

MULTIPLE SERVICES STUDY

KBRE(AM) – Cedar City, UT
KSUB(AM) – Cedar City, UT
KCIN(FM) – Cedar City, UT
KCCA.A(FM) – Colorado City, AZ

March 2001

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MUNN-REESE, INC.
Broadcast Engineering Consultants
Coldwater, MI 49036

ENGINEERING STATEMENT

This firm was retained to determine the number of principal community radio contours available from stations authorized for commercial service within the radio market defined by the principal community contours of KBRE(AM), KSUB(AM), KCIN(FM), all licensed to Cedar City, CO, and application facilities of KCCA.A(FM), Colorado City, AZ.

The existing facilities of the stations included in this report were determined by the use of currently updated copies of the FCC computer databases of AM and FM stations. The listed facilities served as the basis for the computation of the respective principal community contours as defined in §73.3555 (a)(4)(i) of the Rules. The accuracy of the results of this study is understood to be limited to the accuracy of these databases. The FCC databases give no indication of licensed facilities which may be inoperative, construction permit facilities which may now be operating under program test authority (but have not yet been issued a license), facilities which may have been licensed since the last update, or non-commercial stations operating within the AM band. Therefore, some stations may have been included or excluded erroneously. However, unless otherwise indicated, all licensed facilities known to be inoperative and all known non-commercially licensed stations, as well as application and construction permit facilities, have been eliminated from consideration in this study.

For AM stations, Map M-3 soil conductivity values and the authorized licensed transmitting facilities served as the basis for the computation of the predicted 5.0 mV/m groundwave contour in accordance with §73.183 of the FCC Rules. The distance to the contour was computed for seventy-two (72) equally spaced azimuths beginning with 0° True. For FM stations, the authorized Center of Radiation and ERP values were utilized to compute the predicted 3.16 mV/m (70 dBu) contour as provided in §73.313 of the Rules. The predicted FM contours shown in this report are based on the use of 72 equally spaced terrain radials beginning with 0° True.

The radio market has been defined, in accordance with §73.3555 (a)(4)(ii) of the FCC Rules, as the area within the total perimeter formed by the combined principal community contours of KBRE-AM, KSUB(AM), KCIN(FM), and KCCA.A(FM). **Figure 1** shows only the four (4) contours on a map indicating the boundaries of the defined radio market area. To aid in identifying the respective contours, AM contours have been shown with red lines, and FM contours have been shown with black lines.

These contours are also shown in **Figure 2** and **Figure 3** of this report along with the other principal community contours entering the market. The market defining contours have been shown with green dashed lines on these maps. The other AM contours have been shown in **Figure 2** with solid red lines, and the other FM contours have been shown in **Figure 3** with solid black lines.

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In addition to the stations defining the market area, the principal community contours of the three (3) other AM stations and eight (8) other FM stations entering the market are shown in **Figures 2** and **3**, respectively. Including the four (4) stations which define the market area, there is a total of fifteen (15) aural services in this market. Thus, the market falls within the limitations set forth in §73.3555 (a)(1)(iii) for markets in which six stations, not more than four of which are in the same service, can be under common control. **Figure 4** lists the facilities of the individual stations used in this report.

Alternately, this market was analyzed under the guidelines of NPRM, MM Docket No. 00-244. This rulemaking excludes stations under common ownership, operation, or control from entering the market. Stations under common control which help define the market may continue to be counted. Under NPRM, MM Docket No. 00-244, the principal community contours of three (3) other AM stations and seven (7) other FM stations enter the market. Including the four (4) stations which define the market area, there is a total of fourteen (14) aural services in this market. Thus under the proposed rules, the market falls within the limitations set forth in §73.3555(a)(1)(iv) for markets in which five (5) stations, not more than three (3) of which are in the same service, can be under common control. In addition, no more than 50% of the stations in such a market can be under common control. For this market, two (2) AM stations and two (2) FM stations, representing 28.6% of the market would be under common control.

CERTIFICATION

I hereby certify, subject to penalties for perjury, that the contents of this Engineering Statement are true and accurate to the best of my knowledge and belief.

March 15, 2001

MUNN-REESE, INC.

By Justin W. Asher
Justin W. Asher, Project Engineer

By Wayne S. Reese
Wayne S. Reese, President

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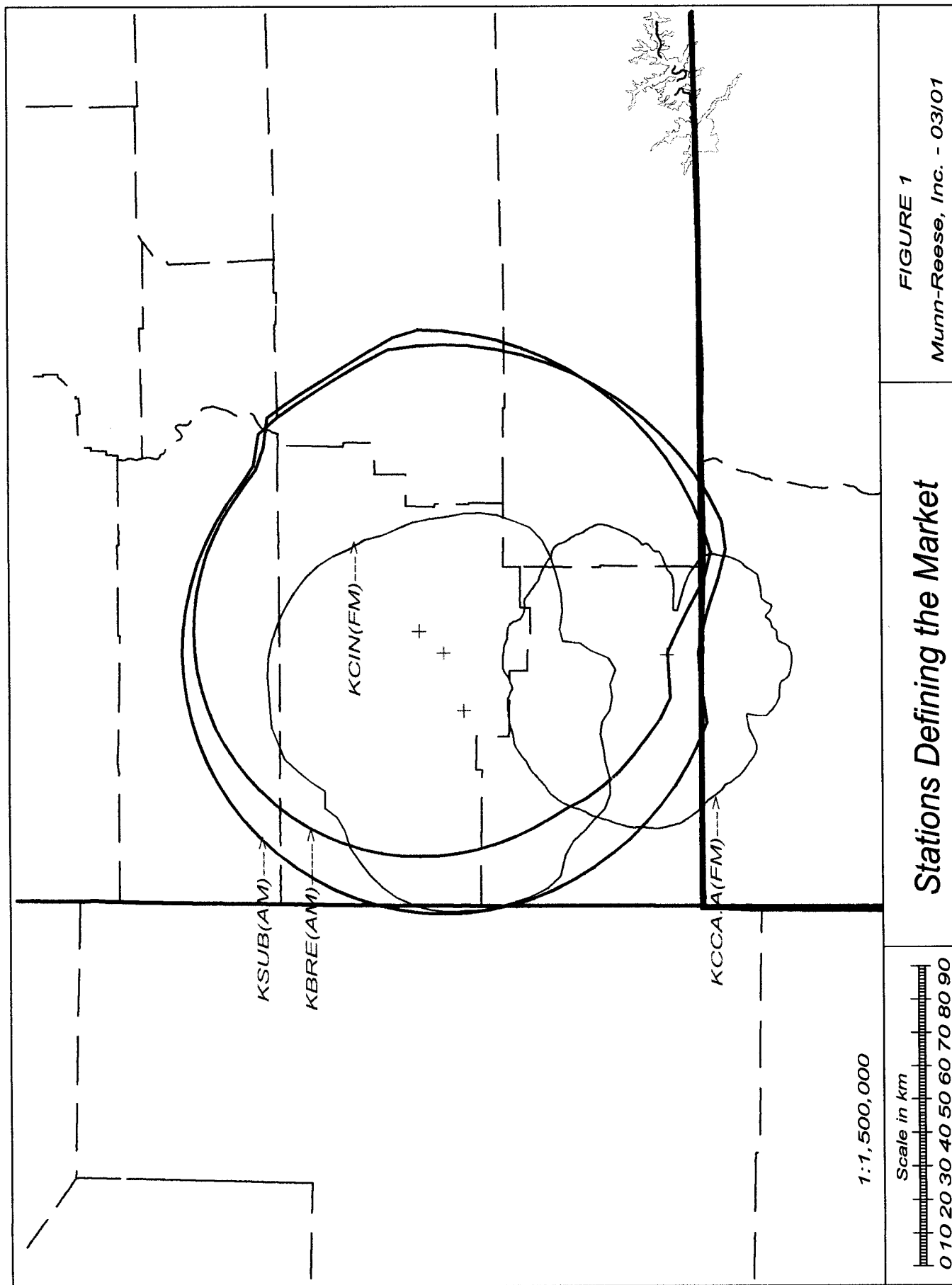
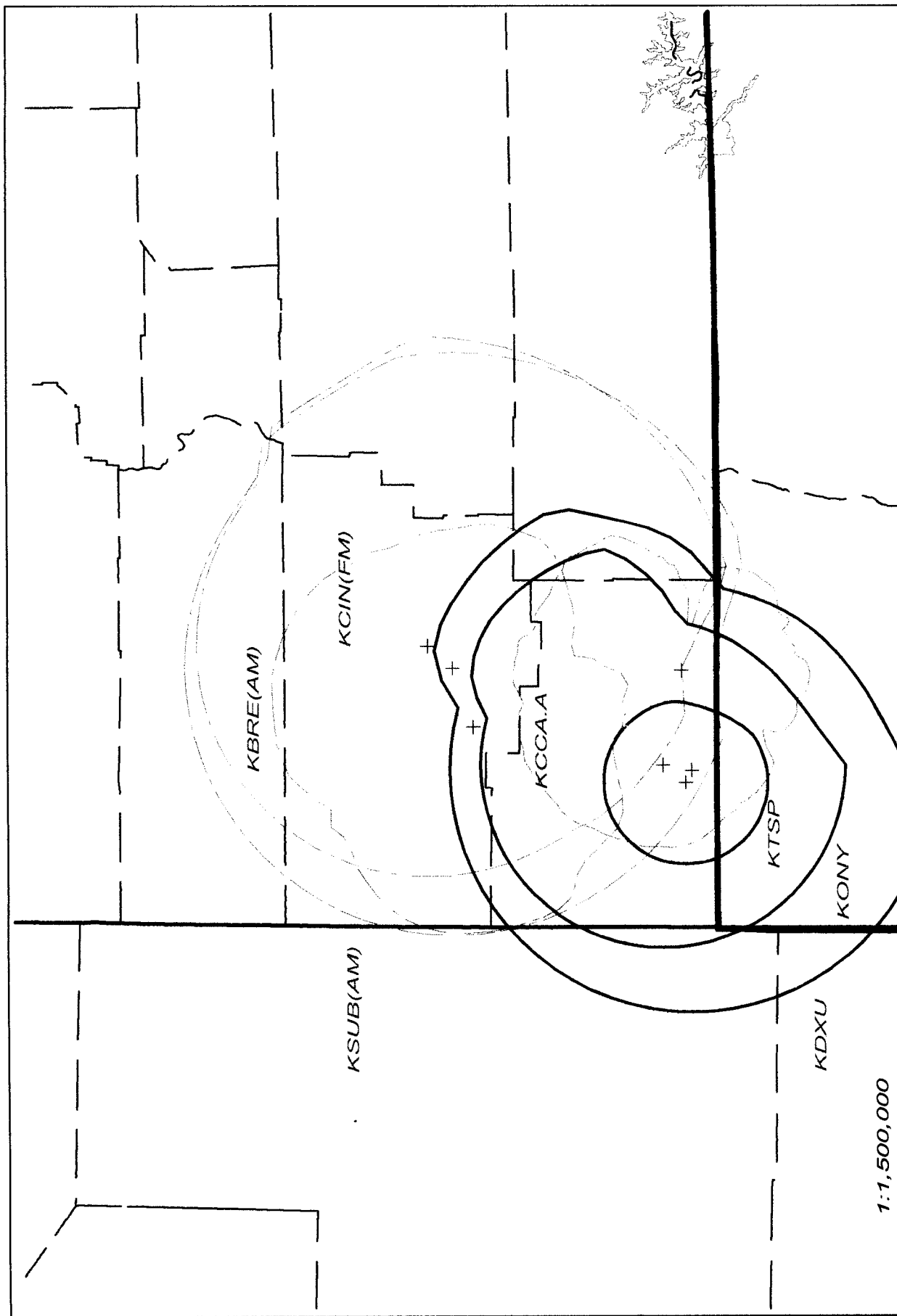
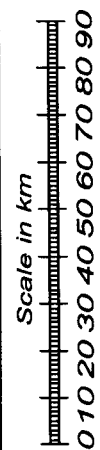


FIGURE 1
Munn-Reese, Inc. - 03/01

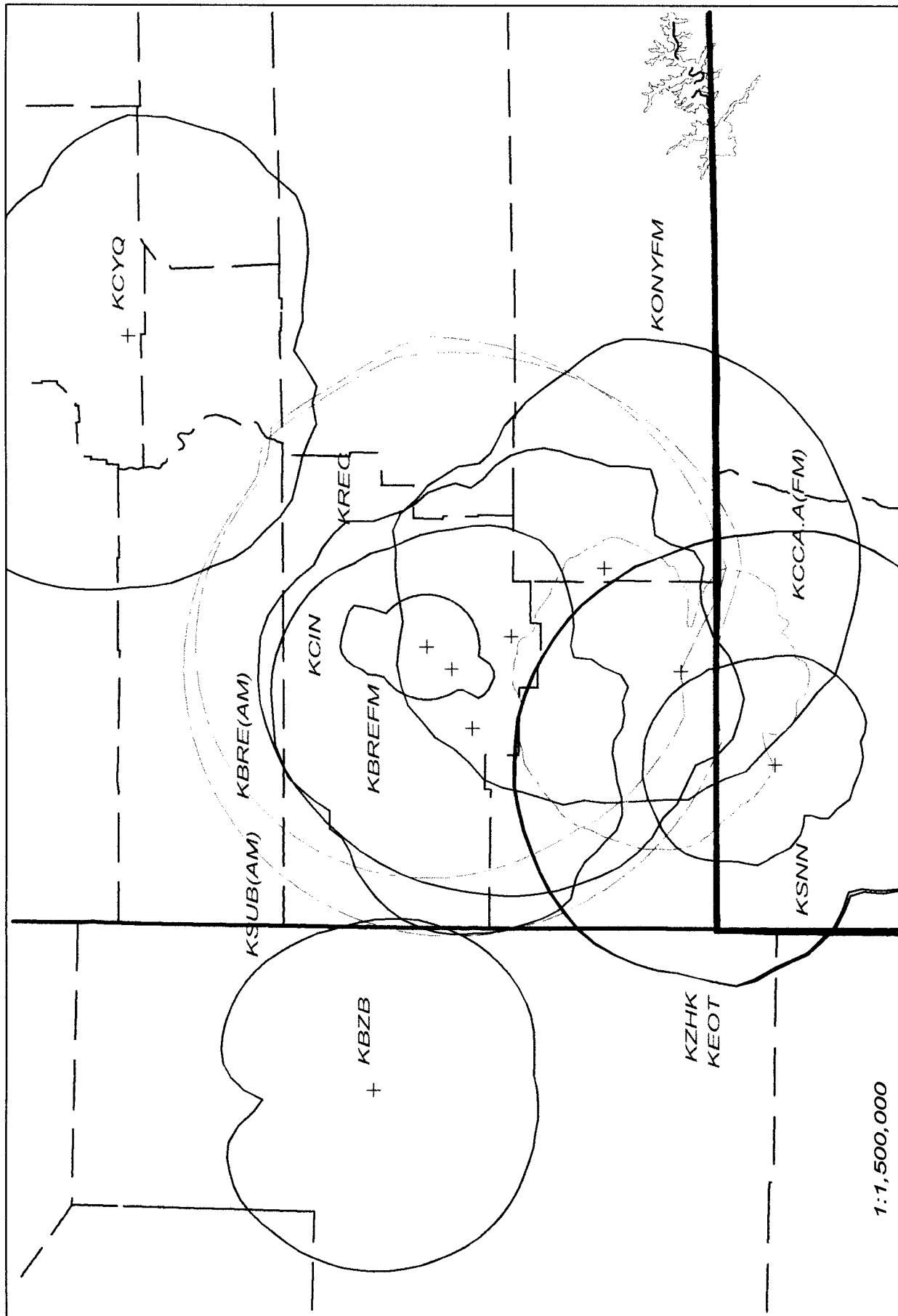


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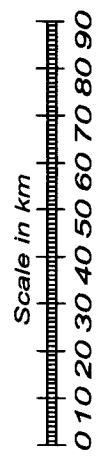


AM Stations Entering the Market

FIGURE 2
Munn-Reese, Inc. - 03/01



1:1,500,000



FM Stations Entering the Market

FIGURE 3

Munn-Reese, Inc. - 03/01

FIGURE 4

FACILITIES SHOWN IN MULTIPLE SERVICES STUDY

AM Stations Entering Market

Call Sign	Coordinates	Frequency	Pwr (kW)	City	State
KBRE ^{1*}	37-45-51 113-06-15	940	10.0	CEDAR CITY	UT
KSUB ^{1*}	37-41-55 113-10-44	590	5.0	CEDAR CITY	UT
KDXU	37-04-04 113-31-04	890	10.0	ST. GEORGE	UT
KONY	37-08-38 113-30-03	1210	10.0	WASHINGTON	UT
KTSP	37-05-02 113-33-26	1450	1.0	ST. GEORGE	UT

FM Stations Entering Market

Call Sign	Coordinates	Channel	Pwr (kW)	City	State
KCCA.A ^{1*}	37-05-42 113-11-12	296C1	34.0	Colorado City	AZ
KCIN ^{1*}	37-38-41 113-22-28	223C	41.0	Cedar City	UT
KBREFM ^{2**}	37-45-51 113-061-5	235C1	55.0	Cedar City	UT
KBZB	37-53-44 114-34-41	255C	5.0	Pioche	NV
KCYQ	38-32-30 112-03-31	229C	41.0	Richfield	UT
KEOT	36-50-49 113-29-28	259C	90.0	St. George	UT
KONYFM	37-17-45 112-50-34	266C	100.0	Kanab	UT
KREC	37-32-32 113-04-05	251C	56.0	Brian Head	UT
KSNN	36-50-49 113-29-28	228C2	2.4	St. George	UT
KZHK	36-50-49 113-29-28	240C	100.0	St. George	UT

^{1*} Represents Stations which define the Radio Market

^{2**} Represents Stations under common control which must be excluded from entering into a market under NPRM, MM Docket No. 00-244

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KBRE(AM) – Cedar City, UT
KSUB(AM) – Cedar City, UT
KCCA.L(FM) – Colorado City, AZ

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ENGINEERING STATEMENT

This firm was retained to determine the number of principal community radio contours available from stations authorized for commercial service within the radio market defined by the principal community contours of KBRE(AM) and KSUB(AM), both licensed to Cedar City, UT and the licensed facilities of KCCA.L(FM), Colorado City, AZ.

The existing facilities of the stations included in this report were determined by the use of currently updated copies of the FCC computer databases of AM and FM stations. The listed facilities served as the basis for the computation of the respective principal community contours as defined in §73.3555 (a)(4)(i) of the Rules. The accuracy of the results of this study is understood to be limited to the accuracy of these databases. The FCC databases give no indication of licensed facilities which may be inoperative, construction permit facilities which may now be operating under program test authority (but have not yet been issued a license), facilities which may have been licensed since the last update, or non-commercial stations operating within the AM band. Therefore, some stations may have been included or excluded erroneously. However, unless otherwise indicated, all licensed facilities known to be inoperative and all known non-commercially licensed stations, as well as application and construction permit facilities, have been eliminated from consideration in this study.

For AM stations, Map M-3 soil conductivity values and the authorized licensed transmitting facilities served as the basis for the computation of the predicted 5.0 mV/m groundwave contour in accordance with §73.183 of the FCC Rules. The distance to the contour was computed for seventy-two (72) equally spaced azimuths beginning with 0° True. For FM stations, the authorized Center of Radiation and ERP values were utilized to compute the predicted 3.16 mV/m (70 dBu) contour as provided in §73.313 of the Rules. The predicted FM contours shown in this report are based on the use of 72 equally spaced terrain radials beginning with 0° True.

The radio market has been defined, in accordance with §73.3555 (a)(4)(ii) of the FCC Rules, as the area within the total perimeter formed by the combined principal community contours of KBRE-AM, KSUB(AM), and KCCA(FM). **Figure 1** shows only the three (3) contours on a map indicating the boundaries of the defined radio market area. To aid in identifying the respective contours, AM contours have been shown with red lines, and FM contours have been shown with black lines.

These contours are also shown in **Figure 2** and **Figure 3** of this report along with the other principal community contours entering the market. The market defining contours have been shown with green dashed lines on these maps. The other AM contours have been shown in **Figure 2** with solid red lines, and the other FM contours have been shown in **Figure 3** with solid black lines.

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In addition to the stations defining the market area, the principal community contours of the three (3) other AM stations and nine (9) other FM stations entering the market are shown in **Figures 2** and **3**, respectively. Including the three (3) stations which define the market area, there is a total of fifteen (15) aural services in this market. Thus, the market falls within the limitations set forth in §73.3555 (a)(1)(iii) for markets in which six stations, not more than four of which are in the same service, can be under common control. **Figure 4** lists the facilities of the individual stations used in this report.

Alternately, this market was analyzed under the guidelines of NPRM, MM Docket No. 00-244. This rulemaking excludes stations under common ownership, operation, or control from entering the market. Stations under common control which help define the market may continue to be counted. Under NPRM, MM Docket No. 00-244, the principal community contours of three (3) other AM stations and seven (7) other FM stations enter the market. Including the three (3) stations which define the market area, there is a total of thirteen (13) aural services in this market. Thus under the proposed rules, the market falls within the limitations set forth in §73.3555(a)(1)(iv) for markets in which five (5) stations, not more than three (3) of which are in the same service, can be under common control. In addition, no more than 50% of the stations in such a market can be under common control. For this market, two (2) AM stations and one (1) FM station, representing 23.1% of the market would be under common control.

CERTIFICATION

I hereby certify, subject to penalties for perjury, that the contents of this Engineering Statement are true and accurate to the best of my knowledge and belief.

March 15, 2001

MUNN-REESE, INC.

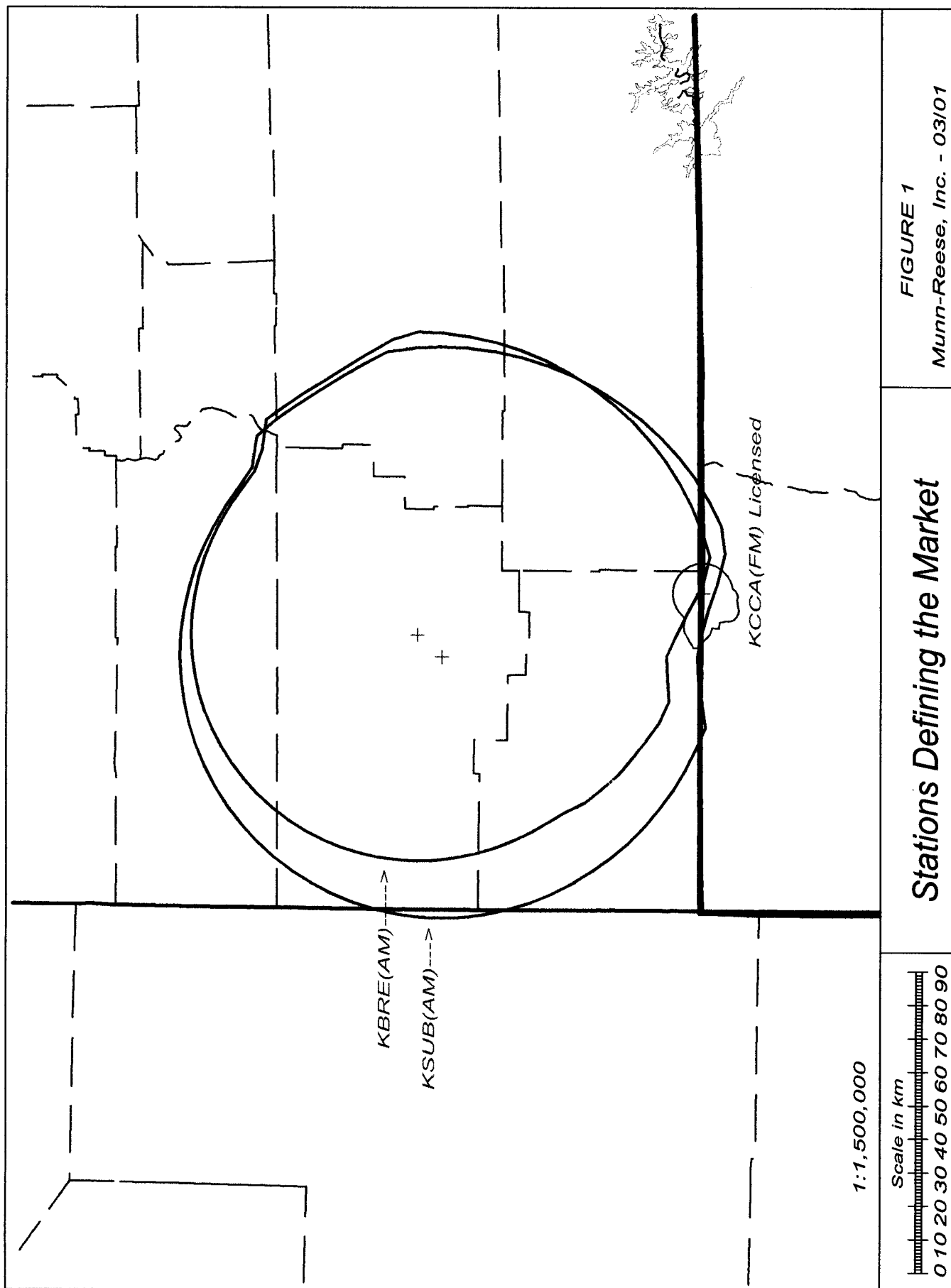
By Justin W. Asher
Justin W. Asher, Project Engineer

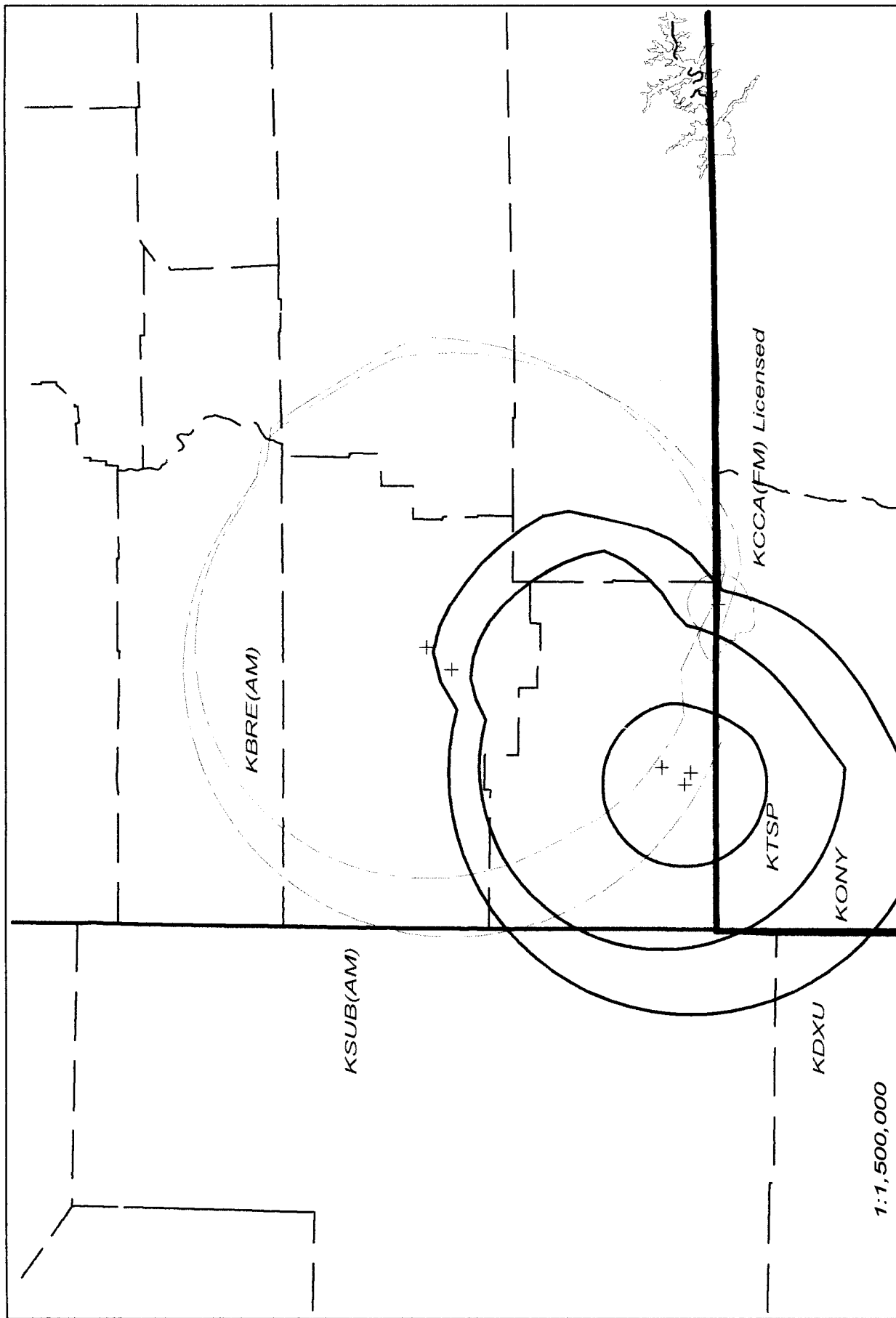
By Wayne S. Reese
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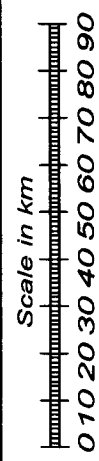
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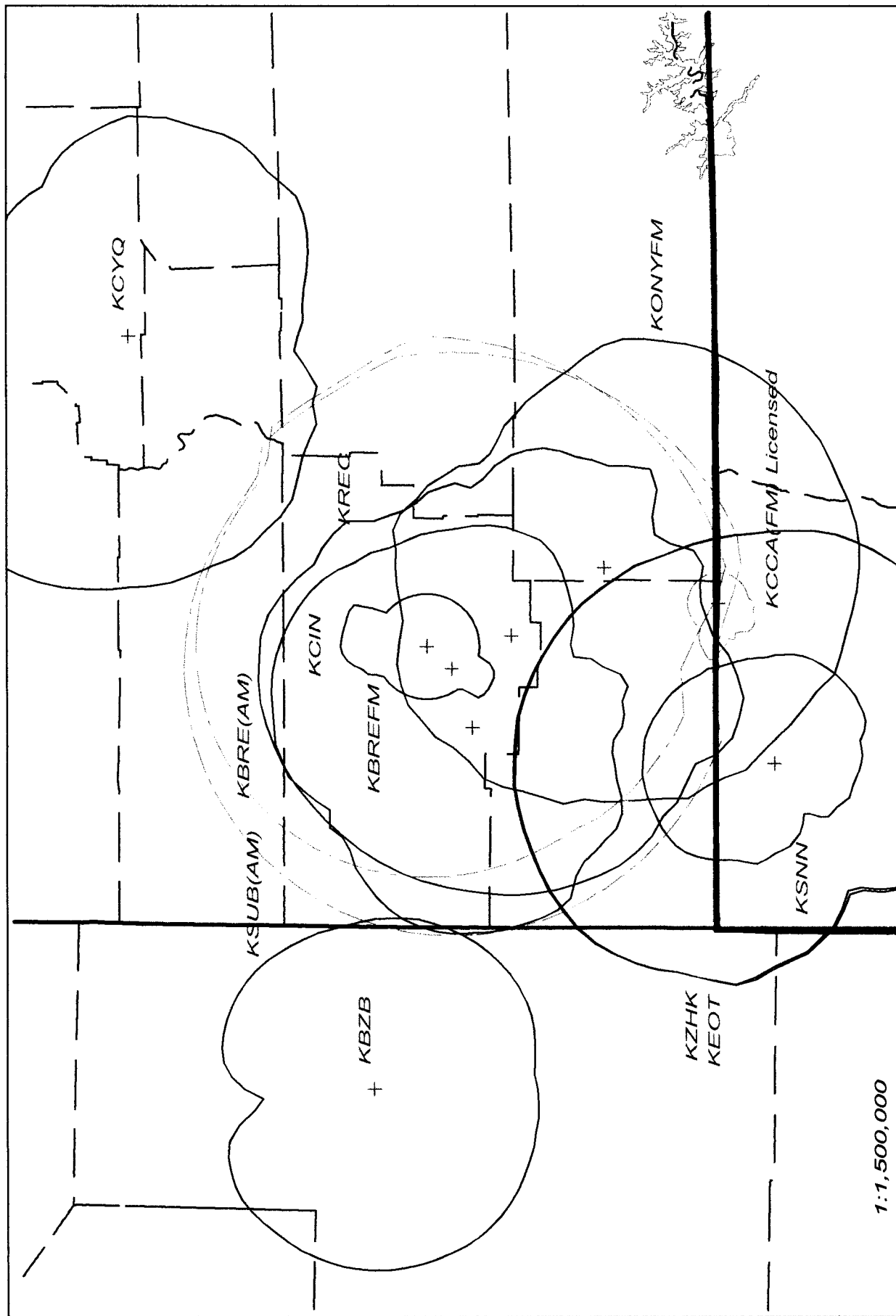


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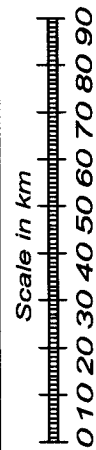


AM Stations Entering the Market

FIGURE 2
Munn-Reese, Inc. - 03/01



1:1,500,000



FM Stations Entering the Market

FIGURE 3
Munn-Reese, Inc. - 03/01

FIGURE 4

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KCYQ	38-32-30 112-03-31	229C	41.0	Richfield	UT
KEOT	36-50-49 113-29-28	259C	90.0	St. George	UT
KONYFM	37-17-45 112-50-34	266C	100.0	Kanab	UT
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KSNM	36-50-49 113-29-28	228C2	2.4	St. George	UT
KZHK	36-50-49 113-29-28	240C	100.0	St. George	UT

¹ * Represents Stations which define the Radio Market

² ** Represents Stations under common control which must be excluded from entering into a market under NPRM, MM Docket No. 00-244