

BENJAMIN F. DAWSON III, PE  
THOMAS M. ECKELS, PE  
STEPHEN S. LOCKWOOD, PE  
DAVID J. PINION, PE  
ERIK C. SWANSON, PE

THOMAS S. GORTON, PE  
MICHAEL H. MEHIGAN, EIT

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](mailto:hatdaw@hatdaw.com)

JAMES B. HATFIELD, PE  
CONSULTANT

MAURY L. HATFIELD, PE  
(1942-2009)

PAUL W. LEONARD, PE  
(1925-2011)

## MULTIPLE OWNERSHIP SERVICE CONTOUR ANALYSIS

Prepared for  
**JOSH Broadcasting, LLC**  
January 2012

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 FM station KANY (FCC Facility ID No. 164149).

### Unrated Market

KANY holds a license on Channel 229C3 at Ocean Shores, Washington, and a construction permit on Channel 229C0 at Montesano, Washington.

The KANY facilities have principal community contour overlap with the following attributable stations:

KSWW	271C3	Elma	(with 271C3 Ocean Shores CP)
KJET	289C2	Raymond	
KOMO-FM	249C	Oakville	(with 249C CP and App)
KBKW	1450 kHz	Aberdeen	

KANY operates 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.

Since KANY holds a construction permit for an upgrade and transmitter site change, with a contingent CP for KSWW to take over service to the current KANY community of license, study has been made of two potential station clusters: Cluster A includes the KANY and KSWW licenses, while Cluster B includes the KANY and KSWW construction permits. 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 both clusters.<sup>1</sup>

**Cluster A: KANY(FM) License, KSWW(FM) License, KOMO-FM, KJET(FM), KBKW(AM)**

In order to qualify for common ownership of this 1AM/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. (Several other stations also provide service to this market. A comprehensive list can be provided should the Commission so require, but the stations listed herein are more than sufficient to satisfy the requirements of §73.3555.)

**Cluster B: KANY(FM) CP, KSWW(FM) CP, KOMO-FM, KJET(FM), KBKW(AM)**

In order to qualify for common ownership of this 1AM/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

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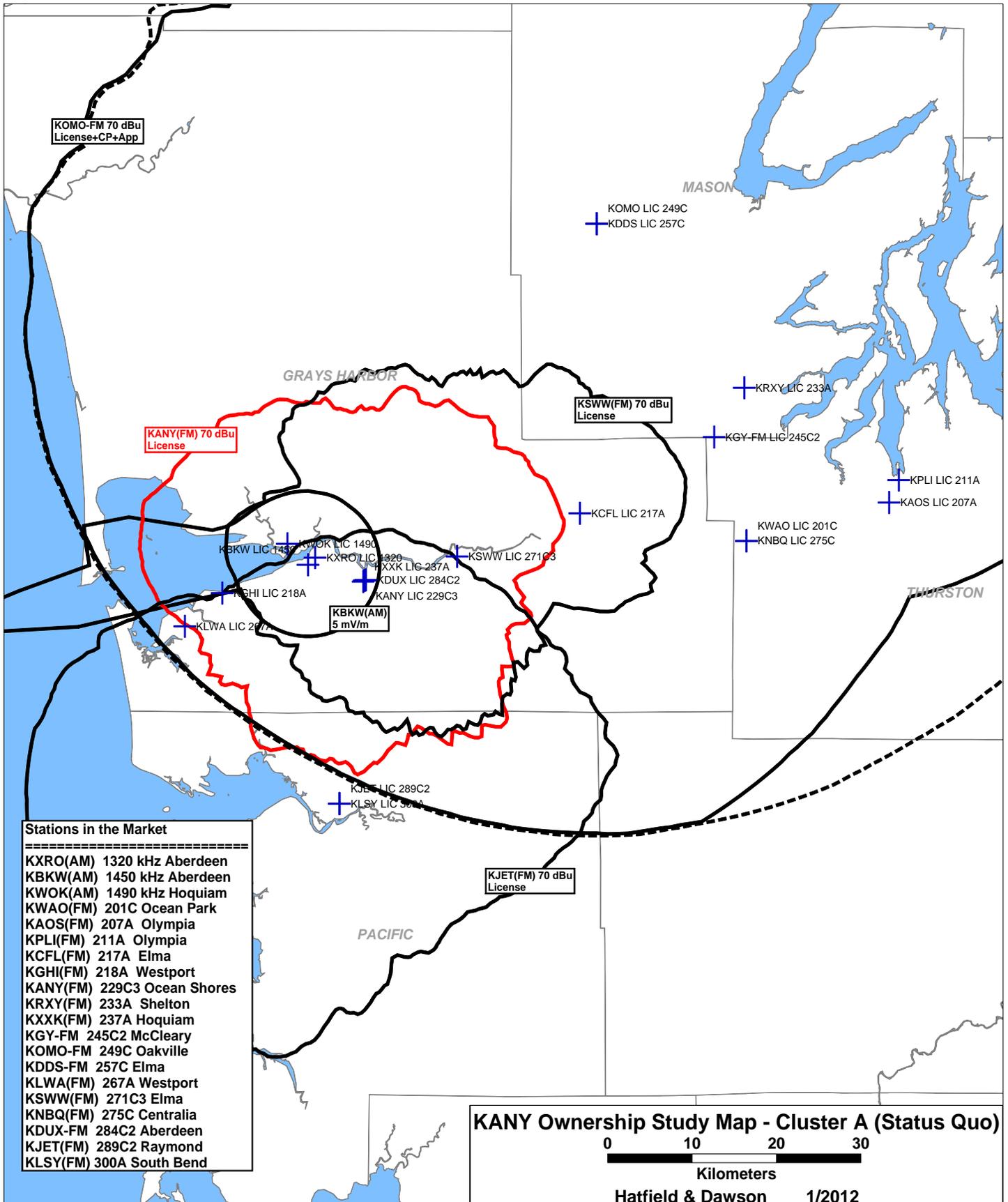
<sup>1</sup> KOMO-FM holds a license and construction permit, and has a pending application. All three of these facilities are from the same transmitter site, and have similar contours.

market. (Several other stations also provide service to this market. A comprehensive list can be provided should the Commission so require, but the stations listed herein are more than sufficient to satisfy the requirements of §73.3555.)

January 11, 2012

A handwritten signature in black ink, appearing to read "Erik C. Swanson". The signature is written in a cursive, flowing style with a long horizontal tail.

Erik C. Swanson



**Stations in the Market**

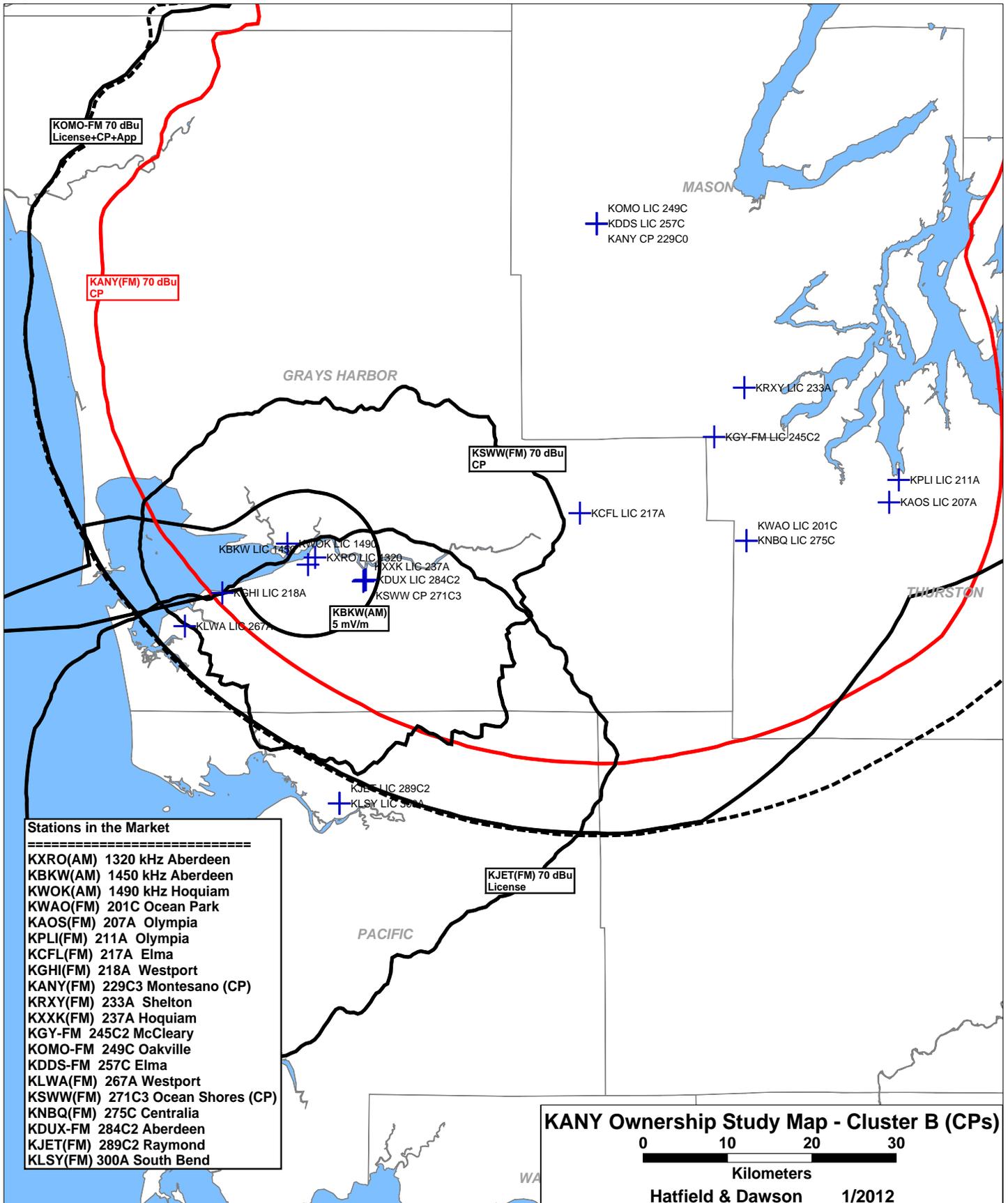
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KXRO(AM)	1320 kHz	Aberdeen
KBKW(AM)	1450 kHz	Aberdeen
KWOK(AM)	1490 kHz	Hoquiam
KWAO(FM)	201C	Ocean Park
KAOS(FM)	207A	Olympia
KPLI(FM)	211A	Olympia
KCFL(FM)	217A	Elma
KGHI(FM)	218A	Westport
KANY(FM)	229C3	Ocean Shores
KRXY(FM)	233A	Shelton
KXXX(FM)	237A	Hoquiam
KGY-FM	245C2	McCleary
KOMO-FM	249C	Oakville
KDDS-FM	257C	Elma
KLWA(FM)	267A	Westport
KSWW(FM)	271C3	Elma
KNBQ(FM)	275C	Centralia
KDUX-FM	284C2	Aberdeen
KJET(FM)	289C2	Raymond
KLSY(FM)	300A	South Bend

**KANY Ownership Study Map - Cluster A (Status Quo)**

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Kilometers

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**Stations in the Market**

- KXRO(AM) 1320 kHz Aberdeen
- KBKW(AM) 1450 kHz Aberdeen
- KWOK(AM) 1490 kHz Hoquiam
- KWAO(FM) 201C Ocean Park
- KAOS(FM) 207A Olympia
- KPLI(FM) 211A Olympia
- KCFL(FM) 217A Elma
- KGHI(FM) 218A Westport
- KANY(FM) 229C3 Montesano (CP)
- KRXY(FM) 233A Shelton
- KXXX(FM) 237A Hoquiam
- KGY-FM 245C2 McCleary
- KOMO-FM 249C Oakville
- KDDS-FM 257C Elma
- KLWA(FM) 267A Westport
- KSWW(FM) 271C3 Ocean Shores (CP)
- KNBQ(FM) 275C Centralia
- KDUX-FM 284C2 Aberdeen
- KJET(FM) 289C2 Raymond
- KLSY(FM) 300A South Bend

**KANY Ownership Study Map - Cluster B (CPs)**



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