

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
ROCKY MOUNTAIN RADIO NETWORK, INC.

This radio multiple ownership analysis was prepared on behalf of Rocky Mountain Radio Network, Inc., which proposes the following radio stations to be considered under present or proposed common ownership or control in the area of Salt Lake City, UT:

Call Sign	City of License	Facilities
KOVO(AM)	Provo-UT	960 kHz, 1 kW-N, 5 kW-D, U, DA-N
KUUU(FM)	Tooele-UT	Channel 221C3, 9.7 kW, 162 m
KTCE(FM)	Payson-UT	Channel 222A, 0.058 kW, 659 m
KCUA(FM)	Coalville-UT	Channel 223C3, 20 kW, 90 m
KWKD(FM)	Randolph-UT	Channel 272C, 89 kW, 633 m (License) Channel 272C, 89 kW, 647 m (Construction Permit)
KMDG(FM)	Nephi-UT	Channel 280C, 74 kW, 684 m
KMXU(FM)	Manti-UT	Channel 286C, 74 kW, 684 m
KOTB(FM)	Evanston-WY	Channel 291C3, 0.38 kW, 464 m (License) Channel 291C, 100 kW, 598 m (Application)
KUDD(FM)	Roy-UT	Channel 300C, 71 kW, 696 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.

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

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	--	KCUA, KOTB(App), KWKD(Lic & CP), KUDD
Market 2	KOVO	KMDG, KMXU, KWKD(Lic & CP), KOTB(App)
Market 3	--	KWKD(Lic & CP), KOTB(Lic & App)
Market 4	KOVO	KTCE, KMDG, KMXU
Market 5	KOVO	KUUU

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. Only those stations having principal community

* 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).

contour overlap with the defined market area were employed in the count of stations. The results of the analysis are tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	23 AM; 32 FM; 55 Total
Market 2	28 AM; 31 FM; 59 Total
Market 3	22 AM; 25 FM; 47 Total
Market 4	23 AM; 26 FM; 49 Total
Market 5	21 AM; 25 FM; 46 Total

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

Louis Robert du Treil, Jr.

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

May 8, 2003

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Tabulation of Stations in Radio Markets

Market 1	
Number	Station
AM Stations	
1	KNRS, SALT LAKE CITY, UT, 570 kHz
2	KVNU, LOGAN, UT, 610 kHz
3	KTKK, SANDY, UT, 630 kHz
4	KALL, NORTH SALT LAKE CITY, UT, 700 kHz
5	KSVN, OGDEN, UT, 730 kHz
6	KSOS, BRIGHAM CITY, UT, 800 kHz
7	KBEE, SALT LAKE CITY, UT, 860 kHz
8	KWDZ, SALT LAKE CITY, UT, 910 kHz
9	KMER, KEMMERER, WY, 950 kHz
10	KOVO, PROVO, UT, 960 kHz
11	KIQN, TOOELE, UT, 1010 kHz
12	KKDS, SOUTH SALT LAKE, UT, 1060 kHz
13	KSL, SALT LAKE CITY, UT, 1160 kHz
14	KJQS, MURRAY, UT, 1230 kHz
15	KEVA, EVANSTON, WY, 1240 kHz
16	KZNS, SALT LAKE CITY, UT, 1280 kHz
17	KFNZ, SALT LAKE CITY, UT, 1320 kHz
18	KSOP, SOUTH SALT LAKE, UT, 1370 kHz
19	KLGN, LOGAN, UT, 1390 kHz
20	KLO, OGDEN, UT, 1430 kHz
21	KLLB, WEST JORDAN, UT, 1510 kHz
22	KMRI, WEST VALLEY CITY, UT, 1550 kHz
23	KSGO, CENTERVILLE, UT, 1600 kHz
FM Stations	
1	KUUU, TOOELE, UT, Channel 221
2	KBLQ-F, LOGAN, UT, Channel 225
3	KUBL-F, SALT LAKE CITY, UT, Channel 227
4	KODJ, SALT LAKE CITY, UT, Channel 231

Market 1	
Number	Station
5	KVFX, LOGAN, UT, Channel 233
6	KZHT, PROVO, UT, Channel 235
7	KLZX, WESTON, ID, Channel 240
8	KXRK, PROVO, UT, Channel 242
9	KKEX, PRESTON, ID, Channel 244
10	KISN-F, SALT LAKE CITY, UT, Channel 246
11	KBZN, OGDEN, UT, Channel 250
12	KBEE-F, SALT LAKE CITY, UT, Channel 254
13	KNYN, FORT BRIDGER, WY, Channel 256
14	KURR, BOUNTIFUL, UT, Channel 258
15	KSFI, SALT LAKE CITY, UT, Channel 262
16	KJQN, BRIGHAM CITY, UT, Channel 264
17	KBER, OGDEN, UT, Channel 266
18	KKAT, OGDEN, UT, Channel 270
19	KWKD, RANDOLPH, UT, Channel 272
20	KQMB, MIDVALE, UT, Channel 274
21	KRSP-F, SALT LAKE CITY, UT, Channel 278
22	KMDG, NEPHI, UT, Channel 280
23	KGNT, SMITHFIELD, UT, Channel 280
24	KSOP-F, SALT LAKE CITY, UT, Channel 282
25	KBNZ, TREMONTON, UT, Channel 285
26	KMXU, MANTI, UT, Channel 286
27	KCPX, CENTERVILLE, UT, Channel 289
28	KOTB, EVANSTON, WY, Channel 291
29	KOSY-F, SPANISH FORK, UT, Channel 293
30	KRAR, BRIGHAM CITY, UT, Channel 295
31	KENZ, OREM, UT, Channel 298
32	KUDD, ROY, UT, Channel 300

Market 2	
Number	Station
AM Stations	
1	KNAK, DELTA, UT, 540 kHz
2	KNRS, SALT LAKE CITY, UT, 570 kHz
3	KVNU, LOGAN, UT, 610 kHz
4	KTKK, SANDY, UT, 630 kHz
5	KMTI, MANTI, UT, 650 kHz
6	KALL, NORTH SALT LAKE CITY, UT, 700 kHz
7	KSVN, OGDEN, UT, 730 kHz

Market 2	
Number	Station
8	KOAL, PRICE, UT, 750 kHz
9	KSOS, BRIGHAM CITY, UT, 800 kHz
10	KBEE, SALT LAKE CITY, UT, 860 kHz
11	KWDZ, SALT LAKE CITY, UT, 910 kHz
12	KMER, KEMMERER, WY, 950 kHz
13	KOVO, PROVO, UT, 960 kHz
14	KIQN, TOOELE, UT, 1010 kHz
15	KKDS, SOUTH SALT LAKE, UT, 1060 kHz
16	KSSL, PRICE, UT, 1080 kHz
17	KSL, SALT LAKE CITY, UT, 1160 kHz
18	KJQS, MURRAY, UT, 1230 kHz
19	KEVA, EVANSTON, WY, 1240 kHz
20	KZNS, SALT LAKE CITY, UT, 1280 kHz
21	KFNZ, SALT LAKE CITY, UT, 1320 kHz
22	KSOP, SOUTH SALT LAKE, UT, 1370 kHz
23	KSRR, PROVO, UT, 1400 kHz
24	KLO, OGDEN, UT, 1430 kHz
25	KHQN, SPANISH FORK, UT, 1480 kHz
26	KLLB, WEST JORDAN, UT, 1510 kHz
27	KMRI, WEST VALLEY CITY, UT, 1550 kHz
28	KSGO, CENTERVILLE, UT, 1600 kHz
FM Stations	
1	KUUU, TOOELE, UT, Channel 221
2	KTCE, PAYSON, UT, Channel 222
3	KUBL-F, SALT LAKE CITY, UT, Channel 227
4	KODJ, SALT LAKE CITY, UT, Channel 231
5	KZHT, PROVO, UT, Channel 235
6	KXRK, PROVO, UT, Channel 242
7	KCFM, LEVAN, UT, Channel 244
8	KISN-F, SALT LAKE CITY, UT, Channel 246
9	KLGL, RICHFIELD, UT, Channel 248
10	KBZN, OGDEN, UT, Channel 250
11	KARB, PRICE, UT, Channel 252
12	KBEE-F, SALT LAKE CITY, UT, Channel 254
13	KNYN, FORT BRIDGER, WY, Channel 256
14	KURR, BOUNTIFUL, UT, Channel 258
15	KSFI, SALT LAKE CITY, UT, Channel 262
16	KJQN, BRIGHAM CITY, UT, Channel 264
17	KWSA, PRICE, UT, Channel 265
18	KBER, OGDEN, UT, Channel 266
19	KKAT, OGDEN, UT, Channel 270
20	KWKD, RANDOLPH, UT, Channel 272
21	KQMB, MIDVALE, UT, Channel 274

Market 2	
Number	Station
22	KRSP-F, SALT LAKE CITY, UT, Channel 278
23	KMDG, NEPHI, UT, Channel 280
24	KSOP-F, SALT LAKE CITY, UT, Channel 282
25	KMXU, MANTI, UT, Channel 286
26	KCPX, CENTERVILLE, UT, Channel 289
27	KOTB, EVANSTON, WY, Channel 291
28	KOSY-F, SPANISH FORK, UT, Channel 293
29	KRAR, BRIGHAM CITY, UT, Channel 295
30	KENZ, OREM, UT, Channel 298
31	KUDD, ROY, UT, Channel 300

Market 3	
Number	Station
AM Stations	
1	KNRS, SALT LAKE CITY, UT, 570 kHz
2	KVNU, LOGAN, UT, 610 kHz
3	KTKK, SANDY, UT, 630 kHz
4	KALL, NORTH SALT LAKE CITY, UT, 700 kHz
5	KSVN, OGDEN, UT, 730 kHz
6	KSOS, BRIGHAM CITY, UT, 800 kHz
7	KBEE, SALT LAKE CITY, UT, 860 kHz
8	KWDZ, SALT LAKE CITY, UT, 910 kHz
9	KMER, KEMMERER, WY, 950 kHz
10	KOVO, PROVO, UT, 960 kHz
11	KIQN, TOOELE, UT, 1010 kHz
12	KKDS, SOUTH SALT LAKE, UT, 1060 kHz
13	KSL, SALT LAKE CITY, UT, 1160 kHz
14	KJQS, MURRAY, UT, 1230 kHz
15	KEVA, EVANSTON, WY, 1240 kHz
16	KZNS, SALT LAKE CITY, UT, 1280 kHz
17	KFNZ, SALT LAKE CITY, UT, 1320 kHz
18	KSOP, SOUTH SALT LAKE, UT, 1370 kHz
19	KLO, OGDEN, UT, 1430 kHz
20	KLLB, WEST JORDAN, UT, 1510 kHz
21	KMRI, WEST VALLEY CITY, UT, 1550 kHz
22	KSGO, CENTERVILLE, UT, 1600 kHz
FM Stations	
1	KUBL-F, SALT LAKE CITY, UT, Channel 227

Market 3	
Number	Station
2	KODJ, SALT LAKE CITY, UT, Channel 231
3	KZHT, PROVO, UT, Channel 235
4	KXRK, PROVO, UT, Channel 242
5	KISN-F, SALT LAKE CITY, UT, Channel 246
6	KBZN, OGDEN, UT, Channel 250
7	KBEE-F, SALT LAKE CITY, UT, Channel 254
8	KNYN, FORT BRIDGER, WY, Channel 256
9	KURR, BOUNTIFUL, UT, Channel 258
10	KSFI, SALT LAKE CITY, UT, Channel 262
11	KJQN, BRIGHAM CITY, UT, Channel 264
12	KBER, OGDEN, UT, Channel 266
13	KKAT, OGDEN, UT, Channel 270
14	KWKD, RANDOLPH, UT, Channel 272
15	KQMB, MIDVALE, UT, Channel 274
16	KRSP-F, SALT LAKE CITY, UT, Channel 278
17	KMDG, NEPHI, UT, Channel 280
18	KSOP-F, SALT LAKE CITY, UT, Channel 282
19	KMXU, MANTI, UT, Channel 286
20	KCPX, CENTERVILLE, UT, Channel 289
21	KOTB, EVANSTON, WY, Channel 291
22	KOSY-F, SPANISH FORK, UT, Channel 293
23	KRAR, BRIGHAM CITY, UT, Channel 295
24	KENZ, OREM, UT, Channel 298
25	KUDD, ROY, UT, Channel 300

Market 4	
Number	Station
AM Stations	
1	KNAK, DELTA, UT, 540 kHz
2	KNRS, SALT LAKE CITY, UT, 570 kHz
3	KTKK, SANDY, UT, 630 kHz
4	KMTI, MANTI, UT, 650 kHz
5	KALL, NORTH SALT LAKE CITY, UT, 700 kHz
6	KOAL, PRICE, UT, 750 kHz
7	KBEE, SALT LAKE CITY, UT, 860 kHz
8	KWDZ, SALT LAKE CITY, UT, 910 kHz
9	KOVO, PROVO, UT, 960 kHz
10	KIQN, TOOELE, UT, 1010 kHz
11	KKDS, SOUTH SALT LAKE, UT, 1060 kHz

Market 4	
Number	Station
12	KSSL, PRICE, UT, 1080 kHz
13	KSL, SALT LAKE CITY, UT, 1160 kHz
14	KJQS, MURRAY, UT, 1230 kHz
15	KZNS, SALT LAKE CITY, UT, 1280 kHz
16	KFNZ, SALT LAKE CITY, UT, 1320 kHz
17	KSOP, SOUTH SALT LAKE, UT, 1370 kHz
18	KSRR, PROVO, UT, 1400 kHz
19	KLO, OGDEN, UT, 1430 kHz
20	KHQN, SPANISH FORK, UT, 1480 kHz
21	KLLB, WEST JORDAN, UT, 1510 kHz
22	KMRI, WEST VALLEY CITY, UT, 1550 kHz
23	KSGO, CENTERVILLE, UT, 1600 kHz
FM Stations	
1	KUUU, TOOELE, UT, Channel 221
2	KTCE, PAYSON, UT, Channel 222
3	KUBL-F, SALT LAKE CITY, UT, Channel 227
4	KODJ, SALT LAKE CITY, UT, Channel 231
5	KZHT, PROVO, UT, Channel 235
6	KXRK, PROVO, UT, Channel 242
7	KCFM, LEVAN, UT, Channel 244
8	KISN-F, SALT LAKE CITY, UT, Channel 246
9	KLGL, RICHFIELD, UT, Channel 248
10	KBZN, OGDEN, UT, Channel 250
11	KARB, PRICE, UT, Channel 252
12	KBEE-F, SALT LAKE CITY, UT, Channel 254
13	KURR, BOUNTIFUL, UT, Channel 258
14	KSFI, SALT LAKE CITY, UT, Channel 262
15	KWSA, PRICE, UT, Channel 265
16	KBER, OGDEN, UT, Channel 266
17	KKAT, OGDEN, UT, Channel 270
18	KWKD, RANDOLPH, UT, Channel 272
19	KQMB, MIDVALE, UT, Channel 274
20	KRSP-F, SALT LAKE CITY, UT, Channel 278
21	KMDG, NEPHI, UT, Channel 280
22	KSOP-F, SALT LAKE CITY, UT, Channel 282
23	KMXU, MANTI, UT, Channel 286
24	KCPX, CENTERVILLE, UT, Channel 289
25	KOSY-F, SPANISH FORK, UT, Channel 293
26	KENZ, OREM, UT, Channel 298

Market 5	
Number	Station
AM Stations	
1	KNRS, SALT LAKE CITY, UT, 570 kHz
2	KTKK, SANDY, UT, 630 kHz
3	KMTI, MANTI, UT, 650 kHz
4	KALL, NORTH SALT LAKE CITY, UT, 700 kHz
5	KSVN, OGDEN, UT, 730 kHz
6	KBEE, SALT LAKE CITY, UT, 860 kHz
7	KWDZ, SALT LAKE CITY, UT, 910 kHz
8	KOVO, PROVO, UT, 960 kHz
9	KIQN, TOOELE, UT, 1010 kHz
10	KKDS, SOUTH SALT LAKE, UT, 1060 kHz
11	KSL, SALT LAKE CITY, UT, 1160 kHz
12	KJQS, MURRAY, UT, 1230 kHz
13	KZNS, SALT LAKE CITY, UT, 1280 kHz
14	KFNZ, SALT LAKE CITY, UT, 1320 kHz
15	KSOP, SOUTH SALT LAKE, UT, 1370 kHz
16	KSRR, PROVO, UT, 1400 kHz
17	KLO, OGDEN, UT, 1430 kHz
18	KHQN, SPANISH FORK, UT, 1480 kHz
19	KLLB, WEST JORDAN, UT, 1510 kHz
20	KMRI, WEST VALLEY CITY, UT, 1550 kHz
21	KSGO, CENTERVILLE, UT, 1600 kHz
FM Stations	
1	KUUU, TOOELE, UT, Channel 221
2	KTCE, PAYSON, UT, Channel 222
3	KUBL-F, SALT LAKE CITY, UT, Channel 227
4	KODJ, SALT LAKE CITY, UT, Channel 231
5	KZHT, PROVO, UT, Channel 235
6	KXRK, PROVO, UT, Channel 242
7	KCFM, LEVAN, UT, Channel 244
8	KISN-F, SALT LAKE CITY, UT, Channel 246
9	KLGL, RICHFIELD, UT, Channel 248
10	KBZN, OGDEN, UT, Channel 250
11	KBEE-F, SALT LAKE CITY, UT, Channel 254
12	KURR, BOUNTIFUL, UT, Channel 258
13	KSFI, SALT LAKE CITY, UT, Channel 262
14	KBER, OGDEN, UT, Channel 266
15	KKAT, OGDEN, UT, Channel 270
16	KWKD, RANDOLPH, UT, Channel 272
17	KQMB, MIDVALE, UT, Channel 274
18	KRSP-F, SALT LAKE CITY, UT, Channel 278
19	KMDG, NEPHI, UT, Channel 280

Market 5	
Number	Station
20	KSOP-F, SALT LAKE CITY, UT, Channel 282
21	KMXU, MANTI, UT, Channel 286
22	KCPX, CENTERVILLE, UT, Channel 289
23	KOSY-F, SPANISH FORK, UT, Channel 293
24	KENZ, OREM, UT, Channel 298
25	KUDD, ROY, UT, Channel 300