

**RADIO MARKET ANALYSIS**  
**LOST COAST COMMUNICATIONS, INC.**  
**KXGO RADIO STATION**  
**ARCATA, CALIFORNIA**  
**January 2010**

**TECHNICAL STATEMENT**

1. This Technical Statement and attached exhibits were prepared on behalf of Lost Coast Communications, Inc. ("LCC"), proposed assignee of station KXGO, Channel 226C, Arcata, California. LCC is submitting an application for transfer of KXGO, therefore, a Radio Market analysis is needed. LCC is also the licensee of KHUM, Channel 284C, Garberville, California; and KSLG-FM<sup>1</sup>, Channel 231C1, Hydesville, California. Principals of LCC have an attributable interest in the licensee of KWPT, Channel 262C1, Fortuna, California.<sup>2</sup> None of these facilities are licensed to a metro county in any Arbitron market nor considered "home" in any rated market. Therefore, an analysis using the revised contour overlap rules is necessary. A map of the city grade contours of the four subject stations is attached as Exhibit #1.

**NON-RATED MARKET REVIEW**

2. There is contour overlap between the four subject stations.<sup>3</sup> Therefore, a study has been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission's rules. The city grade contours of KXGO and KHUM will be used to define the market boundary as these two contours completely encompass the city grade contours of KWPT

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- 1) KSLG-FM also holds a construction permit (BPH-20071004ACS). However, the city grade contour of the KSLG-FM permit is almost identical to the licensed KSLG-FM contour.
  - 2) KWPT also holds a construction permit (BPH-20071004ACR), which is considered herein.
  - 3) The KSLG-FM and KWPT permits do not create any additional markets for review. There is just one overlap market to consider.



and KSLG-FM (over land). The study will determine the number of other AM and FM stations that are contributors to the Radio Market. The number of contributors will then be added to the subject stations in the market to show the total number of stations in the market. Only those stations with transmitter sites within 92.0 kilometers of the common overlap area will be considered as contributors to the subject markets. No other station in which LCC has an interest will be considered, unless it is a subject station in the market under review.

3. Exhibit #2 is a depiction of the stations within the Radio Market boundary. Exhibit #3 is a tabulation of the stations in the Radio Market, which totals sixteen stations when the four subject stations are included. The number of stations indicated falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.<sup>4</sup> At this level, common ownership or control of up to six commercial stations, with no more than four commercial stations in the same service, is permissible. Therefore, the Radio Market is in compliance.

4. Based on the compliance shown in the non-rated market reviewed, the acquisition of KXGO by LCC, along with ownership or interest in KHUM, KSLG-FM and KWPT, is in compliance with the Commission's multiple ownership rules.

5. The foregoing technical statement was prepared on behalf of Lost Coast Communications, Inc., by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to

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4) There are additional stations; however, they were not considered as there were sufficient stations, based on the number of facilities in each market to be commonly held.

AM and FM facilities in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.5. BIA database. All AM and FM data was extracted from the CDBS database. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.



# Graham Brock, Inc. - Broadcast Technical Consultants

## KXGO

BLH-20040709ACA  
Latitude: 40-43-38 N  
Longitude: 123-58-22 W  
ERP: 50.00 kW  
Channel: 226C  
Frequency: 93.1 MHz  
AMSL Height: 895.0 m

## KWPT

BLH-20031121AKK  
Latitude: 40-25-23 N  
Longitude: 124-06-21 W  
ERP: 12.00 kW  
Channel: 262C1  
Frequency: 100.3 MHz  
AMSL Height: 941.0 m

## KWPT CP

BPH-20071004ACR  
Latitude: 40-30-03 N  
Longitude: 124-17-08 W  
ERP: 13.50 kW  
Channel: 262C1  
Frequency: 100.3 MHz  
AMSL Height: 737.4 m

## KSLG-FM

BLH-20010413AAJ  
Latitude: 40-30-04 N  
Longitude: 124-17-05 W  
ERP: 4.50 kW  
Channel: 231C1  
Frequency: 94.1 MHz  
AMSL Height: 712.0 m

## KSLG-FM CP

BPH-20071004ACS  
Latitude: 40-30-03 N  
Longitude: 124-17-08 W  
ERP: 3.90 kW  
Channel: 231C1  
Frequency: 94.1 MHz  
AMSL Height: 751.4 m

## KHUM

BLH-19910528KC  
Latitude: 40-07-15 N  
Longitude: 123-41-27 W  
ERP: 50.00 kW  
Channel: 284C  
Frequency: 104.7 MHz  
AMSL Height: 1237.0 m

KWPT Lic 3.16 mV/m

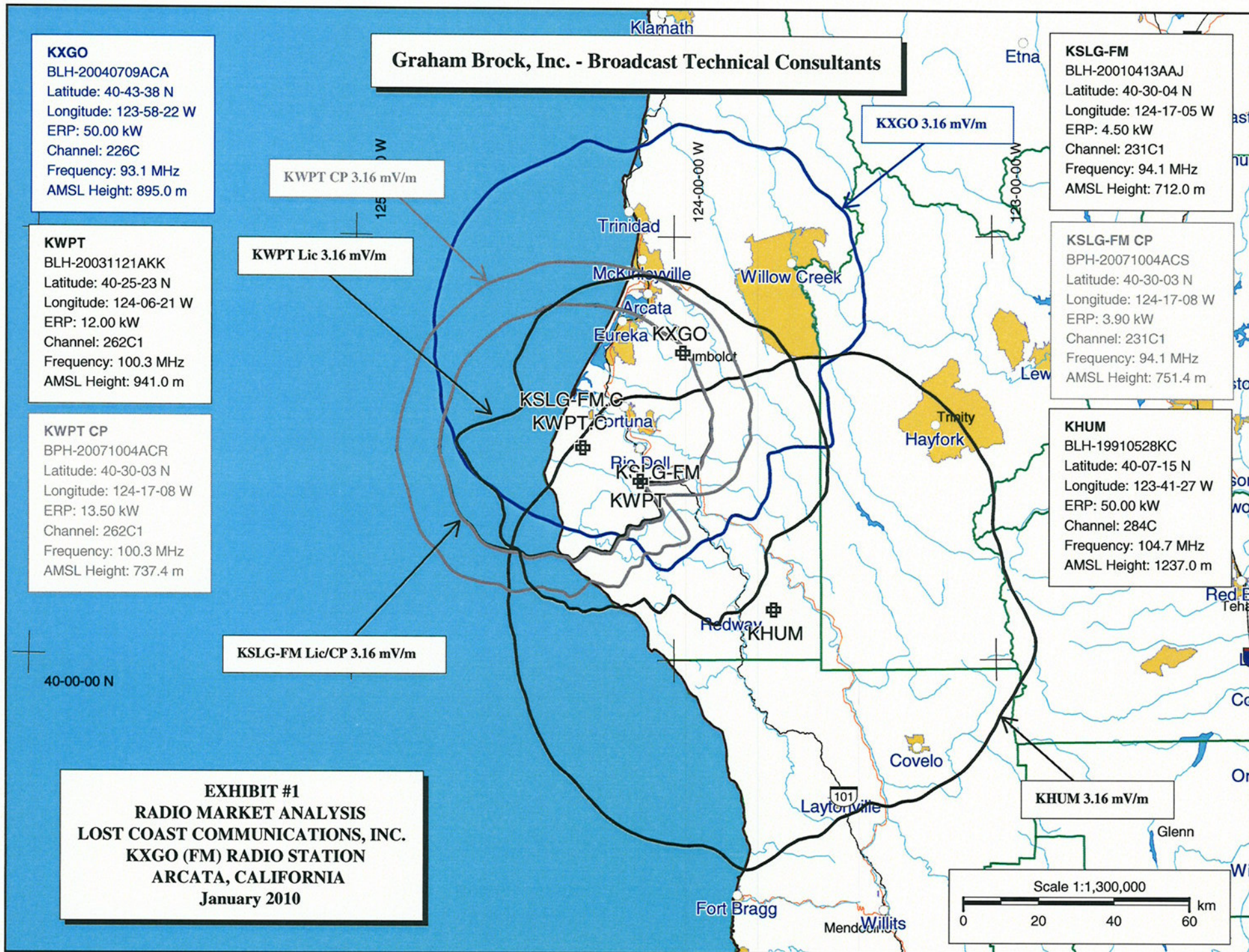
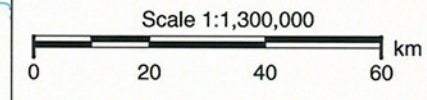
KWPT CP 3.16 mV/m

KXGO 3.16 mV/m

KSLG-FM Lic/CP 3.16 mV/m

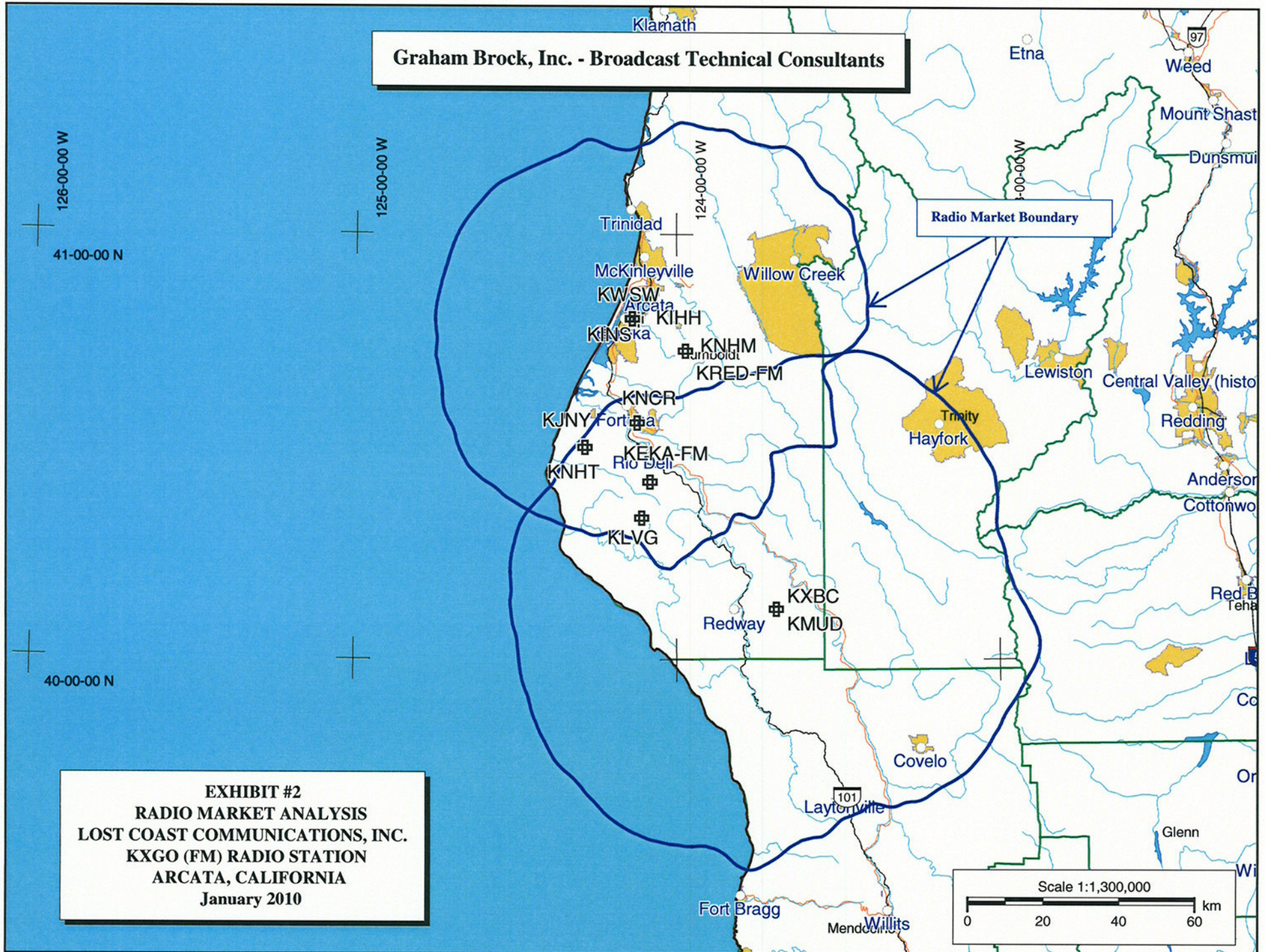
KHUM 3.16 mV/m

**EXHIBIT #1**  
**RADIO MARKET ANALYSIS**  
**LOST COAST COMMUNICATIONS, INC.**  
**KXGO (FM) RADIO STATION**  
**ARCATA, CALIFORNIA**  
**January 2010**





**Graham Brock, Inc. - Broadcast Technical Consultants**





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**EXHIBIT #3**

**Tabulation of Stations in Radio Market #1**

**AM Stations**

KWSW	790 kHz	Eureka, California
KINS	980 kHz	Eureka, California
KNCR	1090 kHz	Fortuna, California
KIHH	1400 kHz	Eureka, California

Total AM Stations - 4

**FM Stations**

KXBC	Ch 206C1	Garberville, California
KMUD	Ch 216C1	Garberville, California
KNHM	Ch 218C3	Bayside, California
KRED-FM	Ch 222C1	Eureka, California
* KXGO	Ch 226C	Arcata, California
* KSLG-FM	Ch 231C1	Hydesville, California
KJNY	Ch 256C1	Ferndale, California
* KWPT	Ch 262C1	Fortuna, California
KEKA-FM	Ch 268C	Eureka, California
KLVG	Ch 279C0	Garberville, California
* KHUM	Ch 284C	Garberville, California
KNHT	Ch 297C2	Rio Dell, California

Total FM Stations - 12

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 16**

\* Subject station.

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

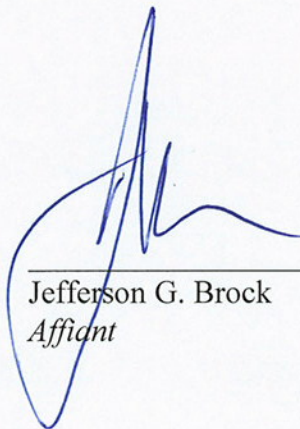
State of Georgia    )  
St. Simons Island    ) ss:  
County of Glynn    )

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Lost Coast Communications, Inc., to prepare the attached Technical Exhibit.

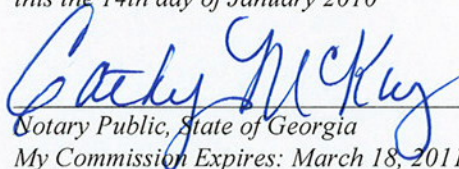
His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 14th day of January 2010.*

  
\_\_\_\_\_  
Jefferson G. Brock  
*Affiant*

*Sworn to and subscribed before me  
this the 14th day of January 2010*

  
\_\_\_\_\_  
Notary Public, State of Georgia  
My Commission Expires: March 18, 2011