

**Multiple Ownership Study**

The following engineering statement and attached exhibits have been prepared for Three Eagles Communications, licensee of several broadcast facilities in the State of Iowa, and are in support of their multiple ownership showing for the acquisition of additional stations.

It is proposed that Three Eagles acquire stations KVFD(AM) and KUEL(FM) at Fort Dodge, Iowa. The first map in this study depicts the facilities under common control within the State of Iowa as well as the proposed acquisitions. The markets that would be created as a result of the acquisition of these two facilities are indicated by the aqua and orange shading.

Because of the proximity of the facilities to be acquired relative to the facilities already under common control, it is necessary to define two separate markets as previously indicated, however, these two markets may be easily shown on a single map as will be the case with this study. The first market under consideration is created by the common overlap between KIAQ(FM) at Clarion, Iowa, KFVD(AM) at Fort Dodge, Iowa, and KTLB(FM) at Twin Lakes, Iowa. The second market is defined by the common overlap between KIAQ(FM) at Clarion, KVFD(AM) at Fort Dodge, and KUEL(FM) also at Fort Dodge.

In the case of the first market, the grouping is created by the common overlap between three facilities, two of which are in the same service. As a result of this grouping, it is necessary and sufficient to demonstrate that the proponent would not control greater than fifty percent of the stations serving the market. As the map analyzing the two markets under consideration demonstrates, there are at least seven other facilities whose principal community coverage contours overlap at least one of the market defining stations. It is therefore respectfully submitted that this market would comply with the provisions of Section 73.3555 of the Commission's Rules.

The second market under consideration is defined by the common overlap between three facilities, two of which are in the same service. As with the previous market, it is necessary and sufficient to demonstrate that the proponent would not control greater than fifty percent of the stations serving the market. The map analyzing the markets indicates that there are at least 7 other facilities serving the market. As a result, it is respectfully submitted that this market would also comply with the provisions of Section 73.3555 of the Commission's Rules.

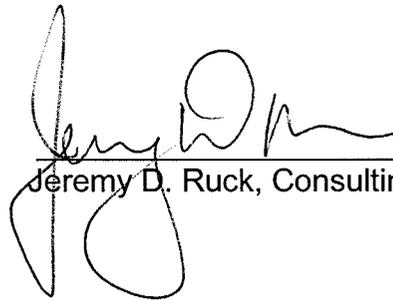
Since both markets under consideration comply with the provisions of Section 73.3555 of the Commission's Rules, it is respectfully submitted that the acquisition of KVFD(AM) and KUEL(FM) by Three Eagles would be in compliance with the Commission's Rules. It should be noted that the maps

contained in this study were computer generated using a commercially available software package. As a result of the computer generation, it is believed that these maps are considerably more accurate than similar maps generated by hand.

The preceding statement and attached exhibits have been prepared by me or under my direction and are true and accurate to the best of my belief and knowledge.

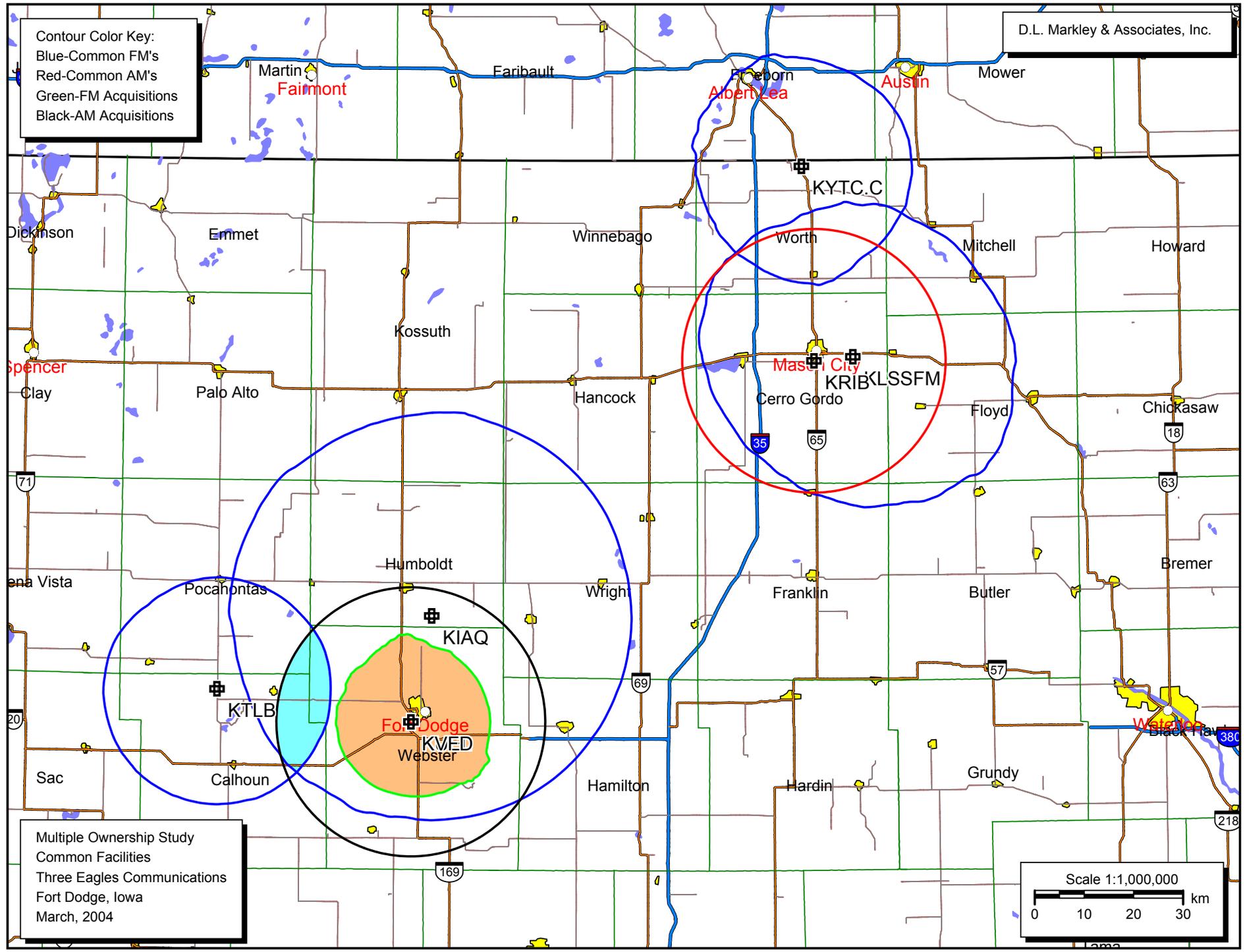
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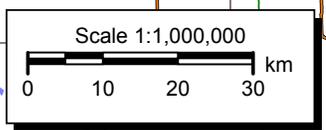


Jeremy D. Ruck, Consulting Engineer

Contour Color Key:  
Blue-Common FM's  
Red-Common AM's  
Green-FM Acquisitions  
Black-AM Acquisitions

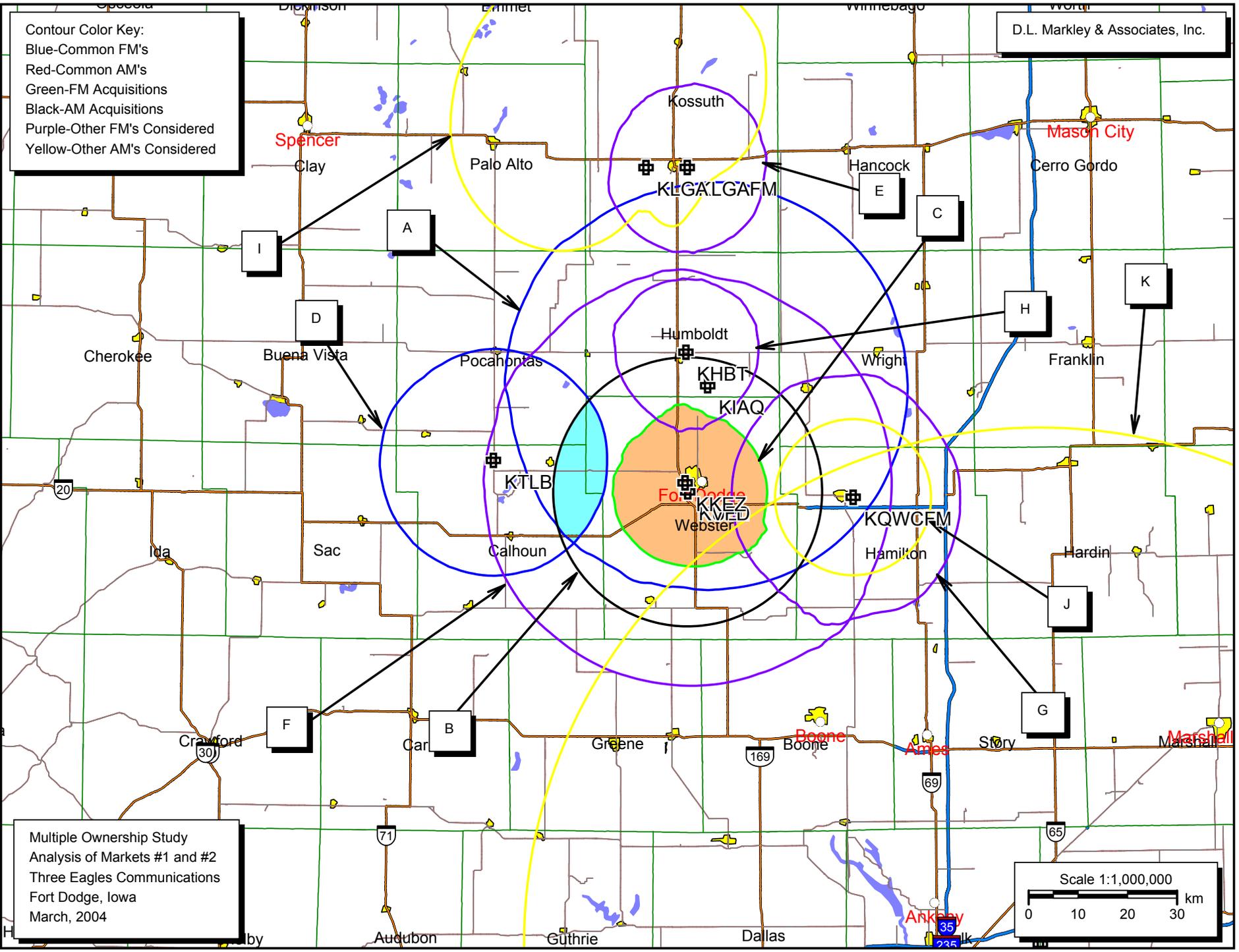


Multiple Ownership Study  
Common Facilities  
Three Eagles Communications  
Fort Dodge, Iowa  
March, 2004

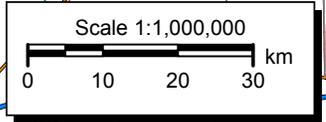


Contour Color Key:  
 Blue-Common FM's  
 Red-Common AM's  
 Green-FM Acquisitions  
 Black-AM Acquisitions  
 Purple-Other FM's Considered  
 Yellow-Other AM's Considered

D.L. Markley & Associates, Inc.



Multiple Ownership Study  
 Analysis of Markets #1 and #2  
 Three Eagles Communications  
 Fort Dodge, Iowa  
 March, 2004



**Index to Facilities Depicted on Market Analysis Map**

<b>A-</b>	<b>KIAQ(FM)</b>	<b>Clarion, Iowa</b>
<b>B-</b>	<b>KVFD(AM)</b>	<b>Fort Dodge, Iowa</b>
<b>C-</b>	<b>KUEL(FM)</b>	<b>Fort Dodge, Iowa</b>
<b>D-</b>	<b>KTLB(FM)</b>	<b>Twin Lakes, Iowa</b>
<b>E-</b>	<b>KLGA-FM</b>	<b>Algona, Iowa</b>
<b>F-</b>	<b>KKEZ(FM)</b>	<b>Fort Dodge, Iowa</b>
<b>G-</b>	<b>KQWC-FM</b>	<b>Webster City, Iowa</b>
<b>H-</b>	<b>KHBT(FM)</b>	<b>Humboldt, Iowa</b>
<b>I-</b>	<b>KLGA(AM)</b>	<b>Algona, Iowa</b>
<b>J-</b>	<b>KWQC(AM)</b>	<b>Webster City, Iowa</b>
<b>K-</b>	<b>WHO(AM)</b>	<b>Des Moines, Iowa</b>