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MULTIPLE OWNERSHIP ANALYSIS

Prepared for
South Sound Broadcasting, LLC
&
Sunnylands Broadcasting, LLC
June 2011

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) an application for minor modification of construction permit for FM station KOMO-FM on Channel 249C at Belfair, Washington (by South Sound Broadcasting), and b) an application for a new FM station on Channel 253C3 at Oakville, Washington (by Sunnylands Broadcasting).

South Sound Broadcasting & Sunnylands Broadcasting

There is a common ownership interest between South Sound Broadcasting and Sunnylands Broadcasting. There are no other stations in the vicinity which are directly attributable to South Sound Broadcasting or to Sunnylands Broadcasting.

Rated Market Analysis: While KOMO-FM is licensed to a community outside the Seattle-Tacoma Arbitron rated market (and proposed to be licensed to a different community outside that market), it provides service to that market. Likewise, while the community of license for the new Oakville 253C3 station is located outside the Seattle-Tacoma market, it may be considered to operate within that market due to its proximity. Out of an abundance of caution, therefore, a rated market analysis has been performed on the KOMO-FM/Oakville 253C3 cluster.

In order for a single entity to have a cognizable interest in this 2FM cluster, §73.3555(a) requires that there must be at least 4 stations in the relevant market. BIA reports that there are at least 70

commercial and non-commercial radio stations which are considered “home” to the Seattle-Tacoma market. Therefore the proposed operations of KOMO-FM and Oakville 253C3 are in compliance with §73.3555(a) with regard to the rated Seattle-Tacoma market.

Unrated Market Analysis: KOMO-FM is proposed to be licensed to a community in Mason County, which is not within any Arbitron-rated market. New FM 253C3 is proposed to be licensed to a community in Grays Harbor County, which is not within any Arbitron-rated market. Accordingly, an ownership 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 do not have overlap with 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 18 stations in the relevant market. (In fact, numerous other stations provide service to this market, but are omitted for clarity.)

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Fisher Broadcasting

This showing reflects the fact that KOMO-FM is being operated by Fisher Broadcasting under an LMA. Fisher also has an attributable interest in three other radio stations in the vicinity, each of which has principal community contour overlap with KOMO-FM:

KVI(AM)	570 kHz	Seattle
KOMO(AM)	1000 kHz	Seattle
KPLZ-FM	268C	Seattle

Rated Market Analysis: Fisher's stations KVI(AM), KOMO(AM), and KPLZ-FM are licensed to communities located within the Seattle-Tacoma Arbitron rated market. While KOMO-FM is licensed to a community located outside that market (and proposed to be licensed to a different community outside that market), it provides service to that market. In order for a single entity to have a cognizable interest in this 2AM/2FM cluster, §73.3555(a) requires that there must be at least 8 stations in the relevant market. BIA reports that there are at least 70 commercial and non-commercial radio stations which are considered "home" to the Seattle-Tacoma market. Therefore the proposed modification of KOMO-FM is in compliance with §73.3555(a) with regard to the rated Seattle-Tacoma market.

Unrated Market Analysis: KOMO-FM is proposed to be licensed to a community in Mason County, which is not within any Arbitron-rated market. Accordingly, an additional ownership 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 do not have overlap with 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 2AM/2FM cluster, there must be at least 8 stations in the relevant “market”. This study demonstrates that there are at least 38 stations in the relevant market. (In fact, numerous other stations provide service to this market, but are omitted for clarity.)

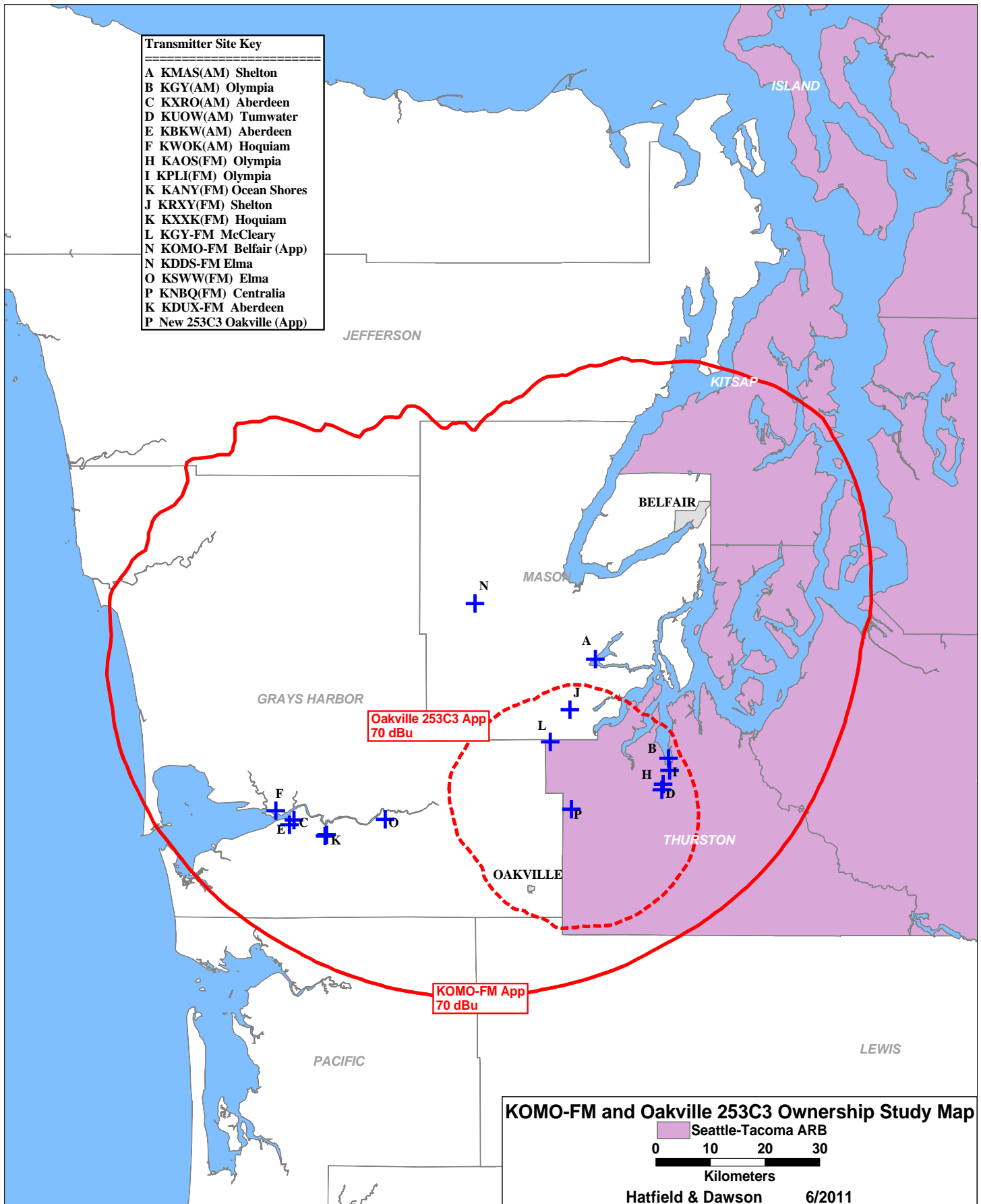
It should be noted that New FM 253C3 at Oakville will not have principal community contour overlap with the Fisher-owned stations, nor will Fisher have an attributable interest (or LMA or JSA) in Oakville 253C3. The Oakville 253C3 70 dBu contour is shown on the attached map exhibit for reference only.

Erik C. Swanson, P.E.

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Transmitter Site Key

- A KMAS(AM) Shelton
- B KGY(AM) Olympia
- C KXRO(AM) Aberdeen
- D KUOW(AM) Tumwater
- E KBKW(AM) Aberdeen
- F KWOK(AM) Hoquiam
- H KAOS(FM) Olympia
- I KPLI(FM) Olympia
- K KANY(FM) Ocean Shores
- J KRXY(FM) Shelton
- K KXXX(FM) Hoquiam
- L KGY-FM McCleary
- N KOMO-FM Belfair (App)
- N KDDS-FM Elma
- O KSWW(FM) Elma
- P KNBQ(FM) Centralia
- K KDUX-FM Aberdeen
- P New 253C3 Oakville (App)



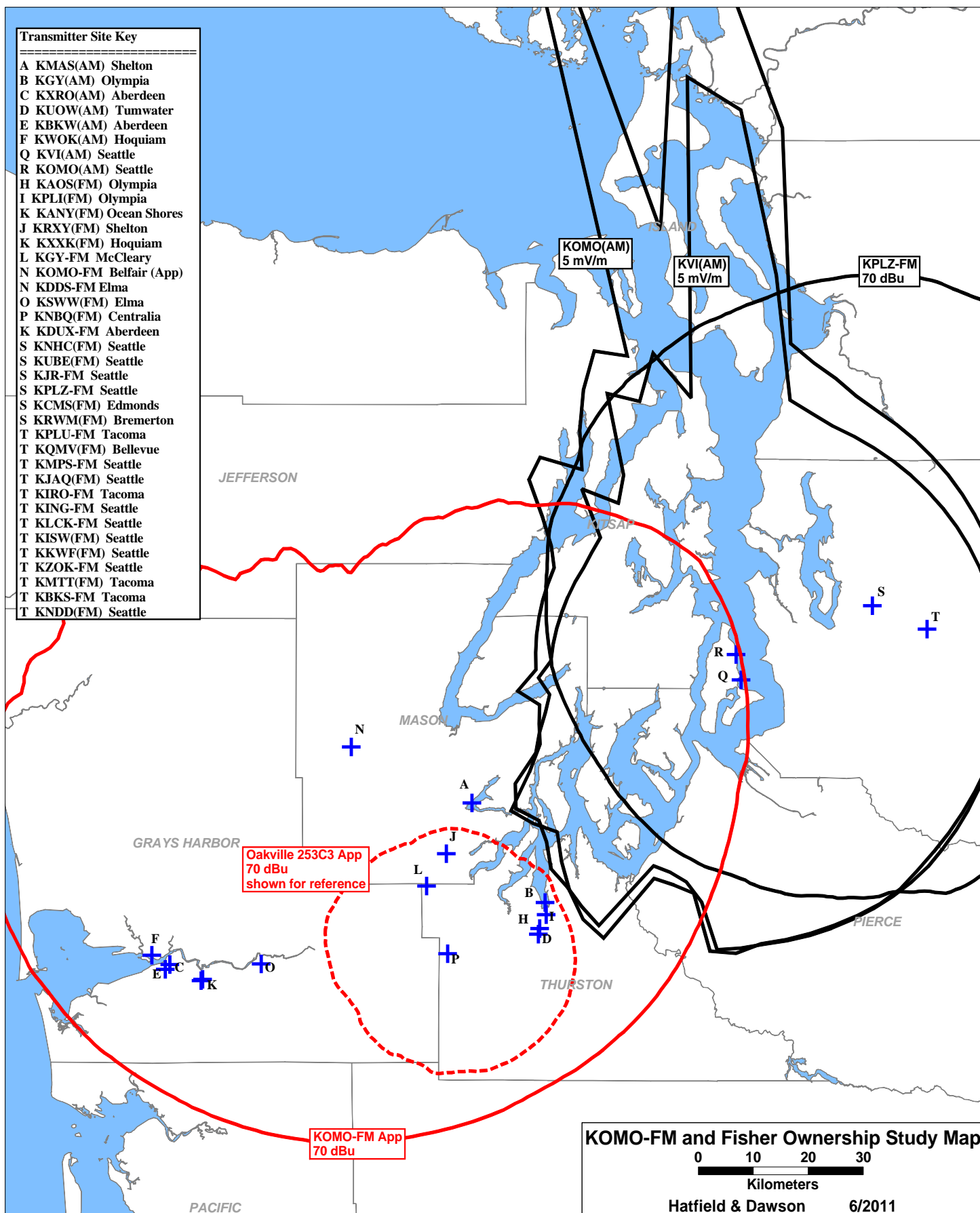
KOMO-FM and Oakville 253C3 Ownership Study Map

Seattle-Tacoma ARB
0 10 20 30
Kilometers

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Transmitter Site Key

- A KMAS(AM) Shelton
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- D KUOW(AM) Tumwater
- E KBKW(AM) Aberdeen
- F KWOK(AM) Hoquiam
- Q KVI(AM) Seattle
- R KOMO(AM) Seattle
- H KAOS(FM) Olympia
- I KPLI(FM) Olympia
- K KANY(FM) Ocean Shores
- J KRXY(FM) Shelton
- K KXXK(FM) Hoquiam
- L KGY-FM McCleary
- N KOMO-FM Belfair (App)
- N KDDS-FM Elma
- O KSWW(FM) Elma
- P KNBQ(FM) Centralia
- K KDUX-FM Aberdeen
- S KNHC(FM) Seattle
- S KUBE(FM) Seattle
- S KJR-FM Seattle
- S KPLZ-FM Seattle
- S KCMS(FM) Edmonds
- S KRWM(FM) Bremerton
- T KPLU-FM Tacoma
- T KQMV(FM) Bellevue
- T KMPS-FM Seattle
- T KJIAQ(FM) Seattle
- T KIRO-FM Tacoma
- T KING-FM Seattle
- T KLCK-FM Seattle
- T KISW(FM) Seattle
- T KKWF(FM) Seattle
- T KZOK-FM Seattle
- T KMTT(FM) Tacoma
- T KBKS-FM Tacoma
- T KNDD(FM) Seattle



KOMO-FM and Fisher Ownership Study Map

0 10 20 30
Kilometers

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