

**RADIO MARKET ANALYSIS**  
**LEGEND COMMUNICATIONS OF WYOMING, LLC**  
**KLGT - BUFFALO, WYOMING**  
**KZZS, STORY, WYOMING**  
**November 2011**

**TECHNICAL STATEMENT**

1. This Technical Statement and attached exhibits were prepared on behalf of Legend Communications of Wyoming, LLC (“Legend”), licensee of KLGW, Channel 243C1, Buffalo, Wyoming and KZZS, Channel 252C1, Story, Wyoming. Legend is submitting an application to correct the coordinates and elevation of KLGW and KZZS, as such a Radio Market analysis is needed. Legend is also the licensee of KBBS, 1450 kHz, Buffalo, Wyoming.<sup>1</sup> None of these facilities is licensed to, or considered “home”, in any rated market. Therefore, a study demonstrating compliance with the Commission’s multiple ownership rules in a non-rated market is required.

2. The 3.16 mV/m contours of the proposed KLGW and KZZS overlap with the contour of KBBS. A map depicting the city grade contours of these facilities is shown on Exhibit #1. Therefore, a study has been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission’s rules. The contours of KLGW and KBBS will be used to define

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1) Legend is also the licensee of KZMQ, 1140 kHz, (KZMQ also has an outstanding construction permit to relocate and change city of license from Greybull, Wyoming to Ten Sleep, Wyoming, which is considered herein) and KZMQ-FM, Channel 262C, Greybull, Wyoming; KWOR, 1340 kHz, Worland, Wyoming; KCGL, Channel 281C, Powell, Wyoming; KODI, 1400 kHz, and KTAG, Channel 250C, Cody, Wyoming; and KBBS, 1450 kHz, as depicted on Exhibit #1. As indicated, there is no overlap between the proposed KLGW or KZZS with any of these other Legend stations and these stations are not considered further.

Legend is also the licensee of KGWY, Channel 264C1, Gillette, Wyoming; KAML-FM, Channel 245C0, and KIML, 1270 kHz, Gillette, Wyoming; and KDDV-FM, Channel 268C0 Wright, Wyoming. These stations are so far removed that they are not shown on Exhibit #1 and these stations are not considered further.

the market boundary, hereinafter referred to as the "Radio Market".<sup>2</sup> The study will determine the number of other commercial AM and FM stations that either have transmitter sites within, or provide coverage to, the Radio Market. Only those stations with transmitter sites within 92.0 kilometers will be considered as contributors to the market. No other station in which Legend has an interest will be considered, unless it is a subject station in the market under review.

3. Exhibit #2 is a depiction of the stations within, or providing service to, the Radio Market boundary. Exhibit #3 is a tabulation of the stations in the Radio Market, which totals seven when the three subject stations are included.<sup>3</sup> 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 and fewer stations level, common ownership or control of up to five stations, with no more than three in the same service, is permissible, provided the number of stations to be commonly held does not exceed 50% of the stations in the market. Therefore, Legend is in compliance with the Commission's multiple ownership rules for a non-rated market.

4. Based on compliance shown in the non-rated market reviewed, the applications for KLGTV and KZZS, in conjunction with Legend's interest in KBBS, are in compliance with the Commission's multiple ownership rules, as detailed in §73.3555.

5. The foregoing technical statement was prepared on behalf of Legend Communications of Wyoming, LLC, by Graham Brock, Inc., its Technical Consultants. All information contained

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2) The proposed KZZS contour is completely encompassed by the proposed KLGTV contour.

3) There are numerous additional stations, but they were not considered as a sufficient number of other stations are depicted, based on the number of stations to be commonly held.

herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.6. BIA database. All data relating to AM and FM facilities was extracted from the Commission's CDBS database. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.

**Graham Brock, Inc. - Broadcast Technical Consultants**

**KLGT - Proposed**  
 BLH-20110222ADX  
 Latitude: 44-34-31.90 N  
 Longitude: 106-52-21.70 W  
 ERP: 100.00 kW  
 Channel: 243C1  
 AMSL Height: 1696.6 m

**KZZS - Proposed**  
 BLH-20030228AAI  
 Latitude: 44-34-31.90 N  
 Longitude: 106-52-21.70 W  
 ERP: 100.00 kW  
 Channel: 252C1  
 AMSL Height: 1671.0 m

**KCGL**  
 BLH-20011205AAM  
 Latitude: 44-29-42 N  
 Longitude: 109-09-10 W  
 ERP: 100.00 kW  
 Channel: 281C  
 AMSL Height: 2337.0 m

**KKLX**  
 BLH-19860602KF  
 Latitude: 44-04-06 N  
 Longitude: 107-51-57 W  
 ERP: 50.00 kW  
 Channel: 241C2  
 AMSL Height: 1433.0 m

**KKLX.C - CP**  
 Latitude: 44-03-34 N  
 Longitude: 107-51-13 W  
 ERP: 63.00 kW  
 Channel: 241C1  
 AMSL Height: 1491.0 m

**KTAG**  
 BLH-20010904AAI  
 Latitude: 44-29-42 N  
 Longitude: 109-09-10 W  
 ERP: 100.00 kW  
 Channel: 250C  
 AMSL Height: 2365.0 m

**KZMQ-FM**  
 BMLH-20040617AAP  
 Latitude: 44-48-41 N  
 Longitude: 107-55-06 W  
 ERP: 56.00 kW  
 Channel: 262C  
 AMSL Height: 2960.0 m

**KWOR**  
 Latitude: 44-01-02 N  
 Longitude: 107-58-14 W  
 ERP: 1.0 kW  
 Freq: 1340 kHz

**KBBS**  
 Latitude: 44-20-33 N  
 Longitude: 106-40-54 W  
 ERP: 1.0 kW  
 Freq: 1450 kHz

**KODI**  
 Latitude: 44-30-46 N  
 Longitude: 109-03-20 W  
 ERP: 1.0 kW  
 FREQ: 1400 kHz

**KZMQ - License**  
 Latitude: 44-27-01 N  
 Longitude: 108-02-56 W  
 ERP: 10.0 kW  
 Freq: 1140 kHz

**KZMQ - CP**  
 Latitude: 44-06-12 N  
 Longitude: 107-28-50 W  
 ERP: 10.0 kW  
 Freq: 1140 kHz

**KZMQ-FM 3.16 mV/m**

**KLGT 3.16 mV/m**

**KZZS 3.16 mV/m**

**KTAG 3.16 mV/m**

**KCGL 3.16 mV/m**

**KTAG**

**KZMQ-FM**

**KLGT - Proposed**

**KZZS - Proposed**

**KCGL**

**KODI**

**KZMQ**

**KBBS**

**KKLX**

**KZMQ - CP**

**KBBS 5.0 mV/m**

**KODI 5.0 mV/m**

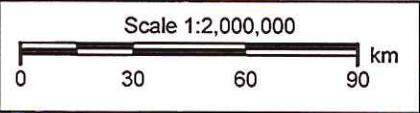
**KZMQ Lic 5.0 mV/m**

**KZMQ CP 5.0 mV/m**

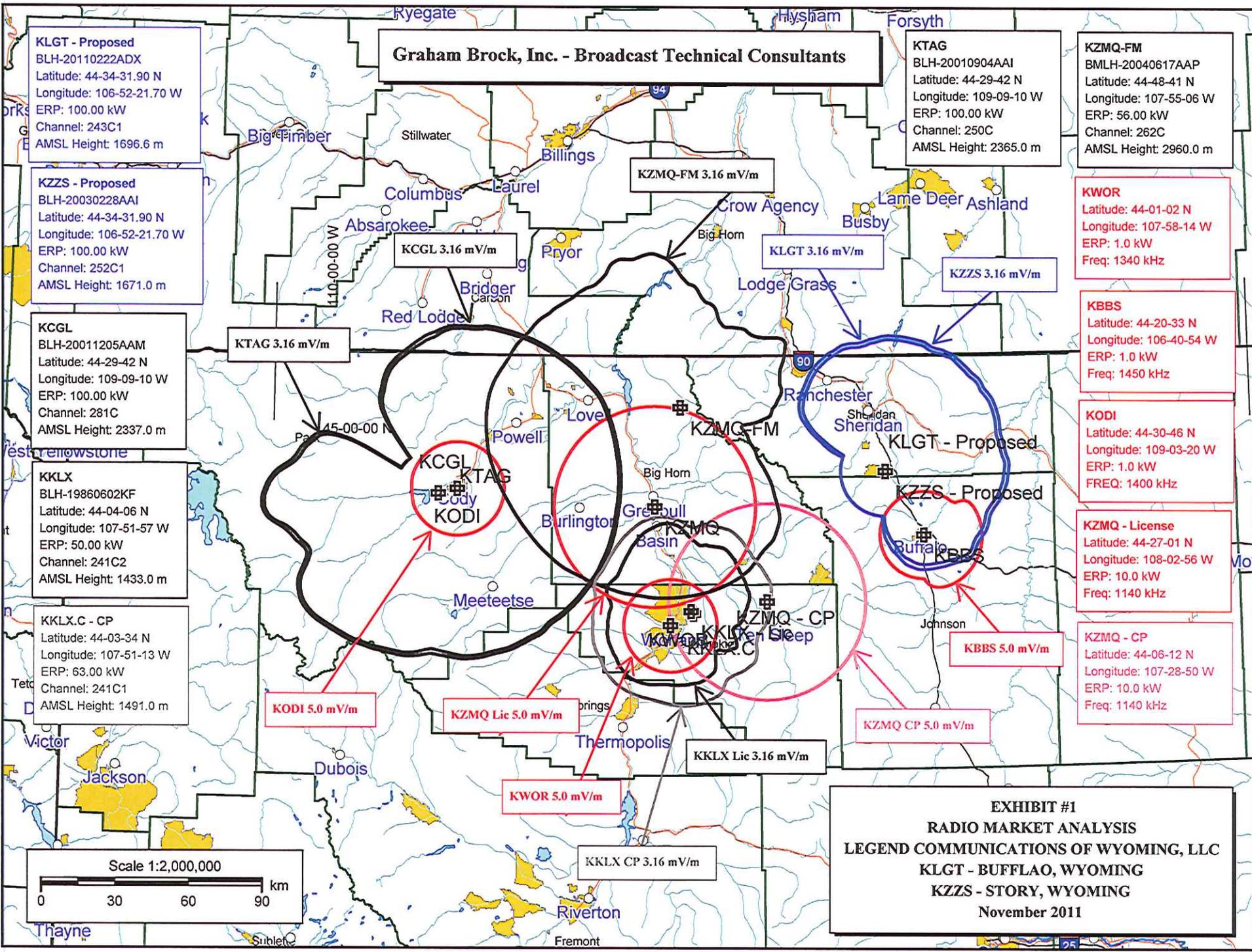
**KKLX Lic 3.16 mV/m**

**KWOR 5.0 mV/m**

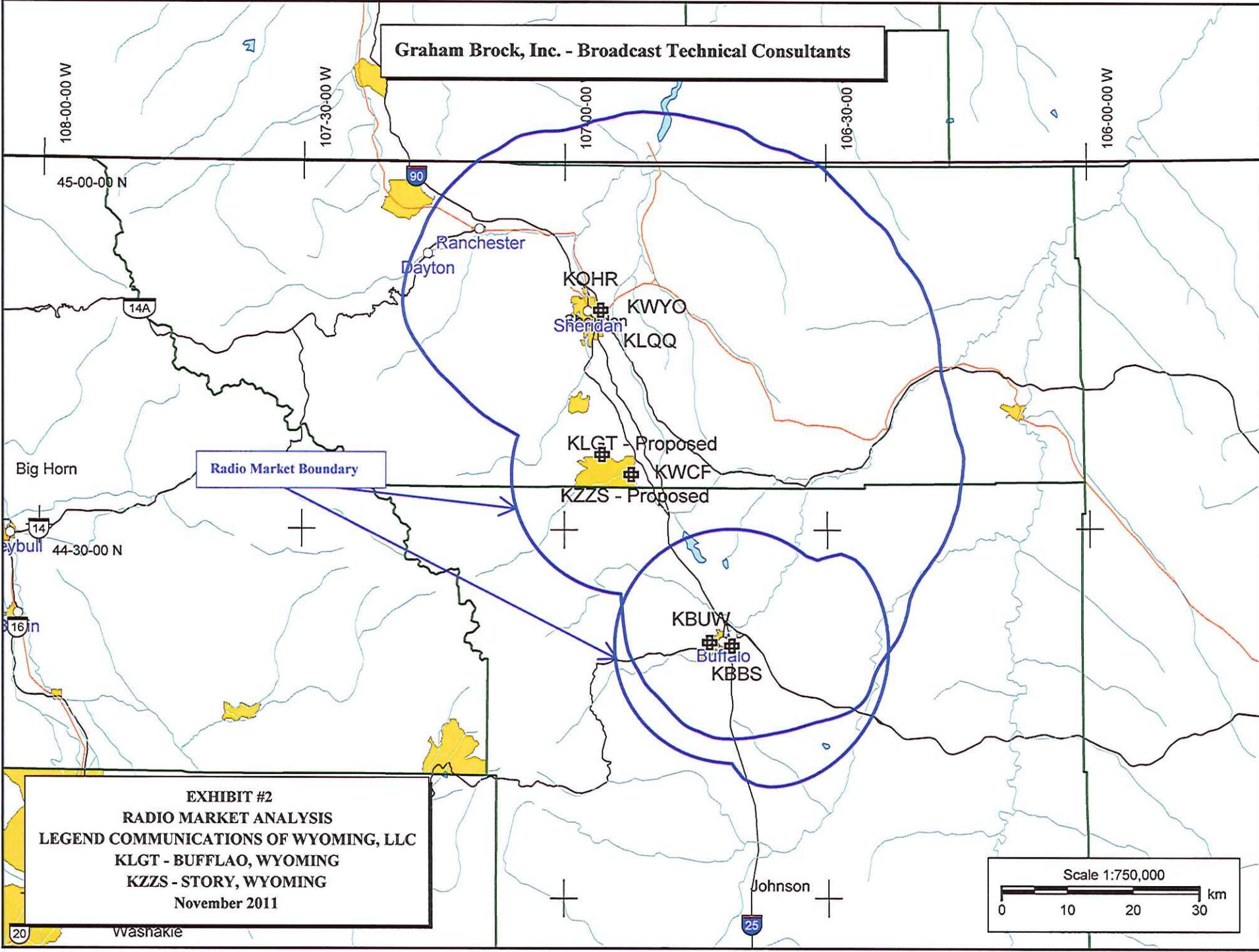
**KKLX CP 3.16 mV/m**



**EXHIBIT #1**  
**RADIO MARKET ANALYSIS**  
**LEGEND COMMUNICATIONS OF WYOMING, LLC**  
**KLGT - BUFFALO, WYOMING**  
**KZZS - STORY, WYOMING**  
 November 2011

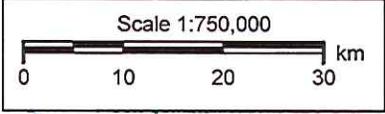


Graham Brock, Inc. - Broadcast Technical Consultants



Radio Market Boundary

**EXHIBIT #2**  
**RADIO MARKET ANALYSIS**  
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**EXHIBIT #3**

**Tabulation of Stations in Radio Market**

**AM Stations**

	KWYO	1410 kHz	Sheridan, Wyoming
*	KBBS	1450 kHz	Buffalo, Wyoming

Total AM Stations - 2

**FM Stations**

	KOHR	Ch 205A	Sheridan, Wyoming
	KWCF	Ch 207C3	Sheridan, Wyoming
	KBUW	Ch 213A	Buffalo, Wyoming
*	KLGT	Ch 243C1	Buffalo, Wyoming
*	KZZS	Ch 252C1	Story, Wyoming

Total FM Stations - 5

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 7**

\* Subject station.

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

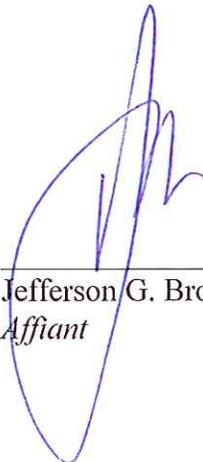
*State of Georgia )*  
*St. Simons Island ) ss:*  
*County of Glynn )*

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Legend Communications of Wyoming, LLC, to prepare the attached Technical Exhibit.

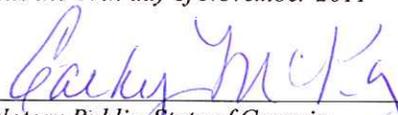
His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 17th day of November 2011.*

  
\_\_\_\_\_  
Jefferson G. Brock  
*Affiant*

*Sworn to and subscribed before me  
this the 17th day of November 2011*

  
\_\_\_\_\_  
*Notary Public, State of Georgia  
My Commission Expires: March 14, 2015*