

Exhibit 5

Local Radio Ownership

By this application, Moberly/Macon License Co., LLC (“GoodRadio”) seeks a construction permit for NEW(FM), Moberly, Missouri (“the Station”). The instant application implicates the Commission’s local radio ownership rule because GoodRadio or its affiliate is the licensee of the following stations whose principal community contours overlap the Station:

Station	Community	Arbitron Market of Community	Home Market of Station
KIRK(FM)	Moberly, MO	None	None
KRES(FM)	Moberly, MO	None	None
KWIX(AM)	Moberly, MO	None	None
NEW(FM)	Moberly, MO	None	None
KCDG(FM)	Madison, MO	None	None

Local Radio Ownership Rule

Under Section 73.3555(a)(1) of the Commission’s rules, the FCC uses a tiered approach, as described below, to determine whether a combination of commonly-owned radio stations complies with the local radio ownership limits for any particular market.¹

Full-Power Commercial and Noncommercial Stations in the Market	Maximum Number of Stations in Which a Single Entity May Have an Attributable Interest	Maximum Number of Stations in the Same Service
45 or More Stations	8 Radio Stations	5
Between 30 and 44 Stations	7 Radio Stations	4
Between 15 and 29 Stations	6 Radio Stations	4
14 or Fewer Stations	5 Radio Stations (Provided that no entity may have an interest in more than 50% of the stations in the market)	3

The community of Moberly, Missouri is located outside all Arbitron Metro Markets and the Station is not “home” to an Arbitron Metro Market. Accordingly, the Commission defines a market as the area where the principal community contours for the commonly-owned stations overlap. To determine the number of stations in that market, the Commission counts all stations (including stations within Arbitron Metro Markets) whose principal community contours overlap that of at least one of the commonly-owned stations. The Commission, however, excludes all stations whose transmitters are greater than 92 kilometers

¹ See 47 C.F.R. 73.3555(a)(1).

from the mutual overlap area and any commonly owned stations that are not included already in the market (the “Contour Methodology”).²

Analysis

As the attached engineering statement from du Treil, Lundin & Rackley demonstrates, the proposed changes comply with the Commission’s local ownership rule. Under the Contour Methodology, the Station, as modified creates a single radio market:

Proposed Market Combination	Number of Stations In Market	Complies with Local Ownership Rule?
NEW(FM), KIRK(FM), KRES(FM), KWIX(AM) and KCDG(FM).	15	Yes (1 AM and 4 FM)

Common ownership of these three stations in this single market complies with the local radio ownership rule because at least 15 stations serve this market.

* * * *

Based on the foregoing, GoodRadio respectfully submits that the proposed construction permit for NEW(FM), Moberly, Missouri, fully complies with the Commission’s local radio ownership rules.

² See 2002 Biennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, *Report & Order & Notice of Proposed Rulemaking*, 18 FCC Rcd 13,620, ¶ 285 (2003).

ATTACHMENT 1

Engineering Statement of du Treil, Lundin & Rackley

ENGINEERING STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS

This radio multiple ownership analysis was prepared to consider potential common ownership of the stations tabulated below under the FCC “Interim” contour analysis method, as the stations are located outside of any Arbitron Market.¹ Christine CP Co., LLC (“the Permittee”) has attributable interest in the stations tabulated below and is proposing to construct a NEW FM station on channel 223A at Moberly, MO.

Call Sign / Facility ID	Location	Facilities
KWIX (AM) / 35889 Licensed	Moberly, MO	1230 kHz 0.49 kW-D ND-1
KCDG(FM) / 171017 Authorized	Madison, MO	Channel 247C3 12 kW 146 m
KIRK(FM) / 78275 Licensed	Macon, MO	Channel 260C3 12.5 kW 141 m
KRES(FM) / 35890 Licensed	Moberly, MO	Channel 284C 100 kW 311 m

The principal community contours (3.16 mV/m for FM stations, 5 mV/m for AM stations) for these stations are depicted on a map included herein as Figure 1. As there is common contour overlap between the proposed NEW FM station and the above mentioned stations, an ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555(a).

Radio Markets

The “radio markets” 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. There is one “radio market” to consider which includes all five stations listed above.

Count of Stations in Defined Market

The number of radio stations in a “radio market” is determined by counting the operating stations having principal community contours that overlap or intersect the principal community contours that define the radio market, plus the subject stations that are co-owned.

¹ See Report and Order and Notice of Proposed Rulemaking, MB Docket 02-277, FCC 03-127, Released July 2, 2003.

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. Commonly owned stations were not considered in the count of stations in the defined markets. The results of the analysis are tabulated below:

Defined Radio Market	Number of Other Stations in the Radio Market
Market 1	10 FM

Figure 2 is a tabulation of the radio stations identified in the defined radio market. It is noted that the tabulation is not a complete list of all of the other stations in the market, but rather enough stations to show compliance with the FCC's radio multiple ownership rules. 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 Section 73.184. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of Section 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 5 degrees of azimuth.

Based on the above, it is concluded that the proposed combination of the stations to be owned will comply with Section 73.3555(a) of the FCC Rules.

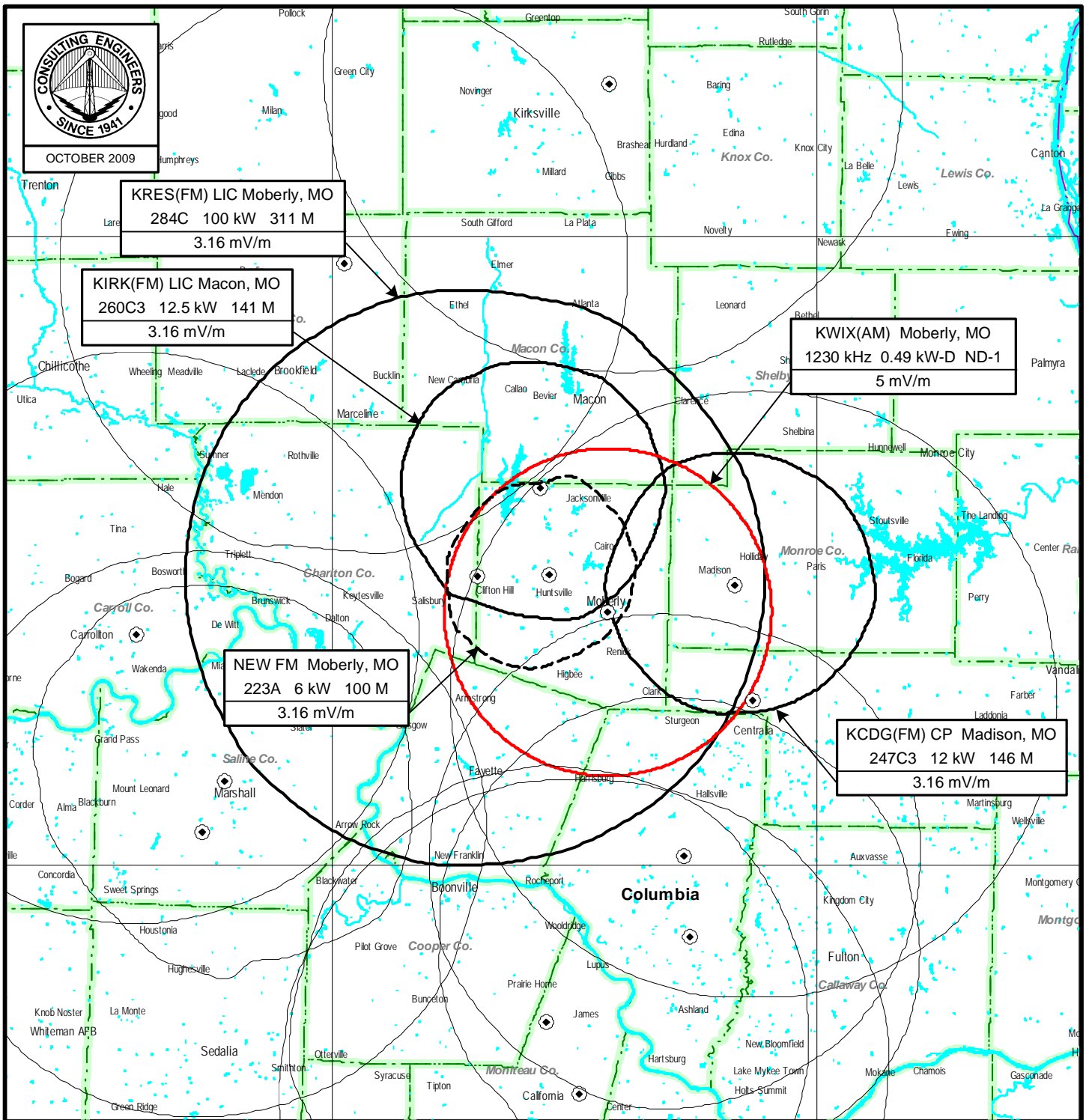


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Figure 1



PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

du Treil, Lundin & Rackley, Inc Sarasota, Florida

ENGINEERING STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS

Tabulation of Other Stations in Radio Market 1

<u>Call Sign</u>	<u>City of License</u>	<u>State</u>	<u>Freq/Ch.</u>
KBIA	Columbia	MO	217
KRXL	Kirksville	MO	233
KWWR	Mexico	MO	239
KPOW-FM	La Monte	MO	249
KMZU	Carrollton	MO	264
KPLA	Columbia	MO	268
KMMO-FM	Marshall	MO	275
KOQL	Ashland	MO	291
KTXY	Jefferson City	MO	295
KLTE	Kirksville	MO	300