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**Prepared for
Cochise Media Licenses 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 with an assignment application for station KPSA-FM on Channel 249A at Lordsburg, NM (Facility ID #29027). This station holds a construction permit to upgrade to Channel 250C (FCC File No. BPH-20051228AEC).

The KPSA-FM 249A license facility does not operate within an Arbitron rated market and does not have principal community contour overlap with any other attributable station. Therefore no further analysis is necessary with respect to the KPSA-FM license facility.

The KPSA-FM 250C construction permit facility has principal community contour overlap with the following attributable stations:

KFMM(FM)	256C	Thatcher, AZ	Cochise Broadcasting LLC
KNFT-FM	275C1	Bayard, NM	Skywest Licenses New Mexico LLC
KNFT(AM)	950 kHz	Bayard, NM	Skywest Licenses New Mexico LLC
KSCQ(FM)	225C2	Silver City, NM	Skywest Media LLC
	(with outstanding permit on 224C1)		

Skywest Media LLC and Skywest Licenses New Mexico LLC (collectively "Skywest") are wholly owned by Ted Tucker (Jr.), who is the son of Ted Tucker (Sr.) and Jana Tucker. Ted Tucker (Sr.) and Jana Tucker each own 50% of Cochise Media Licenses LLC and Cochise Broadcasting LLC

(collectively “Cochise”). While Skywest is operated independently of Cochise, the Skywest stations have been included in this analysis out of an abundance of caution.

Unrated Market

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. This exhibit evidences at least the minimum number of stations necessary to demonstrate compliance with the rules concerning radio multiple ownership in unrated markets.

The combination of these stations listed above forms two discrete clusters:

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Cluster A: KPSA-FM CP, KSCQ(FM), KNFT-FM, KNFT(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 9 stations in the relevant market.

Cluster B: KPSA-FM App, KFMM(FM)

In order to qualify for common ownership of this 0AM/2FM cluster, there must be at least 4 stations in the relevant "market". This study demonstrates that there are at least 5 stations in the relevant market.

July 9, 2009



Erik C. Swanson, P.E.





