

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

RADIO MARKET ANALYSIS

JOHN HARVEY REES

GUNNISON, COLORADO

June 2015

TECHNICAL EXHIBIT

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TECHNICAL STATEMENT

1. This Technical Statement and attached exhibits were prepared on behalf of John Harvey Rees (“Rees”), proposed licensee of KVLE, Channel 272A, Gunnison, Colorado. Rees is also the licensee of FM station KEJJ, Channel 252A, Gunnison, Colorado and AM station KPKE, 1490 kHz, Gunnison, Colorado. None of these stations is licensed or proposed to be licensed to a community in a metro county in any Arbitron market, nor are any of the stations considered “home” to any Arbitron Market. As noted on Exhibit A, the city grade contour of the proposed KVLE overlaps with the city grade contour of KEJJ and KPKE. Therefore, this review will verify that KVLE, KEJJ, and KPKE are in compliance in a non-rated market.

2. A study has been conducted to determine if ownership of KVLE with KEJJ and KPKE complies with §73.3555 of the Commission’s rules. The city grade contours of the three stations will be used to determine the number of other stations serving the defined market. The study will determine the number of other commercial AM and FM stations that either have transmitter sites within or provide coverage to the subject radio market. Only those stations with transmitter sites within 92.0 kilometers will be considered as contributors to the market. No other station in which Rees has an interest will be considered, unless it is a subject station in the market under review.

3. Exhibit B is a depiction of the boundaries of the contour Radio Market, and Exhibit C shows other commercial and non-commercial stations within or providing service to the Contour Radio Market boundary. A total of seven stations is depicted on the map, including the three subject stations. Exhibit D is a tabulation of the stations in the Radio Market. The number of stations depicted falls in the fourteen or fewer station tier of §73.3555(a)(1)(iv) of the Commission's rules. At this level, common ownership or control of up to five stations, with no more than three in the same service (provided that the party controls less than 50% of the stations in the market, is permissible. Therefore, the Contour Radio Market is in compliance with the Commission's rules.

4. Based on the compliance shown in the non-rated market reviewed, the co-ownership of KVLE, KEJJ and KPKE is in compliance with the Commission's multiple ownership rules, with regard to the stations reviewed.

5. The foregoing technical statement was prepared on behalf of John Harvey Rees, 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 AM and FM facilities was extracted from the CDBS database. All data relating to AM and FM facilities in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.6. BIA database. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.

KVLE-FM - Gunnison, CO - BMLH20141202AAI
Latitude: 38-33-53 N - Longitude: 106-55-38 W
Channel: 272 - Frequency: 102.3 MHz
ERP: 6.00 kW - AMSL Height: 2418.0 m

KEJJ - Gunnison, CO - BLH19811216AQ
Latitude: 38-31-22 N - Longitude: 106-54-28 W
Channel: 252 - Frequency: 98.3 MHz
ERP: 3.00 kW - AMSL Height: 2627.0 m

KPKE (AM), GUNNISON, CO
1490 kHz
Latitude: 38-33-57 N / Longitude: 106-55-32 W

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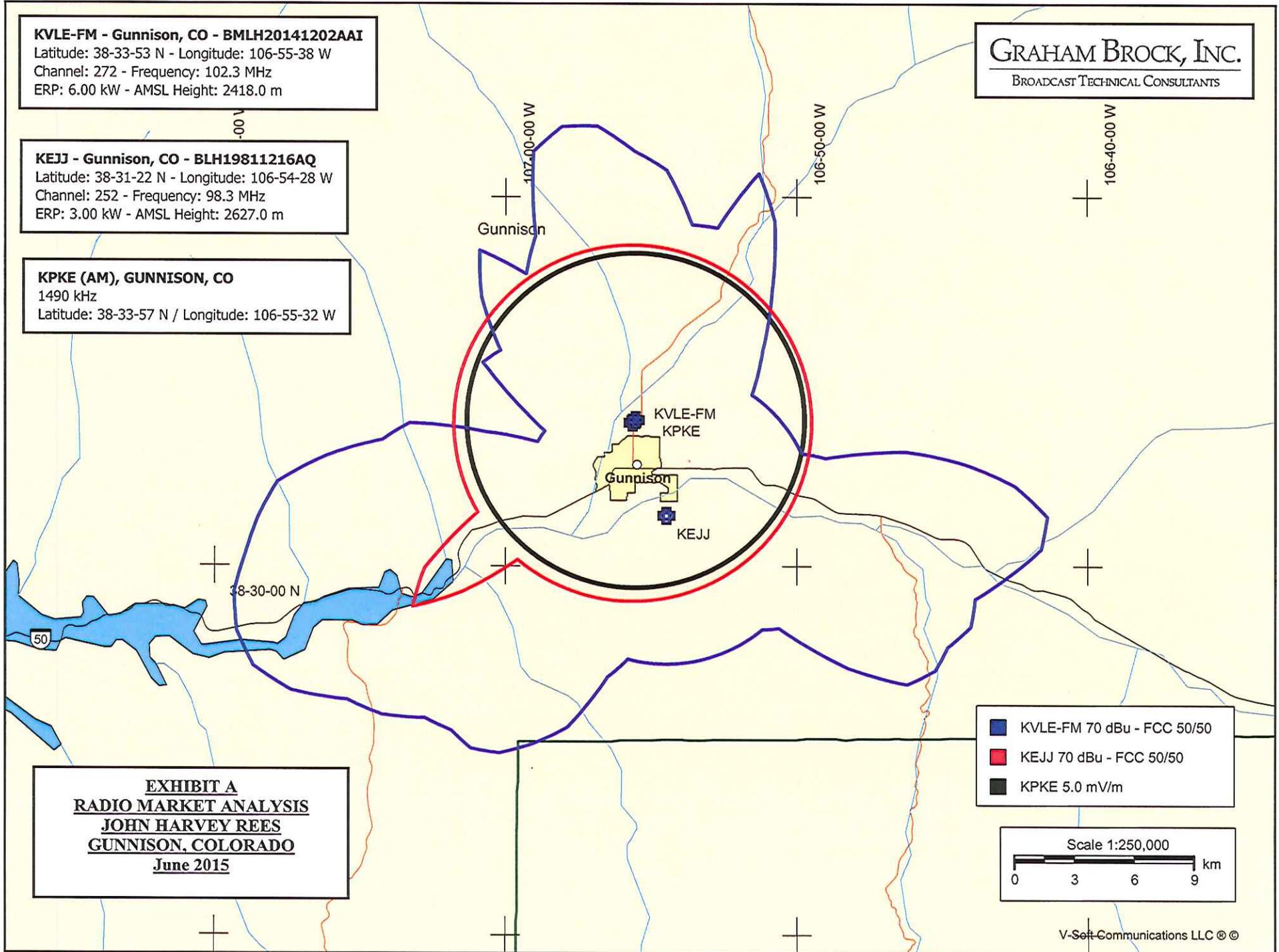


EXHIBIT A
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■ KVLE-FM 70 dBu - FCC 50/50
■ KEJJ 70 dBu - FCC 50/50
■ KPKE 5.0 mV/m

Scale 1:250,000
0 3 6 9 km

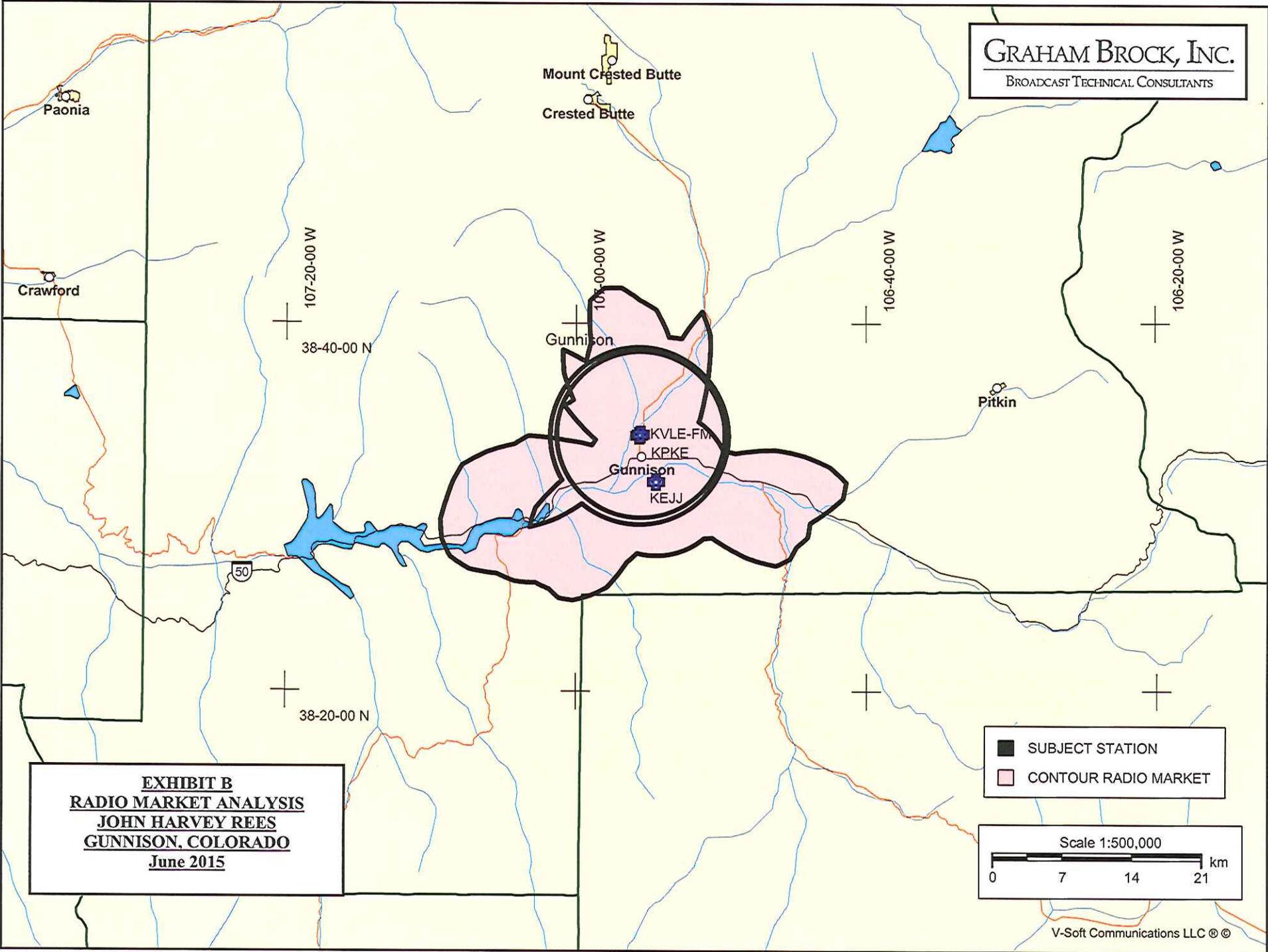


EXHIBIT B
RADIO MARKET ANALYSIS
JOHN HARVEY REES
GUNNISON, COLORADO
June 2015

■ SUBJECT STATION
■ CONTOUR RADIO MARKET

Scale 1:500,000
0 7 14 21 km

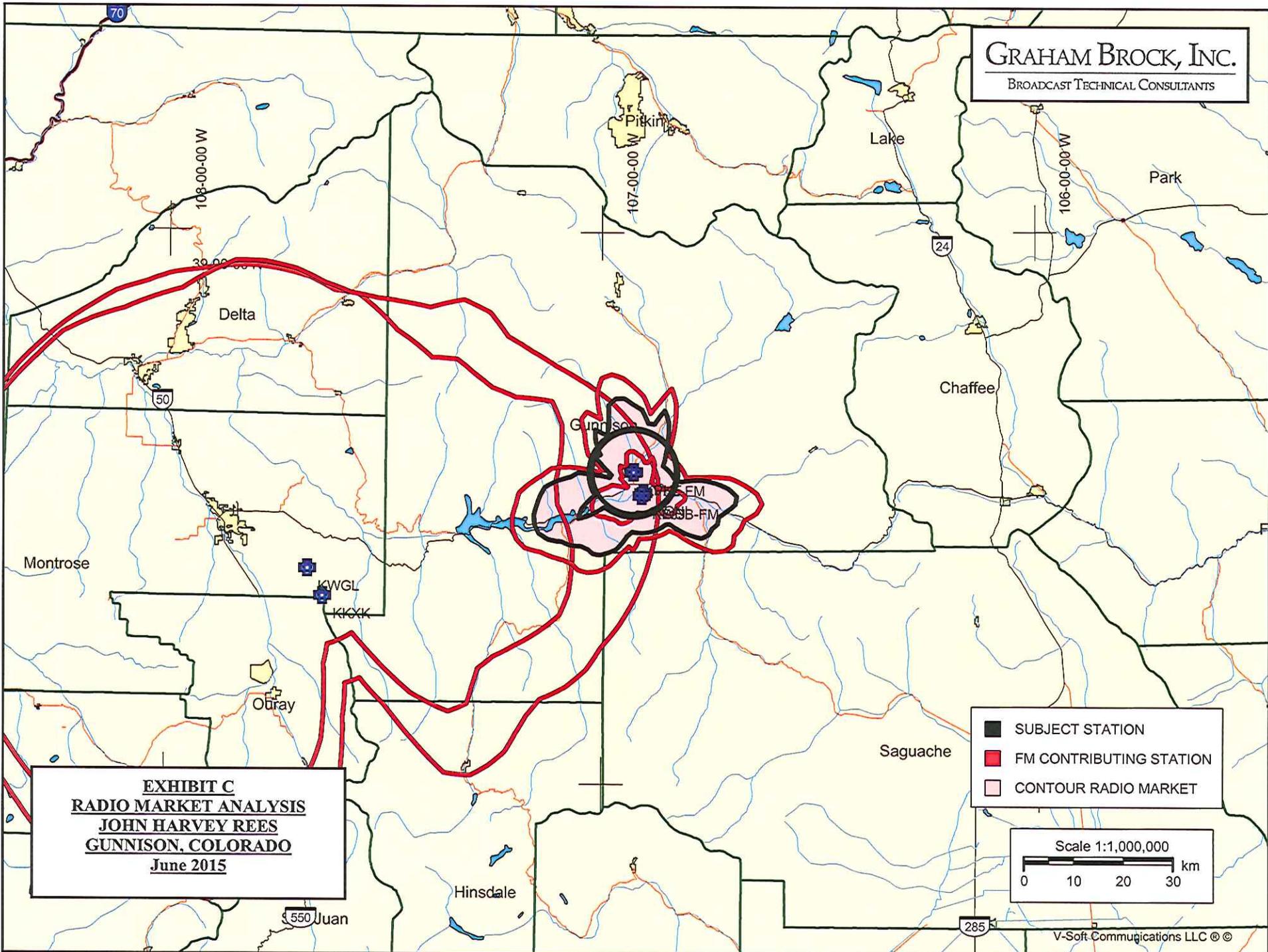
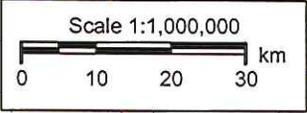


EXHIBIT C
RADIO MARKET ANALYSIS
JOHN HARVEY REES
GUNNISON, COLORADO
June 2015

- SUBJECT STATION
- FM CONTRIBUTING STATION
- CONTOUR RADIO MARKET



RADIO MARKET ANALYSIS
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EXHIBIT D

Tabulation of Stations in Radio Market

Total number of overlapping contours: 7

Reference:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
KVLE-FM	FM	272A Gunnison	CO	BMLH20141202AAI	0.0	0.0
KEJJ	FM	252A Gunnison	CO	BLH19811216AQ	5.0	160.0
KPKE	AM	1490 GUNNISON	CO	BL19970520AD	0.2	49.7

Overlapping Contours:

Callsign	Type	Chan City	St	File Number	Dist (km)	Azi (deg)
KGNI	FM	204C3 Gunnison	CO	BLED20130809AAK	4.6	153.4
KWSB-FM	FM	216A Gunnison	CO	BLED19850430LR	5.0	160.0
KKKK	FM	231C Montrose	CO	BLH19961009KC	67.1	248.2
KWGL	FM	289C Ouray	CO	BLH19990608KF	68.1	253.5

Distance and bearing calculations from coordinates: 38-33-53 N, 106-55-38 W

Duopoly Options:

TV: Not Included

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

AM: 5.0 mV/m

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

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

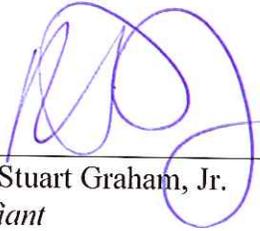
State of Georgia)
St. Simons Island) ss:
County of Glynn)

R. STUART GRAHAM, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by John Harvey Rees, to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He is a graduate of Auburn University and has been active in Broadcast Engineering since 1972.

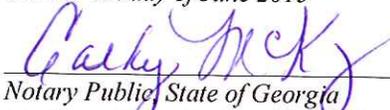
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 4th day of June 2015.



R. Stuart Graham, Jr.
Affiant

*Sworn to and subscribed before me
this the 4th day of June 2015*



Notary Public, State of Georgia
My Commission Expires: March 12, 2019