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MULTIPLE OWNERSHIP SERVICE CONTOUR ANALYSIS

**Prepared for
J&J Broadcasting, Inc.
April 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 assignment application for AM stations KAPS 660 kHz Mount Vernon and KBRC 1430 kHz Mount Vernon. The proposed assignee has no other media interests.

Unrated Market

These stations operate outside any market rated by Arbitron. Therefore, 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 their 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.

Hatfield & Dawson Consulting Engineers

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 are not a part of the discrete cluster being studied.

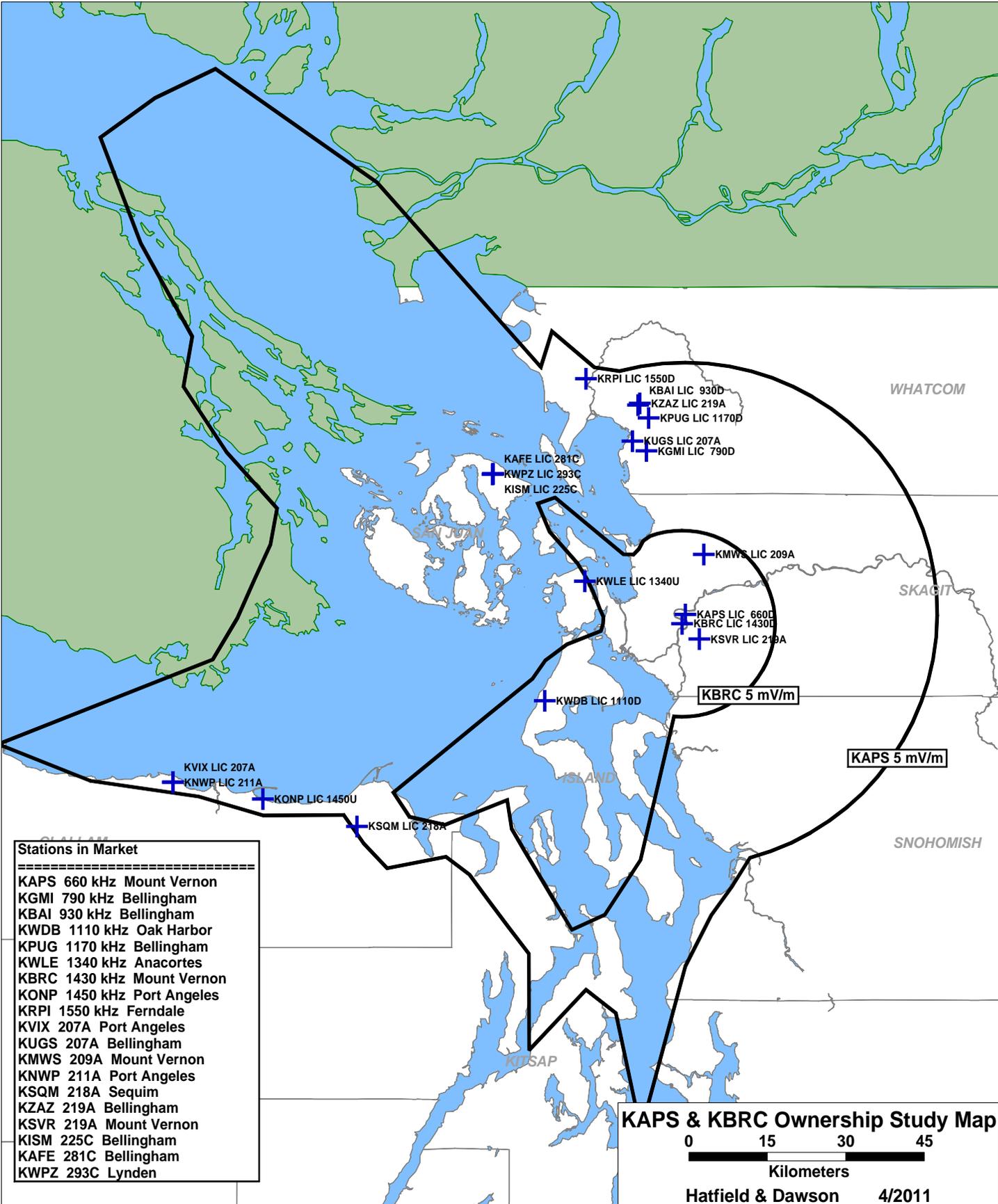
This exhibit evidences at least the minimum number of stations necessary to demonstrate compliance with the rules concerning radio multiple ownership in unrated markets. In order to qualify for common ownership of this 2 AM station cluster, there must be at least 4 stations in the relevant “market”. This study demonstrates that there are at least 19 stations in the relevant market.¹

April 1, 2011

A handwritten signature in black ink, appearing to read "Erik C. Swanson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Erik C. Swanson

¹ Numerous other AM and FM stations have principal community contours which overlap the KAPS and KBRC principal community contours. For clarity, only those stations with transmitter sites inside the KAPS and KBRC principal community contours are considered in this study.



Stations in Market

KAPS	660 kHz	Mount Vernon
KGMI	790 kHz	Bellingham
KBAI	930 kHz	Bellingham
KWDB	1110 kHz	Oak Harbor
KPUG	1170 kHz	Bellingham
KWLE	1340 kHz	Anacortes
KBRC	1430 kHz	Mount Vernon
KONP	1450 kHz	Port Angeles
KRPI	1550 kHz	Ferndale
KVIX	207A	Port Angeles
KUGS	207A	Bellingham
KMWS	209A	Mount Vernon
KNWP	211A	Port Angeles
KSQM	218A	Sequim
KZAZ	219A	Bellingham
KSVR	219A	Mount Vernon
KISM	225C	Bellingham
KAFE	281C	Bellingham
KWPZ	293C	Lynden

KAPS & KBRC Ownership Study Map



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