

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS

This statement and the attached figures have been prepared as part of a study to determine if the following radio stations could be commonly owned.

Call Sign	Location	Facilities
KFLG-FM	Kingman, AZ	Channel 234C, 46 kW, 760 m
KLUK(FM)	Needles, CA	Channel 251C1, 29.5 kW, 473 m
KAAA(AM)	Kingman, AZ	1230 kHz, 1 kW-U ND1
KZZZ(AM)	Bullhead City, AZ	1490 kHz, 1 kW-U ND1
KFLG(AM)	Bullhead City, AZ	1000 kHz, 1 kW-D NDD
Proposed C1 Facility	Needles, CA	Channel 296C1, 16.8 kW, 582 m

Since these stations have overlapping principal community contours (3.16 mV/m for FM stations, 5 mV/m for AM stations), an ownership study has been prepared in accordance with the Federal Communications Commission multiple ownership rules (See Section 73.3555 of the FCC Rules).

Radio Market

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. The predicted

See Order in Implementation of Section 202(a) and 202(b) (1) of the Telecommunications Act of 1996 (Broadcast Radio Ownership) FCC 96-90, released March 8, 1996 and Memorandum Opinion and Order in Revision of Radio Rules and Policies 7 FCC Rcd 6387, 6395 para. 39 (1992).

principal contours of the stations tabulated above are shown on Figure 1 herein. There is one "radio market" for analysis under the Commission's Rules. The table below lists the defined market:

Defined Radio Market	Stations that Define Radio Market
	FM/AM stations
Market 1	KFLG-FM, KLUK(FM), Proposed C1 Facility, KAAA(AM), KZZZ(AM), KFLG(AM)

Count of Stations in Defined Markets

The number of radio stations in a "radio market" is determined by counting the operating, commercial stations having principal community contours which overlap or intersect the principal community contours which define the radio market, plus the subject stations to be co-owned. The result of the analysis is tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	6 AM, 12 FM; 18 total

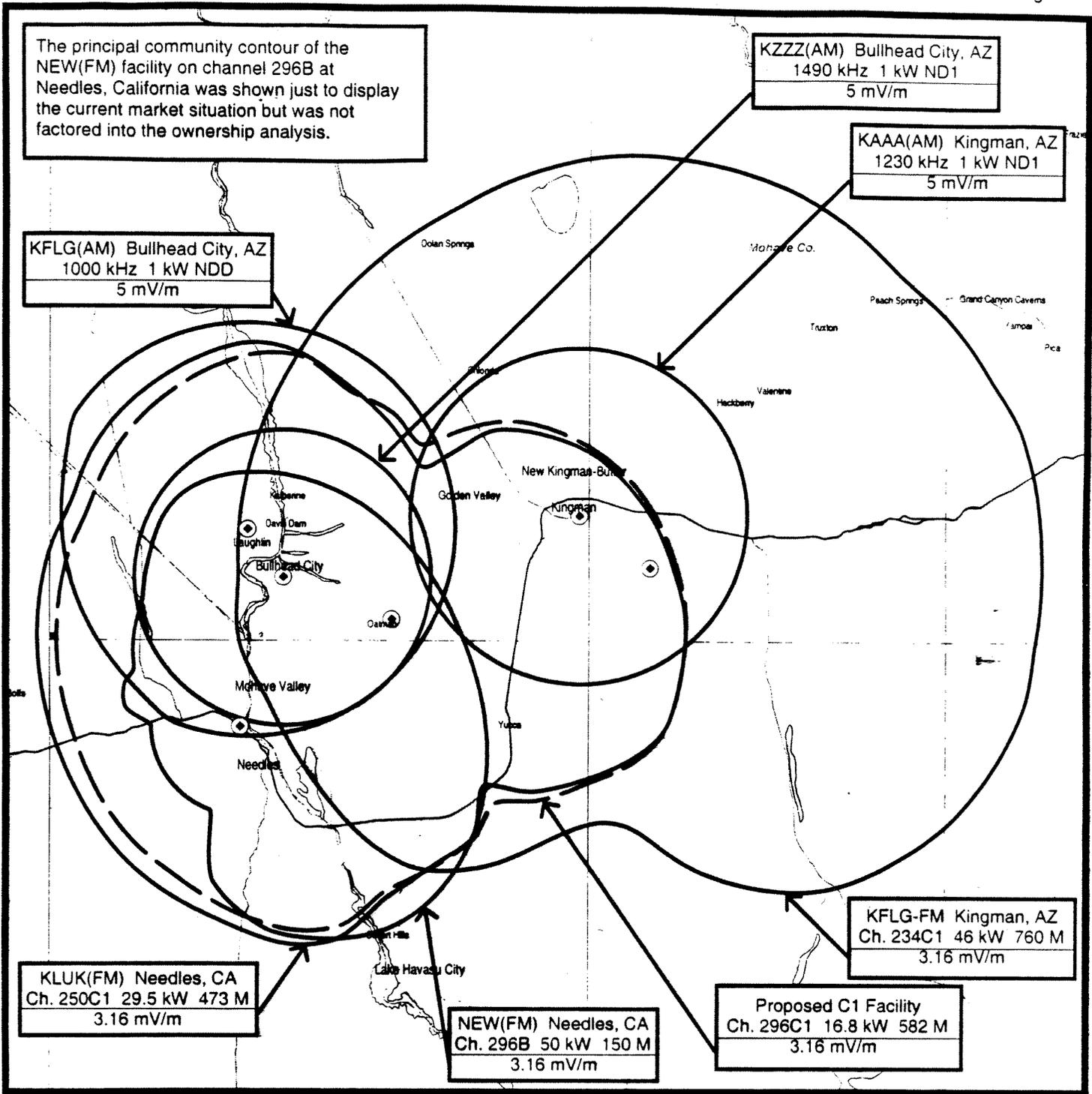
Figure 2, is a tabulation of radio stations identified in the defined radio market. Only known licensed, operating commercial stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's AM database and the appropriate Ground Wave Field Strength versus Distance Graph of 47 CFR 73.184. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR 73.313. Terrain data was derived from the N.G.D.C. 30-second computer database for each of the FM stations using radials evenly-spaced every 10 degrees of azimuth.

Based on the above, it is believed the proposed combination of stations complies with Section 73.3555(a) of the FCC Rules.


Jerome J. Manarchuck

du Treil, Lundin & Rackley, Inc.
201 Fletcher Ave.
Sarasota, Florida 34237
(941)329-6000

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PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

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Tabulation of Stations in the Radio Market

Market 1	
Number	Station
AM Stations	
1	KDWN(AM), Las Vegas, NV, 720 kHz
2	KNTR(AM), Lake Havasu City, AZ, 980
3	KFLG(AM), Bullhead City, AZ, 1000
4	KAAA(AM), Kingman, AZ, 1230
5	KTOX(AM), Needles, CA, 1340
6	KZZZ(AM), Bullhead City, AZ, 1490
FM Stations	
1	KJJJ(FM), Lake Havasu City, AZ, Ch. 224
2	KADD(FM), Laughlin, NV, Ch. 228
3	KZZZ-FM, Kingman, AZ, Ch. 234
4	KLUK(FM), Needles, CA, Ch. 250
5	KHWY(FM), Essex, CA, Ch. 255
6	KGMN(FM), Kingman, AZ, Ch. 260
7	KRRK(FM), Lake Havasu City, AZ, 266
8	KBYE(FM), Bullhead City, AZ, Ch. 274
9	KZUL-FM, Lake Havasu City, AZ, Ch. 283
10	KRCY(FM), Kingman, AZ, 290
11	Proposed C1, Needles, CA, Ch. 296
12	KVGS(FM), Laughlin, NV, 300