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## **MULTIPLE OWNERSHIP SERVICE CONTOUR ANALYSIS**

**Prepared for  
Richard Linn  
September 2015**

The attached analysis of compliance with the radio multiple ownership rules was prepared in accordance with the Rules and Regulations of the Federal Communications Commission, in connection with an application for a new FM station at Waldport, Oregon.

### **Unrated Market**

Waldport is located outside any Nielsen rated market. However, the proposed facility has principal community contour overlap with FM station KSHL Gleneden Beach, which is owned by Richard Linn's wife, Stephanie Linn. Out of an abundance of caution, and for the sake of a complete record, this exhibit assumes that KSHL is attributable.<sup>1</sup>

These stations operate outside any market rated by Nielsen. Therefore, analysis has been made consistent with the Commission's interim rules for unrated markets. The 70 dBu contours of FM stations were determined from the technical data contained in the most recent edition of the FCC FM Database. The listed antenna height above average terrain was used together with topographic data obtained from the digitized 30 second or 3 second database. The 5 mV/m daytime contours of AM stations were determined from the technical data contained in the most recent edition of the FCC AM Database. The listed antenna parameter information was used together with a digitized version of the FCC M-3 or Region II ground conductivity database.

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<sup>1</sup> KSHL holds a construction permit to relocate to Coburg, Oregon. The proposed Waldport facility does not have principal community contour overlap with the KSHL Coburg facility.

The service contours were plotted using correct map projection mathematics. Those stations whose transmitter sites are within the respective principal community service contours of the stations proposed to be commonly owned have only the sites rather than their contours shown. All contours and enclosed transmitter site locations have been labeled. A list of all stations considered is included with this statement.

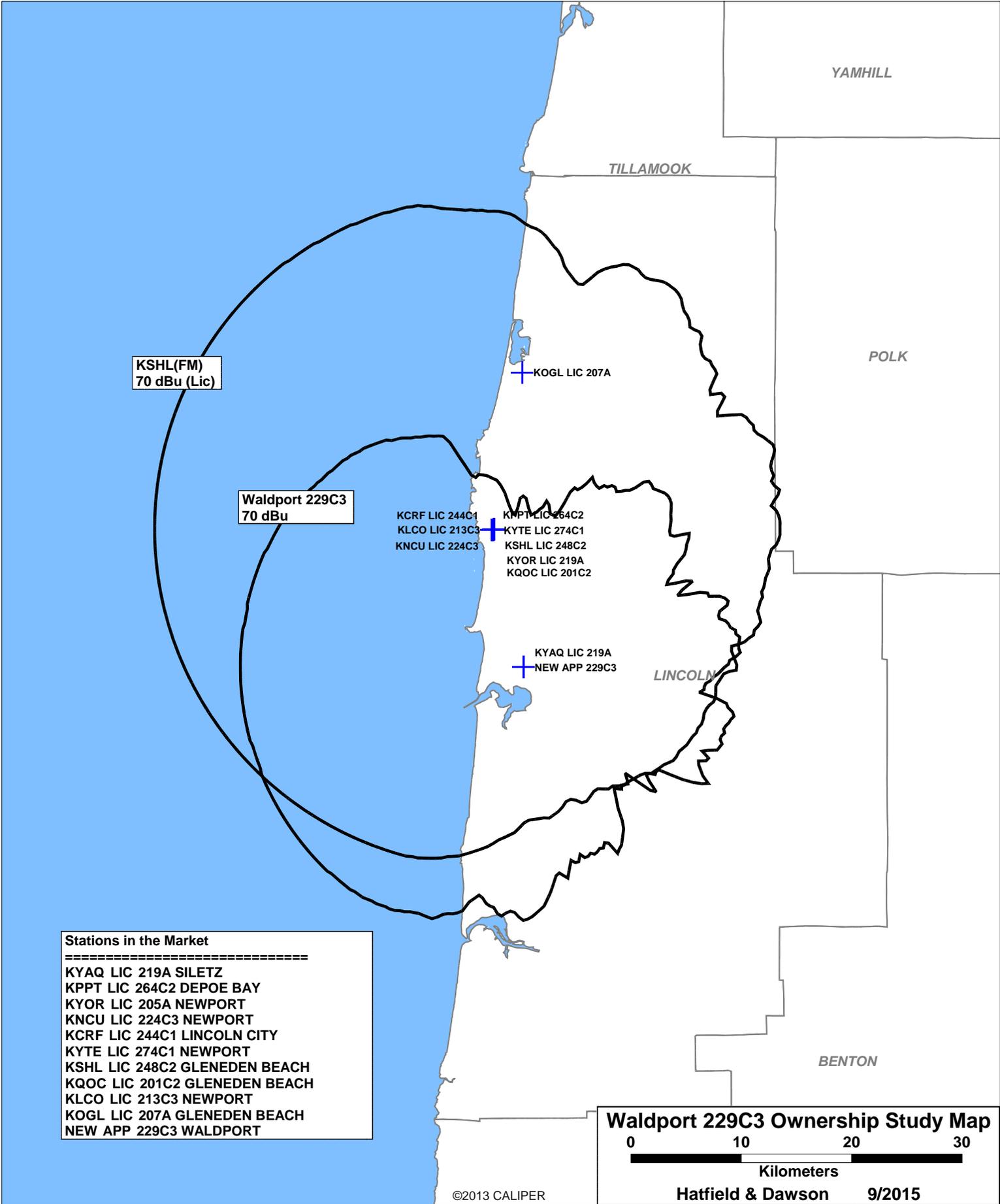
In counting stations providing service to the “market” defined by each of the discrete clusters formed in unrated markets, stations whose transmitter sites are located in excess of 92 km from the perimeter of the common overlap area have been excluded, as have other stations to be commonly-owned but which are not a part of the discrete cluster being studied.

This exhibit evidences at least the minimum number of stations necessary to demonstrate compliance with the rules concerning radio multiple ownership in unrated markets. In order to qualify for common ownership of this 0AM/2FM cluster, there must be at least 4 stations in the relevant “market”. This study demonstrates that there are at least 11 stations in the relevant market. (Indeed, additional AM and FM stations also provide service to this market, but have been omitted from this exhibit for the sake of clarity and simplicity.)

September 10, 2015

A handwritten signature in black ink, appearing to read "Erik C. Swanson". The signature is fluid and cursive, with the first name "Erik" and last name "Swanson" clearly distinguishable.

Erik C. Swanson



YAMHILL

TILLAMOOK

POLK

**KSHL(FM)  
70 dBu (Lic)**

+ **KOGL LIC 207A**

**Waldport 229C3  
70 dBu**

**KCRF LIC 244C1**    **KMPY LIC 264C2**  
**KLCO LIC 213C3**    **+ KYTE LIC 274C1**  
**KNCU LIC 224C3**    **KSHL LIC 248C2**  
**KYOR LIC 219A**  
**KQOC LIC 201C2**

+ **KYAQ LIC 219A**  
**NEW APP 229C3**

LINCOLN

- Stations in the Market**
- 
- KYAQ LIC 219A SILETZ
  - KPPT LIC 264C2 DEPOE BAY
  - KYOR LIC 205A NEWPORT
  - KNCU LIC 224C3 NEWPORT
  - KCRF LIC 244C1 LINCOLN CITY
  - KYTE LIC 274C1 NEWPORT
  - KSHL LIC 248C2 GLENEDEN BEACH
  - KQOC LIC 201C2 GLENEDEN BEACH
  - KLCO LIC 213C3 NEWPORT
  - KOGL LIC 207A GLENEDEN BEACH
  - NEW APP 229C3 WALDPOR

**Waldport 229C3 Ownership Study Map**

0      10      20      30

Kilometers

Hatfield & Dawson      9/2015