

### **Compliance with Multiple Ownership Rules**

In this application and a related application being filed concurrently, HBI Radio Bemidji, LLC (the “Assignee”) proposes to acquire the licenses of the following broadcast radio stations (collectively, the “Stations”):

From BG Broadcasting, Inc.

KKZY(FM), Bemidji, MN (FIN 77087)  
KLLZ-FM, Walker, MN (FIN 28656)  
WQXJ(FM), Blackduck, MN (FIN 165994)

From Paul Bunyan Broadcasting Co.

KBHP(FM), Bemidji, MN (FIN 51878)  
KBUN(AM), Bemidji, MN (FIN 51879)

This application is being filed concurrently with separate applications to assign the following radio stations to affiliates of Assignee:

KIKV-FM, Sauk Centre, MN (FIN 4336)  
KULO(FM), Alexandria, MN (FIN 23091)  
KLIZ-FM, Brainerd, MN (FIN 28654)  
WJJY-FM, Brainerd, MN (FIN 5394)  
KBLB(FM), Nisswa, MN (FIN 4337)  
KUAL-FM, Brainerd, MN (FIN 60495)  
KLIZ(AM), Brainerd, MN (FIN 28653)  
KVBR(AM), Brainerd, MN (FIN 60496)  
KKWS(FM), Wadena, MN (FIN 28650)  
KWAD(AM), Wadena, MN (FIN 28649)  
KNSP(AM), Staples, MN (FIN 30016)

This exhibit is being submitted to demonstrate that the proposed acquisition of the Stations complies with the FCC’s local radio ownership rule.<sup>1</sup>

Local Radio Ownership

None of the stations subject to these applications are home to any Arbitron market. Accordingly, compliance with the FCC’s local radio ownership limits was analyzed under the

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<sup>1</sup> The proposed assignment of the Stations includes an FM translator station, K235BP, Bemidji, MN (FIN 152419) (“K235BP”), currently licensed to Paul Bunyan Broadcasting Co. FM translator stations are not subject to the Commission’s multiple ownership rules, and therefore K235BP is not analyzed for purposes of this exhibit.

FCC Form 314 Assignment Application  
Section III - Assignee  
Question 6(b)  
Exhibit 18

FCC's interim contour overlap methodology. As shown in the attached Technical Statement prepared by du Treil, Lundin & Rackley, Inc., the proposed acquisition of the Stations by Assignee fully complies with the FCC's local radio ownership rule.

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
BEMIDJI, MINNESOTA  
MARKET AREA

This radio multiple ownership analysis was prepared concerning radio broadcast stations in the Bemidji, Minnesota market area. This analysis was prepared under the FCC interim contour analysis method.\* Considering all attributable radio stations in the area, the following stations were analyzed:

Call Sign	City of License	Facilities
KBUN/AM	Bemidji, MN	1450 kHz, 1 kW, U
KKZY/FM	Bemidji, MN	Ch. 238C1, 100 kW, 129 m
KLLZ/FM	Walker, MN	Ch. 256C1, 100 kW, 154 m (License) Ch. 256C1, 100 kW, 160 m (Application) <sup>†</sup>
KBHP/FM	Bemidji, MN	Ch. 266C1, 100 kW, 159 m
WQXJ/FM	Blackduck, MN	Ch. 283C3, 8.5 kW, 148 m
KKWS/FM	Wadena, MN	Ch. 290C1, 100 kW, 171 m

The principal community contours of all of these stations are depicted on a map included herein as Figure 1. The radio multiple ownership analysis considers only those stations with overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations). An ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

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\* See Report and Order and Notice of Proposed Rulemaking, MB Docket 02-277, FCC 03-127, Released July 2, 2003.

<sup>†</sup> See FCC File No. BPH-20141104ABW.

Radio Markets

The “radio market” applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. As listed in the table below, there are three defined “radio markets” formed by the subject stations:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
1	KBUN	KKZY, KLLZ (Lic.), KBHP, WQXJ
2	KBUN	KKZY, KLLZ (App.), KBHP, WQXJ
3	--	KLLZ (Lic.), KKWS

Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating stations that have principal community contours that intersect the principal community contours that define the radio market. Only those stations located within 92 km of the perimeter of the mutual overlap area of the defined market area were employed in the count of stations. Commonly owned stations, other than those that form the market in question were not considered in the count of stations in the defined market. The results of the analysis are tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	6 AM; 20 FM; 26 Total
Market 2	6 AM; 19 FM; 25 Total
Market 3	7 AM; 24 FM; 31 Total

Tabulations of the radio stations identified in the defined radio markets are included with this statement. Only known licensed, operating stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's AM database and the appropriate Ground Wave Field Strength versus Distance Graph described in Section 73.184 of the FCC Rules. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method outlined in Section 73.313 of the FCC Rules. Terrain data were derived from the U.S.G.S. 3-second computer database for each of the FM stations using radials evenly-spaced every 5 degrees of azimuth.

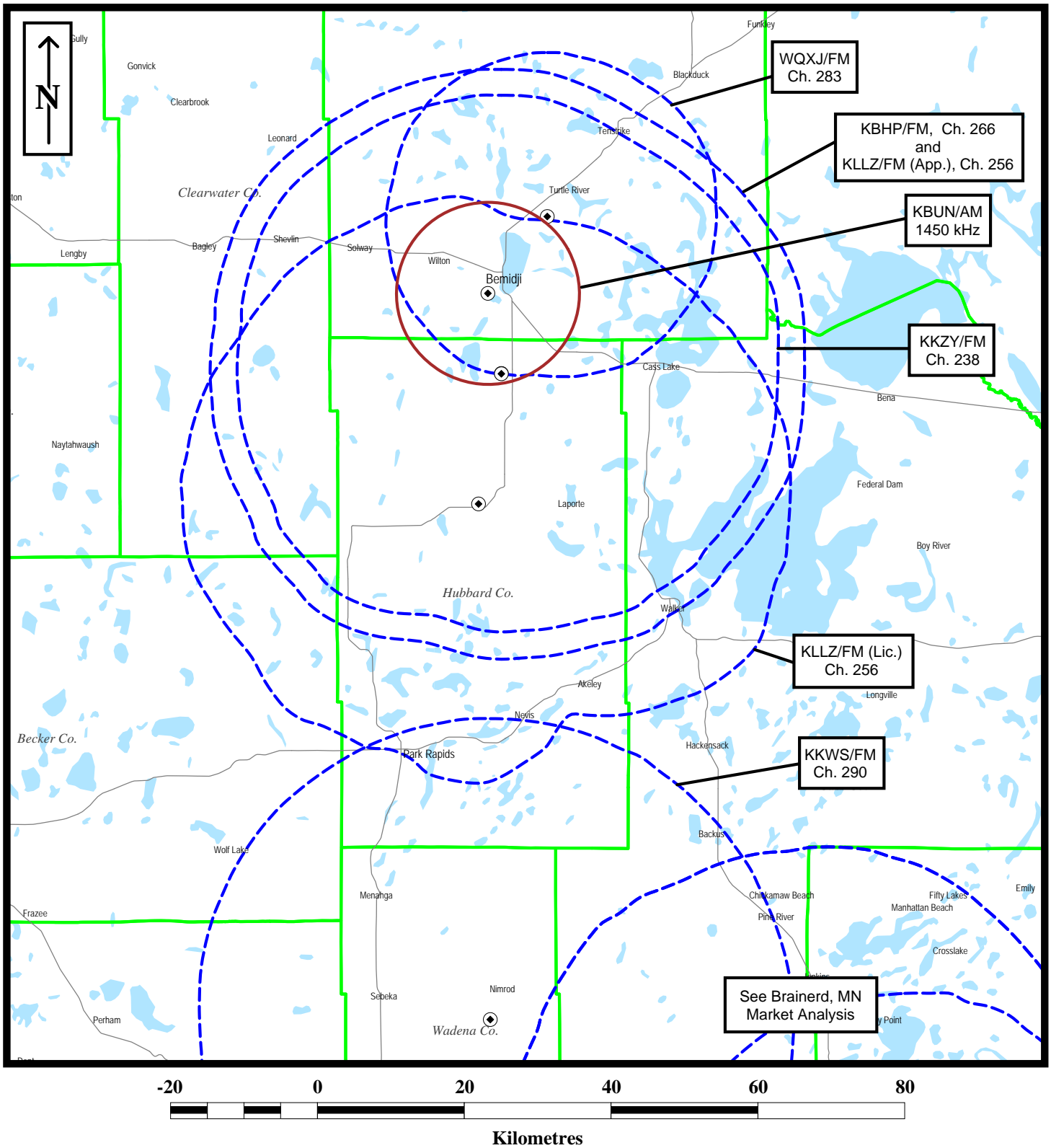
Based on the above, it is concluded that the proposed combination of the stations to be owned complies with Section 73.3555(a) of the FCC Rules.



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November 6, 2014



## PREDICTED PRINCIPAL COMMUNITY CONTOURS

### BEMIDJI, MINNESOTA MARKET

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
BEMIDJI, MINNESOTA MARKET AREA

Call Sign	City	State	Frequency		Call Sign	City	State	Frequency
WBKK	WILTON	MN	820					
KPRM	PARK RAPIDS	MN	870					
KPMI	BEMIDJI	MN	1300					
KKBJ	BEMIDJI	MN	1360					
KBUN	BEMIDJI	MN	1450					
KAKK	WALKER	MN	1570					

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
BEMIDJI, MINNESOTA MARKET AREA

Call Sign	City	State	Channel		Call Sign	City	State	Channel
KCRB-FM	BEMIDJI	MN	203					
WYNJ	BLACKDUCK	MN	208					
KBSB	BEMIDJI	MN	209					
KKWE	WHITE EARTH	MN	210					
KOJB	CASS LAKE	MN	211					
KBXE	BAGLEY	MN	213					
KNBJ	BEMIDJI	MN	217					
WMIS-FM	BLACKDUCK	MN	221					
KXKK	PARK RAPIDS	MN	223					
KKZY	BEMIDJI	MN	238					
KKCQ-FM	BAGLEY	MN	244					
KDKK	PARK RAPIDS	MN	248					
WBJI	BLACKDUCK	MN	252					
KLLZ (Lic)	WALKER	MN	256					
KBHP	BEMIDJI	MN	266					
KQKK	WALKER	MN	270					
KKWB	KELLIHER	MN	273					
KKBJ-FM	BEMIDJI	MN	279					
WQXJ	BLACKDUCK	MN	283					
KKEQ	FOSSTON	MN	296					



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KPRM	PARK RAPIDS	MN	870					
KPMI	BEMIDJI	MN	1300					
KKBJ	BEMIDJI	MN	1360					
KBUN	BEMIDJI	MN	1450					
KAKK	WALKER	MN	1570					

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WYNJ	BLACKDUCK	MN	208					
KBSB	BEMIDJI	MN	209					
KOJB	CASS LAKE	MN	211					
KBXE	BAGLEY	MN	213					
KNBJ	BEMIDJI	MN	217					
WMIS-FM	BLACKDUCK	MN	221					
KXKK	PARK RAPIDS	MN	223					
KKZY	BEMIDJI	MN	238					
KKCQ-FM	BAGLEY	MN	244					
KDKK	PARK RAPIDS	MN	248					
WBJI	BLACKDUCK	MN	252					
KLLZ (App)	WALKER	MN	256					
KBHP	BEMIDJI	MN	266					
KQKK	WALKER	MN	270					
KKWB	KELLIHER	MN	273					
KKBJ-FM	BEMIDJI	MN	279					
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Call Sign	City	State	Frequency		Call Sign	City	State	Frequency
WBKK	WILTON	MN	820					
KPRM	PARK RAPIDS	MN	870					
KVKK	VERNDALE	MN	1070					
WWWI	BAXTER	MN	1270					
KPMI	BEMIDJI	MN	1300					
KKBJ	BEMIDJI	MN	1360					
KAKK	WALKER	MN	1570					

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Call Sign	City	State	Channel		Call Sign	City	State	Channel
KBPN	BRAINERD	MN	202					
KCRB-FM	BEMIDJI	MN	203					
KOPJ	SEBEKA	MN	207					
KBSB	BEMIDJI	MN	209					
KKWE	WHITE EARTH	MN	210					
KOJB	CASS LAKE	MN	211					
KBXE	BAGLEY	MN	213					
KBPR	BRAINERD	MN	214					
KNBJ	BEMIDJI	MN	217					
WMIS-FM	BLACKDUCK	MN	221					
KXKK	PARK RAPIDS	MN	223					
KSKK	STAPLES	MN	234					
KDKK	PARK RAPIDS	MN	248					
WBJI	BLACKDUCK	MN	252					
KLLZ (Lic)	WALKER	MN	256					
KPRW	PERHAM	MN	258					
KLKS	PEQUOT LAKES	MN	261					
KQKK	WALKER	MN	270					
KKWB	KELLIHER	MN	273					
KTIG	PEQUOT LAKES	MN	274					
KKBJ-FM	BEMIDJI	MN	279					
WZFJ	BREEZY POINT	MN	282					
KKWS	WADENA	MN	290					
KKEQ	FOSSTON	MN	296					