

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
KMCQ(FM), COVINGTON, WA/, KDDS-FM, ELMA, WA/KTBK(AM), AUBURN-
FEDERAL WAY, WA

This radio multiple ownership analysis was prepared to consider the attributable interest in the following stations:

Call Sign / Facility ID	Location	Facilities
KMCQ(FM)/41861 Construction Permit	Covington, WA	Ch. 283C3, 25 kW 97 m
KMCQ(FM)/41861 Application	Covington, WA	Ch. 283C2, 8.1 kW 364 m
KDDS-FM/33622	Elma, WA	Ch. 257C, 64 kW-DA 742 m
KTBK(AM)/33683	Auburn-Federal Way, WA	1210 kHz, 27.5 kW-D, DA-2

The principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) of the stations are depicted on a map included herein as Figure 1. Since there is common overlap of the principal community contours of KMCQ(FM), KDDS-FM and KTBK(AM), an ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

Radio Market

The “radio market” applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned.* There is one new “radio market” defined for analysis under the Commission’s Rules. The table below lists the defined market:

Defined Radio Market	Stations that Define Radio Market
	FM Stations
Market 1	KMCQ(FM), KDDS-FM, KTBK(AM)

* See Order in Implementation of Section 202(a) and 202(b)(1) of the Telecommunications Act of 1996 (Broadcast Radio Ownership) FCC 96-90, released March 8, 1996 and Memorandum Opinion and Order in Revision of Radio Rules and Policies 7 FCC Rcd 6387, 6395 para. 39 (1992).

Count of Stations in Defined Market

The number of other radio stations in a “radio market” is determined by counting the operating stations having principal community contours that intersect the principal community contours which define the radio market. Only those stations located within 92 kilometers of the perimeter of the mutual overlap area of the respective defined market area were employed in the count of the stations. The results of the analysis are tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	8-AM, 10 FM (at least 18 stations)

Figure 2 is a tabulation of other radio stations identified in the defined radio market tabulated above. It is noted that there may be additional stations considered in the market, however the list provided is more than enough to show compliance with the FCC’s radio multiple ownership rules. Only known licensed, operating stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission’s AM database and the appropriate Ground Wave Field Strength versus Distance Graph of 47 CFR 73.184. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR 73.313. Terrain data was derived from the N.G.D.C. 30-second computer database for each of the FM stations using radials evenly-spaced every 10 degrees of azimuth.

Based on the above, it is concluded that the proposed combination of the stations to which an attributable interest will be held complies with Section 73.3555(a) of the FCC Rules.

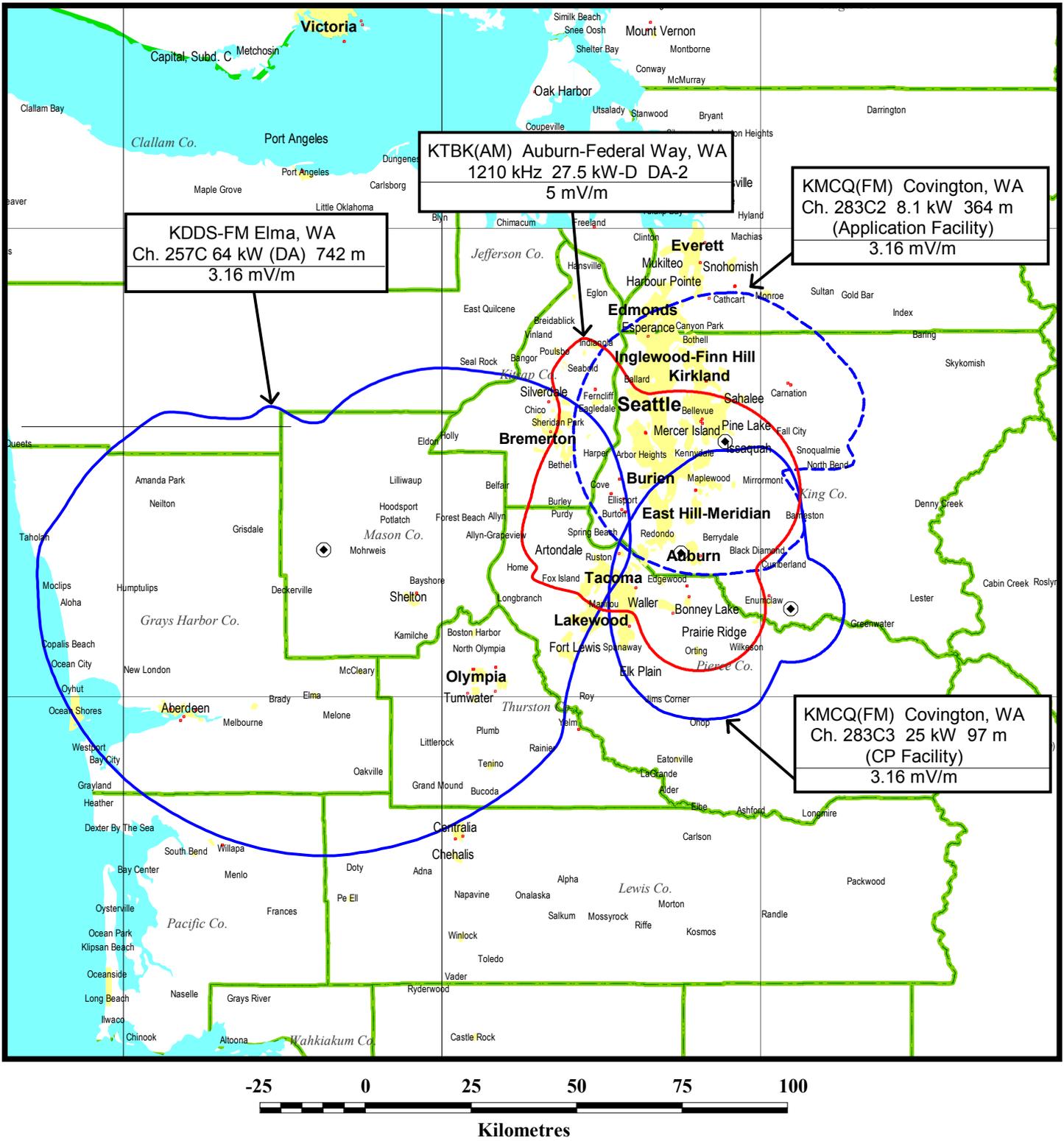


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Figure 1



PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

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Tabulation of Other Stations Defined in Radio Market

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KKDZ (AM)	Seattle	WA	1250 kHz
KLFE (AM)	Seattle	WA	1590
KXPA (AM)	Bellevue	WA	1540
KGNW (AM)	Burien-Seattle	WA	820
KRIZ (AM)	Renton	WA	820
KVI (AM)	Seattle	WA	570
KOMO (AM)	Seattle	WA	1000
KJR (AM)	Seattle	WA	950
KBSG-FM	Tacoma	WA	97.3 MHz
KNDD (FM)	Seattle	WA	107.7
KING (FM)	Seattle	WA	98.1
KMTT (FM)	Tacoma	WA	103.7
KMPS-FM	Seattle	WA	94.1
KISW (FM)	Seattle	WA	99.9
KPLZ-FM	Seattle	WA	101.5
KJR-FM	Seattle	WA	95.7
KUOW-FM	Seattle	WA	94.9
KQMV (FM)	Bellevue	WA	92.5