

**RADIO MARKET ANALYSIS**  
**LEGEND COMMUNICATIONS**  
**OF WYOMING, LLC**  
**KZZS (FM) RADIO STATION**  
**STORY, WYOMING**  
**October 2002**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits were prepared on behalf of Legend Communications of Wyoming, LLC ("Legend"), permittee of radio station KZZS, Channel 252C2, Thermopolis, Wyoming. KZZS was ordered to Channel 252C1 at Story, Wyoming, and is submitting an application proposing operation on Channel 252A at Story. Legend also has attributable interests in the licenses of KBBS, 1450 kHz, and KLGT, Channel 225C1, Buffalo, Wyoming.<sup>1</sup> The 3.16 mV/m contours of the proposed KZZS and KLGT overlap. The 3.16 mV/m contours of the two FM stations also overlap with the 5.0 mV/m contour of KBBS. This results in Legend having attributable interests in two FM facilities and one AM facility in the same radio market. Exhibit #1 is a map depicting the subject stations.

2. A study has, therefore, been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission's rules. The subject stations' contours, therefore, establish the market boundary, hereinafter referred to as the "Radio Market". The study will determine the number of other commercial AM and FM stations that either have transmitter sites within the subject radio market, or have principal community contour overlap with the subject stations.

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1) There is also a pending application to make minor changes in the facilities of KLGT, which is considered in this instant study.

3. Exhibit #2 is a depiction of the Radio Market with the transmitter sites or city grade contours of seven commercial AM and FM stations, including the subject stations.<sup>2</sup> Exhibit #3 is a tabulation of the stations in the radio market. 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 or fewer stations level, common ownership or control of up to five stations, with no more than three in the same service, is permissible. Therefore, Legend's interests in two FM stations and one AM station in the same radio market are in compliance with the Commission's rules. Therefore, Legend's proposed minor change application for KZZS is in compliance with §73.3555 of the rules.

4. The foregoing technical statement was prepared on behalf of Legend Communications of Wyoming, LLC, by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities was extracted from the CDBS database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.

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2) Although there are additional stations providing service to the Radio Market, they are not considered since the number of stations was ample to demonstrate compliance with the rules based on the number of stations proposed to be commonly owned.

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

**KLGT**

BLH-19950911KA  
Latitude: 44-34-28 N  
Longitude: 106-52-14 W  
Power: 100.00 kW  
Channel: 225C1

**KZZS**

Latitude: 44-34-28 N  
Longitude: 106-52-14 W  
Power: 0.90 kW  
Channel: 252A

**KBBS**

Latitude: 44-20-33 N  
Longitude: 106-40-54 W  
Power: 1.00 kW  
Frequency: 1450 KHz

**KLGT Proposed**

Latitude: 44-34-29 N  
Longitude: 106-52-14 W  
Power: 100.00 kW  
Channel: 225C1

KZZS 3.16 mV/m

KBBS 5.0 mV/m

KLGT PROPOSED 3.16 mV/m

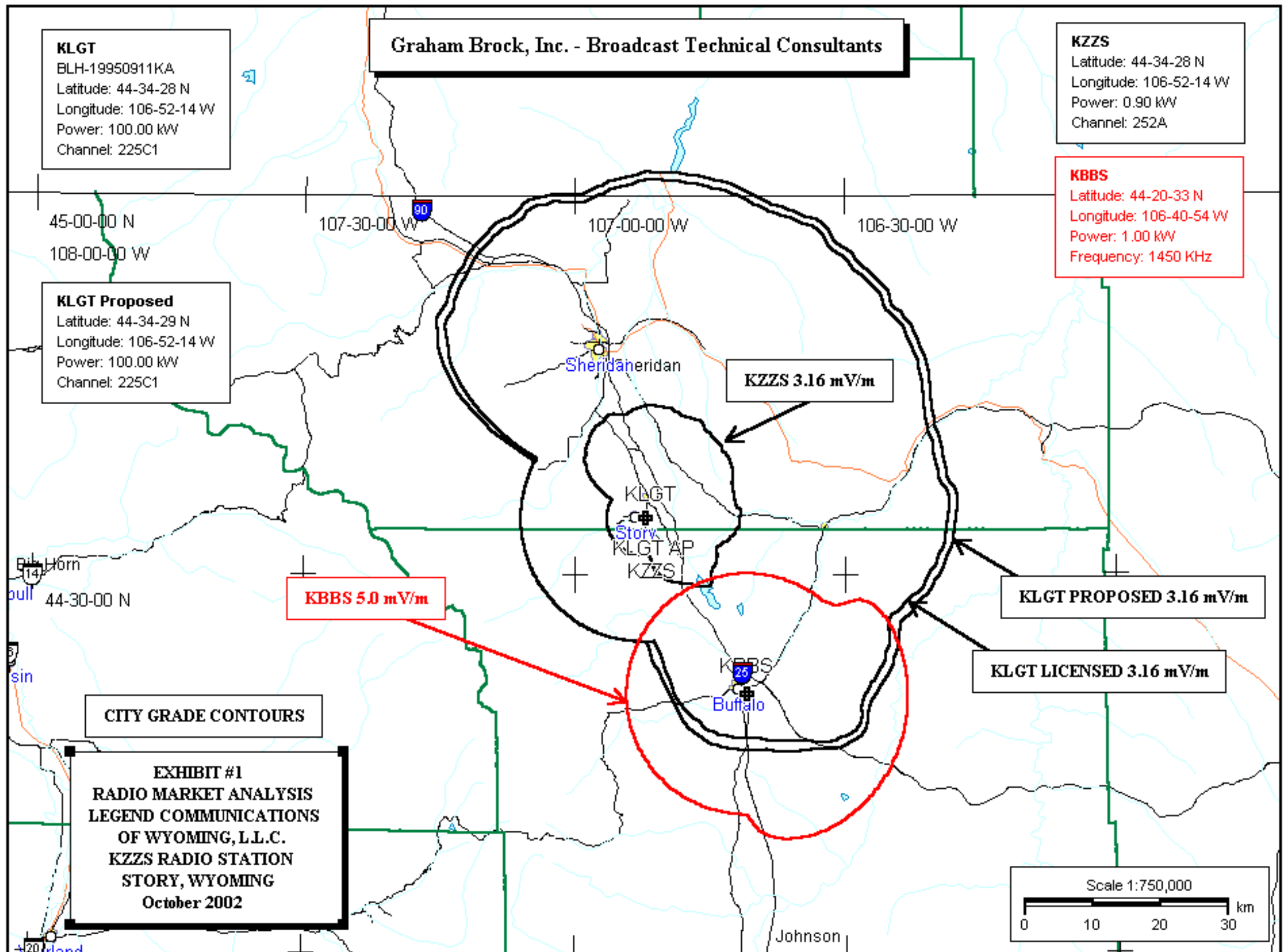
KLGT LICENSED 3.16 mV/m

CITY GRADE CONTOURS

**EXHIBIT #1**  
**RADIO MARKET ANALYSIS**  
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Scale 1:750,000

0 10 20 30 km



Graham Brock, Inc. - Broadcast Technical Consultants

RADIO MARKET BOUNDARY

45-00-00 N  
108-00-00 W

107-30-00 W

107-00-00 W

106-30-00 W

106-00-00 W

KROE  
Sheridan  
KWYO

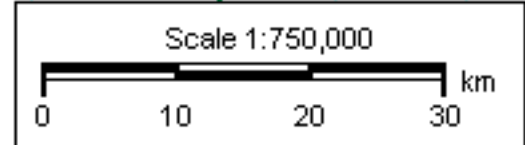
KLGT  
Story  
KZZS

KBBS  
Buffalo

KYTI/KZWY 3.16 mV/m

STATIONS IN RADIO MARKET

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

**Tabulation of Stations in Radio Market**

**AM Stations**

KROE	930 kHz	Sheridan, WY
KWYO	1410 kHz	Sheridan, WY
* KBBS	1450 kHz	Buffalo, WY

Total AM Stations - 3

**FM Stations**

* KLGT	Ch 225C1	Buffalo, WY
+ KYTI	Ch 229C	Sheridan, WY
+ KZWW	Ch 235C	Sheridan, WY
* KZZS	Ch 252C1	Story, WY

Total FM Stations - 4

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

- \* Subject station
- + City grade contour provides service to Radio Market