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## **MULTIPLE OWNERSHIP SERVICE CONTOUR ANALYSIS**

**Prepared for  
Bicoastal Media Licenses VI, LLC  
December 2016**

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 assignment of license for FM station KCMD at Grants Pass, Oregon, to Bicoastal Media Licenses VI, LLC.

### **Unrated Market**

KCMD operates outside any Nielsen rated market,<sup>1</sup> but the proposed facility has principal community contour overlap with the following attributable stations, as depicted on the attached overview map exhibit.<sup>2</sup>

KRWQ(FM)	262C1	Gold Hill
KLDZ(FM)	278C1	Medford
KIFS(FM)	298C2	Ashland

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

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<sup>1</sup> KCMD is located near the Medford-Ashland Nielsen market, but is not included on the BIA count of stations in that market.

<sup>2</sup> The map exhibit also demonstrates that KCMD does not have principal community contour overlap with Bicoastal stations KMED(AM) and KYVL(FM). Those two stations are therefore excluded from the unrated market ownership study.

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.

**Cluster A: KCMD(FM), KRWQ(FM), KLDZ(FM), KIFS(FM)**

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 0AM/4FM cluster, there must be at least 15 stations in the relevant “market”. This study demonstrates that there are at least 29 stations in the relevant market.<sup>3</sup> This study is equally applicable to the KCMD license, and to the pending application BPH-20161118AAW for correction of the KCMD transmitter site coordinates.

December 7, 2016



Erik C. Swanson

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<sup>3</sup> In fact, several other stations could be included in the market count, but for the sake of clarity this study has been limited to stations with transmitter sites whose transmitter sites are within the respective principal community service contours of the stations proposed to be commonly owned.



