

**RADIO MARKET ANALYSIS**  
**LEGEND COMMUNICATIONS OF WYOMING, LLC**  
**KKLX RADIO STATION**  
**WORLAND, WYOMING**  
**January 2008**

**TECHNICAL STATEMENT**

1. This Technical Statement and attached exhibits were prepared on behalf of Legend Communications of Wyoming, LLC (“Legend”), authorized assignee of KKLX, Channel 241C2, Worland, Wyoming. Legend is submitting a minor change application to upgrade KKLX to Channel 241C1 at Worland, Wyoming; as such, a Radio Market analysis is needed. Legend also has an attributable interest in stations KGCL, Channel 271C2, Ten Sleep, Wyoming<sup>1</sup> and KZMQ, 1140 kHz, and KZMQ-FM, Channel 262C, Greybull, Wyoming.<sup>2</sup> Legend is also the authorized assignee of KWOR, 1340 kHz, Worland, Wyoming. The 3.16 mV/m contours of the proposed KKLX, KZMQ-FM, and the proposed KGCL (CP and application) overlap with one another and with the 5.0 mV/m contours of KWOR and KZMQ. This results in Legend having an attributable interest in three FM stations and two AM stations in the same market. None of these stations are located nor considered “home” in any Arbitron market. Therefore, a revised contour overlap analysis is necessary. Exhibit #1 is a map depicting the subject stations.

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- 1) There is a pending one-step upgrade for KGCL, which is considered in this instant review.
  - 2) Legend is also the licensee of KCGL, Channel 281C, Powell, Wyoming; KODI, 1400 kHz, and KTAG, Channel 250C, Cody, Wyoming; KBBS, 1450 kHz, and KLGT, Channel 225C1, Buffalo, Wyoming; and KZZS, Channel 252C1, Story, Wyoming, as depicted on Exhibit #1. Exhibit #1A shows no overlap of the proposed KKLX with either KCGL or KTAG.

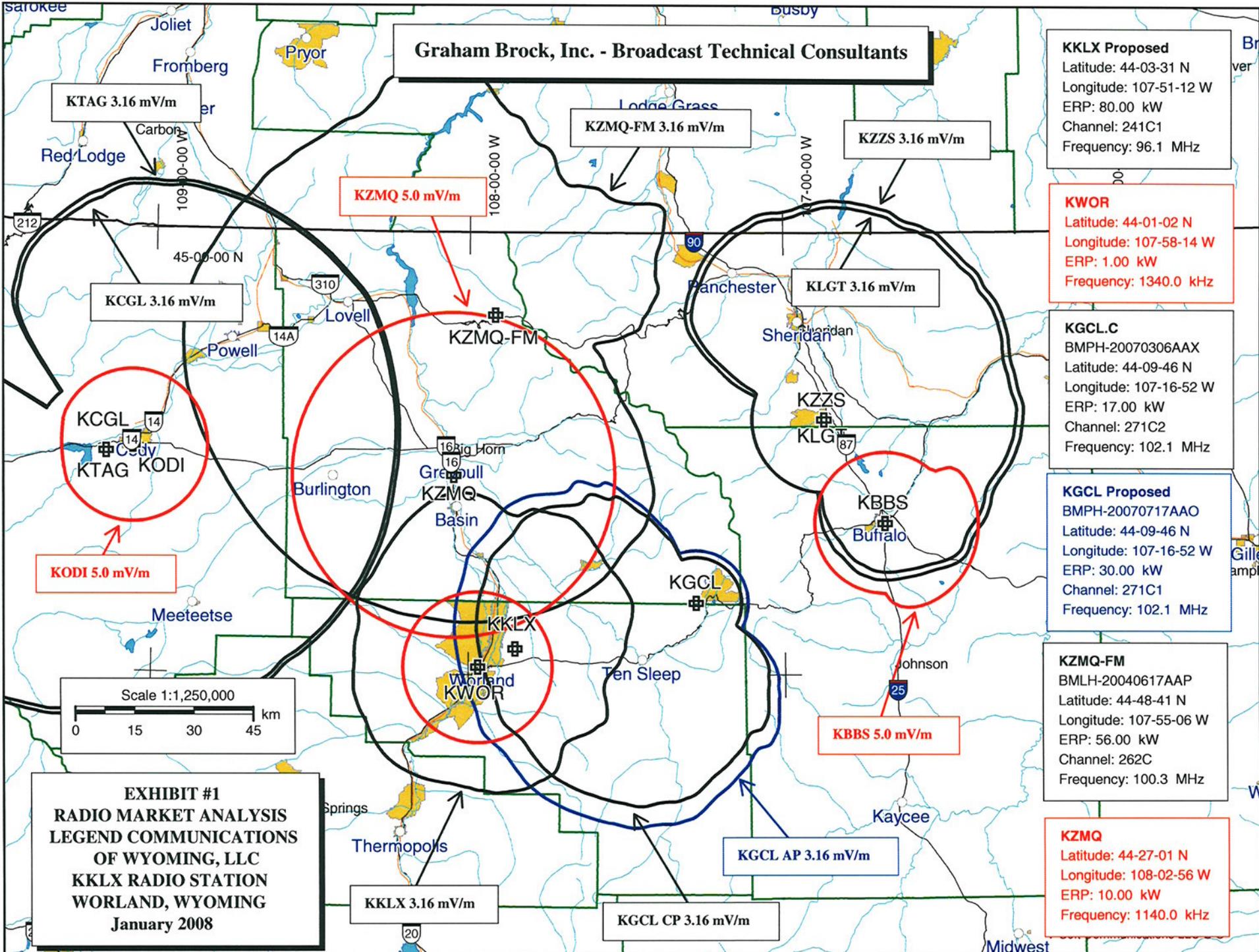
Legend is also the licensee of KGWY, Channel 264C1, Gillette, Wyoming and is the applicant for a new FM facility at Wright, Wyoming. Additionally, Legend has an attributable interest in the licensee of KAML-FM, Channel 245C1, and KIML, 1270 kHz, Gillette, Wyoming. These stations are so far removed that they are not shown on Exhibit #1. None of these stations have city grade overlap with KWOR or KKLX; therefore, they are not considered further.

2. A study, therefore, has been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission's rules. The contours of the proposed KKLX, KZMQ, KZMQ-FM, and KGCL will be used to define the market boundary, hereinafter referred to as the "Radio Market". The study will determine the number of other commercial AM and FM stations that either have transmitter sites within, or provide coverage to, the Radio Market. Only those stations with transmitter sites within 92.0 kilometers will be considered as contributors to the market. No other station in which Legend has an interest will be considered, unless it is a subject station in the market under review.

3. Exhibit #2 is a depiction of the stations within, or providing service to, the Radio Market boundary. A total of eleven stations is depicted, including the five subject stations. Exhibit #3 is a tabulation of the stations in the Radio Market. The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules. At the fourteen and fewer stations level, common ownership or control of up to five stations, with no more than three in the same service, is permissible, provided the number of stations to be commonly held does not exceed 50% of the stations in the market. Based on Legend's interest in the above referenced stations, it is demonstrated herein that the proposed minor change application for KKLX is in compliance with the Commission's multiple ownership rules, as detailed in §73.3555 of the rules.

4. The foregoing technical statement was prepared on behalf of Legend Communications of Wyoming, LLC, by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and

**Graham Brock, Inc. - Broadcast Technical Consultants**



**KKLX Proposed**  
 Latitude: 44-03-31 N  
 Longitude: 107-51-12 W  
 ERP: 80.00 kW  
 Channel: 241C1  
 Frequency: 96.1 MHz

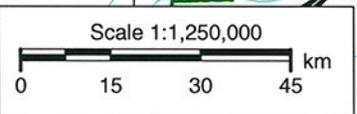
**KWOR**  
 Latitude: 44-01-02 N  
 Longitude: 107-58-14 W  
 ERP: 1.00 kW  
 Frequency: 1340.0 kHz

**KGCL.C**  
 BMPH-20070306AAX  
 Latitude: 44-09-46 N  
 Longitude: 107-16-52 W  
 ERP: 17.00 kW  
 Channel: 271C2  
 Frequency: 102.1 MHz

**KGCL Proposed**  
 BMPH-20070717AAO  
 Latitude: 44-09-46 N  
 Longitude: 107-16-52 W  
 ERP: 30.00 kW  
 Channel: 271C1  
 Frequency: 102.1 MHz

**KZMQ-FM**  
 BMLH-20040617AAP  
 Latitude: 44-48-41 N  
 Longitude: 107-55-06 W  
 ERP: 56.00 kW  
 Channel: 262C  
 Frequency: 100.3 MHz

**KZMQ**  
 Latitude: 44-27-01 N  
 Longitude: 108-02-56 W  
 ERP: 10.00 kW  
 Frequency: 1140.0 kHz



**EXHIBIT #1**  
**RADIO MARKET ANALYSIS**  
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**KTAG**  
 BLH-20010904AAI  
 Latitude: 44-29-42 N  
 Longitude: 109-09-10 W  
 ERP: 100.00 kW  
 Channel: 250C  
 Frequency: 97.9 MHz  
 AMSL Height: 2365.0 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model : FCC

**KKLX Proposed**  
 Latitude: 44-03-31 N  
 Longitude: 107-51-12 W  
 ERP: 80.00 kW  
 Channel: 241C1  
 Frequency: 96.1 MHz  
 AMSL Height: 1460.3 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model : FCC

**KCGL**  
 BLH-20011205AAM  
 Latitude: 44-29-42 N  
 Longitude: 109-09-10 W  
 ERP: 100.00 kW  
 Channel: 281C  
 Frequency: 104.1 MHz  
 AMSL Height: 2337.0 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model : FCC

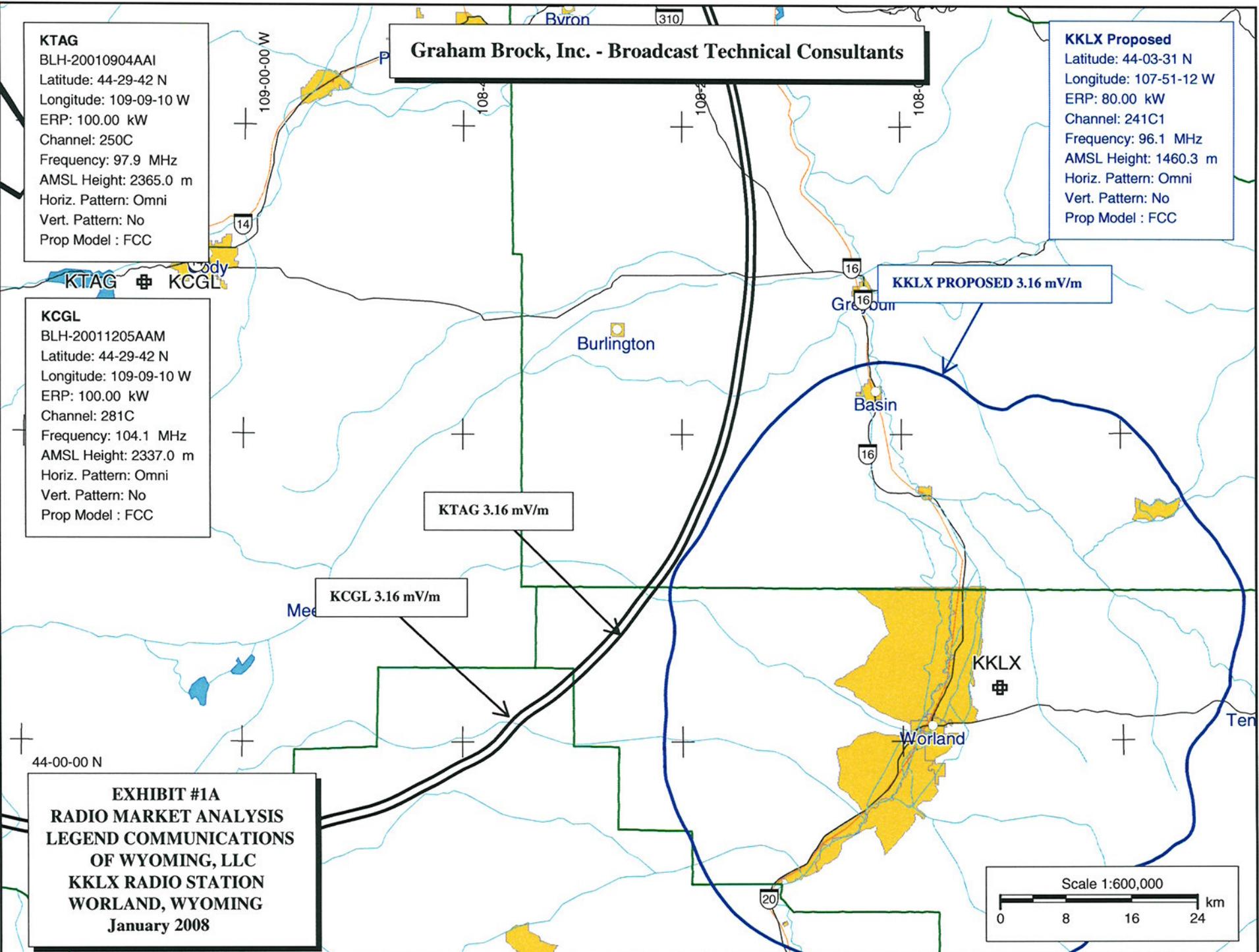
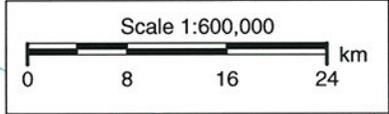
**KKLX PROPOSED 3.16 mV/m**

**KTAG 3.16 mV/m**

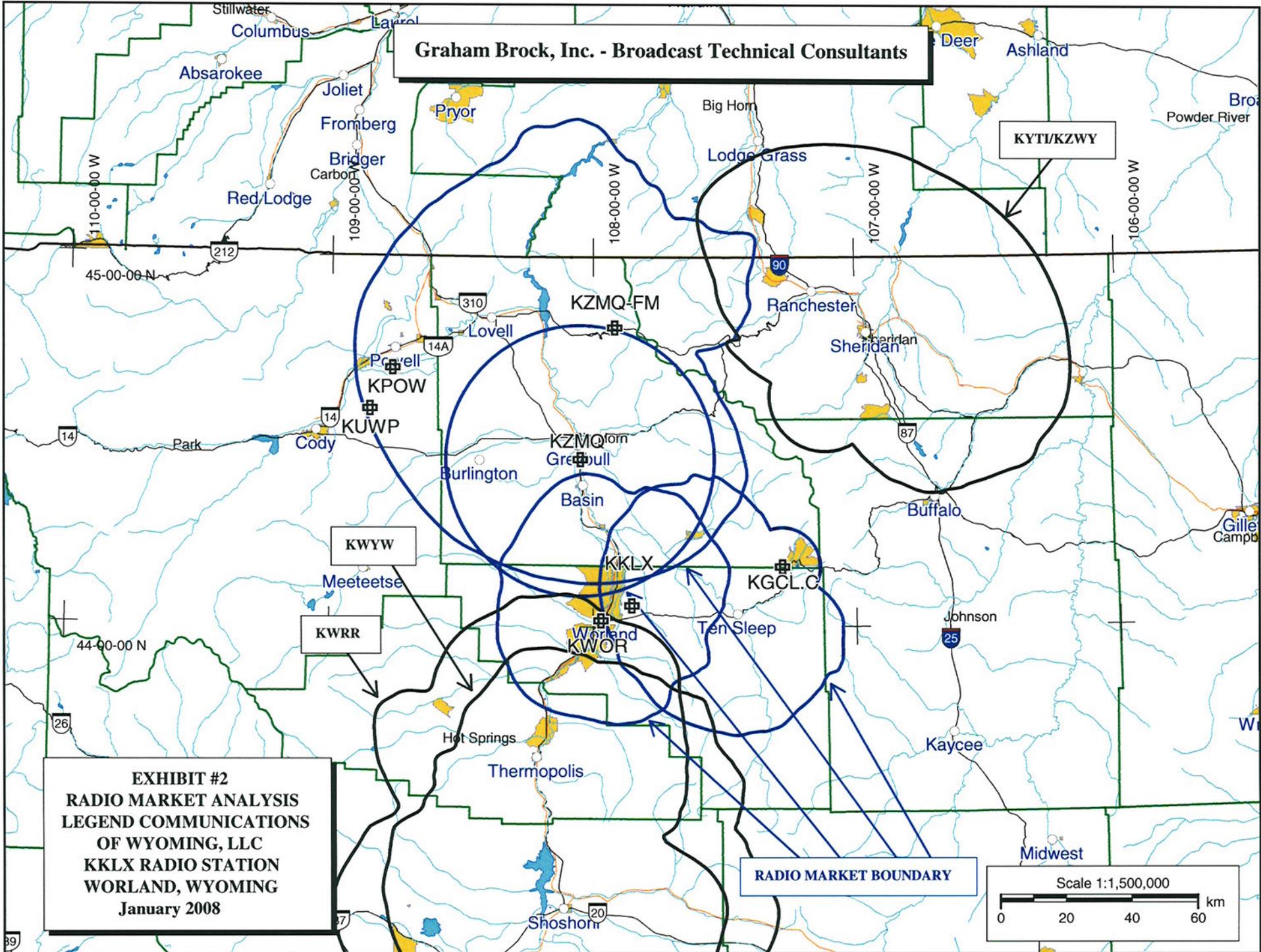
**KCGL 3.16 mV/m**

**KKLX**

**EXHIBIT #1A  
 RADIO MARKET ANALYSIS  
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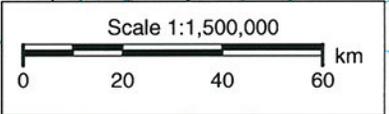
KYTI/KZWY

KWYW

KWRR

RADIO MARKET BOUNDARY

**EXHIBIT #2**  
**RADIO MARKET ANALYSIS**  
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**EXHIBIT #3**

**Tabulation of Stations in Radio Market**

**AM Stations**

* KZMQ	1140 kHz	Greybull, Wyoming
KPOW	1260 kHz	Powell, Wyoming
* KWOR	1340 kHz	Worland, Wyoming

Total AM Stations - 3

**FM Stations**

+ KWRR	Ch 208C	Ethete, Wyoming
KUWP	Ch 211C3	Powell, Wyoming
+ KYTI	Ch 229C	Sheridan, Wyoming
+ KZWY	Ch 235C	Sheridan, Wyoming
* KKLX	Ch 241C1	Worland, Wyoming
+ KWYW	Ch 256C	Lost Cabin, Wyoming
* KZMQ-FM	Ch 262C	Greybull, Wyoming
* KGCL	Ch 271C1	Ten Sleep, Wyoming

Total FM Stations - 8

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 11**

- \* Subject station.
- + Provides city grade coverage to radio market.