

STATEMENT RE MULTIPLE-OWNERSHIP COMPLIANCE

A. INTRODUCTION

1. The proposed Assignee, Tom, Rick, and Harley Broadcasting LLC (*TRH*), is already the licensee of:

- radio station KHLB(FM), Channel 273C2, Mason, Texas, FCC Facility ID No. 83109; and
- radio station KRZS(FM), Channel 260C3, Hunt, Texas, FCC Facility ID No. 165377.

2. The stations that the proposed Assignee seeks to acquire are:

- KYRT(FM), Channel 250A, Hunt, Texas, FCC Facility ID No. 165378; and
- KZZM(FM), Channel 260C3, Mason, Texas, FCC Facility ID No. 170992.

B. STATIONS KRZS AND KYRT

i. WHEN COLLOCATED

2. Radio Station KYRT, as originally licensed, was authorized to serve the community of Mason, Texas, on Channel 249A. See FCC File Nos. BNPH-20060309AAT and BLH-20091110AAN. By means of Construction Permit BPH-20100312AAQ, the FCC modified the station's license to specify Hunt, Texas as the community of license and Channel 250A as the operating frequency. Construction Permit BPH-20100312AAQ also authorized a change in transmitter site.

3. The site authorized by Construction Permit BPH-20100312AAQ for station KYRT is the same as authorized by Construction Permit BPH-20070718ABF for station KRZS(FM), Channel 260C3, Hunt, Texas, FCC Facility ID No. 165377.

4. Munbilla Kerrville, Ltd. (*MKL*), a sister entity under common control with Munbilla Broadcasting Properties, Ltd. (*MBPL*) (the proposed assignor here), previously owned station KRZS. MKL filed application BPH-20070718ABF while it still owned that station.

5. MKL subsequently (in October 2010) assigned station KRZS to TRH, with the Commission's prior consent. See FCC File No. BALH-20100621AFZ. Ten weeks later, the Commission granted application BPH-20070718ABF.

6. Upon consummation of the contemplated assignment of station KYRT, and upon implementation of Construction Permits BPH-20070718ABF and BPH-20100312AAQ, stations KRZS and KYRT will be commonly owned and collocated.

7. On March 12, 2010 (the date of filing of application BPH-20100312AAQ), the licensees of stations KRZS and KYRT were under common control. Therefore, a multiple-ownership study accompanied application BPH-20100312AAQ. Annex A hereto is a copy of that study, which demonstrated that the two commonly controlled facilities, KRZS and KYRT, when collocated, would comply with the local radio multiple-ownership rule, § 73.3555(a)(1)(iv).

8. The conclusion established by the BPH-20100312AAQ multiple-ownership study remains valid if TRH, rather than the Munbilla entities that previously owned stations KRZS and KYRT, is considered to be the licensee of both stations. See Annex B hereto. Therefore, the proposed common ownership of stations KRZS and KYRT by TRH, would comply with the Commission's local multiple-ownership rule, § 73.3555(a)(1)(iv), even when the two stations are collocated.

ii. AT PRESENT

3. Stations KRZS and KYRT have not yet collocated, and each station's licensed site differs from the site at which they will collocate. The city-grade contours of the two stations' licensed facilities do not overlap. The city-grade contour of station KRZS also does not overlap either the city-grade contour of station KHLB or the city-grade contour of station KZZM. Therefore, there is no question that the common ownership of stations KRZS as licensed, KHLB as licensed, KZZM as licensed, and KYRT (with its licensed¹ facilities) will comply with the Commission's local multiple-ownership rule, § 73.3555(a)(1)(iv).

C. STATIONS KHLB, KYRT, AND KZZM

4. From its licensed transmitter site, station KYRT does not provide city-grade service to Hunt. However, the licensed KYRT facility does provide city-grade service to Mason, its original community of license.

5. When, on April 30, 2007, when MBPL applied for the original Construction Permit for station KZZM², MBPL was also:

¹ See FCC File No. BLH-20091110AAN.

² See FCC File No. BNPH-20070430CGN, subsequently granted on June 14, 2007.

- the licensee of station KHLB; and
- the applicant for the then-pending (but soon thereafter issued) original Construction Permit for station KYRT.³

The city-grade contours of the one then-licensed facility (KHLB) and the two then-proposed facilities (now KYRT and now KZZM) would have overlapped (and now do overlap). Therefore, application BNPH-20070430CGN contained a multiple-ownership study. See Annex C. The study demonstrated that MBPL's common ownership of:

- station KHLB;
- the facility now known as KYRT; and
- the facility now known as KZZM,

would comply with the local radio multiple-ownership rule, § 73.3555(a)(1)(iv).

6. That study is equally valid if one substitutes TRH as the licensee of the three above-listed facilities that provide city-grade service to Mason.. See Annex B hereto.⁴ Therefore, TRH's common ownership of station KHLB, station KZZM, and KYRT (prior to implementation of Construction Permit BPH-20100312AAQ) will comply with the Commission's local radio multiple-ownership rule, § 73.3555(a)(1)(iv).

D. STATIONS KHLB AND KZZM

7. Stations KHLB and KZZM are presently collocated. Both are licensed to serve the community of Mason, Texas, in full compliance with § 73.315 of the Commission's Rules. See FCC File Nos. BLH-20050310ADT and BLH-20100524ABN, respectively. Therefore, the city-grade contours of stations KHLB and KZZM necessarily overlap.

8. As noted above, the city-grade contour associated with KYRT's BLH-20091110AAN technical parameters also overlaps with the city-grade contours of station KHLB and KZZM. However, once station KYRT implements Construction Permit BPH-20100312AAQ, the city-grade contour of station KYRT will no longer overlap either with the city-grade contour of station KHLB or with the city-grade contour of station KZZM.

³ See FCC File No. BNPH-20060309AAT, subsequently granted on May 2, 2007

⁴ MKL assigned station KRZS to TRH in October 2010, with the Commission's prior consent. See FCC File No. BALH-20100621AFZ.

9. Upon:

- the proposed assignment of station KZZM to TRH; and
- the implementation by station KYRT of Construction Permit BPH-20100312AAQ,

stations KHLB and KZZM would be collocated and commonly owned, and their city-grade contours would not overlap with the city-grade contour of any other commonly owned facility.

10. As discussed in Paras. 4 through 6, above, the common ownership of stations KHLB, KYRT (with BLH-20091110AAN technical parameters), and KZZM would comply with the Commission's local multiple-ownership rule, § 73.3555(a)(1)(iv). If the common ownership of stations KHLB, KYRT (with BLH-20091110AAN technical parameters), and KZZM would comply with the Commission's local multiple-ownership rule, § 73.3555(a)(1)(iv), the common ownership of two Mason stations, KHLB and KZZM, after KYRT's implementation of Construction Permit BPH-20100312AAQ, would necessarily comply with t § 73.3555(a)(1)(iv).

E. CONCLUSION

9. The proposed common ownership of stations KHLB, KRZS, KYRT, and KZZM would comply with the Commission's local multiple-ownership rule, § 73.3555(a)(1)(iv).

FCC Form 314
Radio Stations KYRT(FM),
FCC Facility ID No. 165378, and
KZZM,
FCC Facility ID No. 170992
Attachment to Exhibit 17

ANNEX A

BENJAMIN F. DAWSON III, PE
THOMAS M. ECKELS, PE
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DAVID J. PINION, PE

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MULTIPLE OWNERSHIP SERVICE CONTOUR ANALYSIS

**Prepared for
Munbilla Broadcasting Properties, Ltd.
December 2009**

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 minor change application for FM station KYRT (Facility ID #165378).

Unrated Market

The proposed community of license (Hunt, Texas) is not located within any Arbitron rated market. The only attributable station with which KYRT will have principal community contour overlap is FM station KRZS. 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.

Hatfield & Dawson Consulting Engineers

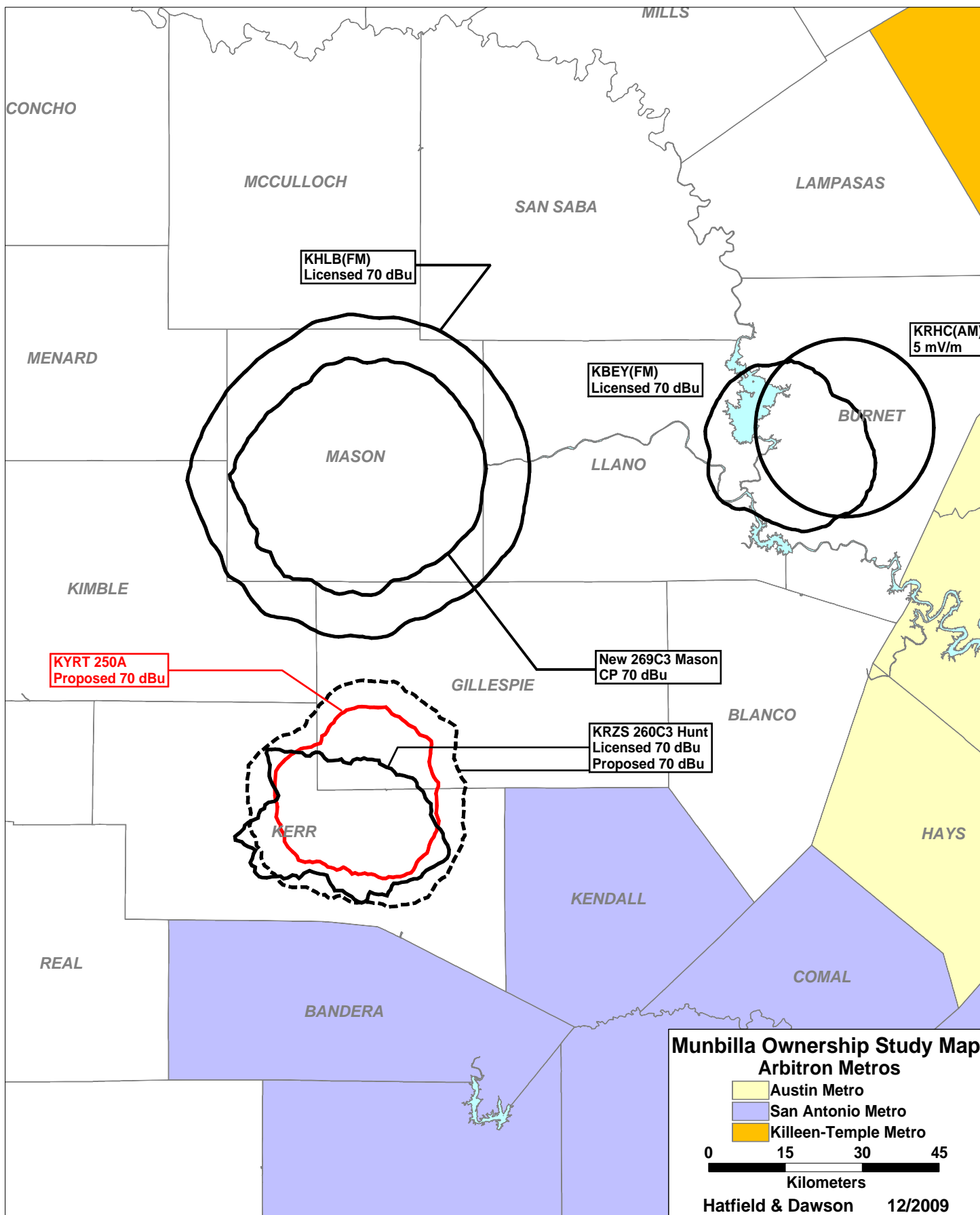
In counting stations providing service to the “market” defined by each of the discrete clusters formed in unrated markets, stations whose transmitter sites are located in excess of 92 km from the perimeter of the common overlap area have been excluded, as have other stations to be commonly-owned but 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 10 stations in the relevant market. This analysis is applicable to consideration of either the KRZS license or application facility.

December 1, 2009

Erik C. Swanson, P.E.

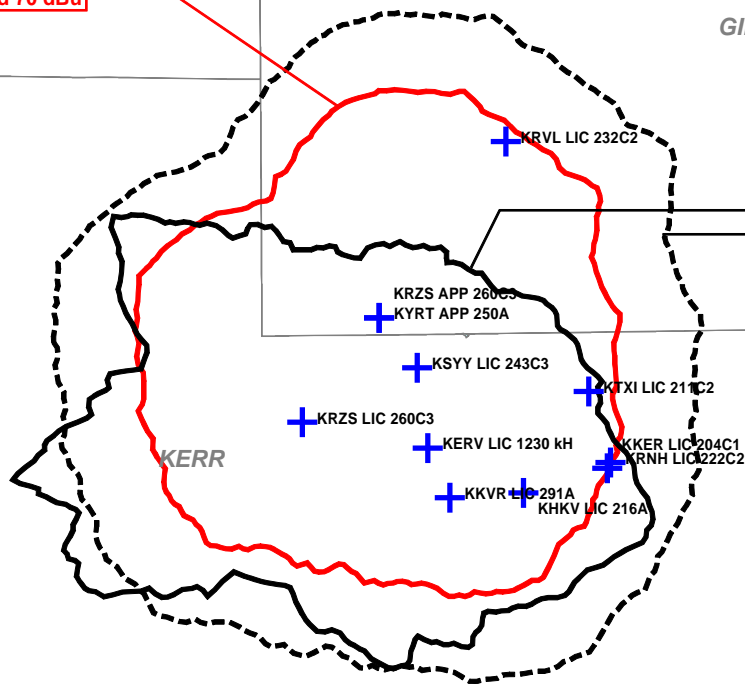
Hatfield & Dawson Consulting Engineers



KYRT 250A
Proposed 70 dBu

GILLESPIE

KRZS 260C3 Hunt
Licensed 70 dBu
Proposed 70 dBu



List of Stations

KERV 1230 kHz Kerrville
KKER 204C1 Kerrville
KTXI 211C2 Ingram
KHKV 216A Kerrville
KRNH 222C2 Kerrville
KRVL 232C2 Kerrville
KSYY 243C3 Ingram
KYRT 250A Hunt (App)
KRZS 260C3 Hunt (Lic + App)
KKVR 291A Kerrville

BANDERA

KYRT Ownership Study Map

0 5 10 15

Kilometers

Hatfield & Dawson 12/2009

FCC Form 314
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KZZM,
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ANNEX B

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(1942-2009)

PAUL W. LEONARD, PE
(1925-2011)

MULTIPLE OWNERSHIP SERVICE CONTOUR ANALYSIS

Prepared for Tom, Rick, and Harley 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 stations KYRT (Facility ID #165378) and KZZM (Facility ID #170992).

Unrated Market

KYRT is currently licensed on Channel 249A at Mason, Texas, and holds a construction permit on Channel 250A at Hunt, Texas. KZZM is licensed on Channel 269C3 at Mason, Texas.

The only attributable stations with which KYRT or KZZM will have principal community contour overlap are KHLB Channel 273C2 Mason and KRZS Channel 260C3 Hunt (License & CP).

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.

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.

Cluster A: KYRT(FM) License, KZZM(FM) License, KHLB(FM) License

This is a “status quo” scenario, reflecting the current licensed operations of these three stations at Mason. In order to qualify for common ownership of this 0AM/3FM cluster, there must be at least 6 stations in the relevant “market”. This study demonstrates that there are at least 7 stations in the relevant market.

Cluster B: KZZM(FM) License, KHLB(FM) License

This scenario reflects the operation eventual configuration of the Mason stations, once KYRT has implemented its construction permit at Hunt. 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 6 stations in the relevant market. (This scenario is covered by the same map exhibit as Cluster A. The only change is the removal of KYRT from both the numerator and the denominator.)

Cluster C: KRZS(FM) License or CP, KYRT(FM) CP

This scenario reflects the operation eventual configuration of the Hunt stations, once KYRT has implemented its construction permit at Hunt. 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 9 stations in the relevant market. This analysis is applicable

to consideration of either the KRZS License or CP facility.

A handwritten signature in black ink, appearing to read "Erik C. Swanson". The signature is fluid and cursive, with a large initial "E" and "S".

January 24, 2012

Erik C. Swanson, P.E.

Hatfield & Dawson Consulting Engineers

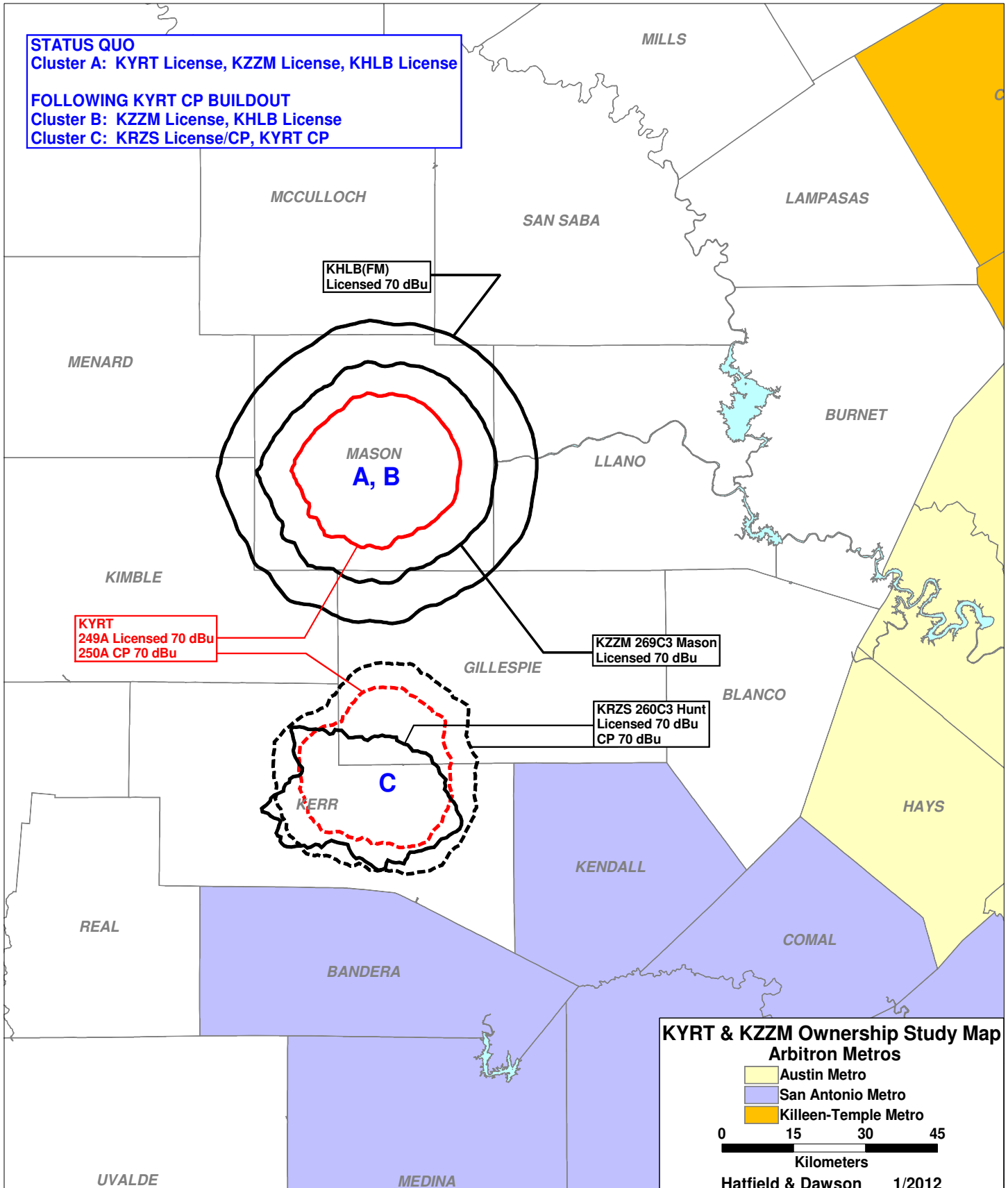
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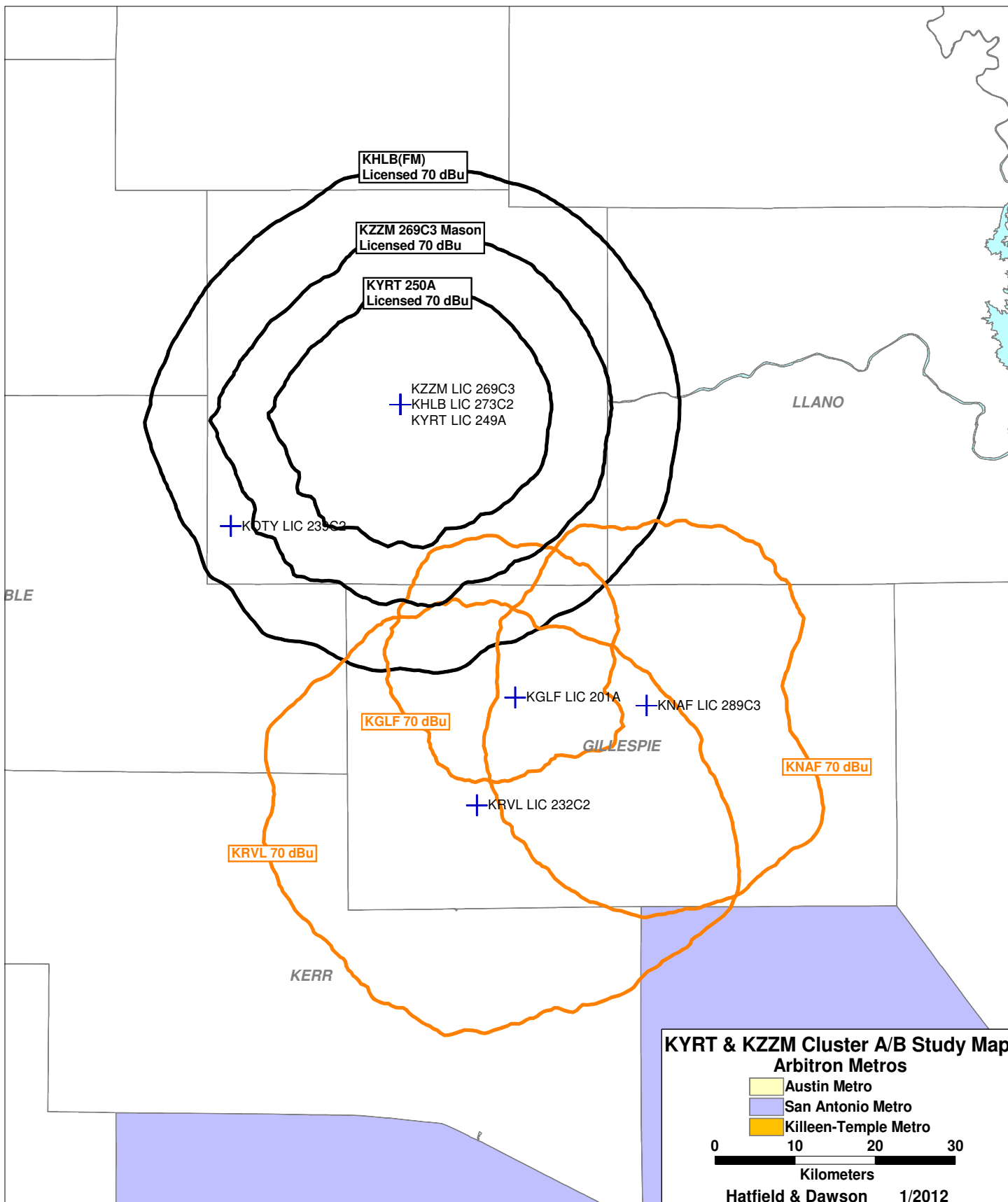
Cluster A: KYRT License, KZZM License, KHLB License

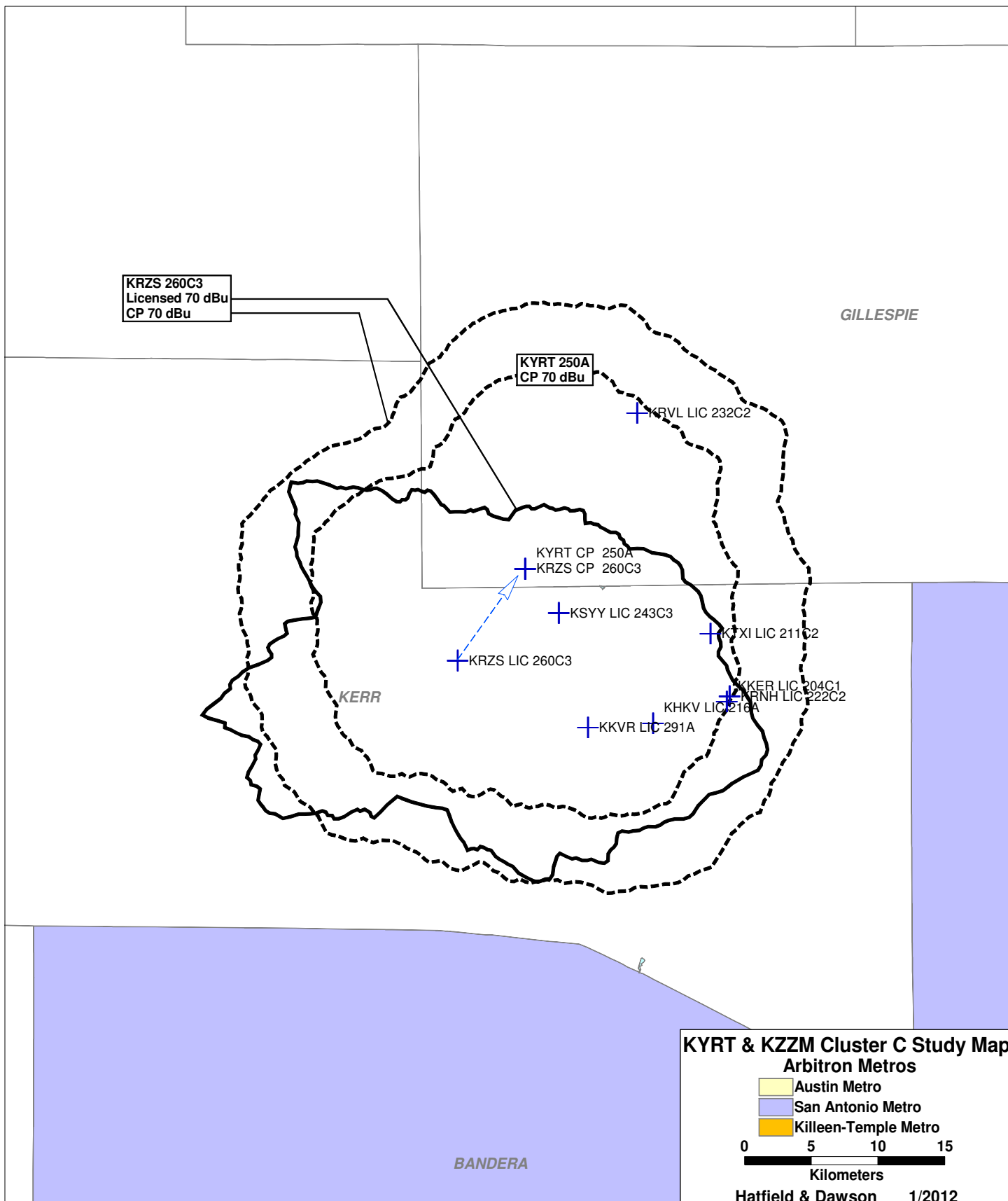
FOLLOWING KYRT CP BUILDOUT

Cluster B: KZZM License, KHLB License

Cluster C: KRZS License/CP, KYRT CP







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ANNEX C

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MULTIPLE OWNERSHIP SERVICE CONTOUR ANALYSIS

Prepared for
Munbilla Broadcasting Properties, Ltd.
March 2006

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 application for a new FM station on Channel 269C3 at Mason, Texas.

Unrated Market

Munbilla's attributable stations in the vicinity are:

New FM	269C3	Mason	(application)
New FM	259A	Mason	(application)
New FM	260C3	Hunt	(application)
KHLB(FM)	273C2	Mason	
KHLE(FM)	295A	Burnet	
KBEY(FM)	223A	Burnet	
KRHC(AM)	1340 kHz	Burnet	

The proposed new station at Mason has principal community contour overlap with only KHLB(FM) and Mason 259A.

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.

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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 3FM cluster, there must be at least 6 stations in the relevant "market". This study demonstrates that there are at least 7 stations in the relevant market.

April 6, 2007

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

Hatfield & Dawson Consulting Engineers

**FM STATIONS WITH 70 dBu CONTOURS OVERLAPPING
70 dBu CONTOURS OF MASON 269C3, MASON 259A, KHLB**

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude
=====					
KGLF LIC	DOSS TX	BLD031030ACK	201A 88.1	6.000 DA 100.0	30-22-22 099-05-02
KRVL LIC	KERRVILLE TX	BLH920513KB	232C2 94.3	33.000 122.0	30-15-08 099-08-01
KOTY LIC	MASON TX	BLH040720AAS	239C2 95.7	50.000 133.0	30-33-53 099-27-13
NEW APP	MASON TX	BNPH060309AAT	259A 99.7	6.000 85.0	30-44-48 099-14-58
NEW APP	MASON TX		269C3 101.7	8.200 172.0	30-42-03 099-13-59
KHLB LIC	MASON TX	BLH050310ADT	273C2 102.5	26.000 192.0	30-42-03 099-13-59
KNAF-FM LIC	FREDERICKSBURG TX	BLH041217AXT	289C3 105.7	9.100 DA 164.0	30-21-49 098-54-47

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