

Multiple Ownership Compliance Study
Mollman Media, Inc.
Duncan, Comanche, Cache, Lawton and Apache, Oklahoma
December 2018

Introductory Statement

Mollman Media, Inc. wishes to purchase 4 FM and 3 AM stations in Southwest Oklahoma. Many of these stations have overlapping city grade signals that require a Multiple Ownership Compliance Study to be sure that this proposed purchase is in compliance with Section 73.3555 of the Commission's rules.

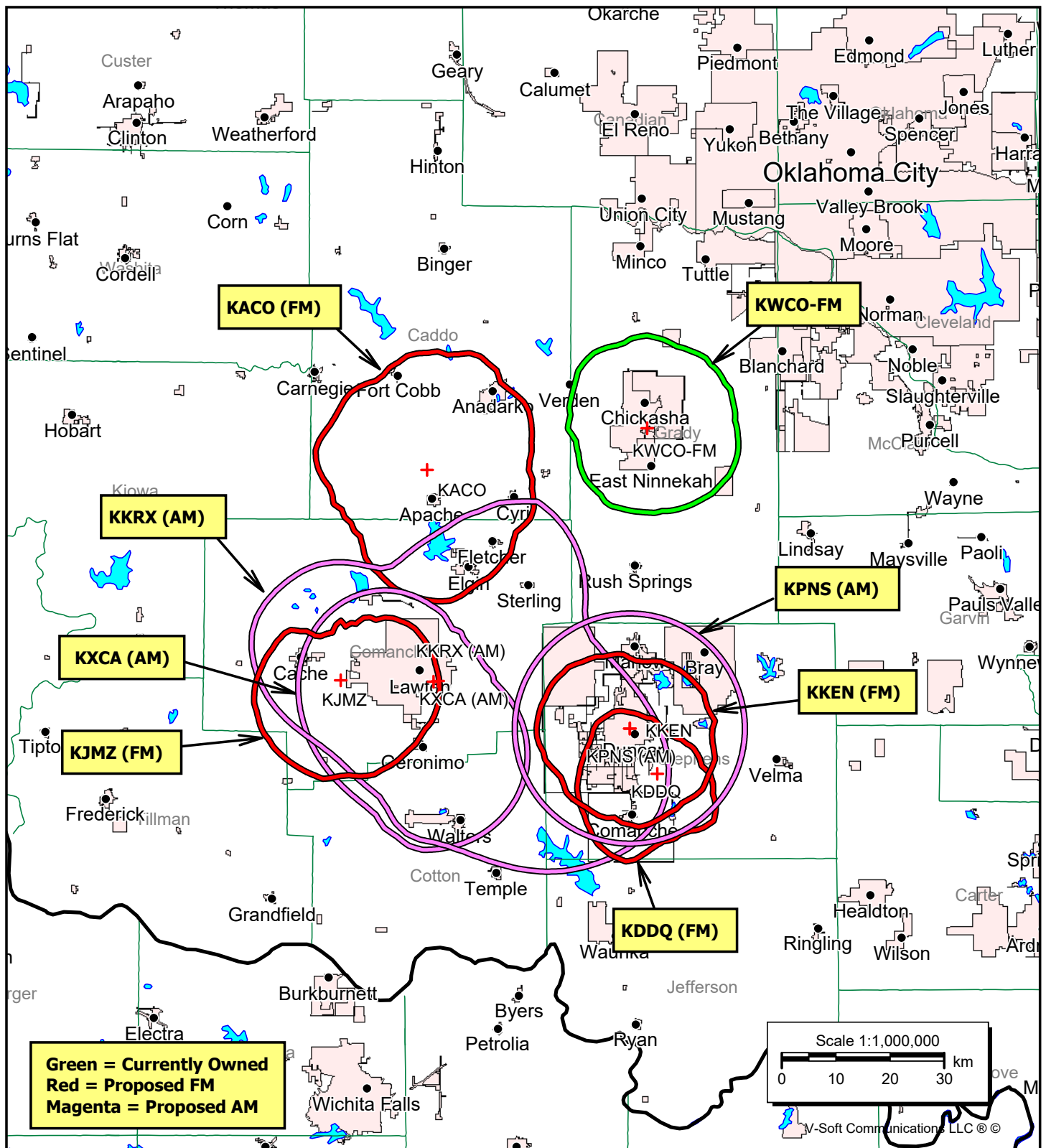
Mollman Media currently owns KWCO-FM, Chickasha, OK. The proposed new stations are: KPNS (AM) and KKEN (FM), Duncan, OK; KKRX (AM) and KXCA (AM), Lawton, OK; KDDQ (FM) Comanche, OK; KJMZ (FM), Cache, OK and KACO (FM), Apache, OK. None of the proposed stations have city grade overlap with the presently owned KWCO-FM. Both the present and proposed Mollman Media properties city grade coverage can be seen in the exhibit "Mollman Media, Inc. Proposed Properties". The proposed new stations form 4 unique radio markets. Each market analysis follows.

This study was prepared by Clifton G. Moor, President, Bromo Communications, Inc. It is based on publically available information from the FCC. All conclusions and findings herein are thought to be true, accurate and reliable to the knowledge of the undersigned:



Clifton G. Moor, President
Bromo Communications, Inc

December 18, 2018



Multiple Ownership Compliance Study Mollman Media, Inc Proposed Properties

Bromo Communications, Inc.

December 2018

Market 1

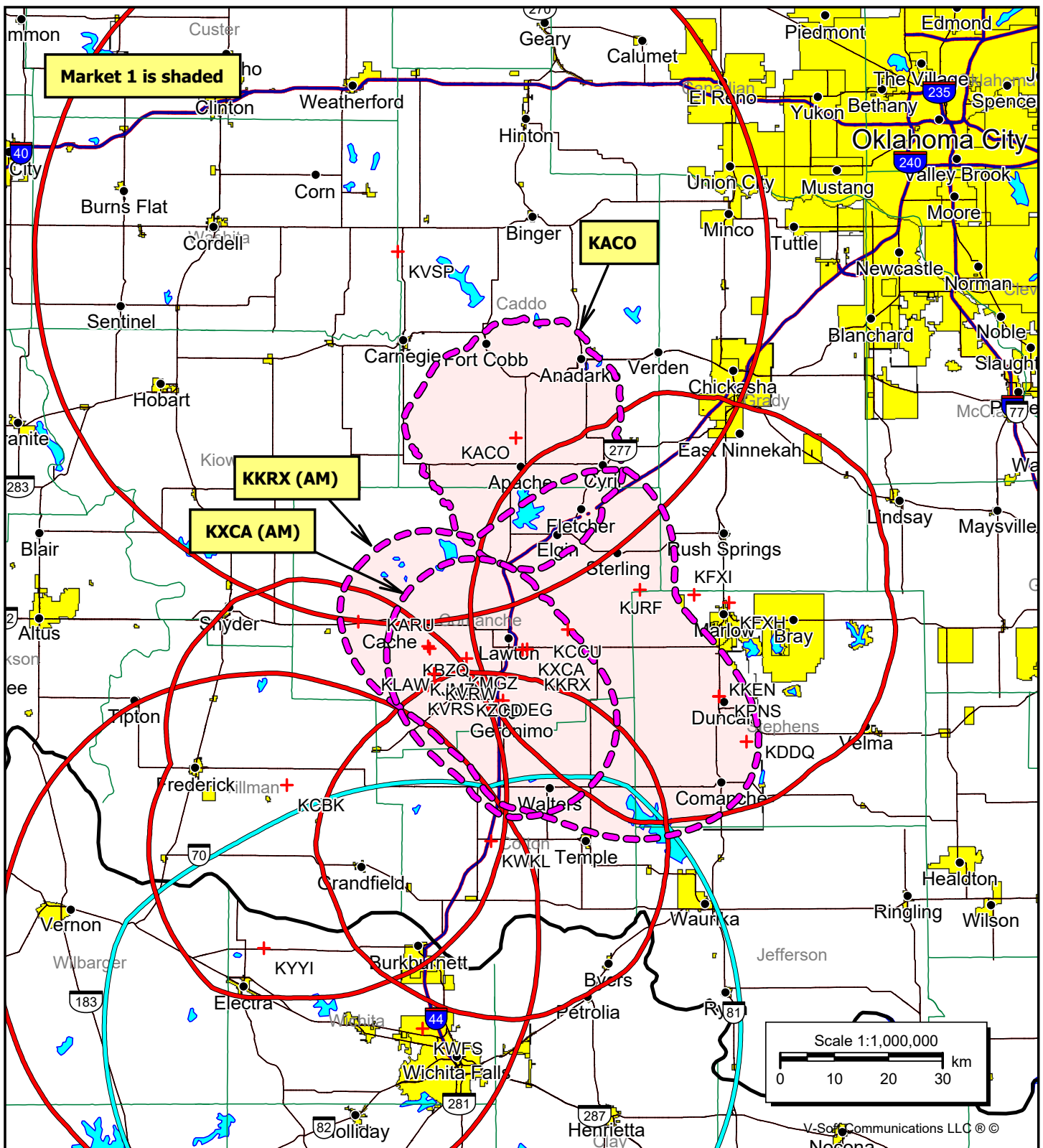
Market 1 is formed by KACO (FM), KKRX (AM) and KXCA (AM). Within the Market 1 subject area there are 10 AM or FM transmitters that are not owned or proposed to be owned by Mollman Media. Their transmitter sites are plotted on the Market 1 Exhibit.

KOEG	Walters, OK
KARU	Cache, OK
KCCU	Lawton, OK
KVRS	Lawton, OK
KZCD	Lawton, OK
KMGZ	Lawton, OK
KBZQ	Lawton, OK
KLAW	Lawton, OK
KVRW	Lawton, OK
KJRF	Lawton, OK

Additionally other stations have transmitter sites that are outside of the subject area and they provide city grade coverage to a portion of the subject area:

KFXH	Marlow, OK
KWKL	Grandfield, OK
KCBK	Frederick, OK
KFXI	Marlow, OK
KVSP	Anadarko, OK
KYYI	Burkburnett, OK
KWFS (AM)	Wichita Falls, TX

Therefore, there are 10 stations with sites in the subject area plus 7 stations with transmitters near the subject area that serve some of the area plus 3 subject stations produce a total of 20 services in this market. Paragraph 73.3555(a)(1)(iii) allows the ownership of up to 6 commercial stations with not more than 4 being in the same service when there is a total of between 19 and 29 services. Therefore, the common ownership of the 3 stations in Market 1 (1 FM and 2 AM) is thought to be in concert with the Commission's rules.



Multiple Ownership Compliance Study Mollman Media, Inc. - Market 1

Bromo Communications, Inc.

December 2018

Market 2

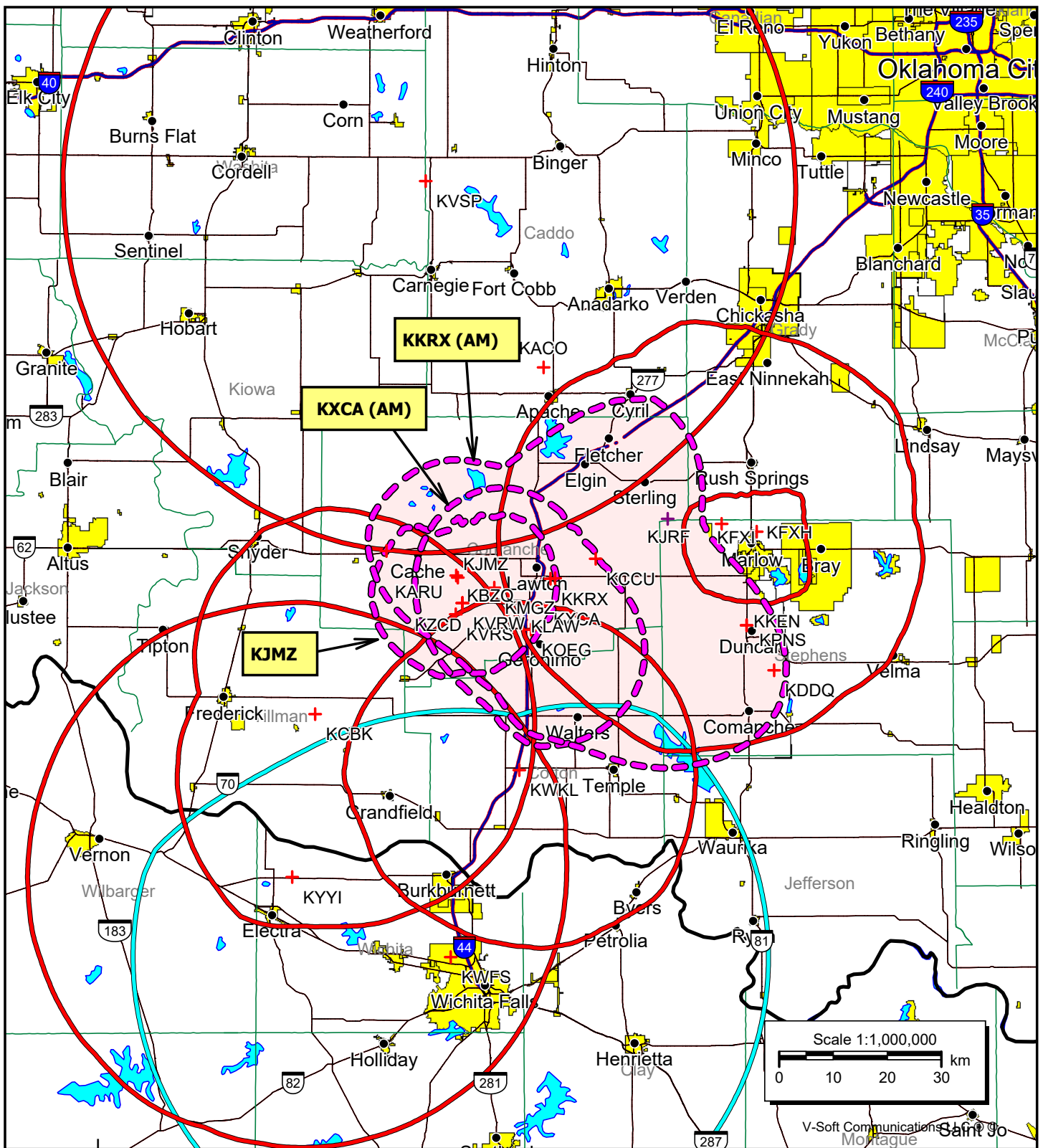
Market 2 is formed by KJMZ (FM), KXCA (AM) and KKRX (AM). Within the Market 2 subject area there are 10 AM or FM transmitters that are not proposed to be owned by Mollman Media. Their transmitter sites are plotted on the Market 1 Exhibit.

KOEG	Walters, OK
KARU	Cache, OK
KCCU	Lawton, OK
KVRS	Lawton, OK
KJRF	Lawton, OK
KZCD	Lawton, OK
KMGZ	Lawton, OK
KBZQ	Lawton, OK
KLAW	Lawton, OK
KVRW	Lawton, OK

Additionally other stations have transmitter sites that are outside of the subject area and provide city grade coverage to a portion of the subject area:

KXFH	Marlow, OK
KWKL	Grandfield, OK
KCBK	Frederick, OK
KFXI	Marlow, OK
KVSP	Anadarko, OK
KYYI	Burkburnett, OK
KWFS (AM)	Wichita Falls, TX

There are 10 stations with sites in the subject area plus 7 stations with transmitters near the subject area that serve some of the area plus 3 subject stations produce a total of 20 services in this market. Paragraph 73.3555(a)(1)(iii) allows the ownership of up to 6 commercial stations with not more than 4 being in the same service when there is a total of between 15 and 29 services. Therefore, the common ownership of the 3 stations in Market 2 (1 FM and 2 AM) is thought to be in concert with the Commission's rules.



Multiple Ownership Compliance Study Mollman Media, Inc. - Market 2

Bromo Communications, Inc.

December 2018

Market 3

Market 3 is formed by KXCA (AM), KPNS (AM) and KKRX (AM). Within the Market 3 subject area there are 12 AM or FM transmitters that are not proposed to be owned by Mollman Media. Their transmitter sites are plotted on the Market 3 Exhibit.

KOEG	Walters, OK
KFXH	Marlow, OK
KARU	Cache, OK
KCCU	Lawton, OK
KVRS	Lawton, OK
KJRF	Lawton, OK
KFXI	Marlow, OK
KZCD	Lawton, OK
KMGZ	Lawton, OK
KBZQ	Lawton, OK
KLAW	Lawton, OK
KVRW	Lawton, OK

Additionally other stations have transmitter sites that are outside of the subject area and provide city grade coverage to a portion of the subject area:

KWKL	Grandfield, OK
KCBK	Frederick, OK
KICM	Healdton, OK
KVSP	Anadarko, OK
KYYI	Burkburnett, TX
KWFS (AM)	Wichita Falls, TX

There are 12 stations with sites in the subject area plus 6 stations with transmitters near the subject area that serve some of the area plus 3 subject stations produce a total of 21 services in this market. Paragraph 73.3555(a)(1)(iii) allows the ownership of up to 6 commercial stations with not more than 4 being in the same service when there is a total of between 15 and 29 services. Therefore, the common ownership of the 3 stations in Market 3 (all 3 AM) by Mollman Media, Inc. is thought to be in concert with the Commission's rules.

Market 4

Market 4 is formed by KKEN (FM), KDDQ (FM), KKRX (AM) and KPNS (AM). Within the Market 4 subject area there are 12 AM or FM transmitters that are not proposed to be commonly owned. Their transmitter sites are plotted on the Market 4 Exhibit:

KFXI	Marlow, OK
KFXH	Marlow, OK
KCCU	Lawton, OK
KOEG	Walters, OK
KVRS	Lawton, OK
KVRW	Lawton, OK
KMGZ	Lawton, OK
KBZQ	Lawton, OK
KARU	Cache, OK
KJRF	Lawton, OK
KZCD	Lawton, OK
KLAW	Lawton, OK

Additionally other stations have transmitter sites that are outside of the subject area and they provide city grade coverage to a portion of the subject area:

KWKL (FM)	Grandfield, OK
KYYI (FM)	Burkburnett, TX
KCBK (FM)	Fredrick, OK
KICM (FM)	Healdton, OK
KWFS (AM)	Wichita Falls, TX

Therefore, there are 12 stations with sites in the subject area plus 5 stations with transmitters near the subject area that serve some of the area plus 4 subject stations produces a total of 21 services in this market. Paragraph 73.3555(a)(1)(iii) allows the ownership of up to 6 commercial stations with not more than 4 being in the same service when there is a total of between 15 and 29 services. Therefore, the common ownership of the 4 stations in Market 4 (2 AM and 2 FM) is thought to be in concert with the Commission's rules.

