

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
ALWAYSMOUNTAINTIME, LLC  
ASPEN ET AL., COLORADO

This radio multiple ownership analysis was prepared on behalf of AlwaysMountainTime, LLC in regard to the proposed acquisition of station KKVM(FM) in the Aspen, Colorado area. This analysis was prepared under the FCC interim contour analysis method.\* Considering all attributable radio stations in the area, the following stations were analyzed:

Call Sign	City of License	Facilities
KRKY(AM)	Granby, CO	930 kHz, 0.121 kW-N, 4.5 kW-D, U
KTUN(FM)	New Castle, CO	Ch. 233C3, 25 kW, -121 m (for reference)
KQSE(FM)	Gypsum, CO	Ch. 273C3, 1.35 kW, 660 m
KFMU-FM	Oak Creek, CO	Ch. 281C3, 1.4 kW, 327 m (for reference)
KIDN-FM	Hayden, CO	Ch. 240C3, 6 kW, 198 m (for reference)
KKCH(FM)	Glenwood Springs, CO	Ch. 224C, 56 kW, 763 m
KSKE-FM	Eagle, CO	Ch. 269C1, 12 kW, 667 m
KSMT(FM)	Breckenridge, CO	Ch. 271A, 6 kW, -64 m
KSPN-FM	Aspen, CO	Ch. 276A, 3 kW, -26 m
<u>KKVM(FM)</u>	<u>Vail, CO</u>	<u>Ch. 284C1, 100 kW, 102 m</u>
KNFO(FM)	Basalt, CO	Ch. 291A, 1.6 kW, 111 m (for reference)
KQZR(FM)	Hayden, CO	Ch. 297C2, 29 kW, 198 m (for reference)
KIFT(FM)	Kremmling, CO	Ch. 292C2, 50 kW, 150 m

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\* See Report and Order and Notice of Proposed Rulemaking, MB Docket 02-277, FCC 03-127, Released July 2, 2003.

The principal community contours of all of these stations are depicted on a map included herein as Figure 1. The radio multiple ownership analysis considers only those stations with overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations). An ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

### Radio Markets

The “radio market” applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. As listed in the table below, there are four defined “radio markets” formed by the subject stations:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
1	KRKY	KSMT, <u>KKVM</u>
2	--	KSKE, KQSE, <u>KKVM</u> , KIFT
3	--	KKCH, KSKE, KSKE, <u>KKVM</u>
4	--	KKCH, KSKE, KSPN, <u>KKVM</u>

### Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating stations that have principal community contours that intersect the principal community contours that define the radio market. Only those stations located within 92 km of the perimeter of the mutual overlap area of the defined market area were employed in the count of stations. Commonly owned stations, other than those that form

the market in question were not considered in the count of stations in the defined market. The results of the analysis are tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	4 AM; 23 FM; 27 Total
Market 2	2 AM; 30 FM; 32 Total
Market 3	4 AM; 32 FM; 36 Total
Market 4	3 AM; 27 FM; 30 Total

Figure 2 is a tabulation of the radio stations identified in the defined radio market. Only known licensed, operating stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's AM database and the appropriate Ground Wave Field Strength versus Distance Graph described in Section 73.184 of the FCC Rules. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method outlined in Section 73.313 of the FCC Rules. Terrain data were derived from the N.G.D.C. 30-second computer database for each of the FM stations using radials evenly-spaced every 5 degrees of azimuth.

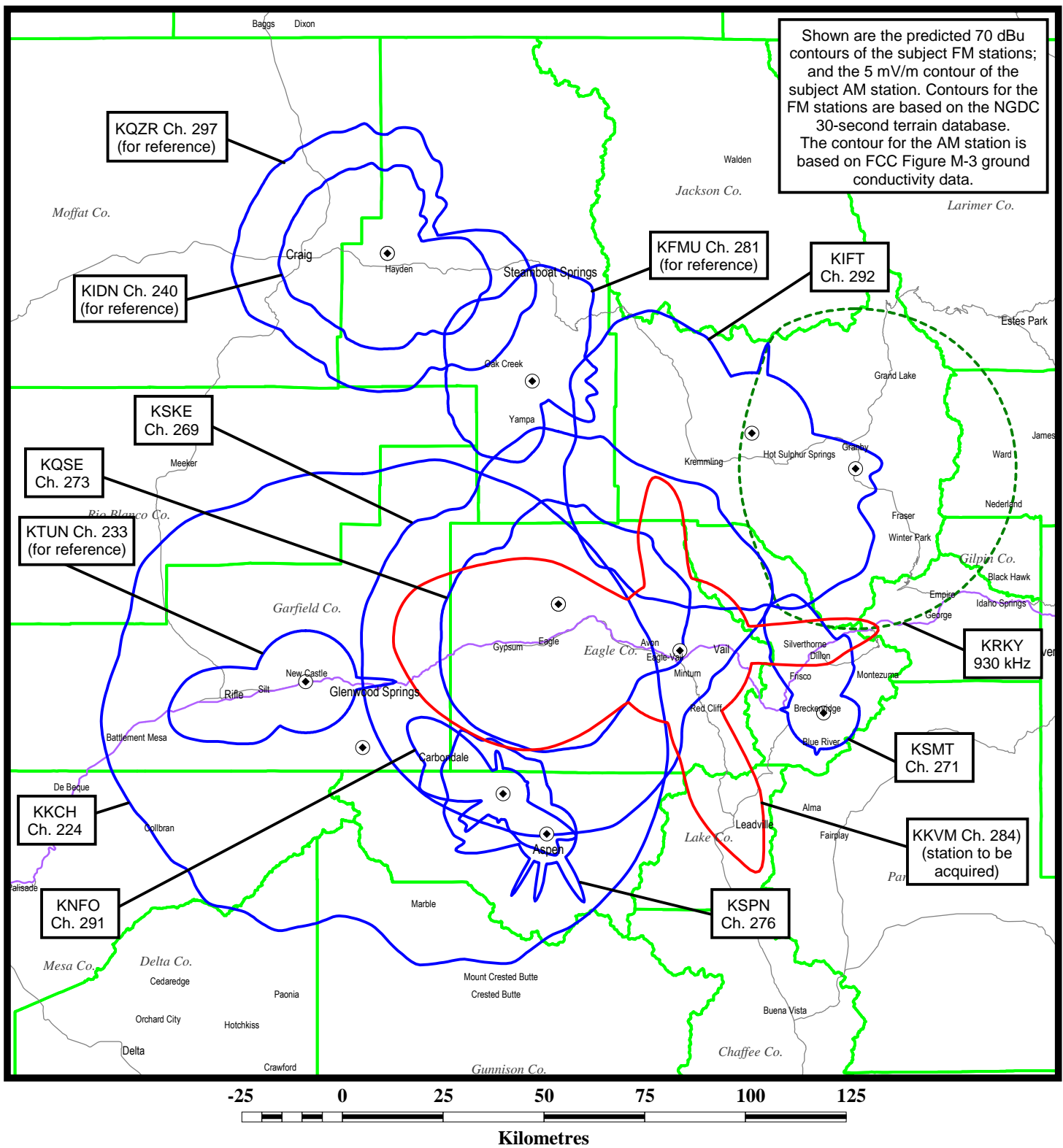
Based on the above, it is concluded that the proposed combination of the stations to be owned complies with Section 73.3555(a) of the FCC Rules.



Louis R. du Treil, Jr.

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April 6, 2015



# PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

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Call Sign	City	State	Frequency		Call Sign	City	State	Frequency
KPOF	DENVER	CO	910					
KRKY	GRANBY	CO	930					
KRKS	DENVER	CO	990					
KVCU	BOULDER	CO	1190					

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Call Sign	City	State	Channel		Call Sign	City	State	Channel
KVJZ	VAIL	CO	203					
KPRE	VAIL	CO	210					
KMPB	BRECKENRIDGE	CO	214					
KTOL	LEADVILLE	CO	215					
KVNC	MINTURN	CO	215					
KLDV	MORRISON	CO	216					
KLRY	GYPSUM	CO	217					
KTND	ASPEN	CO	228					
KYSL	FRISCO	CO	230					
KRKS-FM	LAFAYETTE	CO	234					
KXPK	EVERGREEN	CO	243					
KBCO	BOULDER	CO	247					
KZYZ	AVON	CO	249					
KYGO-FM	DENVER	CO	253					
KIMN	DENVER	CO	262					
KGHT	EL JEBEL	CO	263					
KSMT	BRECKENRIDGE	CO	271					
KSNO-FM	SNOWMASS VILLAGE	CO	280					
KKVM	VAIL	CO	284					
KXKL-FM	DENVER	CO	286					
KALC	DENVER	CO	290					
KBPI	DENVER	CO	294					
KPVW	ASPEN	CO	296					

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Call Sign	City	State	Frequency		Call Sign	City	State	Frequency
KRKY	GRANBY	CO	930					
KGLN	GLENWOOD SPRINGS	CO	980					

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KDNK	GLENWOOD SPRINGS	CO	201					
KVJZ	VAIL	CO	203					
KCJX	CARBONDALE	CO	205					
KLBV	STEAMBOAT SPRINGS	CO	207					
KPRE	VAIL	CO	210					
KHCO	HAYDEN	CO	211					
KVOV	CARBONDALE	CO	213					
KMPB	BRECKENRIDGE	CO	214					
KTOL	LEADVILLE	CO	215					
KVNC	MINTURN	CO	215					
KLRY	GYP SUM	CO	217					
KAJX	ASPEN	CO	218					
KTSG	STEAMBOAT SPRINGS	CO	219					
KLXV	GLENWOOD SPRINGS	CO	220					
KTND	ASPEN	CO	228					
KYSL	FRISCO	CO	230					
KEZZ	PHIPPSBURG	CO	231					
KXPK	EVERGREEN	CO	243					
KUUR	CARBONDALE	CO	244					
KBCR-FM	STEAMBOAT SPRINGS	CO	245					
KZYR	AVON	CO	249					
KYGO-FM	DENVER	CO	253					
KMTS	GLENWOOD SPRINGS	CO	256					
KGHT	EL JEBEL	CO	263					
KSKE-FM	EAGLE	CO	269					
KQSE	GYP SUM	CO	273					
KSNO-FM	SNOWMASS VILLAGE	CO	280					
KKVM	VAIL	CO	284					
KIFT	KREMMLING	CO	292					
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KRAI	CRAIG	CO	550					
KRGS	RIFLE	CO	690					
KGLN	GLENWOOD SPRINGS	CO	980					
KNAM	SILT	CO	1490					

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KDNK	GLENWOOD SPRINGS	CO	201					
KVJZ	VAIL	CO	203					
KCJX	CARBONDALE	CO	205					
KLBV	STEAMBOAT SPRINGS	CO	207					
KPRE	VAIL	CO	210					
KBUT	CRESTED BUTTE	CO	212					
KVOV	CARBONDALE	CO	213					
KMPB	BRECKENRIDGE	CO	214					
KTOL	LEADVILLE	CO	215					
KVNC	MINTURN	CO	215					
KLRY	GYP SUM	CO	217					
KAJX	ASPEN	CO	218					
KLXV	GLENWOOD SPRINGS	CO	220					
KKCH	GLENWOOD SPRINGS	CO	224					
KTND	ASPEN	CO	228					
KYSL	FRISCO	CO	230					
KXPK	EVERGREEN	CO	243					
KUUR	CARBONDALE	CO	244					
KBCR-FM	STEAMBOAT SPRINGS	CO	245					
KAYV	CRESTED BUTTE	CO	246					
KZYR	AVON	CO	249					
KAYW	MEEKER	CO	251					
KYGO-FM	DENVER	CO	253					
KMTS	GLENWOOD SPRINGS	CO	256					
KGHT	EL JEBEL	CO	263					
KDBN	PARACHUTE	CO	266					
KSKE-FM	EAGLE	CO	269					
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KLXV	GLENWOOD SPRINGS	CO	220					
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KYSL	FRISCO	CO	230					
KUUR	CARBONDALE	CO	244					
KAYV	CRESTED BUTTE	CO	246					
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KSPN-FM	ASPEN	CO	276					
KSNO-FM	SNOWMASS VILLAGE	CO	280					
KKVM	VAIL	CO	284					
KNFO	BASALT	CO	291					
KPVW	ASPEN	CO	296					