

Compliance with Local Radio Ownership Rule

The instant application requests a change in the community of license of KNEZ(FM), Channel 297, Fernley, Nevada (FIN 166018), licensed to Shamrock Communications, Inc. (“Shamrock”), from Fernley to Hazen, Nevada with no other changes. This exhibit demonstrates compliance with the FCC’s local radio ownership limits in the Reno, Nevada Nielsen Audio Market as well as under the FCC’s interim contour-overlap methodology.

KNEZ(FM) was included in the Reno, Nevada Nielsen Audio Market prior to May 8, 2015 (*see* attached BIA FCC Geographic Market Definition for Reno, Nevada). Shamrock also holds the licenses of the following other radio stations that were included in the Reno, Nevada Nielsen Audio Market prior to May 8, 2015:

KRZQ(FM), Fallon, Nevada (FIN 165338);
KWNZ(FM), Lovelock, Nevada (FIN 164200); and
KZTI(FM), Fallon Station, Nevada (FIN 189473).

Thus, Shamrock currently holds the licenses for four (4) FM radio stations in the Reno, Nevada Nielsen Audio Market under the FCC’s policy prohibiting an applicant from relying on the removal of their own stations from BIA’s list of “home” stations in a Nielsen Audio Market unless such exclusion has been in effect for at least two years. However, Section 73.3555(a)(1)(iii) of the FCC’s rules provides that in a radio market with 15-29 stations, a party may hold a cognizable interest in up to six (6) commercial stations, not more than four (4) in the same service. Accordingly, Shamrock is in compliance with the FCC’s local radio ownership rule with respect to the Reno, Nevada Nielsen Audio Market.

The proposed new community of license for KNEZ(FM) -- Hazen, Nevada in Churchill County -- is not located within the geographical boundaries of any of the counties in the Reno, Nevada Nielsen Audio Market. As shown on the attached contour analysis map, there will be at least 17 radio stations in the local radio market that includes the proposed facility for KNEZ(FM) on Channel 297C at Hazen, Nevada (FIN 166018):

KVLV(AM), Fallon, Nevada (FIN 36243)
KRNG(FM), Fallon, Nevada (FIN 60327)
KKTU-FM, Fallon Nevada (FIN 36244)
KQNV(FM), Fallon, Nevada (FIN 176348)
KYSA(FM), Sparks, Nevada (FIN 124888)
KWFP(FM), Sparks, Nevada (FIN 13528)
KDOT(FM), Reno, Nevada (FIN 38457)
KOZZ-FM, Reno, Nevada (FIN 38452)
KRNO(FM), Incline Village, Nevada (FIN 204)
KWYL(FM), South Lake Tahoe, California (FIN 67816)
KTHX-FM, Dayton, Nevada (FIN 48685)
KUUB(FM), Sun Valley, Nevada (FIN 83586)

KRZQ(FM), Fallon, Nevada (FIN 165338)
KZTI(FM), Fallon Station, Nevada (FIN 189473)
KWNZ(FM), Lovelock, Nevada (FIN 164200)
KDJJ(FM), Fernley, Nevada (FIN 190451)

While there are many other radio stations that can be included in the local radio market that includes the proposed facility for KNEZ(FM), it is clear that Shamrock will comply with the FCC's local radio ownership rule since Shamrock will only have cognizable interests in only four (4) FM stations in this local market. 47 C.F.R. 73.3555(a)(1)(iii) (an applicant may have cognizable interests in up to six (6) commercial stations, not more than four (4) in the same service, if there are fifteen (15) to twenty-nine (29) stations in the market).

FCC Geographic Market Definition for Reno, NV

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KBUL	FM	98.1	C	Country	Reno, NV	07/02/2003	122	Cumulus Media Holdings Inc	Carson City, NV	Carson City
KBZZ	AM	1270	C	Sports	Reno, NV	07/02/2003	122	Americom Broadcasting	Sparks, NV	Washoe
KCKQ	AM	1180	C	Oldies	Reno, NV	04/16/2015	122	Lotus Communications Corp	Sparks, NV	Washoe
KCMY	AM	1300	C	Country	Reno, NV	07/02/2003	122	Evans Broadcasting Company Inc	Carson City, NV	Carson City
KDOT	FM	104.5	C	Rock	Reno, NV	07/02/2003	122	Lotus Communications Corp	Reno, NV	Washoe
KFBR	FM	91.5	NC	Variety	Reno, NV	01/25/2011	122	Friends Of Black Rock High Rock Inc	Gerlach, NV	Washoe
KFOY	AM	1060	C	Sports	Reno, NV	10/31/2013	122	Lazer Broadcasting Corporation	Sparks, NV	Washoe
KHIT	AM	1450	C	Span/Sprts	Reno, NV	07/02/2003	122	Lotus Communications Corp	Reno, NV	Washoe
KIHM	AM	920	NC	Religion	Reno, NV	07/02/2003	122	IHR Educational Broadcasting	Reno, NV	Washoe
KJIV	FM	89.1	NC	Educational	Reno, NV	12/12/2014	122	OpenSkyRadio Corp	Sun Valley, NV	Washoe
KKFT	FM	99.1	C	News/Talk	Reno, NV	07/31/2015	122	Evans Broadcasting Company Inc	Gardnerville, NV	Douglas
KKOH	AM	780	C	News/Talk	Reno, NV	07/02/2003	122	Cumulus Media Holdings Inc	Reno, NV	Washoe
KLAP	FM	89.5	NC	Educational	Reno, NV	06/24/2010	122	OpenSkyRadio Corp	Gerlach, NV	Washoe
KLCA	FM	96.5	C	Modern AC	Reno, NV	07/02/2003	122	Americom Broadcasting	Tahoe City, CA	Placer
KLRH	FM	92.9	NC	ChrsContem	Reno, NV	07/02/2003	122	Educational Media Foundation	Reno, NV	Washoe
KNEV	FM	95.5	C	Hip Hop	Reno, NV	07/02/2003	122	Cumulus Media Holdings Inc	Reno, NV	Washoe
KNIS	FM	91.3	NC	ChrsContem	Reno, NV	07/02/2003	122	Western Inspirational Broadcasters Inc	Carson City, NV	Carson City
KNNR	AM	1400	C	Smooth	Reno, NV	07/02/2003	122	Fiinn Broadcasting Corporation	Sparks, NV	Washoe
KODS	FM	103.7	C	Oldies	Reno, NV	07/02/2003	122	Americom Broadcasting	Carnelian Bay, CA	Placer
KOLC	FM	97.3	C	Country	Reno, NV	07/02/2003	122	Americom Broadcasting	Carson City, NV	Carson City
KOZZ	FM	105.7	C	Clsc Rock	Reno, NV	07/02/2003	122	Lotus Communications Corp	Reno, NV	Washoe
KPLY	AM	630	C	Sports	Reno, NV	07/02/2003	122	Lotus Communications Corp	Reno, NV	Washoe
KRNO	FM	106.9	C	AC/SftRk	Reno, NV	07/02/2003	122	Americom Broadcasting	Incline Village, NV	Washoe
KRNV	FM	102.1	C	Mexican	Reno, NV	07/02/2003	122	Entravision Communications Corp	Reno, NV	Washoe
KSGG	AM	1230	C	Country	Reno, NV	07/02/2003	122	Americom Broadcasting	Reno, NV	Washoe
KSRN	FM	107.7	C	Mexican	Reno, NV	07/02/2003	122	Lazer Broadcasting Corporation	Kings Beach, CA	Placer
KTHX	FM	100.1	C	AAA	Reno, NV	07/02/2003	122	Lotus Communications Corp	Dayton, NV	Lyon
KUNR	FM	88.7	NC	News/Clsc	Reno, NV	07/02/2003	122	Nevada System of Higher Education	Reno, NV	Washoe
KURK	FM	100.9	C	Clsc Rock	Reno, NV	07/02/2003	122	Evans Broadcasting Company Inc	Sparks, NV	Washoe
KUUB	FM	94.5	C	Sports	Reno, NV	07/02/2003	122	Lotus Communications Corp	Sun Valley, NV	Washoe
KWFP	FM	92.1	C	Country	Reno, NV	07/02/2003	122	Evans Broadcasting Company Inc	Sparks, NV	Washoe
KWYL	FM	102.9	C	CHR	Reno, NV	07/02/2003	122	Cumulus Media Holdings Inc	South Lake Tahoe, CA	El Dorado
KXEQ	AM	1340	C	Mexican	Reno, NV	07/02/2003	122	Azteca Broadcasting Corp	Reno, NV	Washoe
KXTO	AM	1550	C	Span/Relgn	Reno, NV	07/02/2003	122	Christian Ministries of the Valley Inc	Reno, NV	Washoe

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

FCC Geographic Market Definition for Reno, NV

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KYSA	FM	88.3	NC	Chrst/Altve	Reno, NV	09/14/2004	122	Educational Media Foundation	Sparks, NV	Washoe
KZTQ	FM	93.7	C	Adult Hits	Reno, NV	07/02/2003	122	Flinn Broadcasting Corporation	Sun Valley, NV	Washoe

Number of Stations in Geographic Market 36

Previous Stations in Geographic Market

KNEZ	FM	107.3	C	News		05/08/2015	0	Times-Shamrock Communications Inc	Fernley, NV	Lyon
KRZQ	FM	104.1	C	Modern		05/08/2015	0	Times-Shamrock Communications Inc	Fallon, NV	Churchill
KWNZ	FM	106.3	C	Rhymc/AC		05/08/2015	0	Times-Shamrock Communications Inc	Lovelock, NV	Pershing
KZTI	FM	105.3	C	Rock		05/08/2015	0	Times-Shamrock Communications Inc	Fallon Station, NV	Churchill

"C" - Commercial Station; "NC" - Non Commercial Station

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Contour Analysis

Kevin Fitzgerald
Job: KNEZ Hazen Ownership.fmj
Master Database: 2016_Sep_18.fmd
Lat: N39:38:27 Lon: W119:18:01 NAD-27
Scale: 1:1250000
Channel: 297 Class: C
Status: Licensed, Construction Permit, Application
Channels:
Range: 100 km, Clearance: -0.5km
Comments: No Comments
Description: KNEZ, 107.3, Hazen, NV; Ownership Analysis

rfInvestigator Version 3.8.3
by rfSoftware, Inc.
Date: 9/19/2016 7:56:45 PM
Key:
City Grade
Protected
Co-Channel
1st Adj
2nd/3rd Adj

