership rule.

Noalmark Broadcasting Corporation
Non-Nielsen Contour Overlap Market Analysis



Noalmark Broadcasting Corporation Local Radio Ownership Station List

Market 1

This study uses the NED 3 second terrain dataset.

Total number of overlapping contours: 19

Reference:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KIXB	FM	277C1	El Dorado	AR	BLH19930915KC	0.0	0.0
KVMZ	FM	256A	Waldo	AR	BLH20080207AOD	30.0	286.7
KVMA	AM	630	MAGNOLIA	AR	BL	30.0	286.8

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KBPW	FM	201C1	Hampton	AR	BLED20010824AAE	54.9	50.5
KAKV	FM	205C2	El Dorado	AR	BLED20031125AMS	20.2	94.3
KCAC	FM	208C3	Camden	AR	BLED20090501ACQ	53.2	25.7
KNLL	FM	213C1	Nashville	AR	BLED20080122APO	68.6	297.4
KBSA	FM	215C3	El Dorado	AR	BLED19871228KA	21.3	75.0
KEJA	FM	219A	Cale	AR	BLED20100831ABD	43.0	311.0
KBEU	FM	224A	Bearden	AR	BLH20150325AAQ	53.2	25.7
KCXV	FM	237C1	East Camden	AR	BLH20020806AAE	33.0	18.7
KAMD-FM	FM	246C2	Camden	AR	BLH20020806AAD	33.0	18.7
KZHE	FM	263C2	Stamps	AR	BLH19920410KC	43.0	311.0
KMGC	FM	283A	Camden	AR	BLH19941201KA	33.0	18.7
KTKC-FM	FM	225C2	Springhill	LA	BLH19991217ACJ	56.8	245.5
KNBB	FM	249C2	Dubach	LA	BLH20050222ACP	67.1	155.9
KYXA	FM	294C2	Homer	LA	BMLH20060217AAT	68.1	219.0
KXKZ	FM	298C0	Ruston	LA	BMLH20040811AAD	88.6	167.0
KTAL-FM	FM	251C0	Texarkana	TX	BMLH20110418ABH	107.0	251.0

Distance and bearing calculations from coordinates: 33-13-20 N, 092-55-28 W

Duopoly Options:

FM: 3.16 mV/m (70 dBu); Include NCE

AM: Not Included

Stations more than 92 km from the common area were excluded.

Note: This is not a complete listing of all other stations in the market, but rather enough stations to show compliance with the Commission's ownership rules.

Noalmark Broadcasting Corporation Local Radio Ownership Station List

Market 2

This study uses the NED 3 second terrain dataset.

Total number of overlapping contours: 18

Reference:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KIXB	FM	277C1	El Dorado	AR	BLH19930915KC	0.0	0.0
KMRX	FM	241C1	El Dorado	AR	BLH19981019KB	25.7	77.8
KVMA	AM	630	MAGNOLIA	AR	BL	30.0	286.8

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KBPW	FM	201C1	Hampton	AR	BLED20010824AAE	54.9	50.5
KAKV	FM	205C2	El Dorado	AR	BLED20031125AMS	20.2	94.3
KCAC	FM	208C3	Camden	AR	BLED20090501ACQ	53.2	25.7
KNLL	FM	213C1	Nashville	AR	BLED20080122APO	68.6	297.4
KBSA	FM	215C3	El Dorado	AR	BLED19871228KA	21.3	75.0
KEJA	FM	219A	Cale	AR	BLED20100831ABD	43.0	311.0
KBEU	FM	224A	Bearden	AR	BLH20150325AAQ	53.2	25.7
KCXY	FM	237C1	East Camden	AR	BLH20020806AAE	33.0	18.7
KAMD-FM	FM	246C2	Camden	AR	BLH20020806AAD	33.0	18.7
KZHE	FM	263C2	Stamps	AR	BLH19920410KC	43.0	311.0
KMGC	FM	283A	Camden	AR	BLH19941201KA	33.0	18.7
KTKC-FM	FM	225C2	Springhill	LA	BLH19991217ACJ	56.8	245.5
KNBB	FM	249C2	Dubach	LA	BLH20050222ACP	67.1	155.9
KYXA	FM	294C2	Homer	LA	BMLD20060217AAT	68.1	219.0
KXKZ	FM	298C0	Ruston	LA	BMLH20040811AAD	88.6	167.0

Distance and bearing calculations from coordinates: 33-13-20 N, 092-55-28 W

Duopoly Options:

TV: Not Included

FM: 3.16 mV/m (70 dBu); Include NCE

AM: Not Included

Stations more than 92 km from the common area were excluded.

Note: This is not a complete listing of all other stations in the market, but rather enough stations to show compliance with the Commission's ownership rules.

Noalmark Broadcasting Corporation Local Radio Ownership Station List

Market 3

This study uses the NED 3 second terrain dataset.

Total number of overlapping contours: 14

Reference:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KELD-FM	FM	293C3	Hampton	AR	BLH19991109ACB	0.0	0.0
KAGL	FM	227C3	El Dorado	AR	BLH20040614ABH	30.5	192.6
KMRX	FM	241C1	El Dorado	AR	BLH19981019KB	30.5	192.6

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KBPW	FM	201C1	Hampton	AR	BLED20010824AAE	10.6	92.0
KAKV	FM	205C2	El Dorado	AR	BLED20031125AMS	38.6	197.6
KCAC	FM	208C3	Camden	AR	BLED20090501ACQ	15.4	325.9
KBSA	FM	215C3	El Dorado	AR	BLED19871228KA	31.7	200.7
KBEU	FM	224A	Bearden	AR	BLH20150325AAQ	15.4	325.9
KCXY	FM	237C1	East Camden	AR	BLH20020806AAE	21.5	259.4
KAMD-FM	FM	246C2	Camden	AR	BLH20020806AAD	21.5	259.4
KZHE	FM	263C2	Stamps	AR	BLH19920410KC	64.5	263.9
KQEW	FM	272C3	Fordyce	AR	BLH20010531AAO	32.2	25.0
KMGC	FM	283A	Camden	AR	BLH19941201KA	21.5	259.4
KNBB	FM	249C2	Dubach	LA	BLH20050222ACP	96.7	182.8

Distance and bearing calculations from coordinates: 33-32-23 N, 092-34-59 W

Duopoly Options:

FM: 3.16 mV/m (70 dBu); Include NCE

AM: Not Included

Stations more than 92 km from the common area were excluded.

Note: This is not a complete listing of all other stations in the market, but rather enough stations to show compliance with the Commission's ownership rules.

Noalmark Broadcasting Corporation Local Radio Ownership Station List

Market 4

This study uses the NED 3 second terrain dataset.

Total number of overlapping contours: 20

Reference:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KAGL	FM	227C3	El Dorado	AR	BLH20040614ABH	0.0	0.0
KELD-FM	FM	293C3	Hampton	AR	BLH19991109ACB	30.5	12.6
KIXB	FM	277C1	El Dorado	AR	BLH19930915KC	25.7	257.9
KMRX	FM	241C1	El Dorado	AR	BLH19981019KB	0.0	0.0
KELD	AM	1400	EL DORADO	AR	BL19940307AB	3.9	194.3
KDMS	AM	1290	EL DORADO	AR	BL20010501ADK	7.6	203.8

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KBPW	FM	201C1	Hampton	AR	BLED20010824AAE	34.1	30.4
KAKV	FM	205C2	El Dorado	AR	BLED20031125AMS	8.6	215.7
KCAC	FM	208C3	Camden	AR	BLED20090501ACQ	42.6	357.3
KNLL	FM	213C1	Nashville	AR	BLED20080122APO	89.9	287.0
KBSA	FM	215C3	El Dorado	AR	BLED19871228KA	4.5	271.2
KEJA	FM	219A	Cale	AR	BLED20100831ABD	61.9	291.7
KBEU	FM	224A	Bearden	AR	BLH20150325AAQ	42.6	357.3
KCXV	FM	237C1	East Camden	AR	BLH20020806AAE	29.6	330.7
KAMD-FM	FM	246C2	Camden	AR	BLH20020806AAD	29.6	330.7
KZHE	FM	263C2	Stamps	AR	BLH19920410KC	61.9	291.7
KQEW	FM	272C3	Fordyce	AR	BLH20010531AAO	62.4	18.9
KMGC	FM	283A	Camden	AR	BLH19941201KA	29.6	330.7
KTKC-FM	FM	225C2	Springhill	LA	BLH19991217ACJ	82.1	249.4
KNBB	FM	249C2	Dubach	LA	BLH20050222ACP	66.8	178.2

Distance and bearing calculations from coordinates: 33-16-16 N, 092-39-17 W

Duopoly Options:

FM: 3.16 mV/m (70 dBu); Include NCE

AM: Not Included

Stations more than 92 km from the common area were excluded.

Note: This is not a complete listing of all other stations in the market, but rather enough stations to show compliance with the Commission's ownership rules.

Noalmark Broadcasting Corporation Local Radio Ownership Station List

Market 5

This study uses the NED 3 second terrain dataset.

Total number of overlapping contours: 21

Reference:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KLBQ(Proposed)	FM	254C3	El Dorado	AR		0.0	0.0
KAGL	FM	227C3	El Dorado	AR	BLH20040614ABH	12.7	349.4
KIXB	FM	277C1	El Dorado	AR	BLH19930915KC	28.4	284.4
KMRX	FM	241C1	El Dorado	AR	BLH19981019KB	12.7	349.4
KELD	AM	1400	EL DORADO	AR	BL19940307AB	9.3	339.3
KDMS	AM	1290	EL DORADO	AR	BL20010501ADK	7.7	315.5

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KBPW	FM	201C1	Hampton	AR	BLED20010824AAE	44.5	19.7
KAKV	FM	205C2	El Dorado	AR	BLED20031125AMS	9.2	306.8
KCAC	FM	208C3	Camden	AR	BLED20090501ACQ	55.1	355.5
KNLL	FM	213C1	Nashville	AR	BLED20080122APO	96.4	293.7
KBSA	FM	215C3	El Dorado	AR	BLED19871228KA	14.3	331.3
KEJA	FM	219A	Cale	AR	BLED20100831ABD	69.5	300.6
KBEU	FM	224A	Bearden	AR	BLH20150325AAQ	55.1	355.5
KCXY	FM	237C1	East Camden	AR	BLH20020806AAE	41.8	336.3
KAMD-FM	FM	246C2	Camden	AR	BLH20020806AAD	41.8	336.3
KZHE	FM	263C2	Stamps	AR	BLH19920410KC	69.5	300.6
KMGC	FM	283A	Camden	AR	BLH19941201KA	41.8	336.3
KTKC-FM	FM	225C2	Springhill	LA	BLH19991217ACJ	80.9	258.3
KNBB	FM	249C2	Dubach	LA	BLH20050222ACP	54.3	180.3
KYXA	FM	294C2	Homer	LA	BMLED20060217AAT	84.0	237.0
KXKZ	FM	298C0	Ruston	LA	BMLH20040811AAD	79.7	185.6

Distance and bearing calculations from coordinates: 33-09-32 N, 092-37-47 W

Duopoly Options:

FM: 3.16 mV/m (70 dBu); Include NCE

AM: Not Included

Stations more than 92 km from the common area were excluded.

Note: This is not a complete listing of all other stations in the market, but rather enough stations to show compliance with the Commission's ownership rules.

Noalmark Broadcasting Corporation Local Radio Ownership Station List

Market 6

This study uses the NED 3 second terrain dataset.

Total number of overlapping contours: 22

Reference:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KIXB	FM	277C1	El Dorado	AR	BLH19930915KC	0.0	0.0
KMRX	FM	241C1	El Dorado	AR	BLH19981019KB	25.7	77.8
KLBQ(Proposed)	FM	254C3	El Dorado	AR		28.4	104.3
KMLK(Proposed)	FM	268A	Junction City	AR		42.3	138.5
KDMS	AM	1290	EL DORADO	AR	BL20010501ADK	22.1	94.0

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KBPW	FM	201C1	Hampton	AR	BLED20010824AAE	54.9	50.5
KAKV	FM	205C2	El Dorado	AR	BLED20031125AMS	20.2	94.3
KCAC	FM	208C3	Camden	AR	BLED20090501ACQ	53.2	25.7
KBSA	FM	215C3	El Dorado	AR	BLED19871228KA	21.3	75.0
KEJA	FM	219A	Cale	AR	BLED20100831ABD	43.0	311.0
KBEU	FM	224A	Bearden	AR	BLH20150325AAQ	53.2	25.7
KCXY	FM	237C1	East Camden	AR	BLH20020806AAE	33.0	18.7
KAMD-FM	FM	246C2	Camden	AR	BLH20020806AAD	33.0	18.7
KZHE	FM	263C2	Stamps	AR	BLH19920410KC	43.0	311.0
KMGC	FM	283A	Camden	AR	BLH19941201KA	33.0	18.7
KGRM	FM	218C2	Grambling	LA	BLED19901005KA	80.6	166.5
KTKC-FM	FM	225C2	Springhill	LA	BLH19991217ACJ	56.8	245.5
KNBB	FM	249C2	Dubach	LA	BLH20050222ACP	67.1	155.9
KJLO-FM	FM	281C0	Monroe	LA	BLH19880812KE	100.1	128.3
KXRR	FM	291C0	Monroe	LA	BLH19880714IA	100.1	128.3
KYXA	FM	294C2	Homer	LA	BMLD20060217AAT	68.1	219.0
KXKZ	FM	298C0	Ruston	LA	BMLH20040811AAD	88.6	167.0

Distance and bearing calculations from coordinates: 33-13-20 N, 092-55-28 W

Duopoly Options:

FM: 3.16 mV/m (70 dBu); Include NCE

AM: Not Included

Stations more than 92 km from the common area were excluded.

Note: This is not a complete listing of all other stations in the market, but rather enough stations to show compliance with the Commission's ownership rules.