

**ENGINEERING STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS**

This radio multiple ownership analysis was prepared on behalf of NRC Broadcasting Mountain Group, LLC to consider the common ownership of stations KFMU-FM, KIDN-FM, KKCH(FM), KNFO(FM), KTRJ(FM), KSMT(FM), KSPN-FM, and KTUN(FM), as well as any other stations in which NRC Broadcasting Mountain Group, LLC or its principals hold an attributable interest. The analysis was done under the FCC “Interim” contour method, as the stations are located outside of any Arbitron market.* Below is a tabulation of facilities for each station considered.

Call Sign / Facility ID	Location	Facilities
KRKY(AM) / 24745 Licensed Facility	Granby, CO	930 kHz 4.5 kW-D ND1
KFMU(FM) / 34434 Licensed Facility	Oak Creek, CO	Channel 281C3 1.4 kW 327 m
KZMV(FM) / 24746 Licensed Facility	Kremmling, CO	Channel 292C2 50 kW 150 m
KSKE-FM / 16269 Licensed Facility	Vail, CO	Channel 284C1 100 kW 102 m
KSMT(FM) / 57336 Pending Application Facility	Breckenridge, CO	Channel 271A 6 kW (DA) -64 m
KTUN(FM) / 44012 Licensed Facility	Eagle, CO	Channel 269C1 12 kW (DA) 667 m
KTUN(FM) / 44012 Pending Application Facility	Eagle, CO	Channel 269C1 10.5 kW 696 m
KJEB(FM) / 164290 Licensed Facility	New Castle, CO	Channel 233C3 25 kW -121 m
KJEB(FM) / 164290 Pending Application Facility	New Castle, CO	Channel 233C1 90 kW 211 m
KKCH(FM) / 4360 Licensed Facility	Glenwood Springs, CO	Channel 224C 56 kW 763 m
KNFO(FM) / 8780 Licensed Facility	Basalt, CO	Channel 291A 1.6 kW 111 m
KSPN-FM / 43884 Licensed Facility	Aspen, CO	Channel 276A 3 kW -26 m
KSPN-FM / 43884 Pending Application Facility	Aspen, CO	Channel 276C3 25 kW -9 m
KQZR(FM) / 86173 Pending Application	Gypsum, CO	Channel 273C3 0.245 kW (DA) 851 m

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

Facility		
KQZR(FM) / 86173 Licensed Facility	Craig, CO	Channel 273C 100 kW 379 m
KTRJ(FM) / 84270 Licensed Facility	Hayden, CO	Channel 297C2 29 kW 198 m
KIDN(FM) / 57339 Licensed Facility	Hayden, CO	Channel 240C3 6 kW 198 m
KIDN(FM) / 57339 Authorized CP Facility	Hayden, CO	Channel 240C2 6 kW 198 m

The principal community contours of these stations are depicted on a map included herein as Figure 1. Since the principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) of the 8 stations to be commonly owned are in some way involved in overlap with some of the stations tabulated above, 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 markets” applicable to common ownership of the subject stations are defined as the areas encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. There are sixteen “radio markets” to be considered. The table below lists the defined markets:

Defined Radio Markets	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	--	KFMU(FM)(Licensed), KTUN(FM)(Pending Application), KZMV(FM)(Licensed)
Market 2	KRKY(AM)	KSKE-FM(Licensed), KSMT(FM)(Licensed)
Market 3	--	KKCH(FM)(Licensed), KNFO(FM)(Licensed), KSPN-FM (Licensed or Pending application), KTUN(FM)(Pending Application)
Market 4	--	KKCH(FM)(Licensed), KSKE-FM(Licensed), KSPN-FM (Licensed or Pending Application), KTUN(FM)(Pending Application)
Market 5	--	KKCH(FM)(Licensed), KTUN(FM)(Licensed or Pending Application), KZMV(FM)(Licensed)
Market 6	--	KSKE-FM(Licensed), KTUN(FM)(Licensed or Pending Application), KZMV(FM)(Licensed)
Market 7	KRKY(AM)	KSMT(FM)(Pending Application), KZMV(FM)(Licensed)
Market 8	--	KKCH(FM)(Licensed), KQZR(FM)(Pending Application), KSKE-FM(Licensed), KTUN(FM)(Licensed or Pending Application)

Market 9	--	KJEB(FM)(Licensed or Pending Application), KKCH(FM)(Licensed), KTUN(FM)(Licensed or Pending Application)
Market 10	--	KJEB(FM)(Pending Application), KKCH(FM)(Licensed), KSPN-FM(Pending Application), KTUN(FM)(Licensed)
Market 11	--	KFMU(FM)(Licensed), KIDN(FM)(Licensed or Authorized CP), KTRJ(FM)(Licensed)
Market 12	--	KFMU(FM)(Licensed), KTUN(FM)(Licensed or Pending Application)
Market 13	--	KSMT(FM)(Pending Application), KTUN(FM)(Licensed), KZMV(FM)(Licensed)
Market 14	KRKY(AM)	KTUN(FM)(Licensed), KZMV(FM)(Licensed)
Market 15	--	KIDN(FM)(Licensed or Authorized CP), KQZR(FM)(Licensed), KTRJ(FM)(Licensed)
Market 16	--	KJEB(FM)(Pending Application), KKCH(FM)(Licensed), KQZR(FM)(Licensed)

Count of Stations in Defined Markets

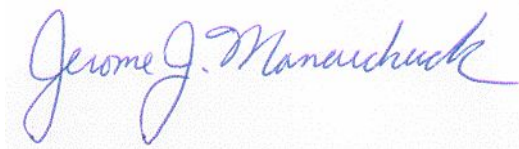
The number of radio stations in a “radio market” is determined by counting the operating stations having principal community contours which overlap or intersect the principal community contours which define the radio market. Only those stations located within 92 km of the perimeter of the mutual overlap area of the defined market area were employed in the count of stations. The results of the analysis are tabulated below:

Defined Radio Markets	Total Number of Stations in the Radio Market	Number of NRC Stations that Define the Radio Market
Market 1	4 AM, 15 FM; 19 Total	3
Market 2	6 AM, 17 FM; 23 Total	3
Market 3	3 AM, 17 FM; 20 Total	4
Market 4	3 AM, 16 FM; 19 Total	4
Market 5	3 AM, 20 FM; 23 Total	3
Market 6	4 AM, 21 FM; 25 Total	3
Market 7	5 AM, 16 FM; 21 Total	3
Market 8	2 AM, 22 FM; 24 Total	4
Market 9	3 AM, 18 FM; 21 Total	3
Market 10	3 AM, 19 FM; 22 Total	4
Market 11	3 AM, 12 FM; 15 Total	4
Market 12	4 AM, 20 FM; 24 Total	2
Market 13	1 AM, 11 FM; 12 Total	3

Market 14	2 AM, 14 FM; 16 Total	3
Market 15	3 AM, 11 FM; 14 Total	3
Market 16	5 AM, 21 FM; 26 Total	3

Sheets 1 thru 16 of Figure 2 are tabulations of the radio stations identified in the defined radio markets. 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 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 1 degree of azimuth.

Based on the above, the proposed assignment of these eight stations to NRC Broadcasting Mountain Group, LLC complies with Section 73.3555(a) of the FCC Rules.

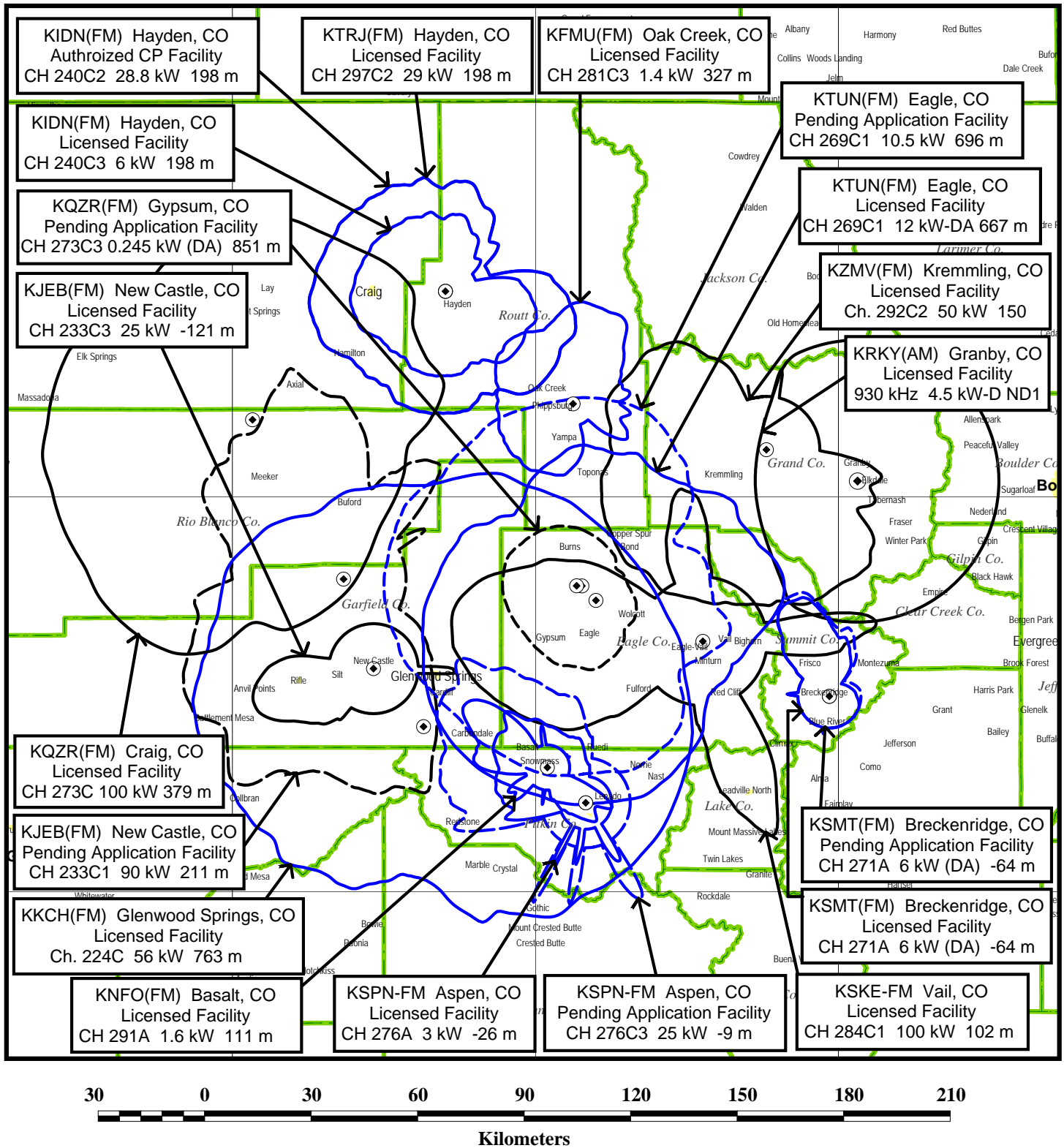


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Figure 1



PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

NRC BROADCASTING MOUNTAIN GROUP, LLC

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

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Tabulation of Other Stations Defined in Radio Market 1

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KRAI	CRAIG	CO	550 kHz
KVLE	VAIL	CO	610
KGLN	GLENWOOD SPRINGS	CO	980
KBCR	STEAMBOAT SPRINGS	CO	1230
KRNC	STEAMBOAT SPRINGS	CO	88.5 MHz
KLBV	STEAMBOAT SPRINGS	CO	89.3
KPRE	VAIL	CO	89.9
KHCO	HAYDEN	CO	90.1
KLRY	GYP SUM	CO	91.3
KTSG	SIDNEY	CO	91.7
KRAI-FM	CRAIG	CO	93.7
KYSL	FRISCO	CO	93.9
KBCR-FM	STEAMBOAT SPRINGS	CO	96.9
KZYR	AVON	CO	97.7
KMTS	GLENWOOD SPRINGS	CO	99.1
KZMV	KREMMLING	CO	106.3

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Tabulation of Other Stations Defined in Radio Market 2

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KVLE	VAIL	CO	610 kHz
KPOF	DENVER	CO	910
KRKS	DENVER	CO	990
KVCU	BOULDER	CO	1190
KEZZ	ESTES PARK	CO	1470
KPRE	VAIL	CO	89.9 MHz
KLRY	GYPSUM	CO	91.3
KYSL	FRISCO	CO	93.9
KRKS-FM	LAFAYETTE	CO	94.7
KXPK	EVERGREEN	CO	96.5
KBCO-FM	BOULDER	CO	97.3
KZYR	AVON	CO	97.7
KYGO-FM	DENVER	CO	98.5
KIMN	DENVER	CO	100.3
KRFX	DENVER	CO	103.5
KSNO-FM	SNOWMASS VILLAGE	CO	103.9
KXKL-FM	DENVER	CO	105.1
KALC	DENVER	CO	105.9
KZMV	KREMMLING	CO	106.3
KBPI	DENVER	CO	106.7

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Tabulation of Other Stations Defined in Radio Market 3

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KVLE	VAIL	CO	610 kHz
KRGS	RIFLE	CO	690
KGLN	GLENWOOD SPRINGS	CO	980
KDNK	GLENWOOD SPRINGS	CO	88.1 MHz
KCJX	CARBONDALE	CO	88.9
KPRE	VAIL	CO	89.9
KVOV	CARBONDALE	CO	90.5
KLRY	GYP SUM	CO	91.3
KAJX	ASPEN	CO	91.5
KLXV	GLENWOOD SPRINGS	CO	91.9
KYSL	FRISCO	CO	93.9
KRVG	GLENWOOD SPRINGS	CO	95.5
KZYR	AVON	CO	97.7
KMTS	GLENWOOD SPRINGS	CO	99.1
KSNO-FM	SNOWMASS VILLAGE	CO	103.9
KZKS	RIFLE	CO	105.3

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Tabulation of Other Stations Defined in Radio Market 4

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KVLE	VAIL	CO	610 kHz
KRGS	RIFLE	CO	690
KGLN	GLENWOOD SPRINGS	CO	980
KDNK	GLENWOOD SPRINGS	CO	88.1 MHZ
KCJX	CARBONDALE	CO	88.9
KPRE	VAIL	CO	89.9
KVOV	CARBONDALE	CO	90.5
KLRY	GYP SUM	CO	91.3
KAJX	ASPEN	CO	91.5
KLXV	GLENWOOD SPRINGS	CO	91.9
KRVG	GLENWOOD SPRINGS	CO	95.5
KZYR	AVON	CO	97.7
KMTS	GLENWOOD SPRINGS	CO	99.1
KSNO-FM	SNOWMASS VILLAGE	CO	103.9
KZKS	RIFLE	CO	105.3

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Tabulation of Other Stations Defined in Radio Market 5

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KRAI	CRAIG	CO	550 kHz
KVLE	VAIL	CO	610
KGLN	GLENWOOD SPRINGS	CO	980
KDNK	GLENWOOD SPRINGS	CO	88.1 MHz
KCJX	CARBONDALE	CO	88.9
KLBV	STEAMBOAT SPRINGS	CO	89.3
KPRE	VAIL	CO	89.9
KHCO	HAYDEN	CO	90.1
KVOV	CARBONDALE	CO	90.5
KLRY	GYP SUM	CO	91.3
KAJX	ASPEN	CO	91.5
KTSG	SIDNEY	CO	91.7
KLXV	GLENWOOD SPRINGS	CO	91.9
KYSL	FRISCO	CO	93.9
KRVG	GLENWOOD SPRINGS	CO	95.5
KBCR-FM	STEAMBOAT SPRINGS	CO	96.9
KZYR	AVON	CO	97.7
KMTS	GLENWOOD SPRINGS	CO	99.1
KSNO-FM	SNOWMASS VILLAGE	CO	103.9
KZMV	KREMMLING	CO	106.3

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Tabulation of Other Stations Defined in Radio Market 6

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KVLE	VAIL	CO	610 kHz
KGLN	GLENWOOD SPRINGS	CO	980
KBCR	STEAMBOAT SPRINGS	CO	1230
KEZZ	ESTES PARK	CO	1470
KDNK	GLENWOOD SPRINGS	CO	88.1 MHz
KCJX	CARBONDALE	CO	88.9
KLBV	STEAMBOAT SPRINGS	CO	89.3
KPRE	VAIL	CO	89.9
KHCO	HAYDEN	CO	90.1
KVOV	CARBONDALE	CO	90.5
KLRY	GYP SUM	CO	91.3
KTSG	SIDNEY	CO	91.7
KLXV	GLENWOOD SPRINGS	CO	91.9
KYSL	FRISCO	CO	93.9
KRVG	GLENWOOD SPRINGS	CO	95.5
KXPK	EVERGREEN	CO	96.5
KBCR-FM	STEAMBOAT SPRINGS	CO	96.9
KZYR	AVON	CO	97.7
KYGO-FM	DENVER	CO	98.5
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KSNO-FM	SNOWMASS VILLAGE	CO	103.9
KZMV	KREMMLING	CO	106.3

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Tabulation of Other Stations Defined in Radio Market 7

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KVLE	VAIL	CO	610 kHz
KPOF	DENVER	CO	910
KVCU	BOULDER	CO	1190
KEZZ	ESTES PARK	CO	1470
KPRE	VAIL	CO	89.9 MHz
KLRY	GYP SUM	CO	91.3
KYSL	FRISCO	CO	93.9
KRKS-FM	LAFAYETTE	CO	94.7
KXPK	EVERGREEN	CO	96.5
KBCO-FM	BOULDER	CO	97.3
KZYR	AVON	CO	97.7
KYGO-FM	DENVER	CO	98.5
KIMN	DENVER	CO	100.3
KRFX	DENVER	CO	103.5
KXKL-FM	DENVER	CO	105.1
KALC	DENVER	CO	105.9
KZMV	KREMMLING	CO	106.3
KBPI	DENVER	CO	106.7

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Tabulation of Other Stations Defined in Radio Market 8

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KVLE	VAIL	CO	610 kHz
KGLN	GLENWOOD SPRINGS	CO	980
KDNK	GLENWOOD SPRINGS	CO	88.1 MHz
KCJX	CARBONDALE	CO	88.9
KLBV	STEAMBOAT SPRINGS	CO	89.3
KPRE	VAIL	CO	89.9
KHCO	HAYDEN	CO	90.1
KVOV	CARBONDALE	CO	90.5
KTOL	LEADVILLE	CO	90.9
KLRY	GYPSUM	CO	91.3
KAJX	ASPEN	CO	91.5
KTSG	SIDNEY	CO	91.7
KLXV	GLENWOOD SPRINGS	CO	91.9
KYSL	FRISCO	CO	93.9
KRVG	GLENWOOD SPRINGS	CO	95.5
KBCR-FM	STEAMBOAT SPRINGS	CO	96.9
KZYR	AVON	CO	97.7
KMTS	GLENWOOD SPRINGS	CO	99.1
KCUF	EL JEBEL	CO	100.5
KSNO-FM	SNOWMASS VILLAGE	CO	103.9

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Tabulation of Other Stations Defined in Radio Market 9

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KVLE	VAIL	CO	610 kHz
KRGS	RIFLE	CO	690
KGLN	GLENWOOD SPRINGS	CO	980
KDNK	GLENWOOD SPRINGS	CO	88.1 MHz
KCJX	CARBONDALE	CO	88.9
KPRE	VAIL	CO	89.9
KBUT	CRESTED BUTTE	CO	90.3
KVOV	CARBONDALE	CO	90.5
KLRY	GYPSUM	CO	91.3
KAJX	ASPEN	CO	91.5
KLXV	GLENWOOD SPRINGS	CO	91.9
KRVG	GLENWOOD SPRINGS	CO	95.5
KZYR	AVON	CO	97.7
KAYW	MEEKER	CO	98.1
KMTS	GLENWOOD SPRINGS	CO	99.1
KCUF	EL JEBEL	CO	100.5
KSNO-FM	SNOWMASS VILLAGE	CO	103.9
KZKS	RIFLE	CO	105.3

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Tabulation of Other Stations Defined in Radio Market 10

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KVLE	VAIL	CO	610 kHz
KRGS	RIFLE	CO	690
KGLN	GLENWOOD SPRINGS	CO	980
KDNK	GLENWOOD SPRINGS	CO	88.1 MHz
KCJX	CARBONDALE	CO	88.9
KPRE	VAIL	CO	89.9
KBUT	CRESTED BUTTE	CO	90.3
KVOV	CARBONDALE	CO	90.5
KLRY	GYP SUM	CO	91.3
KAJX	ASPEN	CO	91.5
KLXV	GLENWOOD SPRINGS	CO	91.9
KRVG	GLENWOOD SPRINGS	CO	95.5
KZYR	AVON	CO	97.7
KAYW	MEEKER	CO	98.1
KMTS	GLENWOOD SPRINGS	CO	99.1
KCUF	EL JEBEL	CO	100.5
KSNO-FM	SNOWMASS VILLAGE	CO	103.9
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<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KRAI	CRAIG	CO	550 kHz
KGLN	GLENWOOD SPRINGS	CO	980
KBCR	STEAMBOAT SPRINGS	CO	1230
KPYR	CRAIG	CO	88.3 MHz
KRNC	STEAMBOAT SPRINGS	CO	88.5
KLBV	STEAMBOAT SPRINGS	CO	89.3
KHCO	HAYDEN	CO	90.1
KTSG	SIDNEY	CO	91.7
KRAI-FM	CRAIG	CO	93.7
KBCR-FM	STEAMBOAT SPRINGS	CO	96.9
KAYW	MEEKER	CO	98.1
KZMV	KREMMLING	CO	106.3

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KRAI	CRAIG	CO	550 kHz
KVLE	VAIL	CO	610
KGLN	GLENWOOD SPRINGS	CO	980
KBCR	STEAMBOAT SPRINGS	CO	1230
KDNK	GLENWOOD SPRINGS	CO	88.1 MHz
KRNC	STEAMBOAT SPRINGS	CO	88.5
KCJX	CARBONDALE	CO	88.9
KLBV	STEAMBOAT SPRINGS	CO	89.3
KPRE	VAIL	CO	89.9
KHCO	HAYDEN	CO	90.1
KVOV	CARBONDALE	CO	90.5
KLRY	GYP SUM	CO	91.3
KTSG	SIDNEY	CO	91.7
KLXV	GLENWOOD SPRINGS	CO	91.9
KRAI-FM	CRAIG	CO	93.7
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<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KVLE	VAIL	CO	610 kHz
KPRE	VAIL	CO	89.9 MHz
KLRY	GYPSUM	CO	91.3
KAJX	ASPEN	CO	91.5
KYSL	FRISCO	CO	93.9
KZYR	AVON	CO	97.7
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<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KVLE	VAIL	CO	610 kHz
KLBY	STEAMBOAT SPRINGS	CO	89.3 MHz
KPRE	VAIL	CO	89.9
KHCO	HAYDEN	CO	90.1
KLRY	GYPSUM	CO	91.3
KAJX	ASPEN	CO	91.5
KTSG	SIDNEY	CO	91.7
KYSL	FRISCO	CO	93.9
KBCR-FM	STEAMBOAT SPRINGS	CO	96.9
KZYR	AVON	CO	97.7
KCUF	EL JEBEL	CO	100.5
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<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KRAI	CRAIG	CO	550 kHz
KRGS	RIFLE	CO	690
KBCR	STEAMBOAT SPRINGS	CO	1230
KPYR	CRAIG	CO	88.3 MHz
KRNC	STEAMBOAT SPRINGS	CO	88.5
KLbv	STEAMBOAT SPRINGS	CO	89.3
KHCO	HAYDEN	CO	90.1
KTSG	SIDNEY	CO	91.7
KRAI-FM	CRAIG	CO	93.7
KBCR-FM	STEAMBOAT SPRINGS	CO	96.9
KAYW	MEEKER	CO	98.1

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Tabulation of Other Stations Defined in Radio Market 16

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KRAI	CRAIG	CO	550 kHz
KJOL	GRAND JUNCTION	CO	620
KRGS	RIFLE	CO	690
KGLN	GLENWOOD SPRINGS	CO	980
KNZZ	GRAND JUNCTION	CO	1100
KDNK	GLENWOOD SPRINGS	CO	88.1 MHz
KPYR	CRAIG	CO	88.3
KCJX	CARBONDALE	CO	88.9
KVOV	CARBONDALE	CO	90.5
KLRY	GYPSUM	CO	91.3
KLXV	GLENWOOD SPRINGS	CO	91.9
KJYE	GRAND JUNCTION	CO	92.3
KMGJ	GRAND JUNCTION	CO	93.1
KRAI-FM	CRAIG	CO	93.7
KRVG	GLENWOOD SPRINGS	CO	95.5
KBCR-FM	STEAMBOAT SPRINGS	CO	96.9
KAYW	MEEKER	CO	98.1
KMTS	GLENWOOD SPRINGS	CO	99.1
KEKB	FRUITA	CO	99.9
KCUF	EL JEBEL	CO	100.5
KMXY	GRAND JUNCTION	CO	104.3
KZKS	RIFLE	CO	105.3
KBKL	GRAND JUNCTION	CO	107.9