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## **MULTIPLE OWNERSHIP SERVICE CONTOUR ANALYSIS**

**Prepared for  
Round-Up Radio, Inc.  
August 2005**

The attached analysis of compliance with the radio multiple ownership rules was prepared in accordance with the Rules and Regulations of the Federal Communications Commission, in connection with a Form 302-FM license application for station KUMA-FM (Facility ID #57757). As a part of this license application, it is proposed to increase the authorized ERP of the station from 52 kW to 75 kW.

### **Unrated Market**

KUMA-FM has principal community contour overlap with the following attributable stations:

KUMA-FM	299C1	Pendleton, OR
KUMA(AM)	1290 kHz	Pendleton, OR
KWHT(FM)	278C1	Pendleton, OR
KTIX(AM)	1240 kHz	Pendleton, OR
KWRL(FM)	260C1	La Grande, OR
KCMB-FM	284C	Baker, OR
KTEL(AM)	1490 kHz	Walla Walla, WA

These stations operate outside any market rated by Arbitron. Therefore, analysis has been made consistent with the Commission's interim rules for unrated markets. The 70 dBu contours of FM stations were determined from the technical data contained in the most recent edition of the FCC FM Database. The listed antenna height above average terrain was used together with topographic data obtained from the digitized 30 second or 3 second database. The 5 mV/m

daytime contours of AM stations were determined from the technical data contained in the most recent edition of the FCC AM Database. The listed antenna parameter information was used together with a digitized version of the FCC M-3 or Region II ground conductivity database.

The service contours were plotted using correct map projection mathematics. Those stations whose transmitter sites are within the respective principal community service contours of the stations proposed to be commonly owned have only the sites rather than their contours shown. All contours and enclosed transmitter site locations have been labeled. A list of all stations considered is included with this statement.

In counting stations providing service to the “market” defined by each of the discrete clusters formed in unrated markets, stations whose transmitter sites are located in excess of 92 km from the perimeter of the common overlap area have been excluded, as have other stations to be commonly-owned but which are not a part of the discrete cluster being studied.

KUMA-FM, in combination with the other attributable radio stations, creates four discrete clusters of stations as depicted on the attached overview map exhibit. This exhibit evidences at least the minimum number of stations necessary to demonstrate compliance with the rules concerning radio multiple ownership in unrated markets, for each of the four discrete clusters.

**Cluster A: KUMA-FM, KWHT(FM), KCMB-FM, KWRL(FM)**

In order to qualify for common ownership of this 0AM/4FM cluster, there must be at least 15 stations in the relevant “market”. This study demonstrates that there are at least 20 stations in the relevant market.

**Cluster B: KUMA-FM, KWHT(FM), KCMB-FM, KUMA(AM)**

In order to qualify for common ownership of this 1AM/3FM cluster, there must be at least 8 stations in the relevant “market”. This study demonstrates that there are at least 20 stations in the relevant market.

**Cluster C: KUMA-FM, KWHT(FM), KUMA(AM), KTIK(AM)**


In order to qualify for common ownership of this 2AM/2FM cluster, there must be at least 8 stations

in the relevant “market”. This study demonstrates that there are at least 20 stations in the relevant market.

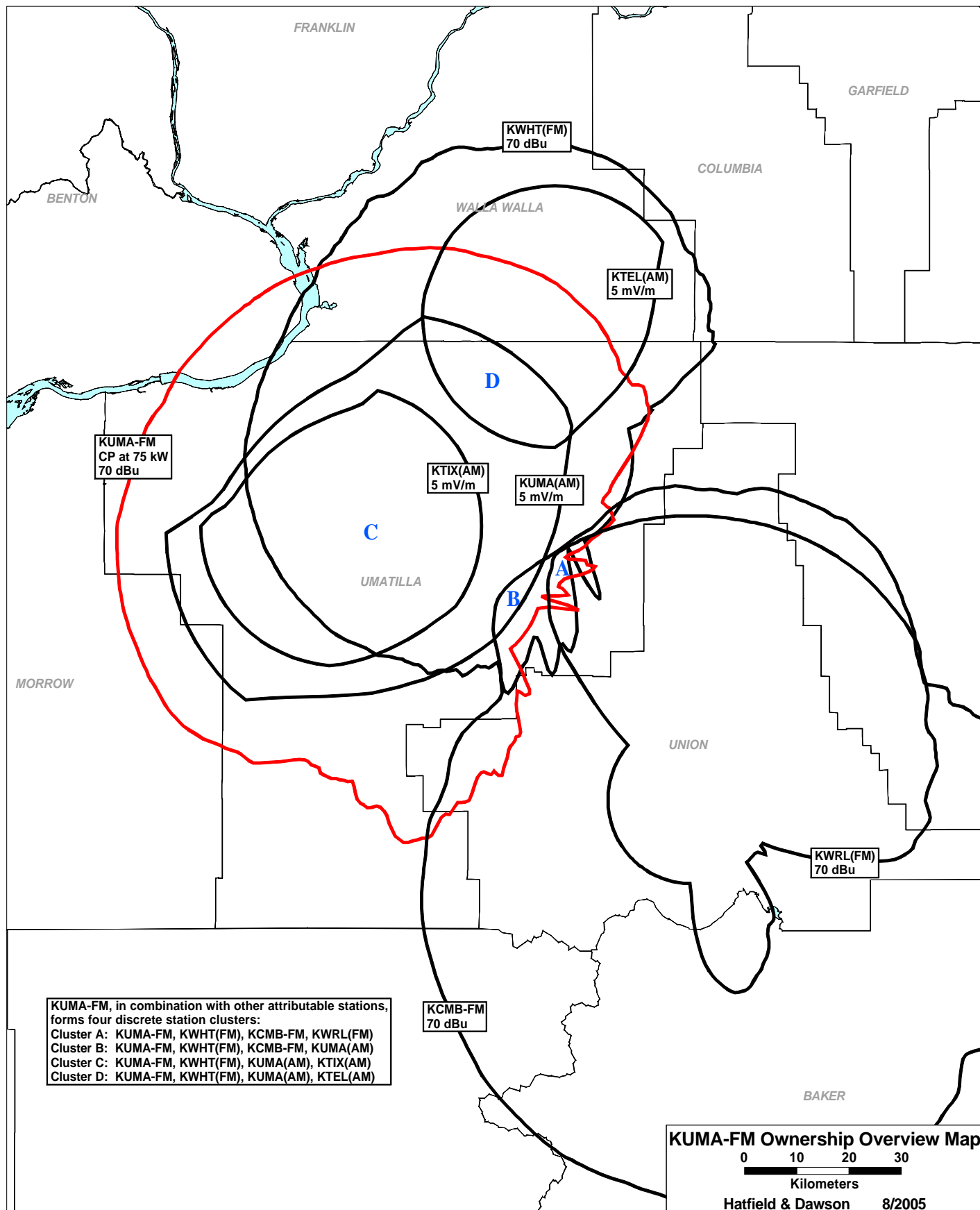
**Cluster D: KUMA-FM, KWHT(FM), KUMA(AM), KTEL(AM)**

In order to qualify for common ownership of this 2AM/2FM cluster, there must be at least 8 stations in the relevant “market”. This study demonstrates that there are at least 20 stations in the relevant market.

August 2, 2005

A handwritten signature in black ink, appearing to read "Erik C. Swanson". The signature is fluid and cursive, with the first name "Erik" and last name "Swanson" clearly distinguishable.

Erik C. Swanson



## Cluster A Analysis

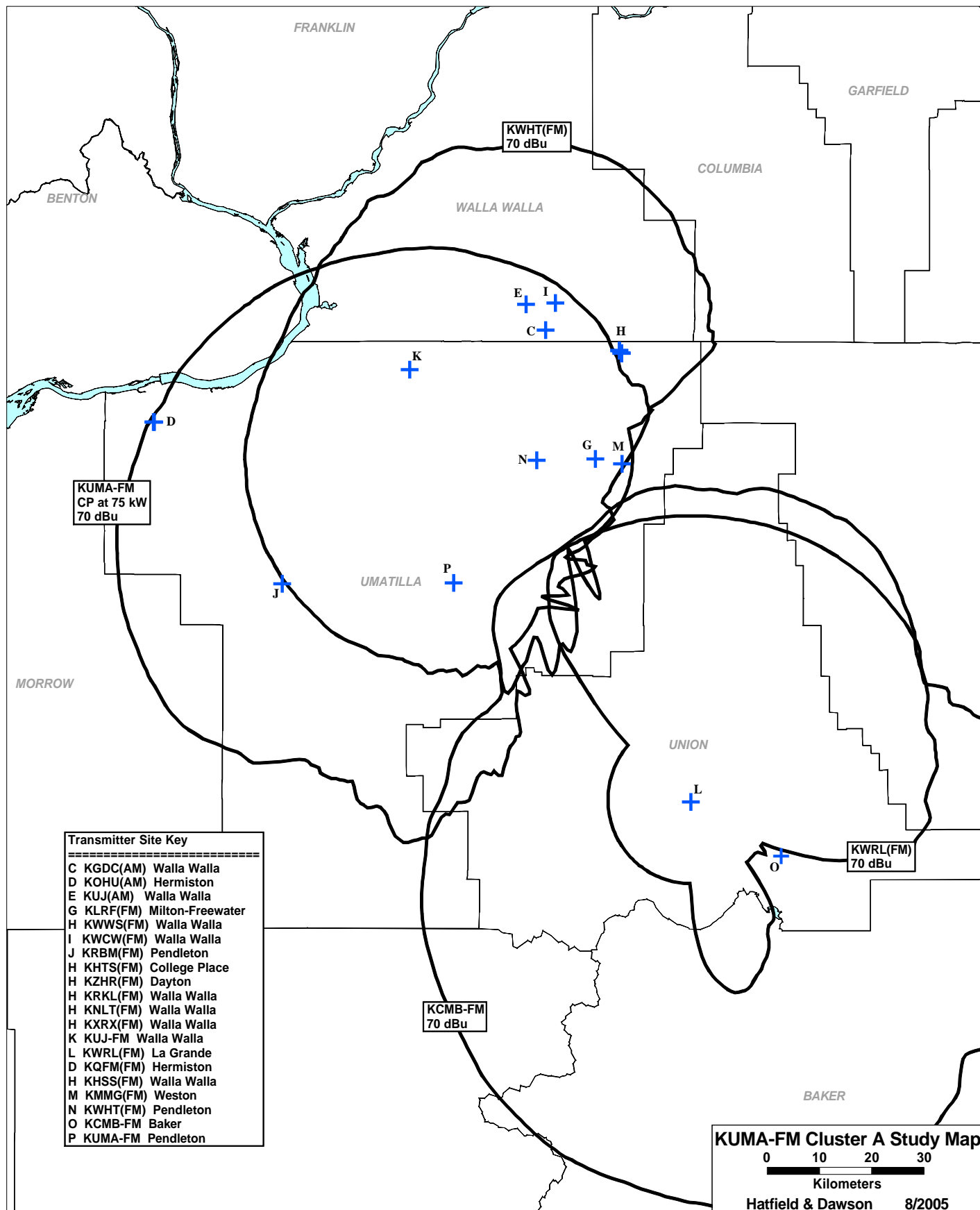
### AM STATIONS WITH 5 mV/m CONTOURS OVERLAPPING 70 dBu CONTOURS OF KUMA-FM, KWHT(FM), KCMB-FM, KWRL(FM)

Call	City		Freq	Power(kW)	Latitude
Status	St Co	FCC File No.	Mode	Hrs Cls	Longitude
=====					
KGDC	WALLA WALLA		1320	1.000	N 46-01-25
LIC	WA US	BL19900518AS	ND1	DAY B	W 118-21-17
KOHU	HERMISTON		1360	4.300	N 45-51-57
LIC	OR US	BL19880426AC	DAN	DAY B	W 119-18-45
KUJ	WALLA WALLA		1420	5.000	N 46-04-03
LIC	WA US	BL	DAN	DAY B	W 118-24-08

## Cluster A Analysis

### FM STATIONS WITH 70 dBu CONTOURS OVERLAPPING 70 dBu CONTOURS OF KUMA-FM, KWHT(FM), KCMB-FM, KWRL(FM)

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude
=====					
KLRF LIC	MILTON-FREEWATER OR	203C2 BLED001220ABZ	7.400 88.5	251.0	45-48-12 118-13-59
KWWS LIC	WALLA WALLA WA	209C2 BLED970609KE	3.200 89.7	410.0	45-59-04 118-10-08
KWCW LIC	WALLA WALLA WA	213A BLED011010AAE	0.160 90.5	-16.0	46-04-11 118-19-51
KRBM LIC	PENDLETON OR	215C2 BLED871019KC	25.000 90.9	180.0	45-35-21 118-59-53
KGTS LIC	COLLEGE PLACE WA	217C2 BLED021217ABR	7.000 91.3	381.0	45-59-20 118-10-29
KZHR LIC	DAYTON WA	223C1 BLH920731KC	54.000 92.5	379.0	45-59-19 118-10-28
KRKL LIC	WALLA WALLA WA	227C1 BMLED020130ABT	42.000 93.3	420.0	45-59-19 118-10-28
KNLT LIC	WALLA WALLA WA	239C BLH811222AI	100.000 95.7	427.0	45-59-04 118-10-08
KXRX LIC	WALLA WALLA WA	246C0 BLH030908ACK	100.000 97.1	405.0	45-59-04 118-10-09
KUJ-FM LIC	WALLA WALLA WA	256C2 BLH000214ABB	29.000 99.1	190.0	45-57-22 118-41-11
KWRL LIC	LA GRANDE OR	260C1 BLH970805KE	60.000 99.9	155.0	45-12-59 118-00-00
KQFM LIC	HERMISTON OR	263A BLH990520KB	5.300 100.5	91.0	45-51-57 119-18-38
KHSS LIC	WALLA WALLA WA	264C3 BLH970827KD	1.300 100.7	419.0	45-59-04 118-10-08
KMMG LIC	WESTON OR	270C2 BLH000323ABX	13.500 101.9	292.0	45-47-41 118-10-06
KWHT LIC	PENDLETON OR	278C1 BLH050112ADB	100.000 103.5	219.0	45-48-02 118-22-36
KCMB-FM LIC	BAKER OR	284C BLH880719KB	100.000 104.7	532.0	45-07-26 117-46-48
KUMA-FM LICAPP	PENDLETON OR	299C1 BLH	75.000 107.7	340.0	45-35-27 118-34-47



## Cluster B Analysis

### AM STATIONS WITH 5 mV/m CONTOURS OVERLAPPING 70 dBu CONTOURS OF KUMA-FM, KWHT(FM), KCMB-FM AND 5 mV/m CONTOUR OF KUMA(AM)

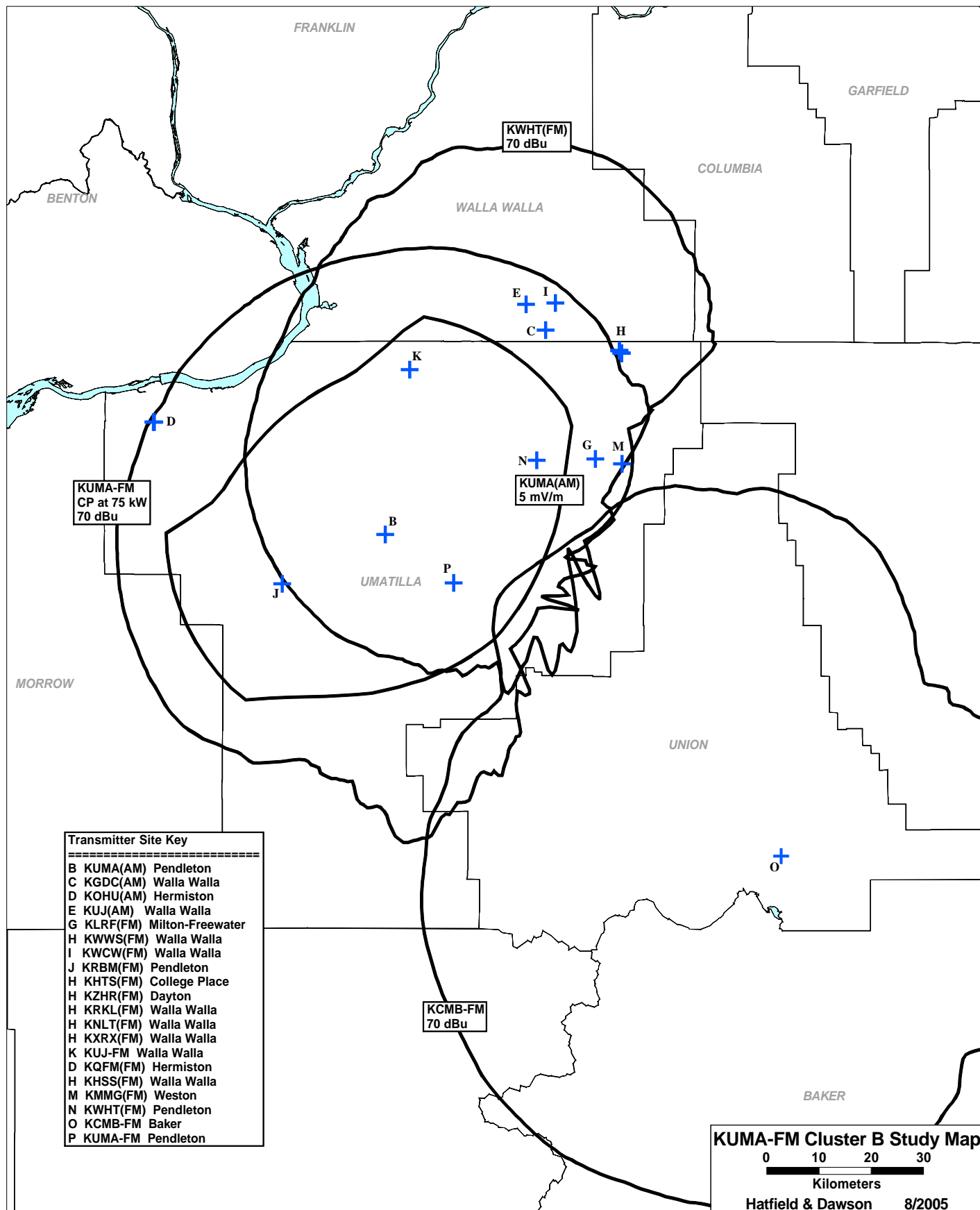
Call	City	Freq	Power(kW)	Latitude
Status	St Co	FCC File No.	Mode Hrs Cls	Longitude
=====				
KUMA	PENDLETON	1290	5.000	N 45-40-25
LIC	OR US BL	DAN	DAY B	W 118-44-48
KGDC	WALLA WALLA	1320	1.000	N 46-01-25
LIC	WA US BL19900518AS	ND1	DAY B	W 118-21-17
KOHU	HERMISTON	1360	4.300	N 45-51-57
LIC	OR US BL19880426AC	DAN	DAY B	W 119-18-45
KUJ	WALLA WALLA	1420	5.000	N 46-04-03
LIC	WA US BL	DAN	DAY B	W 118-24-08



## Cluster B Analysis

### FM STATIONS WITH 70 dBu CONTOURS OVERLAPPING 70 dBu CONTOURS OF KUMA-FM, KWHT(FM), KCMB-FM AND 5 mV/m CONTOUR OF KUMA(AM)

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude
=====					
KLRF LIC	MILTON-FREEWATER OR	BLD001220ABZ	203C2 88.5	7.400 251.0	45-48-12 118-13-59
KWWS LIC	WALLA WALLA WA	BLD970609KE	209C2 89.7	3.200 410.0	45-59-04 118-10-08
KWCW LIC	WALLA WALLA WA	BLD011010AAE	213A 90.5	0.160 -16.0	46-04-11 118-19-51
KRBM LIC	PENDLETON OR	BLD871019KC	215C2 90.9	25.000 180.0	45-35-21 118-59-53
KGTS LIC	COLLEGE PLACE WA	BLD021217ABR	217C2 91.3	7.000 381.0	45-59-20 118-10-29
KZHR LIC	DAYTON WA	BLH920731KC	223C1 92.5	54.000 379.0	45-59-19 118-10-28
KRKL LIC	WALLA WALLA WA	BLD020130ABT	227C1 93.3	42.000 420.0	45-59-19 118-10-28
KNLT LIC	WALLA WALLA WA	BLH811222AI	239C 95.7	100.000 427.0	45-59-04 118-10-08
KXRX LIC	WALLA WALLA WA	BLH030908ACK	246C0 97.1	100.000 405.0	45-59-04 118-10-09
KUJ-FM LIC	WALLA WALLA WA	BLH000214ABB	256C2 99.1	29.000 190.0	45-57-22 118-41-11
KQFM LIC	HERMISTON OR	BLH990520KB	263A 100.5	5.300 91.0	45-51-57 119-18-38
KHSS LIC	WALLA WALLA WA	BLH970827KD	264C3 100.7	1.300 419.0	45-59-04 118-10-08
KMMG LIC	WESTON OR	BLH000323ABX	270C2 101.9	13.500 292.0	45-47-41 118-10-06
KWHT LIC	PENDLETON OR	BLH050112ADB	278C1 103.5	100.000 219.0	45-48-02 118-22-36
KCMB-FM LIC	BAKER OR	BLH880719KB	284C 104.7	100.000 532.0	45-07-26 117-46-48
KUMA-FM LICAPP	PENDLETON OR	BLH	299C1 107.7	75.000 340.0	45-35-27 118-34-47



## Cluster C Analysis

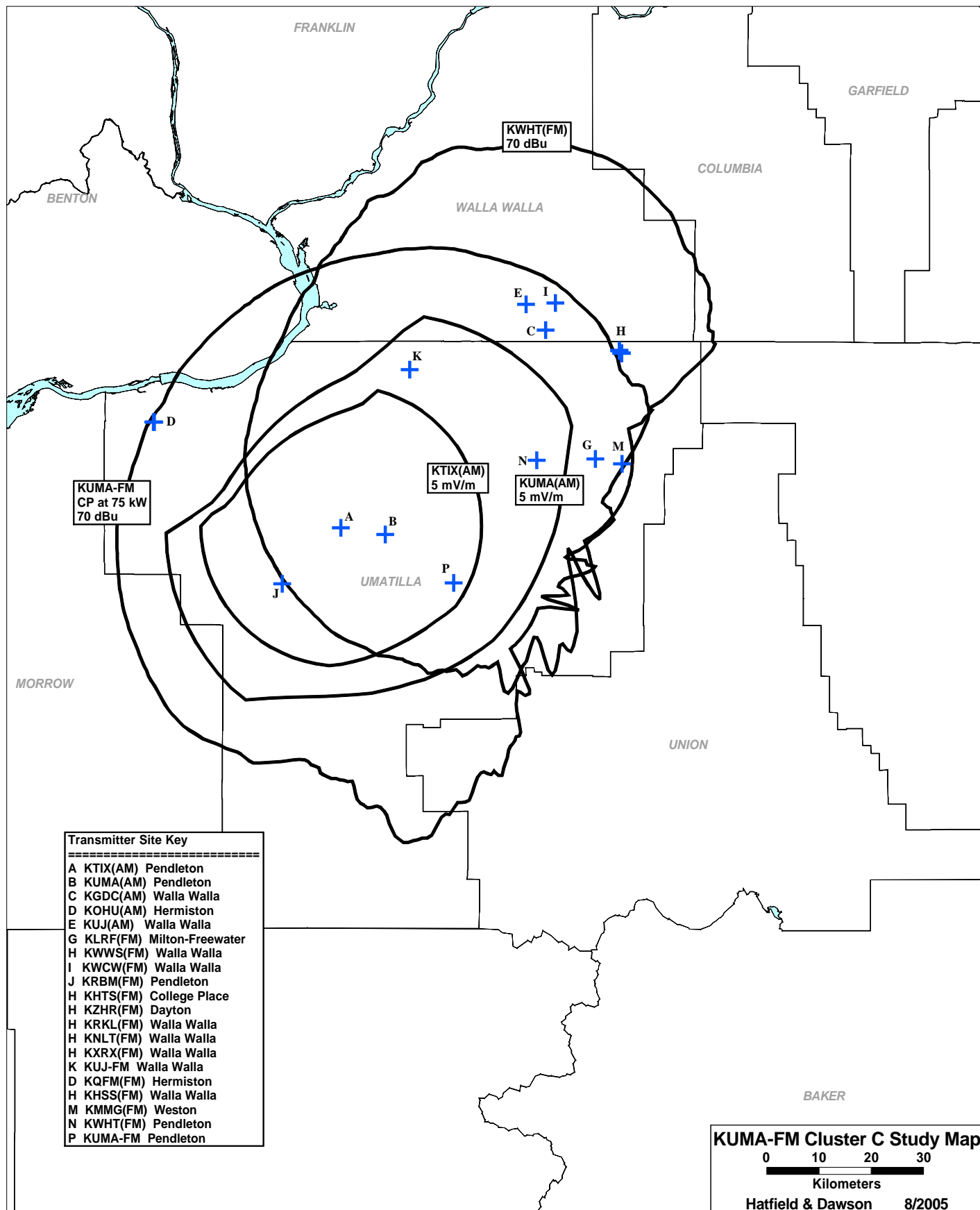
### AM STATIONS WITH 5 mV/m CONTOURS OVERLAPPING 70 dBu CONTOURS OF KUMA-FM, KWHT(FM) AND 5 mV/m CONTOURS OF KUMA(AM), KTIX(AM)

Call	City	Freq	Power(kW)	Latitude
Status	St Co	FCC File No.	Mode Hrs Cls	Longitude
=====				
KTIX	PENDLETON	1240	0.800	N 45-41-06
LIC	OR US BL0021022ABV	ND2	DAY C	W 118-51-17
KUMA	PENDLETON	1290	5.000	N 45-40-25
LIC	OR US BL	DAN	DAY B	W 118-44-48
KGDC	WALLA WALLA	1320	1.000	N 46-01-25
LIC	WA US BL19900518AS	ND1	DAY B	W 118-21-17
KOHU	HERMISTON	1360	4.300	N 45-51-57
LIC	OR US BL19880426AC	DAN	DAY B	W 119-18-45
KUJ	WALLA WALLA	1420	5.000	N 46-04-03
LIC	WA US BL	DAN	DAY B	W 118-24-08

## Cluster C Analysis

### FM STATIONS WITH 70 dBu CONTOURS OVERLAPPING 70 dBu CONTOURS OF KUMA-FM, KWHT(FM) AND 5 mV/m CONTOURS OF KUMA(AM), KTIX(AM)

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude
=====					
KLRF LIC	MILTON-FREEWATER OR	BLD001220ABZ	203C2 88.5	7.400 251.0	45-48-12 118-13-59
KWWS LIC	WALLA WALLA WA	BLD970609KE	209C2 89.7	3.200 410.0	45-59-04 118-10-08
KWCW LIC	WALLA WALLA WA	BLD011010AAE	213A 90.5	0.160 -16.0	46-04-11 118-19-51
KRBM LIC	PENDLETON OR	BLD871019KC	215C2 90.9	25.000 180.0	45-35-21 118-59-53
KGTS LIC	COLLEGE PLACE WA	BLD021217ABR	217C2 91.3	7.000 381.0	45-59-20 118-10-29
KZHR LIC	DAYTON WA	BLH920731KC	223C1 92.5	54.000 379.0	45-59-19 118-10-28
KRKL LIC	WALLA WALLA WA	BMLED020130ABT	227C1 93.3	42.000 420.0	45-59-19 118-10-28
KNLT LIC	WALLA WALLA WA	BLH811222AI	239C 95.7	100.000 427.0	45-59-04 118-10-08
KXRX LIC	WALLA WALLA WA	BLH030908ACK	246C0 97.1	100.000 405.0	45-59-04 118-10-09
KUJ-FM LIC	WALLA WALLA WA	BLH000214ABB	256C2 99.1	29.000 190.0	45-57-22 118-41-11
KQFM LIC	HERMISTON OR	BLH990520KB	263A 100.5	5.300 91.0	45-51-57 119-18-38
KHSS LIC	WALLA WALLA WA	BLH970827KD	264C3 100.7	1.300 419.0	45-59-04 118-10-08
KMMG LIC	WESTON OR	BLH000323ABX	270C2 101.9	13.500 292.0	45-47-41 118-10-06
KWHT LIC	PENDLETON OR	BLH050112ADB	278C1 103.5	100.000 219.0	45-48-02 118-22-36
KUMA-FM LICAPP	PENDLETON OR	BLH	299C1 107.7	75.000 340.0	45-35-27 118-34-47



Transmitter Site Key	
A	KTIX(AM) Pendleton
B	KUMA(AM) Pendleton
C	KGDC(AM) Walla Walla
D	KOHU(AM) Hermiston
E	KUJ(AM) Walla Walla
G	KLRF(FM) Milton-Freewater
H	KWWS(FM) Walla Walla
I	KWCW(FM) Walla Walla
J	KRBM(FM) Pendleton
H	KHTS(FM) College Place
H	KZHR(FM) Dayton
H	KRKL(FM) Walla Walla
H	KNLT(FM) Walla Walla
H	KXR(X)FM) Walla Walla
K	KUJ-FM Walla Walla
D	KQFM(FM) Hermiston
H	KHSS(FM) Walla Walla
M	KMMG(FM) Weston
N	KWHT(FM) Pendleton
P	KUMA-FM Pendleton

## Cluster D Analysis

### AM STATIONS WITH 5 mV/m CONTOURS OVERLAPPING 70 dBu CONTOURS OF KUMA-FM, KWHT(FM) AND 5 mV/m CONTOURS OF KUMA(AM), KTEL(AM)

Call Status	City St Co	FCC File No.	Freq Mode	Power(kW) Hrs Cls	Latitude Longitude
=====	=====	=====	=====	=====	=====
KUMA LIC	PENDLETON OR US BL		1290 DAN	5.000 DAY B	N 45-40-25 W 118-44-48
KGDC LIC	WALLA WALLA WA US BL19900518AS		1320 ND1	1.000 DAY B	N 46-01-25 W 118-21-17
KOHU LIC	HERMISTON OR US BL19880426AC		1360 DAN	4.300 DAY B	N 45-51-57 W 119-18-45
KUJ LIC	WALLA WALLA WA US BL		1420 DAN	5.000 DAY B	N 46-04-03 W 118-24-08
KTEL LIC	WALLA WALLA WA US BL19920102AE		1490 ND1	1.000 UNL C	N 46-02-33 W 118-20-00

## Cluster D Analysis

### FM STATIONS WITH 70 dBu CONTOURS OVERLAPPING 70 dBu CONTOURS OF KUMA-FM, KWHT(FM) AND 5 mV/m CONTOURS OF KUMA(AM), KTEL(AM)

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude
=====					
KLRF LIC	MILTON-FREEWATER OR	BLD001220ABZ	203C2 88.5	7.400 251.0	45-48-12 118-13-59
KWWS LIC	WALLA WALLA WA	BLD970609KE	209C2 89.7	3.200 410.0	45-59-04 118-10-08
KWCW LIC	WALLA WALLA WA	BLD011010AAE	213A 90.5	0.160 -16.0	46-04-11 118-19-51
KRBM LIC	PENDLETON OR	BLD871019KC	215C2 90.9	25.000 180.0	45-35-21 118-59-53
KGTS LIC	COLLEGE PLACE WA	BLD021217ABR	217C2 91.3	7.000 381.0	45-59-20 118-10-29
KZHR LIC	DAYTON WA	BLH920731KC	223C1 92.5	54.000 379.0	45-59-19 118-10-28
KRKL LIC	WALLA WALLA WA	BMLED020130ABT	227C1 93.3	42.000 420.0	45-59-19 118-10-28
KNLT LIC	WALLA WALLA WA	BLH811222AI	239C 95.7	100.000 427.0	45-59-04 118-10-08
KXRX LIC	WALLA WALLA WA	BLH030908ACK	246C0 97.1	100.000 405.0	45-59-04 118-10-09
KUJ-FM LIC	WALLA WALLA WA	BLH000214ABB	256C2 99.1	29.000 190.0	45-57-22 118-41-11
KQFM LIC	HERMISTON OR	BLH990520KB	263A 100.5	5.300 91.0	45-51-57 119-18-38
KHSS LIC	WALLA WALLA WA	BLH970827KD	264C3 100.7	1.300 419.0	45-59-04 118-10-08
KMMG LIC	WESTON OR	BLH000323ABX	270C2 101.9	13.500 292.0	45-47-41 118-10-06
KWHT LIC	PENDLETON OR	BLH050112ADB	278C1 103.5	100.000 219.0	45-48-02 118-22-36
KUMA-FM LICAPP	PENDLETON OR	BLH	299C1 107.7	75.000 340.0	45-35-27 118-34-47

