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## MULTIPLE OWNERSHIP SERVICE CONTOUR ANALYSIS

Prepared for  
Townsquare Media Bozeman License, LLC  
July 2019

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 minor change applications for FM stations KMMS-FM, KISN, and KXLB, all three of which are licensed to Townsquare Media Bozeman License, LLC ("Townsquare")..

### Unrated Market

The three Townsquare stations which are proposed to be modified operate outside any Nielsen rated market, but have or will have principal community contour overlap with the following attributable stations.

<b>Station</b>	<b>Notes</b>
KMMS-FM 234C3 Bozeman	being modified
KISN 244C3 Belgrade	being modified
KXLB 264C1 Churchill	being modified
KZMY 278C1 Bozeman	
KMMS 1450 kHz Bozeman	
KPRK 1340 kHz Bozeman	no overlap with other Townsquare stations, once KMMS-FM, KISN, and KXLB are modified

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.

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.

The attached overview map demonstrates that the proposed KMMS-FM, KISN, and KXLB facilities form a single discrete cluster with the other attributable stations in the area. Principal community contour overlap with KPRK will be eliminated, and that station is depicted on this map only for the sake of a complete record. 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.

**Cluster A: KMMS(AM), KMMS-FM, KISN(FM), KXLB(FM), KZMY(FM)**

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 1AM/4FM cluster, there must be at least 15 stations in the relevant "market". This study demonstrates that there are at least 20 stations in the relevant market.

July 23, 2019

A handwritten signature in black ink, appearing to read "Erik C. Swanson", with a stylized, cursive script.

Erik C. Swanson

Hatfield & Dawson Consulting Engineers



