

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS

We propose to modify KYWD (FM) Green Valley, Arizona. A multiple ownership analysis was prepared considering radio stations under present or proposed common ownership, time brokerage or joint sales.ⁱ

Arbitron Market Study

In this application, we are proposing to change the facilities of Station KYWD (FM) Green Valley, Arizona. The community of license, Green Valley, Arizona, is in Pima County, which is part of the Tucson, AZ Arbitron Metro and thus KYWD (FM) is geographically located in this Arbitron Metro. KYWD (FM) is designated "home" to the Tucson, AZ Arbitron Metro; the number of stations owned by us in the Tucson, AZ Arbitron Metro is not changing by this application.

According to the FCC's local ownership "tiers," in a Metro reported by BIA as having 30 or more, and 44 or fewer commercial and noncommercial educational full-power radio stations, a party may have a cognizable interest in up to 7 commercial full-power radio stations, not more than 4 of which are in the same service(AM or FM) ⁱⁱ. This application complies with the multiple ownership rules because only 7 of 42 full-power radio stations (4 FM and 3 AM) will be attributable to us.

Interim Contour-Overlap Analysis

Because the principal community of KYWD (FM) and the communities of all commonly-owned or attributable stations with overlapping principal contours with KYWD (FM) are located inside an Arbitron Metro, an interim contour-overlap analysis is not required.

Respectfully Submitted,

Troy G. Langham

V.P. Technical Regulatory Affairs

27 February 2019

Table of stations considered being in the Tucson, AZ Arbitron Metroⁱⁱⁱ

Count	Calls	Band	Fac ID	Owner	Community
1	KTGV	FM	57504	Bustos Media Holdings LLC	Oracle
2	KVOI	AM	13969	Bustos Media Holdings LLC	Cortaro
3	KAIC	FM	78758	Calvary Chapel of Tucson Inc	Tucson
4	KCEE	AM	24590	Calvary Chapel of Tucson Inc	Tucson
5	KMIY	FM	53594	iHeartMedia Inc	Tucson
6	KNST	AM	53589	iHeartMedia Inc	Tucson
7	KOHT	FM	8143	iHeartMedia Inc	Marana
8	KRQQ	FM	53591	iHeartMedia Inc	Tucson
9	KTZR	AM	68316	iHeartMedia Inc	Tucson
10	KXEW	AM	8144	iHeartMedia Inc	South Tucson
11	KYWD	FM	24583	iHeartMedia Inc	Green Valley
12	KAZK	FM	176305	Cedar Cove Broadcasting Inc	Willcox
13	KKYZ	FM	2185	Cochise Broadcasting LLC	Sierra Vista
14	KXZK	FM	164116	Cochise Broadcasting LLC	Vail
15	KCUB	AM	56051	Cumulus Media Holdings Inc	Tucson
16	KHYT	FM	56053	Cumulus Media Holdings Inc	Tucson
17	KIIM-FM	FM	56052	Cumulus Media Holdings Inc	Tucson
18	KSZR	FM	39734	Cumulus Media Holdings Inc	Oro Valley
19	KTUC	AM	35684	Cumulus Media Holdings Inc	Tucson
20	KRDX	FM	36023	Desert West Air Ranchers Corp	Vail
21	KFLT	AM	20649	Family Life Broadcasting System	Tucson
22	KFLT-FM	FM	81952	Family Life Broadcasting System	Tucson
23	KQTH	FM	20403	Family Life Broadcasting System	Tucson
24	KXCI	FM	22167	Foundation for Creative Broadca Inc	Tucson
25	KWFM	AM	57503	Hudson Communications Incorporated	South Tucson
26	KSAZ	AM	51079	KASA Radio Hogar Inc	Marana
27	KGvy	AM	14662	KGvy LLC	Green Valley
28	KWCX-FM	FM	72659	KZLZ LLC	Willcox
29	KZLZ	FM	36022	KZLZ LLC	Casas Adobes
30	KCMT	FM	2746	Lotus Communications Corp	Green Valley
31	KFFN	AM	2433	Lotus Communications Corp	Tucson
32	KFMA	FM	87841	Lotus Communications Corp	Oro Valley
33	KLPX	FM	2745	Lotus Communications Corp	Tucson
34	KMXZ-FM	FM	2434	Lotus Communications Corp	Tucson
35	KTKT	AM	2744	Lotus Communications Corp	Tucson
36	KEVT	AM	19119	One Mart Corp	Sahuarita
37	KOHN	FM	122603	Tohono O'Odham Nation	Sells
38	KUAT-FM	FM	2732	University of Arizona Board of Regents	Tucson
39	KUAZ	AM	2723	University of Arizona Board of Regents	Tucson
40	KUAZ-FM	FM	3383	University of Arizona Board of Regents	Tucson

Count	Calls	Band	Fac ID	Owner	Community
41	KGMS	AM	53592	Wilkins Communications Network Inc	Tucson
42	KHIL	AM	72656	Willcox Radio LLC	Willcox

ⁱ None of the following stations are attributable by virtue of a time brokerage agreement or joint sales agreement

ⁱⁱ no person or single entity (or entities under common control) may have a cognizable interest in more than 50% of the full-power, commercial and noncommercial radio stations in such market unless the combination of stations comprises not more than one AM and one FM station.

ⁱⁱⁱ Source: BIA