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## **MULTIPLE OWNERSHIP SERVICE CONTOUR ANALYSIS**

**Prepared for  
Alexandra Communications, Inc.  
April 2017**

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 station KQFO at Pasco, Washington.

### **Rated Market Study**

Including KQFO, Alexandra Communications will be the licensee of three stations in the Tri-Cities (Richland-Kennewick-Pasco) market, which is rated by Nielsen. The other attributable stations in this market are KZIU-FM Weston, OR and KUJ(AM) Walla Walla, WA.<sup>1</sup>

Alexandra's interests in the Tri-Cities market amount to 3 stations, no more than 2 of which are in the same service. In order to qualify for common ownership of a 1AM/2FM cluster, there must be at least 6 stations in the market. BIA lists in excess of 25 stations in this market.

### **Unrated Market Study**

The principal community contour of the proposed KQFO facility overlaps the principal community contour of Alexandra's KUJ(AM) Walla Walla. While KUJ(AM) is considered to be "home" to the rated Tri-Cities market, the KUJ(AM) community of license is located outside the Tri-Cities market boundary. Therefore, an additional 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

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<sup>1</sup> A principal of Alexandra is also a 50% member of Xana Oregon, LLC, which is the licensee of KZLY(FM) Ione, Oregon. While KZLY is located somewhat near the Tri-Cities market, it is not considered to be a part of that market.

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", 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 1AM/1FM cluster, there must be at least 2 stations in the relevant "market". This study demonstrates that there are at least 24 stations in the relevant market. (In fact, numerous other stations have principal community contours which would be included in the market; for the sake of clarity, only those stations with transmitter sites inside the contours of the Alexandra stations have been included in this study.)

April 17 2017

A handwritten signature in black ink, appearing to read "Erik C. Swanson", with a stylized, flowing script.

Erik C. Swanson

Hatfield & Dawson Consulting Engineers



