

**FCC Section 73.3555(a) Multiple Ownership
Zimmer Radio of Mid-Missouri, Inc.
KZWV Channel 270C2 – Eldon, Missouri
November 15, 2016**

This statement and attached exhibits were prepared on behalf of Zimmer Radio of Mid-Missouri, Inc. (“Zimmer”). Zimmer is filing an amendment to FCC Form 301 application BPH-20150805AAU to modify the license of KZWV Channel 270C2, Facility ID No. 165951, licensed to Eldon, Missouri and as such a demonstration of compliance with Section 73.3555 of the Commission's multiple ownership rules is needed. Zimmer is also the licensee of KSSZ(FM) Channel 230C3, Facility ID No. 5227, Fayette, MO, KATI(FM) Channel 232C2, Facility ID No. 67379, California, MO, KCMQ(FM), Channel 244C1, Facility ID No. 74583, Columbia, MO, KCLR-FM Channel 257C2, Facility ID No. 6014, Boonville, MO, KTGR-FM, Channel 263A, Facility ID No. 34408, Fulton, MO, KTXY(FM), Channel 295C, Facility ID No. 9929, Jefferson City, MO, KFAL(AM) 900 kHz, Facility ID No. 34409, Fulton, MO, KWOS(AM), 950 kHz, Facility ID No. 9927, Jefferson City, MO, and KTGR(AM), 1580 kHz, Facility ID No. 74584, Columbia, MO. KZWV is not located in any Nielsen Radio metro county and is not listed as home to any Nielsen Radio rated market. Therefore, a contour overlap study for stations not licensed to metro counties is necessary.

Revised Contour Overlap Analysis

Because KZWV is licensed to a non-metro county and not listed as home to any Nielsen Radio Metro, a contour overlap analysis has been conducted for ownership compliance.

KZWV Defined Radio Market

The combined city grade contours of KZWV Channel 270C2, Eldon, MO, KATI Channel

232C2, California, MO, KCMQ Channel 244C1, Columbia, MO, KCLR Channel 257C2, Boonville, MO, KTTY Channel 295C, Jefferson City, MO and KWOS 950 kHz, Jefferson City MO are being used create the Defined Radio Market Boundary. The contours used to create the Defined Radio Market Boundary are the FCC F(50,50) 70 dBu for FM stations and the 5.0 mV/M for AM stations. A total of 59 full power AM and FM stations with overlapping city grade contours including the six stations that make up the Radio Market Boundary determine the number of stations in the Defined Radio Market. No stations with transmitters more than 92 km from the boundary of the common overlap of subject stations will be considered. Further, no other facility of which the principle shareholders of Zimmer have an attributable interest will be considered as a market contributor unless it is a subject station in the radio market under study.

Exhibit One is a map showing the principal community contours of KZWV overlapping with the principal community contours of KCMQ, KATI, KCLR, KTTY and KWOS. These six subject stations make up the Defined Radio Market for KZWV.

Exhibit Two is a map showing non overlapping the principal community contours of KZWV with four commonly owned non-subject stations; KSSZ, KTGR-FM, KTGR-AM and KFAL.

Exhibit Three is a map showing the Radio Market Boundary and all the full power AM and FM stations with overlapping contours. The Radio Market Boundary is shaded in light green on the map. A total of 59 stations are shown on the map. A total of 13 AM stations and 46 FM stations make up the Defined Radio Market for a total of 59 stations. This includes the six stations that comprise the Radio Market Boundary and 53 other AM and FM stations.

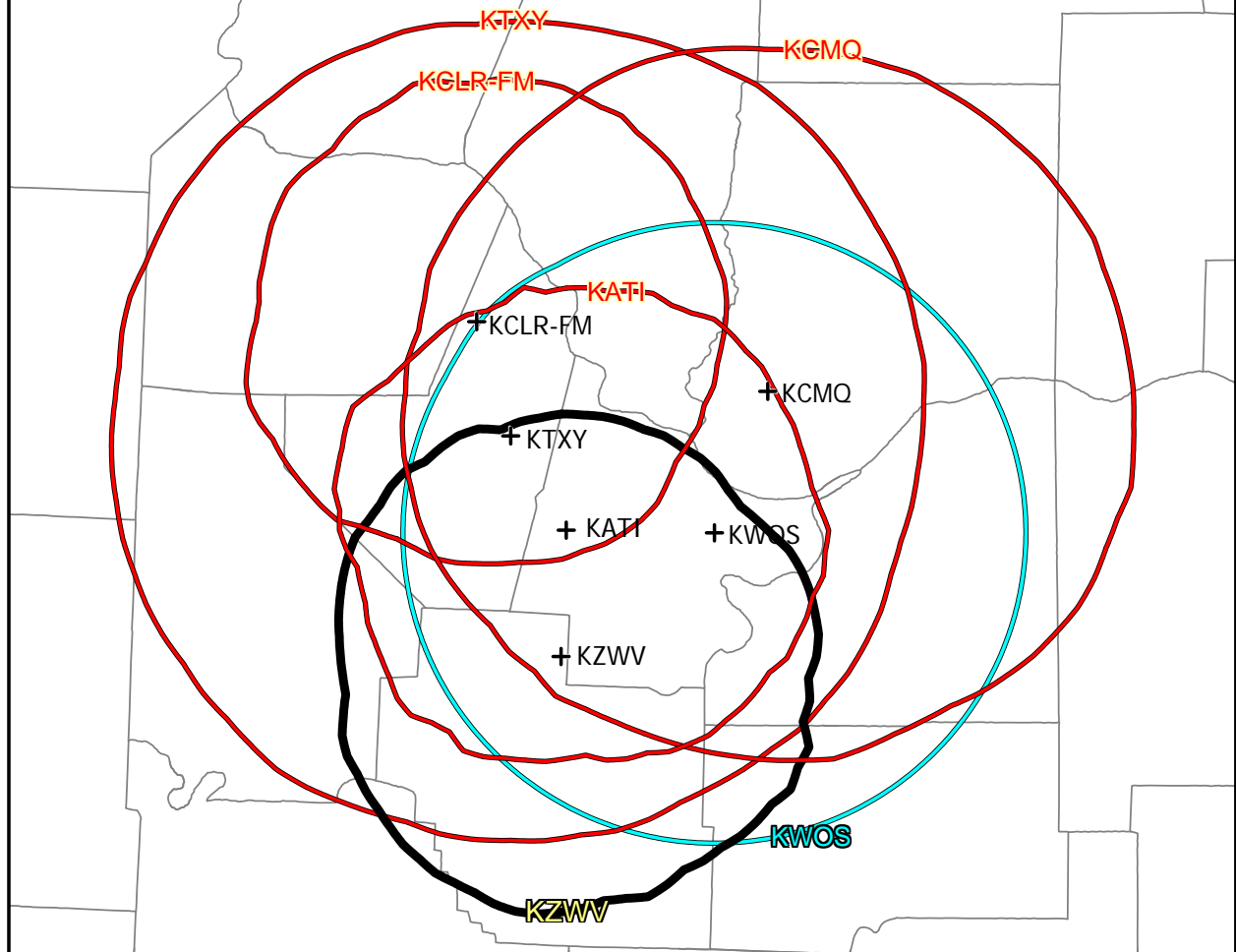
Exhibit Four is a tabulation of the stations in Defined Radio Market titled “Table of Contours Shown”. The number of stations depicted falls in the 45 or greater stations level. Therefore, common ownership or control of up to eight full power stations with no more than five in the same band is permissible. Zimmer would own or have interest in five FM stations and one AM station in the Defined Radio Market. Based on the review of the Defined Radio Market, it is believed that the proposed modification of KZWV is in compliance with §73.3555 of the rules.

The foregoing technical statement was prepared on behalf of Zimmer Radio of Mid-Missouri, Inc. by Donald Lynch of Horizon Broadcast Solutions, LLC, its Technical Consultant. Any information contained herein is true and accurate to the best of my belief and knowledge. All data relating to AM and FM facilities was extracted from the CDBS database. Contour overlap studies were created using V-Soft Probe Version 4.72 Professional, We assume no liability for errors or omissions in that database or program which may be adverse to the information contained herein.

EXHIBIT ONE
Non-Neilsen Radio Market
Defined Market Stations

KZWV Channel 270C2 Eldon, MO

(Map depicts city grade contours
of KZWV (black) and five other
subject stations with overlapping
contours.)



HORIZON
BROADCAST SOLUTIONS

Scale 1:1,000,000
0 10 20 30 km

V-Soft Communications LLC ©

EXHIBIT TWO

Non-Neilsen Radio Market Defined Market Stations

KZWV Channel 270C2 Eldon, MO

(Map depicts KZWV city grade
contour (black) and non
overlapping city grade
contours of four non-subject
stations.

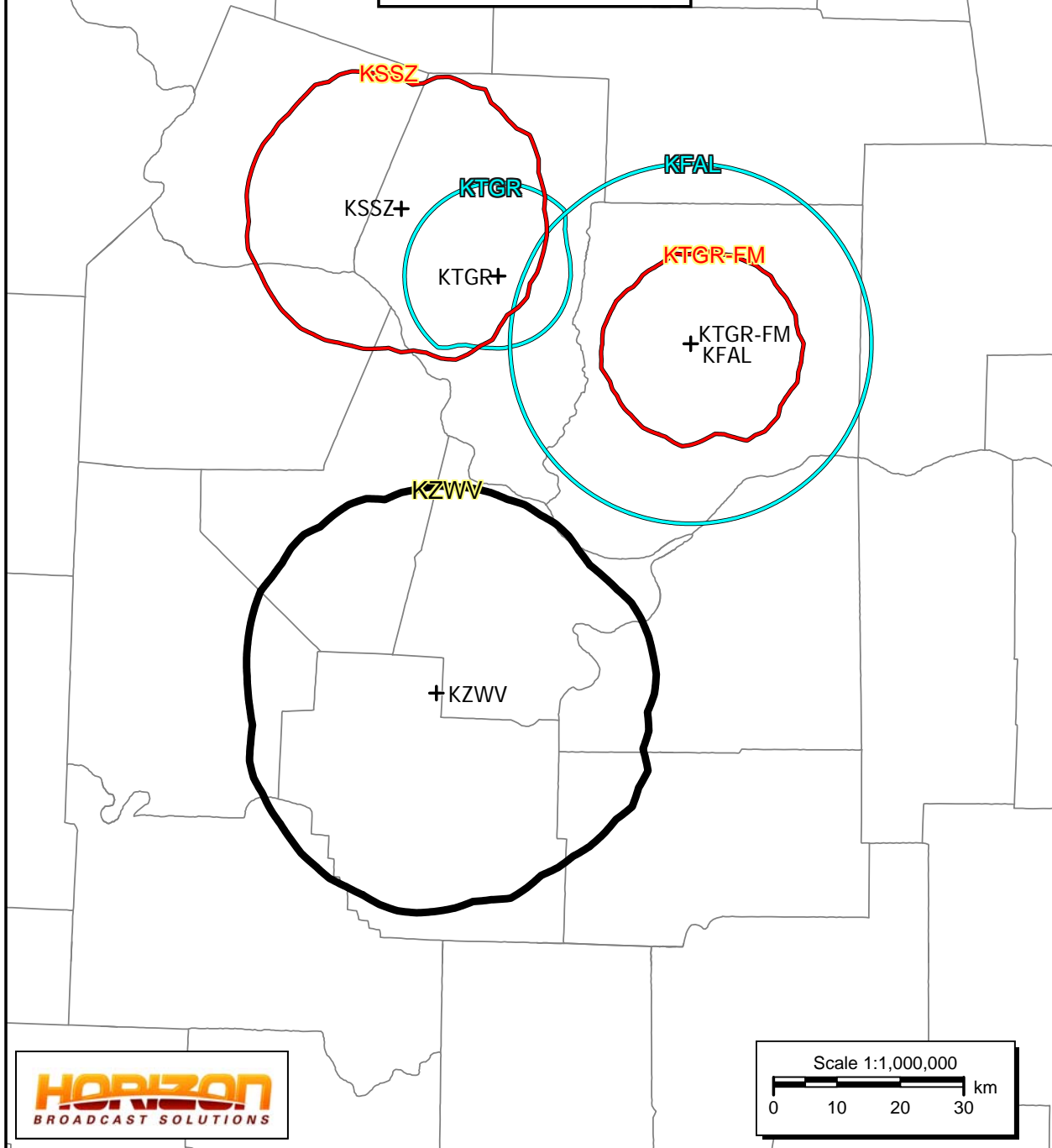


Exhibit Three

KZWV Multiple Ownership Non-Neilsen Radio Market Defined Radio Market Zimmer Radio of Mid-Missouri, Inc.

Defined Radio Market Boundary is shaded green.
Subject stations contours are pink.
All other FM contours are red.
All other AM contours are blue.

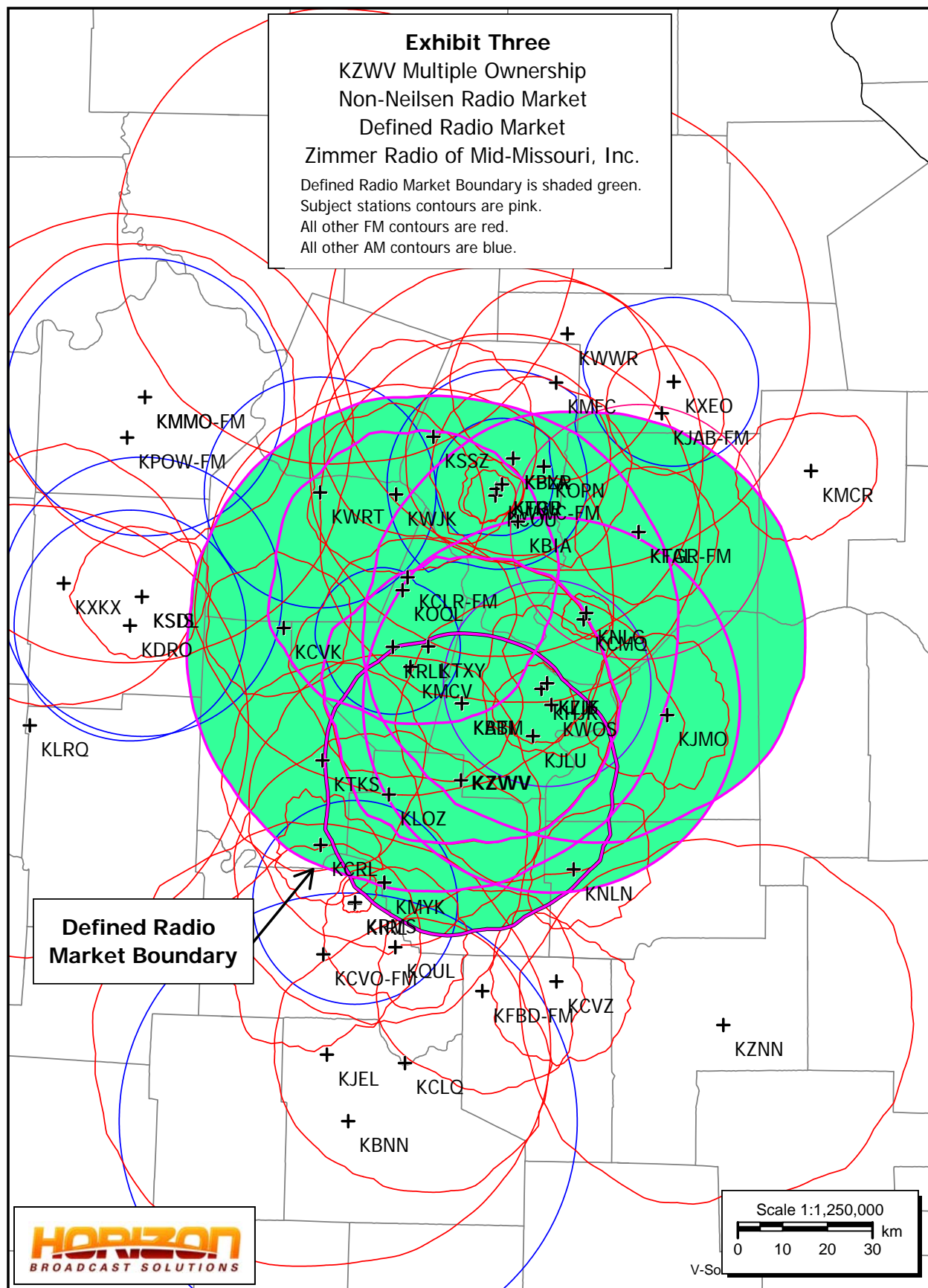


EXHIBIT FOUR - TABLE OF CONTOURS SHOWN

Total number of overlapping contours: 59

Total number of stations in Non-Neilsen Radio Defined Radio Market #1: 59

Reference: RADIO MARKET BOUNDARY - Combined Contours of the following stations

Total number of overlapping contours: 59

Reference:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KZWV	FM	270C2	Eldon	MO	BLH20080910ACP	0.0	0.0
KTXY	FM	295C	Jefferson City	MO	BLH19900727KA	30.7	346.2
KATI	FM	232C2	California	MO	BLH19951013KA	17.1	0.6
KCMQ	FM	244C1	Columbia	MO	BLH19991020AAA	45.0	37.3
KCLR-FM	FM	257C2	Boonville	MO	BLH19900906KA	46.7	345.2
KWOS	AM	950	JEFFERSON CITY	MO	BL	26.2	50.2

Overlapping Contours:

Callsign	Type	Chan	City	St	File Number	Dist (km)	Azi (deg)
KHJR	FM	201A	St. Thomas	MO	BLED20110817AAN	27.1	41.3
KCOU	FM	201A	Columbia	MO	BLED20100129ADO	63.8	6.9
KJAB-FM	FM	202A	Mexico	MO	BLED20050301AAP	93.0	28.7
KJLU	FM	205C2	Jefferson City	MO	BLED19951215KB	18.8	58.4
KIRL	FM	207A	Osage Beach	MO	BLED20110608ABU	36.2	220.7
KOPN	FM	208C2	Columbia	MO	BLED19930203KA	72.2	14.8
KMCV	FM	210C2	High Point	MO	BLED20101209AJF	27.6	336.0
KNLG	FM	212A	New Bloomfield	MO	BLED19970730KB	46.5	36.8
KCRL	FM	212A	Sunrise Beach	MO	BLED19980909KB	34.4	245.3
KWWC-FM	FM	213A	Columbia	MO	BLED19820715AE	65.3	6.9
KNLN	FM	215C3	Vienna	MO	BLED20000606ACF	32.0	128.3
KBIA	FM	217C1	Columbia	MO	BLED959	58.9	12.4
KCVO-FM	FM	219C3	Camdenton	MO	BLED19930420KE	49.3	218.3
KCVZ	FM	221A	Dixon	MO	BLED20030715ABF	49.5	154.6
KMFC	FM	221C3	Centralia	MO	BLH20110118ABM	90.9	13.4
KSDL	FM	222A	Sedalia	MO	BLH20060201BBK	81.9	299.9
KLOZ	FM	224C2	Eldon	MO	BLH19890828KE	16.4	258.8
KWJK	FM	226C3	Boonville	MO	BLH20070516ABI	65.2	347.2
KMYK	FM	228C2	Osage Beach	MO	BLH20000327ABP	28.4	216.8
KSSZ	FM	230C3	Fayette	MO	BLH19960923KD	76.6	355.4
KTKS	FM	236C3	Versailles	MO	BLH20000630ADB	31.1	278.2
KWWR	FM	239C	Mexico	MO	BLH20000530ACL	102.1	13.4
KLRQ	FM	241C0	Clinton	MO	BMLH20030926AQB	96.7	277.2
KJMO	FM	248A	Linn	MO	BLH20060714AAX	48.1	72.4
KPOW-FM	FM	249C1	La Monte	MO	BLH20021101ABG	106.4	315.7
KFBD-FM	FM	250C3	Waynesville	MO	BLH20021211AAO	47.1	174.2
KBBM	FM	261C2	Jefferson City	MO	BLH19910606KE	17.1	0.6
KTGR-FM	FM	263A	Fulton	MO	BMLH19900718KB	67.9	35.6
KPLA	FM	268C1	Columbia	MO	BLH19980306KB	72.5	9.2
KBXR	FM	272C3	Columbia	MO	BLH20000208ABM	72.5	9.2
KQUL	FM	274A	Lake Ozark	MO	BLH19940516KZ	39.9	201.5
KMMO-FM	FM	275C1	Marshall	MO	BLH19931213KB	110.4	320.5
KJEL	FM	279C0	Lebanon	MO	BLH19881115KC	67.9	206.0
KMCR	FM	280A	Montgomery City	MO	BLH20111122CAJ	103.9	48.5
KZJF	FM	281A	Jefferson City	MO	BLH20010319AAZ	28.9	41.6
KRES	FM	284C	Moberly	MO	BLH19830124BA	123.7	348.2
KZNN	FM	287C1	Rolla	MO	BLH19861103KB	79.8	133.0
KXXK	FM	289C2	Knob Noster	MO	BMLH20060829BHP	98.6	296.3
KOQL	FM	291C1	Ashland	MO	BLH19981125KG	44.2	342.9

KCVK	FM	299A Otterville	MO	BLED20110511AFK	52.0	310.7
KCLQ	FM	300C2 Lebanon	MO	BLH20010808AAD	64.1	191.2
KBNN	AM	750 LEBANON	MO	BL20070724AEI	79.8	198.3
KFAL	AM	900 FULTON	MO	BL	67.9	35.6
KWRT	AM	1370 BOONVILLE	MO	BL	71.3	333.9
KRMS	AM	1150 OSAGE BEACH	MO	BML19990416DE	35.9	220.9
KLIK	AM	1240 JEFFERSON CITY	MO	BL	28.9	41.6
KFRU	AM	1400 COLUMBIA	MO	BL19990604DD	66.5	7.9
KTGR	AM	1580 COLUMBIA	MO	BL20060508ACP	66.5	7.9
KRLL	AM	1420 CALIFORNIA	MO	BL19840807AE	33.3	332.9
KDRO	AM	1490 SEDALIA	MO	BL19981120AC	81.3	295.0
KSIS	AM	1050 SEDALIA	MO	BL20061003AHX	81.9	299.9
KXEO	AM	1340 MEXICO	MO	BL20010216ABS	100.4	28.1
KMMO	AM	1300 MARSHALL	MO	BL19940218AA	110.4	320.5

Distance and bearing calculations from coordinates: 38-22-10.50 N, 092-24-32.50 W

Duopoly Options:

TV: Not Included

FM: 3.16 mV/m (70 dBu); Include NCE

AM: 5.0 mV/m