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## **MULTIPLE OWNERSHIP ANALYSIS**

**Prepared for  
JOSH Broadcasting, LLC  
May 2015**

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 an application for modification of FM station KNBQ on Channel 253C2 at Central Park, Washington.

KNBQ is licensed to a community in Grays Harbor County, which is not within any Arbitron-rated market. Accordingly, an ownership 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 the 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.

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 do not have overlap with the discrete cluster being studied.

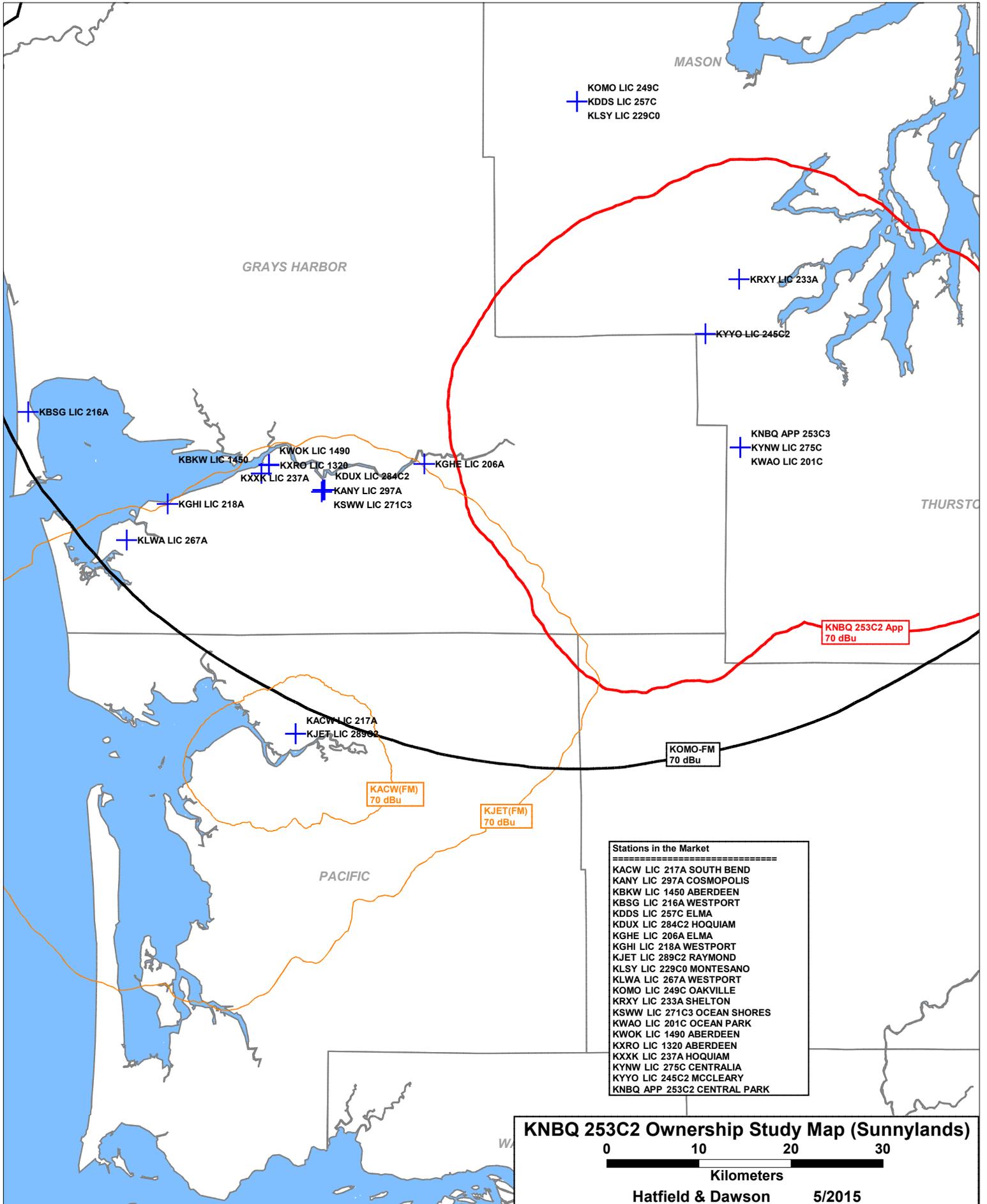
Licensee JOSH Broadcasting has two 50% members, Jodesha Broadcasting and Sunnylands Broadcasting. Apart from the station which is the subject of the instant application, Jodesha does not have an attributable interest in any other station in which Sunnylands has an attributable interest. Nor does Sunnylands have an attributable interest in any other station in which Jodesha has an attributable interest.

### **Sunnylands Broadcasting & South Sound Broadcasting**

Principals of Sunnylands Broadcasting have an ownership interest in South Sound Broadcasting, licensee of KOMO-FM, with which the proposed KNBQ facility has principal community contour overlap. There are no other stations in the vicinity which are attributable to Sunnylands Broadcasting.

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 OAM/2FM cluster, there must be at least 4 stations in the relevant “market”. This study demonstrates that there are at least 21 stations in the relevant market.

In fact, several other stations provide service to this market, but are omitted for clarity.



## Jodesha Broadcasting

The proposed KNBQ facilities have principal community contour overlap with the following stations which are attributable to JOSH member Jodesha Broadcasting, Inc.:<sup>1</sup>

KSWW	271C3	Ocean Shores	
KJET	289C2	Raymond	(License and Application)
KANY	297A	Cosmopolis	

This exhibit evidences at least the minimum number of stations necessary to demonstrate compliance with the rules concerning radio multiple ownership in unrated markets. Given that KJET has both a licensed facility and a pending application facility, there are three separate scenarios which must be considered. However, a single map exhibit suffices to demonstrate compliance for all three scenarios.

***KNBQ Application, KJET Application, KSWW, KANY:*** In order to qualify for common ownership of this 0AM/4FM cluster, there must be at least 15 stations in the relevant “market”. This study demonstrates that there are at least 20 stations in the relevant market.

In fact, several other stations provide service to this market, but are omitted for clarity.

***KNBQ Application, KJET License, KSWW:*** In order to qualify for common ownership of this 0AM/3FM cluster, there must be at least 6 stations in the relevant “market”. This study demonstrates that there are at least 19 stations in the relevant market. (The map exhibit shows 20 stations, but attributable KANY would be omitted from the station count because it is not a part of the cluster being studied.)

In fact, several other stations provide service to this market, but are omitted for clarity.

***KNBQ Application, KSWW, KANY:*** In order to qualify for common ownership of this 0AM/3FM cluster, there must be at least 6 stations in the relevant “market”. This study demonstrates that there are at least 19 stations in the relevant market. (The map exhibit

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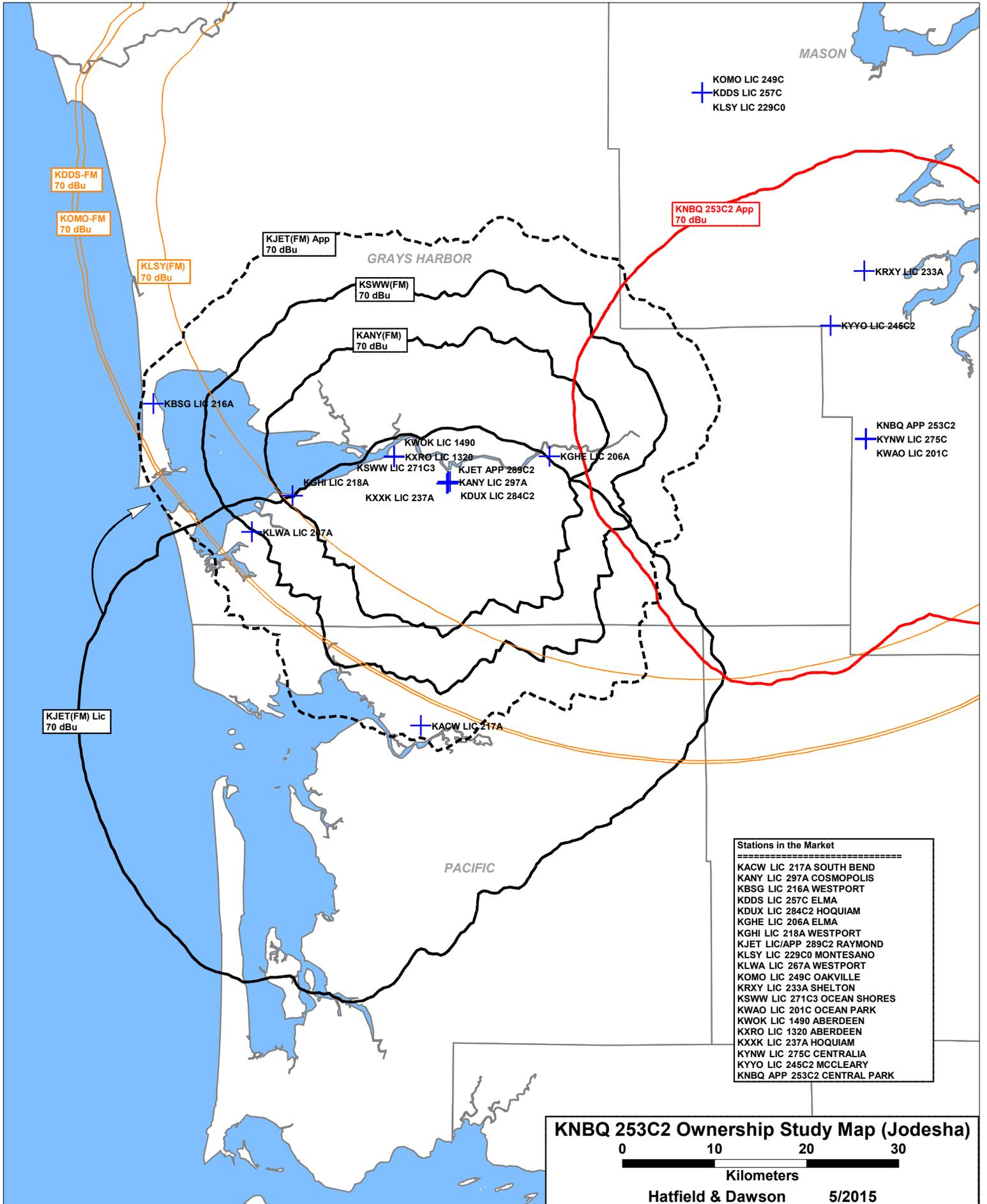
<sup>1</sup> Jodesha is also the licensee of nearby AM station KBKW 1450 kHz Aberdeen. The proposed KNBQ 70 dBu contour does not, however, overlap the KBKW daytime 5 mV/m contour.

shows 20 stations, but attributable KJET would be omitted from the station count because it is not a part of the cluster being studied.)

In fact, several other stations provide service to this market, but are omitted for clarity.

May 28, 2015

Erik C. Swanson, P.E.



MASON

KOMO LIC 249C  
KDDS LIC 257C  
KLSY LIC 229C0

KDDS-FM  
70 dBu

KOMO-FM  
70 dBu

KLSY(FM)  
70 dBu

KJET(FM) App  
70 dBu

GRAYS HARBOR

KSWW(FM)  
70 dBu

KANY(FM)  
70 dBu

KBSG LIC 216A

KWOK LIC 1490

KXRO LIC 1320

KSWW LIC 271C3

KJET APP 289C2

KGHE LIC 206A

KGHI LIC 218A

KANY LIC 297A

KXXX LIC 237A

KDUX LIC 284C2

KLWA LIC 267A

KACW LIC 217A

KJET(FM) Lic  
70 dBu

KNBQ 253C2 App  
70 dBu

KRXY LIC 233A

KYYO LIC 245C2

KNBQ APP 253C2  
KYNW LIC 275C  
KWAO LIC 201C

PACIFIC

- Stations in the Market**
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- KACW LIC 217A SOUTH BEND
  - KANY LIC 297A COSMOPOLIS
  - KBSG LIC 216A WESTPORT
  - KDDS LIC 257C ELMA
  - KDUX LIC 284C2 HOQUIAM
  - KGHE LIC 206A ELMA
  - KGHI LIC 218A WESTPORT
  - KJET LIC/APP 289C2 RAYMOND
  - KLSY LIC 229C0 MONTESANO
  - KLWA LIC 267A WESTPORT
  - KOMO LIC 249C OAKVILLE
  - KRXY LIC 233A SHELTON
  - KSWW LIC 271C3 OCEAN SHORES
  - KWAO LIC 201C OCEAN PARK
  - KWOK LIC 1490 ABERDEEN
  - KXRO LIC 1320 ABERDEEN
  - KXXX LIC 237A HOQUIAM
  - KYNW LIC 275C CENTRALIA
  - KYYO LIC 245C2 MCCLEARY
  - KNBQ APP 253C2 CENTRAL PARK

**KNBQ 253C2 Ownership Study Map (Jodesha)**



Kilometers

Hatfield & Dawson 5/2015