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## **MULTIPLE OWNERSHIP SERVICE CONTOUR ANALYSIS**

**Prepared for  
Puget Sound Broadcasting, LLC  
May 2005**

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 a minor change application for station KAYO-FM (Facility ID #33622).

### **Rated Market Analysis**

The only attributable station with which the proposed KAYO-FM facility has principal community contour overlap is KFMY(FM) Channel 249C1 Raymond, with a pending application on Channel 249C at Oakville. Both stations are listed by BIA as "home" to the Seattle-Tacoma Arbitron Metro.

In order to qualify for common ownership of this 2FM cluster, there must be at least four stations in the relevant market. The attached BIA market definition indicates that there are 73 stations in the Seattle-Tacoma market. (FM station KMIH is also included in the BIA material, but is a Class D secondary station.)

### **Unrated Market Analysis**

For the sake of a complete record, since neither Elma, Raymond, nor Oakdale is located within the Seattle-Tacoma Arbitron Metro, an ownership 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.

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 do not have overlap with 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 2FM cluster, there must be at least four stations in the relevant "market". This study demonstrates that there are at least 11 stations in the relevant market.

May 24, 2005

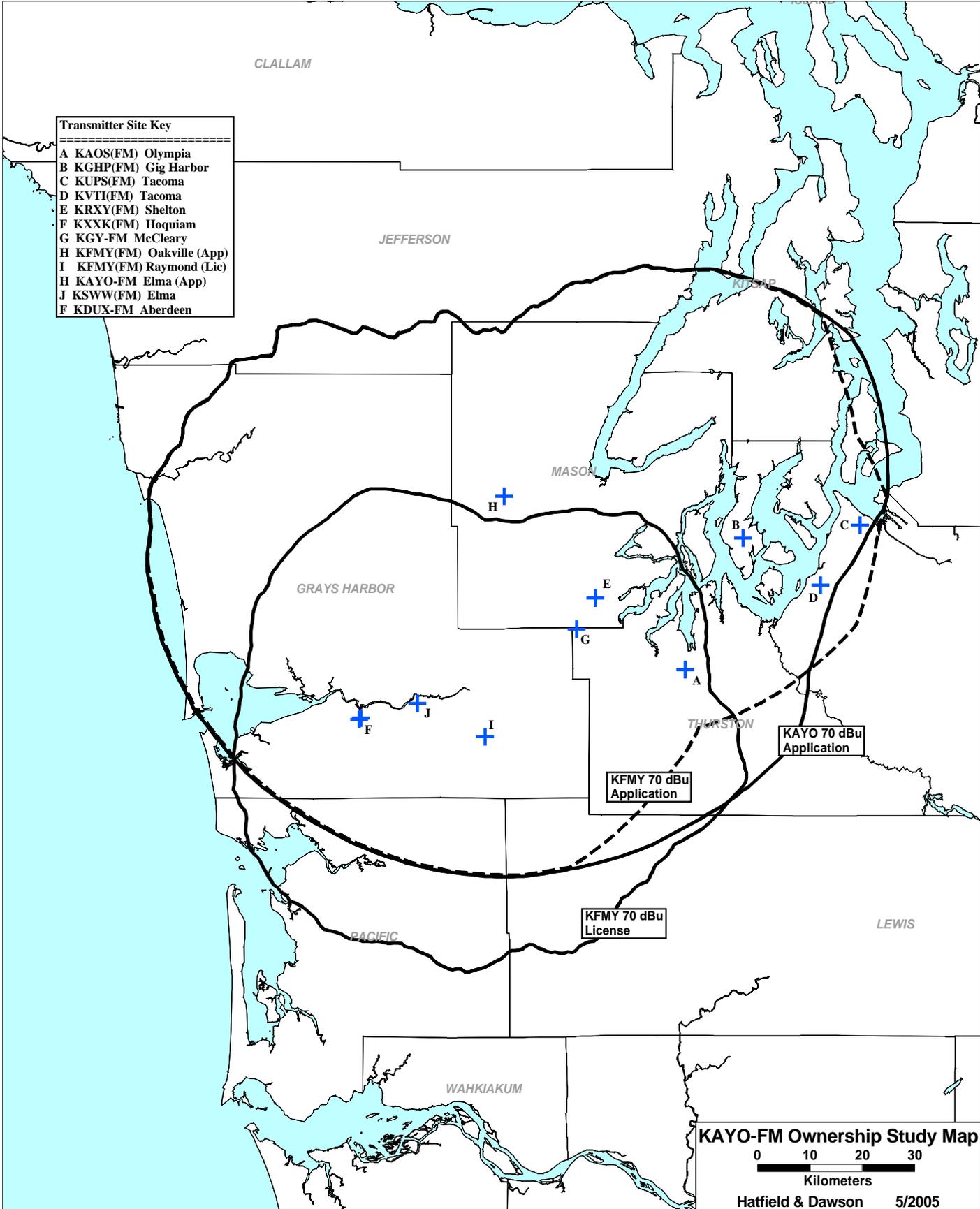
A handwritten signature in black ink, appearing to read "Erik C. Swanson". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Erik C. Swanson

**FM STATIONS WITH 70 dBu CONTOURS OVERLAPPING  
70 dBu CONTOURS OF KFMY (Lic + App), KAYO**

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude
=====					
KAOS LIC	OLYMPIA WA	BLED011228AAV	207A 89.3	1.250 74.0	47-00-58 122-54-57
KGHP LIC	GIG HARBOR WA	BLED880425KA	210A 89.9	1.500 DA 58.0	47-14-29 122-46-14
KUPS LIC	TACOMA WA	BMLED950711KE	211A 90.1	0.100 70.0	47-15-48 122-28-37
KVTI LIC	TACOMA WA	BLED910510KA	215C1 90.9	51.000 111.0	47-09-39 122-34-35
KRXY LIC	SHELTON WA	BLH981120KF	233A 94.5	0.710 291.0	47-08-18 123-08-28
KXXX LIC	HOQUIAM WA	BMLH960226KA	237A 95.3	3.000 137.0	46-55-53 123-44-02
KGY-FM LIC	MCCLEARY WA	BLH921109KE	245C3 96.9	2.350 322.0	47-05-08 123-11-19
KFMY LIC	RAYMOND WA	BLH011101ACQ	249C1 97.7	44.000 DA 403.0	46-54-05 123-25-07
KFMY APP	OAKVILLE WA		249C 97.7	60.000 DA 756.0	47-18-46 123-22-15
KAYO-FM APP	ELMA WA		257C 99.3	64.000 DA 742.0	47-18-46 123-22-15
KSWW LIC	ELMA WA	BLH980730KA	271C3 102.1	25.000 98.0	46-57-31 123-35-18
KDUX-FM LIC	ABERDEEN WA	BMLH990125KC	284C2 104.7	31.000 110.0	46-56-00 123-43-49

Transmitter Site Key	
A	KAOS(FM) Olympia
B	KGHP(FM) Gig Harbor
C	KUPS(FM) Tacoma
D	KVTI(FM) Tacoma
E	KRXY(FM) Shelton
F	KXXX(FM) Hoquiam
G	KGY-FM McCleary
H	KFMY(FM) Oakville (App)
I	KFMY(FM) Raymond (Lic)
H	KAYO-FM Elma (App)
J	KSWW(FM) Elma
F	KDUX-FM Aberdeen



**KAYO-FM Ownership Study Map**  
 0 10 20 30  
 Kilometers  
 Hatfield & Dawson 5/2005



## FCC Geographic Market Definition for Seattle-Tacoma, WA

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designn Date	Home Mkt Rank	Owner	City & State of License	County of License
KKMO	AM	1360	C	Ethnic	Seattle-Tacoma, WA	07/02/2003	14	Salem Communications Corporation	Tacoma, WA	Pierce
KDDS	AM	1210	C	Mexican	Seattle-Tacoma, WA	07/02/2003	14	Bustos Media Enterprises LLC	Auburn-Federal Way, WA	King
KAYO	FM	99.3	C	Country	Seattle-Tacoma, WA	07/02/2003	14	South Sound Broadcasting, LLC	Elma, WA	Grays Harbor
KRKO	AM	1380	C	Talk/Sprts	Seattle-Tacoma, WA	07/02/2003	14	SR Broadcasting Inc	Everett, WA	Snohomish
KBLE	AM	1050	C	Christian	Seattle-Tacoma, WA	07/02/2003	14	Sacred Heart Radio	Seattle, WA	King
KMTT	FM	103.7	C	Adult Rock	Seattle-Tacoma, WA	07/02/2003	14	Entercom	Tacoma, WA	Pierce
KBRO	AM	1490	C	Talk	Seattle-Tacoma, WA	07/02/2003	14	FTP Corporation	Bremerton, WA	Kitsap
KCIS	AM	630	C	Inspiration	Seattle-Tacoma, WA	07/02/2003	14	Crista Ministries	Edmonds, WA	Snohomish
KCMS	FM	105.3	C	ChrsContem	Seattle-Tacoma, WA	07/02/2003	14	Crista Ministries	Edmonds, WA	Snohomish
KENU	AM	1330	C	Dance	Seattle-Tacoma, WA	07/02/2003	14	Green River Foundation	Enumclaw, WA	King
KWJZ	FM	98.9	C	Smooth	Seattle-Tacoma, WA	07/02/2003	14	Sandusky Radio	Seattle, WA	King
KGy	AM	1240	C	AC	Seattle-Tacoma, WA	07/02/2003	14	Kerry, Barbara	Olympia, WA	Thurston
KRWM	FM	106.9	C	Soft AC	Seattle-Tacoma, WA	07/02/2003	14	Sandusky Radio	Bremerton, WA	Kitsap
KPTK	AM	1090	C	Country	Seattle-Tacoma, WA	07/02/2003	14	Infinity Broadcasting	Seattle, WA	King
KING	FM	98.1	C	Classical	Seattle-Tacoma, WA	07/02/2003	14	Beethoven	Seattle, WA	King
KIRO	AM	710	C	Nws/Tlk/Spt	Seattle-Tacoma, WA	07/02/2003	14	Entercom	Seattle, WA	King
KWDB	AM	1110	C	AC	Seattle-Tacoma, WA	07/02/2003	14	West Beach Broadcasting	Oak Harbor, WA	Island
KISW	FM	99.9	C	Rock	Seattle-Tacoma, WA	07/02/2003	14	Entercom	Seattle, WA	King
KJR	FM	95.7	C	Clsc Hits	Seattle-Tacoma, WA	07/02/2003	14	Clear Channel Communications	Seattle, WA	King
KLFE	AM	1590	C	Chrst/Talk	Seattle-Tacoma, WA	07/02/2003	14	Salem Communications Corporation	Seattle, WA	King
KJR	AM	950	C	Sports	Seattle-Tacoma, WA	07/02/2003	14	Clear Channel Communications	Seattle, WA	King
KSUH	AM	1450	C	Korean	Seattle-Tacoma, WA	07/02/2003	14	Suh, Jean	Puyallup, WA	Pierce
KKDZ	AM	1250	C	Children	Seattle-Tacoma, WA	07/02/2003	14	ABC/Disney	Seattle, WA	King
KNTB	AM	1480	C	Variety	Seattle-Tacoma, WA	07/02/2003	14	FTP Corporation	Lakewood, WA	Snohomish
KXPA	AM	1540	C	Divrs/Ethnc	Seattle-Tacoma, WA	07/02/2003	14	Multicultural Radio Broadcasting Inc	Bellevue, WA	King
KLSY	FM	92.5	C	AC	Seattle-Tacoma, WA	07/02/2003	14	Sandusky Radio	Bellevue, WA	King
KWPZ	FM	106.5	C	ChrsContem	Seattle-Tacoma, WA	07/02/2003	14	Crista Ministries	Lynden, WA	Whatcom
KKOL	AM	1300	C	Talk	Seattle-Tacoma, WA	07/02/2003	14	Salem Communications Corporation	Seattle, WA	King
KMPS	FM	94.1	C	Country	Seattle-Tacoma, WA	07/02/2003	14	Infinity Broadcasting	Seattle, WA	King
KBSG	FM	97.3	C	Oldies	Seattle-Tacoma, WA	07/02/2003	14	Entercom	Tacoma, WA	Pierce
KOMO	AM	1000	C	News	Seattle-Tacoma, WA	07/02/2003	14	Fisher Communications Inc	Seattle, WA	King
KPLZ	FM	101.5	C	Hot AC	Seattle-Tacoma, WA	07/02/2003	14	Fisher Communications Inc	Seattle, WA	King
KGTK	AM	920	C	Oldies	Seattle-Tacoma, WA	07/02/2003	14	Gottlieb, Alan M.	Olympia, WA	Thurston
KKNW	AM	1150	C	Talk	Seattle-Tacoma, WA	07/02/2003	14	Sandusky Radio	Seattle, WA	King

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for Seattle-Tacoma, WA

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KRQI	FM	96.5	C	Alternative	Seattle-Tacoma, WA	07/02/2003	14	Infinity Broadcasting	Seattle, WA	King
KNDD	FM	107.7	C	Alternative	Seattle-Tacoma, WA	07/02/2003	14	Entercom	Seattle, WA	King
KRIZ	AM	1420	C	R&B Oldies	Seattle-Tacoma, WA	07/02/2003	14	KRIS Bennett Broadcasting	Renton, WA	King
KBKS	FM	106.1	C	AC	Seattle-Tacoma, WA	07/02/2003	14	Infinity Broadcasting	Tacoma, WA	Pierce
KQBZ	FM	100.7	C	Talk	Seattle-Tacoma, WA	07/02/2003	14	Entercom	Seattle, WA	King
KFMY	FM	97.7	C	Clisc Hits	Seattle-Tacoma, WA	10/29/2004	14	South Sound Broadcasting, LLC	Raymond, WA	Pacific
KHHO	AM	850	C	Sports	Seattle-Tacoma, WA	07/02/2003	14	Clear Channel Communications	Tacoma, WA	Pierce
KUBE	FM	93.3	C	CHR	Seattle-Tacoma, WA	07/02/2003	14	Clear Channel Communications	Seattle, WA	King
KUOW	FM	94.9	NC	News/Info	Seattle-Tacoma, WA	07/02/2003	14	University of Washington	Seattle, WA	King
KVI	AM	570	C	Talk	Seattle-Tacoma, WA	07/02/2003	14	Fisher Communications Inc	Seattle, WA	King
KWYZ	AM	1230	C	Korean	Seattle-Tacoma, WA	07/02/2003	14	Suh, Jean	Everett, WA	Snohomish
KTTH	AM	770	C	Talk	Seattle-Tacoma, WA	07/02/2003	14	Entercom	Seattle, WA	King
KZOK	FM	102.5	C	Clisc Rock	Seattle-Tacoma, WA	07/02/2003	14	Infinity Broadcasting	Seattle, WA	King
KLDY	AM	1280	NC	Classical	Seattle-Tacoma, WA	07/02/2003	14	Marrow, Skip	Lacey, WA	Thurston
KZIZ	AM	1560	C	Gospel	Seattle-Tacoma, WA	07/02/2003	14	KRIS Bennett Broadcasting	Pacific, WA	Pierce
KVSN	AM	1340	C	Christian	Seattle-Tacoma, WA	07/02/2003	14	Evergreen Broadcasting Inc	Tumwater, WA	Thurston
KXXO	FM	96.1	C	Soft AC	Seattle-Tacoma, WA	07/02/2003	14	3 Cities Inc	Olympia, WA	Thurston
KBRD	AM	680	NC	Nostalgia	Seattle-Tacoma, WA	07/02/2003	14	Marrow, Skip	Lacey, WA	Thurston
KITZ	AM	1400	C	Talk	Seattle-Tacoma, WA	07/02/2003	14	Gottlieb, Alan M.	Silverdale, WA	Kitsap
KGW	AM	820	C	Chrst/Talk	Seattle-Tacoma, WA	07/02/2003	14	Salem Communications Corporation	Burien-Seattle, WA	King
KIXI	AM	880	C	Nostalgia	Seattle-Tacoma, WA	07/02/2003	14	Sandusky Radio	Mercer Island, WA	King
KFNK	FM	104.9	C	Rock	Seattle-Tacoma, WA	07/02/2003	14	Clear Channel Communications	Eatonville, WA	Pierce
KLAY	AM	1180	C	Nws/Tlk/Spt	Seattle-Tacoma, WA	07/02/2003	14	Clay Huntington	Lakewood, WA	Snohomish
KARR	AM	1460	C	Religion	Seattle-Tacoma, WA	07/02/2003	14	Family Stations Inc	Kirkland, WA	King
KMIH	FM	104.5	NC	CHR	Seattle-Tacoma, WA	07/02/2003	14	Mercer Island School District #400	Mercer Island, WA	King
KAOS	FM	89.3	NC	Variety	Seattle-Tacoma, WA	07/02/2003	14	Evergreen State College	Olympia, WA	Thurston
KASB	FM	89.3	NC	Alternative	Seattle-Tacoma, WA	07/02/2003	14	Bellevue School District 405	Bellevue, WA	King
KBCS	FM	91.3	NC	Variety	Seattle-Tacoma, WA	07/02/2003	14	Bellevue Community College	Bellevue, WA	King
KXOT	FM	91.7	NC	Variety	Seattle-Tacoma, WA	07/02/2003	14	Public Radio Capital Inc	Tacoma, WA	Pierce
KEXP	FM	90.3	NC	Variety	Seattle-Tacoma, WA	07/02/2003	14	University of Washington	Seattle, WA	King
KGHP	FM	89.9	NC	AAA	Seattle-Tacoma, WA	07/02/2003	14	Peninsula School District No. 401	Gig Harbor, WA	Pierce
KGRG	FM	89.9	NC	Alternative	Seattle-Tacoma, WA	07/02/2003	14	Green River Foundation	Auburn, WA	King
KNHC	FM	89.5	NC	Top40/Danc	Seattle-Tacoma, WA	07/02/2003	14	Seattle Public Schools	Seattle, WA	King
KPLU	FM	88.5	NC	Jazz	Seattle-Tacoma, WA	07/02/2003	14	Pacific Lutheran University	Tacoma, WA	Pierce

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KSER	FM	90.7	NC	Variety	Seattle-Tacoma, WA	07/02/2003	14	KSER Foundation	Everett, WA	Snohomish
KUPS	FM	90.1	NC	AOR	Seattle-Tacoma, WA	07/02/2003	14	University of Puget Sound	Tacoma, WA	Pierce
KVTI	FM	90.9	NC	CHR	Seattle-Tacoma, WA	07/02/2003	14	Clover Park Technical College	Tacoma, WA	Pierce
KWFJ	FM	89.7	NC	Christian	Seattle-Tacoma, WA	07/02/2003	14	Calvary Baptist Church	Roy, WA	Pierce
KYIZ	AM	1620	C	Urban CHR	Seattle-Tacoma, WA	07/02/2003	14	KRIZ Broadcasting Inc	Renton, WA	King
KTFH	AM	1680	C	Ethnic	Seattle-Tacoma, WA	07/02/2003	14	Salem Communications Corporation	Seattle, WA	King

Number of Stations in Geographic Market 74

Previous Stations in Geographic Market

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