

**TECHNICAL STATEMENT**  
**RADIO MULTIPLE OWNERSHIP ANALYSIS**

We propose to acquire Seattle, Washington stations KZOK-FM, KJAQ(FM) and KFNQ(AM). A multiple ownership analysis was prepared considering radio stations under present or proposed common ownership, time brokerage or joint sales. The table below reflects all radio stations under present or proposed common ownership, time brokerage or joint sales which are home to the Seattle-Tacoma, Washington Nielsen Radio Metro Market, and any commonly-owned or attributable stations with overlapping principal contours.

<b>Facility ID</b>	<b>Call Sign</b>	<b>Service</b>	<b>City</b>
6387	KFNQ	AM	Seattle
18523	KHHO	AM	Tacoma
48386	KJR	AM	Seattle
27020	KBKS-FM	FM	Tacoma
1091	KJAQ	FM	Seattle
48385	KJR-FM	FM	Seattle
48387	KPWK	FM	Seattle
20357	KZOK-FM	FM	Seattle
33829	KFOO	FM	Centralia
3915	KUBE	FM	Eatonville

**Arbitron Market Study**

All stations except KFOO are geographically located in the Seattle-Tacoma, Washington Nielsen Radio Metro Market. The total number of stations in the Metro is not changing by this application; at present there are 83 stations in the market as can be seen by reference to the attached Table of Stations.

According to the FCC's local ownership "tiers," in a Metro reported as having 45 or more commercial and noncommercial educational full-power radio stations, a party may have a cognizable interest in up to 8 commercial full-power radio stations, not more than 5 of which are in the same service (AM or FM). This application when considered alone does not comply with the multiple ownership rules; however, by virtue of a proposed divestiture transaction, stations KFOO(FM) and KUBE(FM) will no longer be attributable to us.

**Interim Contour-Overlap Analysis**

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

**Conclusion**

In the Arbitron Metro Market studied herein, there are at least 45 radio stations, including the subject commonly-owned stations. Upon completion of the divestiture of stations KFOO(FM) and KUBE(FM), only 3-AM and 5-FM stations will be attributable to us.

Based on the above, and with consideration of the divestiture of stations KFOO(FM) and KUBE(FM), it is concluded that the proposed acquisition complies with Section 73.3555(a) of the FCC Rules.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Troy Langham". The signature is written in a cursive, flowing style.

Troy G. Langham  
FCC Engineering Supervisor  
16 October 2017

**Table of Stations Considered Being in the Seattle-Tacoma, Washington Nielsen Radio Metro  
Market**

<b>Count</b>	<b>Call Sign</b>	<b>Service</b>	<b>Owner</b>
1	KXXO	FM	3 Cities Inc
2	KKDZ	AM	Akal Broadcasting Corporation
3	KZIZ	AM	Akal Broadcasting Corporation
4	KING-FM	FM	Beethoven
5	KBCS	FM	Bellevue College
6	KASB	FM	Bellevue School District 405
7	KWFJ	FM	Bible Broadcasting Network Inc
8	KYFQ	FM	Bible Broadcasting Network Inc
9	KBRD	AM	BJ & Skip's For The Music Foundation
10	KDDS-FM	FM	Bustos Media Holdings LLC
11	KMIA	AM	Bustos Media Holdings LLC
12	KKXA	AM	CAAM Partnership LLC
13	KBKS-FM	FM	iHeartMedia
14	KFOO	FM	iHeartMedia
15	KHHO	AM	iHeartMedia
16	KJR	AM	iHeartMedia
17	KJR-FM	FM	iHeartMedia
18	KPWK	FM	iHeartMedia
19	KUBE	FM	iHeartMedia
20	KLAY	AM	Clay Huntington Legacy LLC
21	KCIS	AM	CRISTA Media
22	KCMS	FM	CRISTA Media
23	KWPZ	FM	CRISTA Media
24	KARR	AM	Dalke, James A
25	KIRO	AM	Bonneville International Corporation
26	KIRO-FM	FM	Bonneville International Corporation
27	KTTH	AM	Bonneville International Corporation
28	KLSW	FM	Educational Media Foundation
29	KFNQ	AM	Entercom
30	KHTP	FM	Entercom
31	KISW	FM	Entercom
32	KJAQ	FM	Entercom
33	KKWF	FM	Entercom
34	KMPS-FM	FM	Entercom
35	KNDD	FM	Entercom
36	KZOK-FM	FM	Entercom
37	KAOS	FM	Evergreen State College
38	KNKX	FM	Friends of 88.5 FM

<b>Count</b>	<b>Call Sign</b>	<b>Service</b>	<b>Owner</b>
39	KPLI	FM	Friends of 88.5 FM
40	KEXP-FM	FM	Friends of KEXP
41	KGTK	AM	Gottlieb, Alan M.
42	KITZ	AM	Gottlieb, Alan M.
43	KGRG	AM	Green River College
44	KGRG-FM	FM	Green River College
45	KIXI	AM	Hubbard Radio LLC
46	KKNW	AM	Hubbard Radio LLC
47	KQMV	FM	Hubbard Radio LLC
48	KRWM	FM	Hubbard Radio LLC
49	KVRQ	FM	Hubbard Radio LLC
50	KBRO	AM	Iglesia Pentecostal Vispera Del Fin
51	KEJI	FM	Iglesia Pentecostal Vispera Del Fin
52	KLDY	AM	Iglesia Pentecostal Vispera Del Fin
53	KNTB	AM	Iglesia Pentecostal Vispera Del Fin
54	KBRC	AM	J & J Broadcasting Inc (WA)
55	KRIZ	AM	KRIZ Broadcasting Inc
56	KYIZ	AM	KRIZ Broadcasting Inc
57	KSER	FM	KSER Foundation
58	KXIR	FM	KSER Foundation
59	KMIH	FM	Mercer Island School District #400
60	KXPA	AM	MultiCultural Radio Broadcasting Inc
61	KRPA	AM	New Age Media Limited
62	KRXY	FM	Olympia Broadcasters Inc
63	KGHP	FM	Peninsula School District No. 401
64	KBLE	AM	Sacred Heart Radio Inc (WA)
65	KBUP	AM	Sacred Heart Radio Inc (WA)
66	KGNW	AM	Salem Media Group Inc
67	KKOL	AM	Salem Media Group Inc
68	KLFE	AM	Salem Media Group Inc
69	KNTS	AM	Salem Media Group Inc
70	KKMO	AM	Sea-Mar Community Health Center
71	KNHC	FM	Seattle Public Schools
72	KOMO	AM	Sinclair Broadcast Group Incorporated
73	KOMO-FM	FM	Sinclair Broadcast Group Incorporated
74	KPLZ-FM	FM	Sinclair Broadcast Group Incorporated
75	KVI	AM	Sinclair Broadcast Group Incorporated
76	KRKO	AM	SR Broadcasting Inc
77	KSUH	AM	Suh, Jean
78	KWYZ	AM	Suh, Jean
79	KMCQ	FM	Sunnylands Broadcasting LLC
80	KUPS	FM	University of Puget Sound

<b>Count</b>	<b>Call Sign</b>	<b>Service</b>	<b>Owner</b>
81	KUOW	AM	University of Washington
82	KUOW-FM	FM	University of Washington
83	KVTI	FM	Clover Park Technical College