

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
ALWAYSMOUNTAINTIME, LLC
ASPEN ET AL., COLORADO

This radio multiple ownership analysis was prepared on behalf of AlwaysMountainTime, LLC in regard to the proposed acquisition of stations in the Aspen, Colorado 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
KRKY(AM)	Granby, CO	930 kHz, 0.121 kW-N, 4.5 kW-D, U
KTUN(FM)	New Castle, CO	Ch. 233C3, 25 kW, -121 m
KQSE(FM)	Gypsum, CO	Ch. 273C3, 1.35 kW, 660 m
KFMU-FM	Oak Creek, CO	Ch. 281C3, 1.4 kW, 327 m
KIDN-FM	Hayden, CO	Ch. 240C3, 6 kW, 198 m
KKCH(FM)	Glenwood Springs, CO	Ch. 224C, 56 kW, 763 m
KSKE-FM	Eagle, CO	Ch. 269C1, 12 kW, 667 m
KSMT(FM)	Breckenridge, CO	Ch. 271A, 6 kW, -64 m
KSPN-FM	Aspen, CO	Ch. 276A, 3 kW, -26 m
KNFO(FM)	Basalt, CO	Ch. 291A, 1.6 kW, 111 m
KQZR(FM)	Hayden, CO	Ch. 297C2, 29 kW, 198 m
KIFT(FM)	Kremmling, CO	Ch. 292C2, 50 kW, 150 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

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

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.

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 nine defined “radio markets” formed by the subject stations:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
1	--	KSKE, KKCH, KTUN
2	--	KNFO, KSPN, KSKE, KKCH
3	--	KIFT, KSKE, KKCH, KQSE
4	--	KSMT, KSKE
5	KRKY	KSMT, KIFT
6	--	KSKE, KFMU
7	--	KIFT, KFMU
8	--	KQZR, KIDN, KFMU
9	KRKY	KIFT, KSKE

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	3 AM; 25 FM; 28 Total
Market 2	3 AM; 26 FM; 29 Total
Market 3	4 AM; 28 FM; 32 Total
Market 4	1 AM; 21 FM; 22 Total
Market 5	4 AM; 18 FM; 22 Total
Market 6	4 AM; 27 FM; 31 Total
Market 7	3 AM; 14 FM; 17 Total
Market 8	2 AM; 12 FM; 14 Total
Market 9	4 AM; 22 FM; 26 Total

Figure 2 is a tabulation of the radio stations identified in the defined radio market. 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.

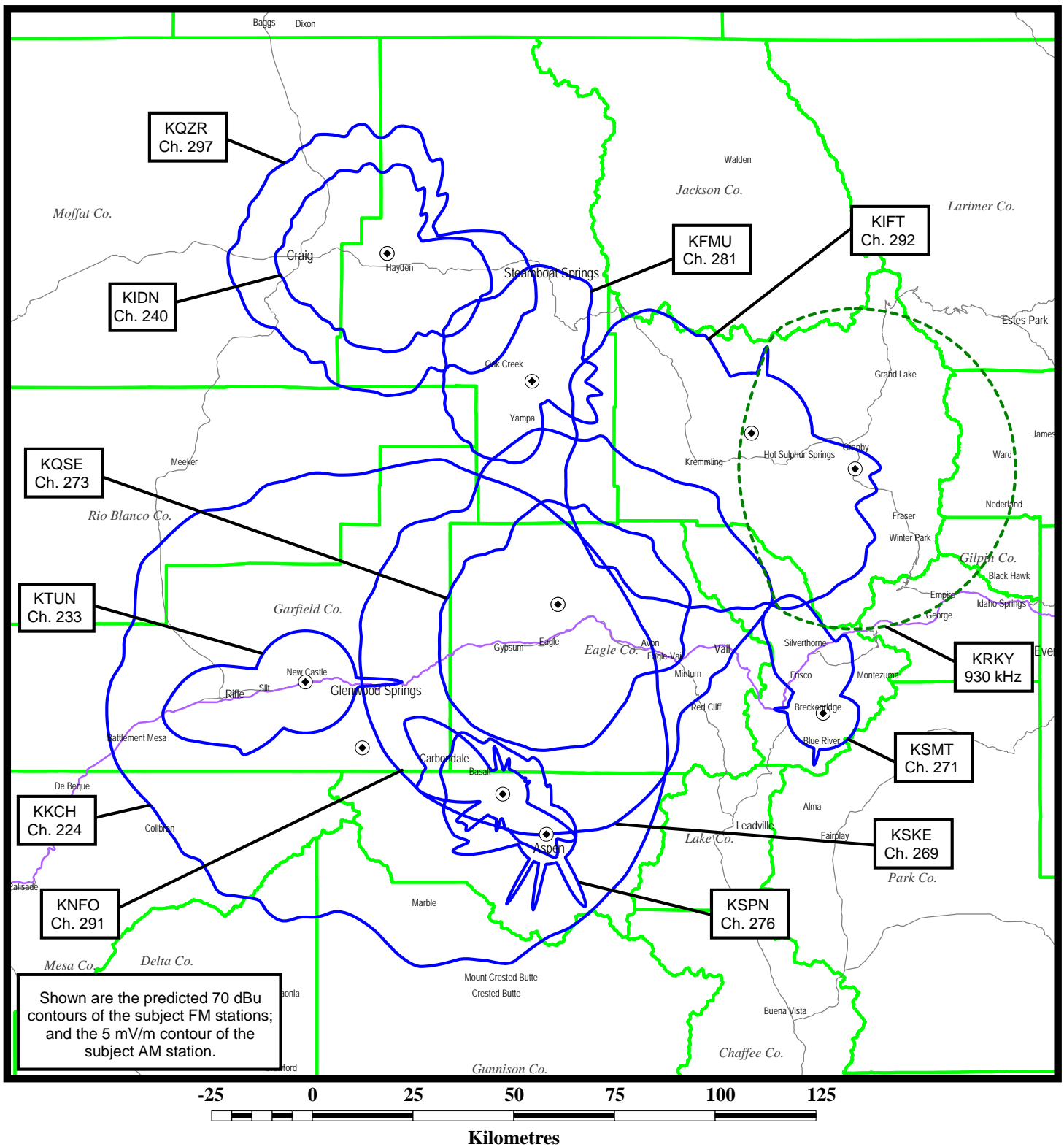
Based on the above, it is concluded that the proposed combination of the stations to be owned complies with Section 73.3555(a) of the FCC Rules.

A handwritten signature in black ink, appearing to read "Louis R. du Treil, Jr.", written in a cursive style.

Louis R. du Treil, Jr.

du Treil, Lundin & Rackley, Inc.
201 Fletcher Ave.
Sarasota, Florida 34237

December 9, 2013



PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

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Tabulation of Stations in Radio Markets

Market 1	
Number	Station
AM Stations	
1	KVLE, VAIL, CO, 610 kHz
2	KRGS, RIFLE, CO, 690 kHz
3	KGLN, GLENWOOD SPRINGS, CO, 980 kHz
FM Stations	
1	KDNK, GLENWOOD SPRINGS, CO, Ch. 201
2	KVJZ, VAIL, CO, Ch. 203
3	KCJX, CARBONDALE, CO, Ch. 205
4	KPRE, VAIL, CO, Ch. 210
5	KVOV, CARBONDALE, CO, Ch. 213
6	KVNC, MINTURN, CO, Ch. 214
7	KLRY, GYPSUM, CO, Ch. 217
8	KAJX, ASPEN, CO, Ch. 218
9	KLXV, GLENWOOD SPRINGS, CO, Ch. 220
10	KKCH, GLENWOOD SPRINGS, CO, Ch. 224
11	KTND, ASPEN, CO, Ch. 228
12	KTUN, NEW CASTLE, CO, Ch. 233
13	KRVG, GLENWOOD SPRINGS, CO, Ch. 238
14	KUUR, CARBONDALE, CO, Ch. 244
15	KAYV, CRESTED BUTTE, CO, Ch. 246
16	KZYR, AVON, CO, Ch. 249
17	KAYW, MEEKER, CO, Ch. 251
18	KMTS, GLENWOOD SPRINGS, CO, Ch. 256
19	KGHT, EL JEBEL, CO, Ch. 263
20	KDBN, PARACHUTE, CO, Ch. 266
21	KSKE-FM, EAGLE, CO, Ch. 269
22	KSNO-FM, SNOWMASS VILLAGE, CO, Ch. 280
23	KKVM, VAIL, CO, Ch. 284
24	KZKS, RIFLE, CO, Ch. 287
25	KPVW, ASPEN, CO, Ch. 296

Market 2	
Number	Station
AM Stations	
1	KVLE, VAIL, CO, 610 kHz
2	KRGS, RIFLE, CO, 690 kHz
3	KGLN, GLENWOOD SPRINGS, CO, 980 kHz
FM Stations	
1	KDNK, GLENWOOD SPRINGS, CO, Ch. 201
2	KVJZ, VAIL, CO, Ch. 203
3	KCJX, CARBONDALE, CO, Ch. 205
4	KPRE, VAIL, CO, Ch. 210
5	KVOV, CARBONDALE, CO, Ch. 213
6	KVNC, MINTURN, CO, Ch. 214
7	KLRY, GYPSUM, CO, Ch. 217
8	KAJX, ASPEN, CO, Ch. 218
9	KLXV, GLENWOOD SPRINGS, CO, Ch. 220
10	KKCH, GLENWOOD SPRINGS, CO, Ch. 224
11	KTND, ASPEN, CO, Ch. 228
12	KYSL, FRISCO, CO, Ch. 230
13	KRVG, GLENWOOD SPRINGS, CO, Ch. 238
14	KUUR, CARBONDALE, CO, Ch. 244
15	KAYV, CRESTED BUTTE, CO, Ch. 246
16	KZYZ, AVON, CO, Ch. 249
17	KMTS, GLENWOOD SPRINGS, CO, Ch. 256
18	KGHT, EL JEBEL, CO, Ch. 263
19	KDBN, PARACHUTE, CO, Ch. 266
20	KSKE-FM, EAGLE, CO, Ch. 269
21	KSPN-FM, ASPEN, CO, Ch. 276
22	KSNO-FM, SNOWMASS VILLAGE, CO, Ch. 280
23	KKVM, VAIL, CO, Ch. 284
24	KZKS, RIFLE, CO, Ch. 287
25	KNFO, BASALT, CO, Ch. 291
26	KPVW, ASPEN, CO, Ch. 296

Market 3	
Number	Station
AM Stations	
1	KVLE, VAIL, CO, 610 kHz

Market 3	
Number	Station
2	KGLN, GLENWOOD SPRINGS, CO, 980 kHz
3	KBCR, STEAMBOAT SPRINGS, CO, 1230 kHz
4	KNAM, SILT, CO, 1490 kHz
FM Stations	
1	KDNK, GLENWOOD SPRINGS, CO, Ch. 201
2	KVJZ, VAIL, CO, Ch. 203
3	KCJX, CARBONDALE, CO, Ch. 205
4	KLBV, STEAMBOAT SPRINGS, CO, Ch. 207
5	KPRE, VAIL, CO, Ch. 210
6	KHCO, HAYDEN, CO, Ch. 211
7	KVOV, CARBONDALE, CO, Ch. 213
8	KVNC, MINTURN, CO, Ch. 214
9	KLRY, GYPSUM, CO, Ch. 217
10	KAJX, ASPEN, CO, Ch. 218
11	KTSG, STEAMBOAT SPRINGS, CO, Ch. 219
12	KLXV, GLENWOOD SPRINGS, CO, Ch. 220
13	KKCH, GLENWOOD SPRINGS, CO, Ch. 224
14	KTND, ASPEN, CO, Ch. 228
15	KYSL, FRISCO, CO, Ch. 230
16	KEZZ, PHIPPSBURG, CO, Ch. 231
17	KRVG, GLENWOOD SPRINGS, CO, Ch. 238
18	KUUR, CARBONDALE, CO, Ch. 244
19	KBCR-FM, STEAMBOAT SPRINGS, CO, Ch. 245
20	KZYR, AVON, CO, Ch. 249
21	KMTS, GLENWOOD SPRINGS, CO, Ch. 256
22	KGHT, EL JEBEL, CO, Ch. 263
23	KSKE-FM, EAGLE, CO, Ch. 269
24	KQSE, GYPSUM, CO, Ch. 273
25	KSNO-FM, SNOWMASS VILLAGE, CO, Ch. 280
26	KKVM, VAIL, CO, Ch. 284
27	KIFT, KREMMLING, CO, Ch. 292
28	KPVW, ASPEN, CO, Ch. 296

Market 4	
Number	Station
AM Stations	
1	KVLE, VAIL, CO, 610 kHz
FM Stations	
1	KDNK, GLENWOOD SPRINGS, CO, Ch. 201
2	KVJZ, VAIL, CO, Ch. 203

Market 4	
Number	Station
3	KMPB, BRECKENRIDGE, CO, Ch. 204
4	KCJX, CARBONDALE, CO, Ch. 205
5	KPRE, VAIL, CO, Ch. 210
6	KVOV, CARBONDALE, CO, Ch. 213
7	KVNC, MINTURN, CO, Ch. 214
8	KLRY, GYPSUM, CO, Ch. 217
9	KAJX, ASPEN, CO, Ch. 218
10	KLXV, GLENWOOD SPRINGS, CO, Ch. 220
11	KTND, ASPEN, CO, Ch. 228
12	KYSL, FRISCO, CO, Ch. 230
13	KRVG, GLENWOOD SPRINGS, CO, Ch. 238
14	KUUR, CARBONDALE, CO, Ch. 244
15	KZYR, AVON, CO, Ch. 249
16	KMTS, GLENWOOD SPRINGS, CO, Ch. 256
17	KGHT, EL JEBEL, CO, Ch. 263
18	KSKE-FM, EAGLE, CO, Ch. 269
19	KSMT, BRECKENRIDGE, CO, Ch. 271
20	KKVM, VAIL, CO, Ch. 284
21	KPVW, ASPEN, CO, Ch. 296

Market 5	
Number	Station
AM Stations	
1	KPOF, DENVER, CO, 910 kHz
2	KVLE, VAIL, CO, 610 kHz
3	KRKY, GRANBY, CO, 930 kHz
4	KVCU, BOULDER, CO, 1190 kHz
FM Stations	
1	KMPB, BRECKENRIDGE, CO, Ch. 204
2	KPRE, VAIL, CO, Ch. 210
3	KLDV, MORRISON, CO, Ch. 216
4	KLRY, GYPSUM, CO, Ch. 217
5	KYSL, FRISCO, CO, Ch. 230
6	KEZZ, PHIPPSBURG, CO, Ch. 231
7	KRKS-FM, LAFAYETTE, CO, Ch. 234
8	KXPK, EVERGREEN, CO, Ch. 243
9	KBCO, BOULDER, CO, Ch. 247
10	KZYR, AVON, CO, Ch. 249
11	KYGO-FM, DENVER, CO, Ch. 253
12	KIMN, DENVER, CO, Ch. 262

Market 5	
Number	Station
13	KSMT, BRECKENRIDGE, CO, Ch. 271
14	KKVM, VAIL, CO, Ch. 284
15	KXKL-FM, DENVER, CO, Ch. 286
16	KALC, DENVER, CO, Ch. 290
17	KIFT, KREMMLING, CO, Ch. 292
18	KBPI, DENVER, CO, Ch. 294

Market 6	
Number	Station
AM Stations	
1	KRAI, CRAIG, CO, 550 kHz
2	KVLE, VAIL, CO, 610 kHz
3	KGLN, GLENWOOD SPRINGS, CO, 980 kHz
4	KBCR, STEAMBOAT SPRINGS, CO, 1230 kHz
FM Stations	
1	KDNK, GLENWOOD SPRINGS, CO, Ch. 201
2	KVJZ, VAIL, CO, Ch. 203
3	KRNC, STEAMBOAT SPRINGS, CO, Ch. 203
4	KCJX, CARBONDALE, CO, Ch. 205
5	KLBV, STEAMBOAT SPRINGS, CO, Ch. 207
6	KPRE, VAIL, CO, Ch. 210
7	KHCO, HAYDEN, CO, Ch. 211
8	KVOV, CARBONDALE, CO, Ch. 213
9	KVNC, MINTURN, CO, Ch. 214
10	KLRY, GYPSUM, CO, Ch. 217
11	KTSG, STEAMBOAT SPRINGS, CO, Ch. 219
12	KLXV, GLENWOOD SPRINGS, CO, Ch. 220
13	KTND, ASPEN, CO, Ch. 228
14	KRAI-FM, CRAIG, CO, Ch. 229
15	KYSL, FRISCO, CO, Ch. 230
16	KEZZ, PHIPPSBURG, CO, Ch. 231
17	KRVG, GLENWOOD SPRINGS, CO, Ch. 238
18	KUUR, CARBONDALE, CO, Ch. 244
19	KBCR-FM, STEAMBOAT SPRINGS, CO, Ch. 245
20	KZYR, AVON, CO, Ch. 249
21	KMTS, GLENWOOD SPRINGS, CO, Ch. 256
22	KGHT, EL JEBEL, CO, Ch. 263
23	KSKE-FM, EAGLE, CO, Ch. 269
24	KSNO-FM, SNOWMASS VILLAGE, CO, Ch. 280
25	KFMU-FM, OAK CREEK, CO, Ch. 281

Market 6	
Number	Station
26	KKVM, VAIL, CO, Ch. 284
27	KPVW, ASPEN, CO, Ch. 296

Market 7	
Number	Station
AM Stations	
1	KRAI, CRAIG, CO, 550 kHz
2	KVLE, VAIL, CO, 610 kHz
3	KBCR, STEAMBOAT SPRINGS, CO, 1230 kHz
FM Stations	
1	KRNC, STEAMBOAT SPRINGS, CO, Ch. 203
2	KLBV, STEAMBOAT SPRINGS, CO, Ch. 207
3	KPRE, VAIL, CO, Ch. 210
4	KHCO, HAYDEN, CO, Ch. 211
5	KLRY, GYPSUM, CO, Ch. 217
6	KTSG, STEAMBOAT SPRINGS, CO, Ch. 219
7	KRAI-FM, CRAIG, CO, Ch. 229
8	KYSL, FRISCO, CO, Ch. 230
9	KEZZ, PHIPPSBURG, CO, Ch. 231
10	KBCR-FM, STEAMBOAT SPRINGS, CO, Ch. 245
11	KZYR, AVON, CO, Ch. 249
12	KFMU-FM, OAK CREEK, CO, Ch. 281
13	KKVM, VAIL, CO, Ch. 284
14	KIFT, KREMMLING, CO, Ch. 292

Market 8	
Number	Station
AM Stations	
1	KRAI, CRAIG, CO, 550 kHz
2	KBCR, STEAMBOAT SPRINGS, CO, 1230 kHz
FM Stations	
1	KPYR, CRAIG, CO, Ch. 202
2	KRNC, STEAMBOAT SPRINGS, CO, Ch. 203
3	KLBV, STEAMBOAT SPRINGS, CO, Ch. 207
4	KHCO, HAYDEN, CO, Ch. 211

Market 8	
Number	Station
5	KTSG, STEAMBOAT SPRINGS, CO, Ch. 219
6	KRAI-FM, CRAIG, CO, Ch. 229
7	KEZZ, PHIPPSBURG, CO, Ch. 231
8	KIDN, HAYDEN, CO, Ch. 240
9	KBCR-FM, STEAMBOAT SPRINGS, CO, Ch. 245
10	KAYW, MEEKER, CO, Ch. 251
11	KFMU-FM, OAK CREEK, CO, Ch. 281
12	KQZR, HAYDEN, CO, Ch. 297

Market 9	
Number	Station
AM Stations	
1	KVLE, VAIL, CO, 610 kHz
2	KRKY, GRANBY, CO, 930 kHz
3	KVCU, BOULDER, CO, 1190 kHz
4	KCFC, BOULDER, CO, 1490 kHz
FM Stations	
1	KMPB, BRECKENRIDGE, CO, Ch. 204
2	KLBV, STEAMBOAT SPRINGS, CO, Ch. 207
3	KPRE, VAIL, CO, Ch. 210
4	KHCO, HAYDEN, CO, Ch. 211
5	KLDV, MORRISON, CO, Ch. 216
6	KLRY, GYPSUM, CO, Ch. 217
7	KTSG, STEAMBOAT SPRINGS, CO, Ch. 219
8	KYSL, FRISCO, CO, Ch. 230
9	KEZZ, PHIPPSBURG, CO, Ch. 231
10	KRKS-FM, LAFAYETTE, CO, Ch. 234
11	KXPK, EVERGREEN, CO, Ch. 243
12	KBCR-FM, STEAMBOAT SPRINGS, CO, Ch. 245
13	KBCO, BOULDER, CO, Ch. 247
14	KZYR, AVON, CO, Ch. 249
15	KYGO-FM, DENVER, CO, Ch. 253
16	KIMN, DENVER, CO, Ch. 262
17	KSKE-FM, EAGLE, CO, Ch. 269
18	KKVM, VAIL, CO, Ch. 284
19	KXKL-FM, DENVER, CO, Ch. 286
20	KALC, DENVER, CO, Ch. 290
21	KIFT, KREMMLING, CO, Ch. 292
22	KBPI, DENVER, CO, Ch. 294