

JAMES B. HATFIELD, PE
BENJAMIN F. DAWSON III, PE
THOMAS M. ECKELS, PE
STEPHEN S. LOCKWOOD, PE
DAVID J. PINION, PE

PAUL W. LEONARD, PE
ERIK C. SWANSON, EIT
THOMAS S. GORTON, PE

HATFIELD & DAWSON
CONSULTING ELECTRICAL ENGINEERS
9500 GREENWOOD AVE. N.
SEATTLE, WASHINGTON 98103

TELEPHONE
(206) 783-9151
FACSIMILE
(206) 789-9834
E-MAIL
hatdaw@hatdaw.com

MAURY L. HATFIELD, PE
CONSULTANT
BOX 1326
ALICE SPRINGS, NT 5950
AUSTRALIA

MULTIPLE OWNERSHIP SERVICE CONTOUR ANALYSIS

**Prepared for
Cochise Broadcasting, LLC
Skywest Media, LLC
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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 applications for new FM stations on Channel 251A at Tubac, AZ (Facility ID #171024) and on Channel 263A at Rio Rico, AZ (Facility ID #171003).

Unrated Market

The proposed Tubac and Rio Rico facilities will be licensed to communities outside any Arbitron market, and do not have principal community contour overlap with any other attributable stations. 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


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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.

This exhibit evidences at least the minimum number of stations necessary to demonstrate compliance with the rules concerning radio multiple ownership in unrated markets. In order to qualify for common ownership of this OAM/2FM cluster, there must be at least 4 stations in the relevant "market". This study demonstrates that there are at least 4 stations in the relevant market.

February 25, 2008

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

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Contours of other attributable stations are shown for reference, to demonstrate that there is no principal community contour overlap between Tubac 251A and those stations.

Stations in the "Market"

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KNOG 216A Nogales
New 251A Tubac
KOFH 256A Nogales
New 263A Rio Rico

Tubac 251A
70 dBu

KKYZ 267C3
App 70 dBu

KKYZ 267C3
CP 70 dBu

KRDX 253A
Lic 70 dBu

Vail 279A
App 70 dBu

KRDX 283A
App 70 dBu

TUBAC APP 251A

SANTA CRUZ

RIO RICO APP 263A

Rio Rico 263A
70 dBu

KOFH LIC 256A

KNOG LIC 216A

M

E

X

I

C

O

Tubac 251A and Rio Rico 263A Ownership Map

0 7 14 21

Kilometers

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2/2008