

RADIO MARKET ANALYSIS
LEGEND COMMUNICATIONS
OF WYOMING, LLC
KZZS (FM) RADIO STATION
STORY, WYOMING
February 2002

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared on behalf of Legend Communications of Wyoming, LLC (“Legend”), permittee of radio station KZZS, Channel 252C2, Thermopolis, Wyoming. KZZS was ordered to Channel 252C1 at Story, Wyoming, and is submitting an application proposing operation on the new channel at Story. Legend also has attributable interests in the licenses of KBBS, 1450 kHz, and KLGT, Channel 225C1, Buffalo, Wyoming. The 3.16 mV/m contours of the proposed KZZS and KLGT overlap. The 3.16 mV/m contours of the two FM stations also overlap with the 5.0 mV/m contour of KBBS.¹ This results in Legend having attributable interests in two FM facilities and one AM facility in the same radio market. Exhibit #1 is a map depicting the subject stations.

2. A study has, therefore, been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission's rules. The subject stations’ contours, therefore, establish the market boundary, hereinafter referred to as the "Radio Market". The study will determine the number of other commercial AM and FM stations that either have transmitter sites within the subject radio market, or have principal community contour overlap with the subject stations.

1) Legend is also submitting a minor change application for KLGT to relocate the site 0.23 kilometer from its licensed site. This relocation will change the defined radio market.

3. Exhibit #2 is a depiction of the Radio Market with the transmitter sites or city grade contours of seven commercial AM and FM stations, including the subject stations.² Exhibit #3 is a tabulation of the stations in the radio market. The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules. At the fourteen or fewer stations level, common ownership or control of up to five stations, with no more than three in the same service, is permissible. Therefore, Legend's interests in two FM stations and one AM station in the same radio market are in compliance with the Commission's rules. Therefore, Legend's proposed minor change application for KZZS is in compliance with §73.3555 of the rules.

4. The foregoing technical statement was prepared on behalf of Legend Communications of Wyoming, LLC, by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities was extracted from the CDBS database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.

2) Although there are additional stations providing service to the Radio Market, they are not considered since the number of stations was ample to demonstrate compliance with the rules based on the number of stations proposed to be commonly owned.

Graham Brock, Inc. - Broadcast Technical Consultants

KLGT
BLH-19950911KA
Latitude: 44-34-28 N
Longitude: 106-52-14 W
Power: 100.00 kW
Channel: 225C1

KZZS
Latitude: 44-34-32 N
Longitude: 106-52-23 W
Power: 100.00 kW
Channel: 252C1

KBBS
Latitude: 44-20-33 N
Longitude: 106-40-54 W
Power: 1.00 kW
Frequency: 1450 KHz

KLGT Proposed
Latitude: 44-34-32 N
Longitude: 106-52-23 W
Power: 100.00 kW
Channel: 225C1

KBBS 5.0 mV/m

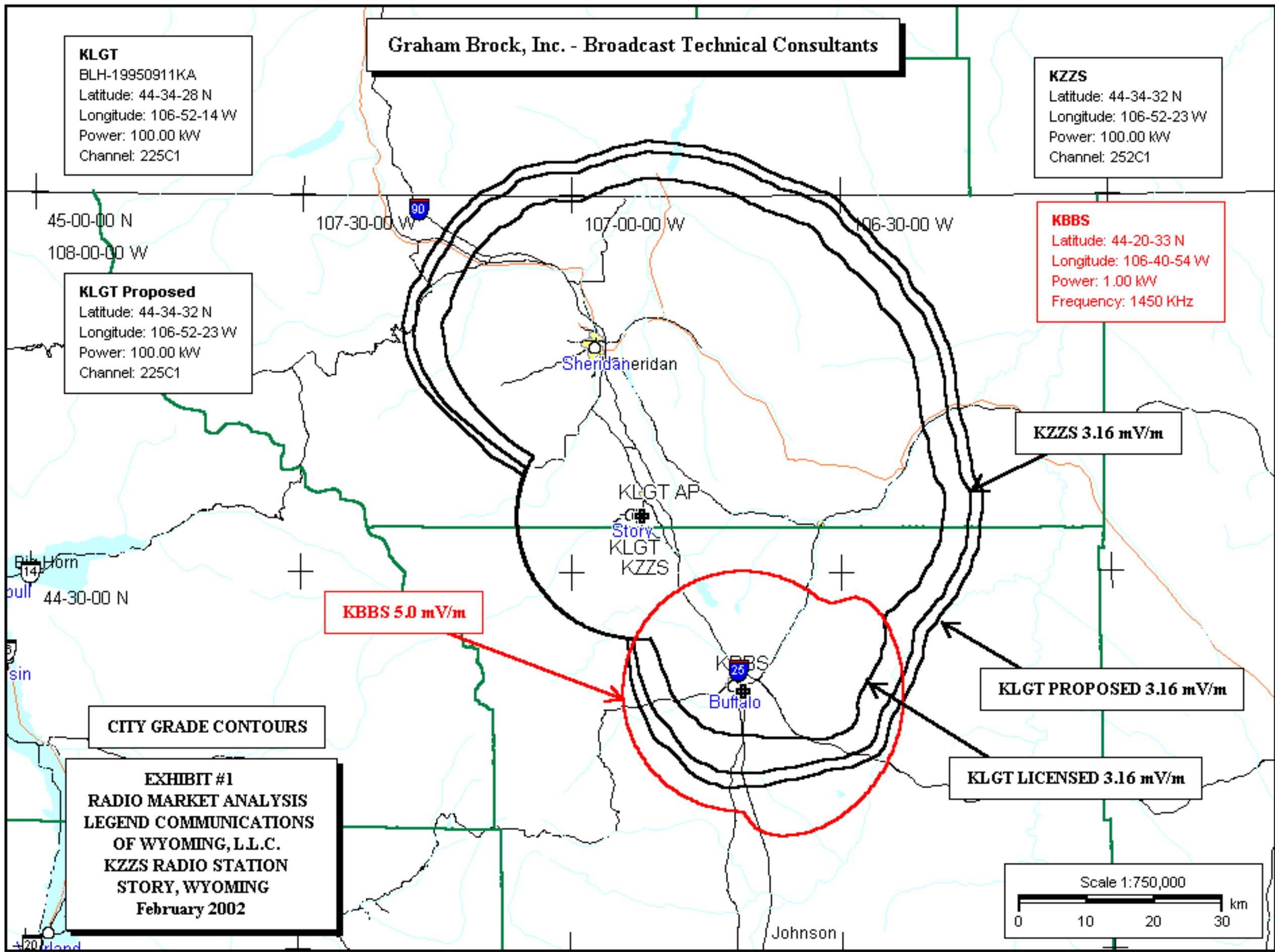
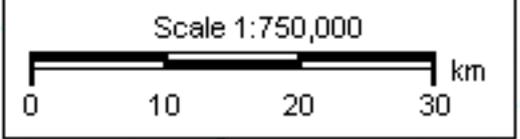
KZZS 3.16 mV/m

KLGT PROPOSED 3.16 mV/m

KLGT LICENSED 3.16 mV/m

CITY GRADE CONTOURS

EXHIBIT #1
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EXHIBIT #3

Tabulation of Stations in Radio Market

AM Stations

KROE	930 kHz	Sheridan, WY
KWYO	1410 kHz	Sheridan, WY
* KBBS	1450 kHz	Buffalo, WY

Total AM Stations - 3

FM Stations

* KLGT	Ch 225C1	Buffalo, WY
+ KYTI	Ch 229C	Sheridan, WY
+ KZWY	Ch 235C	Sheridan, WY
* KZZS	Ch 252C1	Story, WY

Total FM Stations - 4

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 7

- * Subject station
- + City grade contour provides service to Radio Market