

**ENGINEERING STATEMENT COVERING  
BROADCAST MULTIPLE OWNERSHIP STUDY  
CCR-LA JUNTA IV, LLC and CCR-LAMAR IV, LLC  
LA JUNTA & LAMAR, COLORADO**

**JANUARY 2014**

**ENGINEERING STATEMENT COVERING  
BROADCAST MULTIPLE OWNERSHIP STUDY  
CCR-LA JUNTA IV, LLC & CCR-LAMAR IV, LLC  
LA JUNTA & LAMAR, COLORADO**

**JANUARY 2014**

This engineering statement is submitted for the purpose of reflecting a change in ownership structure for the commonly owned stations in the market. No facility technical changes are associated with this filing. This statement, supporting tabulations and figures have been prepared on behalf of **CCR-La Junta IV, LLC and CCR-Lamar IV, LLC (“CCR”)**. The purpose of this statement is to demonstrate CCR’s compliance with *Section 73.3555* of the Commission’s Rules with respect to multiple ownership of AM and FM broadcast facilities in the La Junta and Lamar, Colorado market.

CCR proposes continued common ownership in the following four stations in the La Junta and Lamar, Colorado market. All four stations are listed below:

KBLJ(AM)	La Junta, CO	1400 kHz	1 kW LU	ID 7047
KLMR(AM)	Lamar, CO	920 kHz	5 kW LD	ID 174
KTHN(FM)	La Junta, CO	92.1 MHz	3 kW	ID 7046
KLMR-FM	Lamar, CO	93.5 MHz	100 kW	ID 175

The four stations are considered as two separate markets since the principal community contours of KTHN(FM) and KLMR-FM do not overlap.

Market 1: KTHN(FM), KLMR(AM), KBLJ(AM)

Market 2: KLMR-FM, KLMR(AM), KBLJ(AM)

In each market there are two AM stations and one FM station.

A multiple ownership analysis was prepared considering the above described radio stations under proposed common ownership or control, which stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) in accordance with *Section 73.3555* of the FCC Rules.

## **RADIO MARKETS & METHODOLOGY**

The radio market is defined as the area encompassed by the principal community contours (predicted or measured 5 mV/m groundwave contour for AM; predicted 3.16 mV/m contour for FM) of the stations that are both mutually overlapping and proposed to be commonly attributable post-transaction. The number of radio stations in this defined radio market (i.e., the numerator) will not exceed the limits set forth in *Section 73.3555(a)*. A commonly attributable station whose contour overlaps the contour of some but not all of the contours of the stations that define the radio market was not counted toward the local radio ownership limits (i.e., is not counted in the numerator). Since the commonly owned stations are in counties which are not Arbitron Metro counties, stations counted as part of the market are determined on the basis of contour overlap.

*Figure 1* depicts the principal community contours for all four stations for which common ownership is proposed. *Figure 2* depicts other FM stations plus those depicted on *Figure 1*. There are no additional AM stations in the market. It is noted that the market perimeter is defined by the 5 mV/m AM contours and thus other stations considered as being part of markets 1 and 2 are the same.

*Table I* lists all AM stations whose 5 mV/m contour duplicates some portion of the market, and these reflect only the **CCR** owned facilities as depicted in pink on *Figure 1*. *Table II* lists all FM stations whose 70 dBu contour duplicates some portion of the market. The contours for these additional stations are plotted on *Figure 2* in blue along with the market as depicted on *Figure 1*.

Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's CDBS database using the appropriate Ground Wave Field Strength versus Distance Graph of 47 CFR 73.184. Ground conductivities were obtained from FCC Figure M3. Distances to the FM contours were determined based on the methodology of 47 CFR 73.313. Terrain data was derived from the Radiosoft Comstudy 3 second terrain database which has been found to be in good agreement with the FCC's 30 second terrain database for each of the FM stations, using radials spaced every 5 degrees of azimuth.

### **CONCLUSION**

There are 6 other FM stations considered in this study which have principal community contours that overlap some portion of the attributable stations principal community contours. AM stations KLMR and KBLJ are a part of each of the two markets and their contours represent the boundary of the market for all practical purposes as stated above.

Stations in each market are listed as follows:

Market 1: Attributable Stations - 3 Stations (2 AM & 1 FM)  
KTHN(FM), KLMR(AM) and KBLJ(AM)

Non Attributable Stations in Market = 4  
KPHT(FM), KRKV(FM), KECC(FM), KVAY(FM)

Market 2: Attributable Stations – 3 Stations (2 AM & 1 FM)  
KLMR-FM, KLMR(AM) and KBLJ(AM)

Non Attributable Stations in Market = 4  
KRKV(FM), KCSE(FM), KTLH(FM), KVAY(FM)

Based on the above analysis, it is believed that the proposed common ownership of stations complies with *Section 73.3555(a)(1)(iv)* of the Commission's Rules where, in a market of 14 or fewer stations, one owner may have up to five commercial stations with not more than three stations in the same service.

The foregoing was prepared on behalf of **CCR-La Junta IV, LLC and CCR-Lamar IV, LLC** by Laura M. Mizrahi of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The undersigned certifies, under penalty of perjury, that the statements herein are true and correct of her own knowledge, except such statements made on information and belief, and as to these statements she believes them to be true and correct.

/s/ Laura M. Mizrahi  
*for* Communications Technologies, Inc.  
Marlton, New Jersey

January 27, 2014

**TABLE I**

**AM STATIONS IN THE CCR-LA JUNTA IV & LAMAR IV, LLC MARKET ANALYSIS**

**JANUARY 2014**

CALL ARN	ST	CITY OWNER	FREQ LATITUDE	PAT LONGITUDE	AG	PWR	DESC
KBLJ BL 37-59-14.0 N	CO	LA JUNTA CCR-LA JUNTA IV, LLC	1400.00000		LU	1.000	ND1
		103-34-01.0 W					
KLMR BL 38-06-53.0 N	CO	LAMAR CCR-LAMAR IV, LLC	920.00000		LD	5.000	DAN
		102-37-16.0 W					

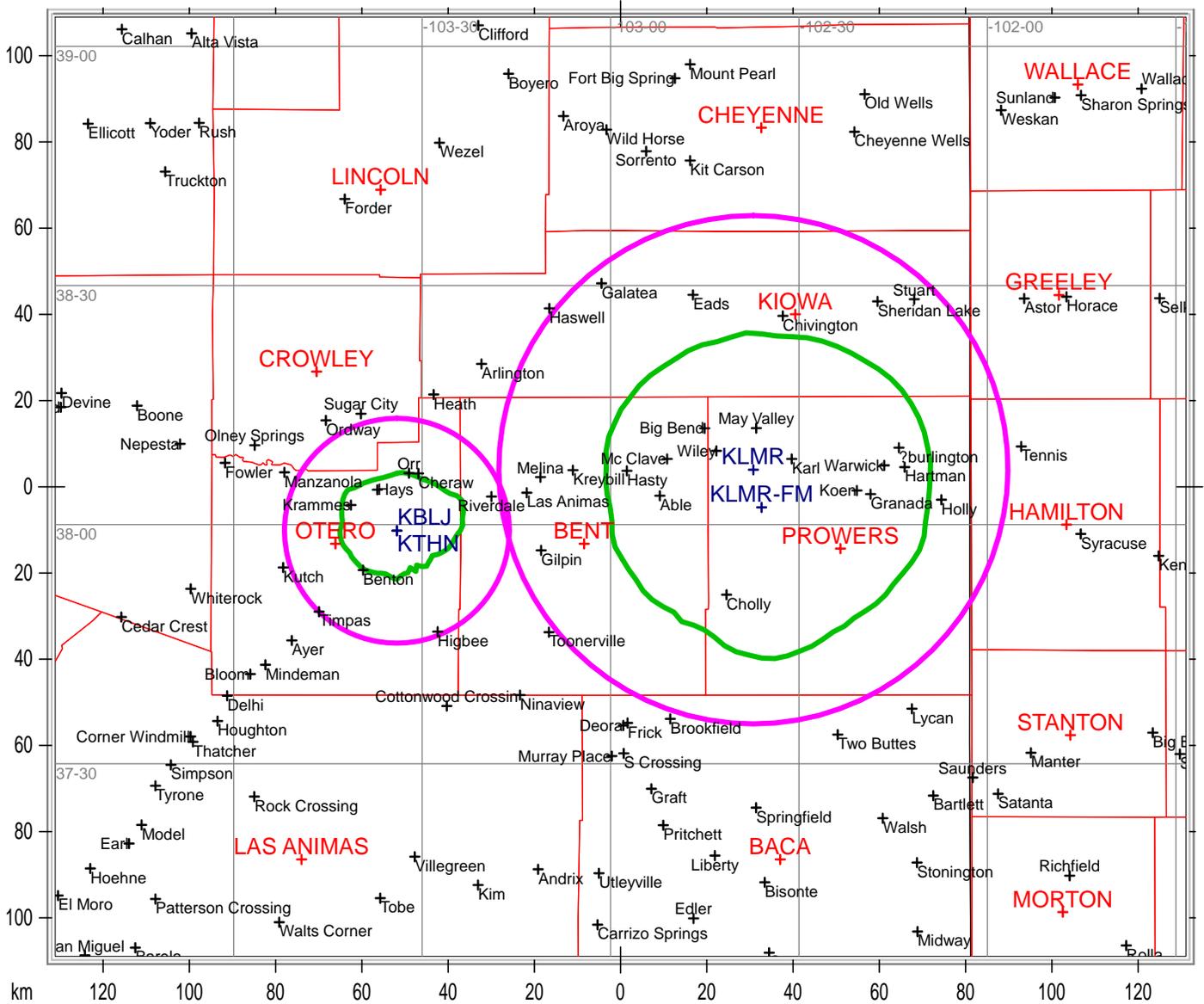
**TABLE II**

**FM STATIONS IN THE CCR-LA JUNTA IV & LAMAR IV, LLC MARKET ANALYSIS**

**JANUARY 2014**

CALL ARN	ST	CITY OWNER	FREQ LATITUDE	CHN LONGITUDE	CL	ERP HAAT:m	STAT AMSL:m
KTHN BLH-6370 37-59-15.0	CO	LA JUNTA CCR-LA JUNTA IV, LLC	92.10000 92.586	1375.000	A	3000.00	LIC
KLMR-FM BMLH-20130425AAI 38-02-10.0	CO	LAMAR CCR-LAMAR IV, LLC	93.50000 143.096	1292.000	C1	100000.00	LIC
KPHT BMLH-20080204ACH 37-54-08.0	CO	ROCKY FORD CAPSTAR TX LLC	95.50000 221.053	1762.000	C1	100000.00	LIC
KRKV BMLH-20081201ATJ 37-56-23.0	CO	LAS ANIMAS ALLEYCAT COMMUNICATIONS	107.30000 109.190	1397.000	C1	80000.00	LIC
KECC BLED-20000607ACN 37-58-43.0	CO	LA JUNTA THE COLORADO COLLEGE	89.10000 94.264	1380.000	A	740.00	LIC
KCSE BLED-20110323AAC 38-02-10.0	CO	LAMAR KANZA SOCIETY, INC.	90.70000 110.096	1259.000	A	250.00	LIC
KTLH BLED-20120629ADL 38-02-10.0	CO	LAMAR EDUCATIONAL COMMUNICATIONS OF COLORADO SPRINGS, INC.	89.50000 126.096	1275.000	A	1500.00	LIC
KVAY BMLH-20050207ACJ 38-06-44.0	CO	LAMAR BEACON BROADCASTING LLC	105.70000 134.598	1337.000	C1	100000.00	LIC

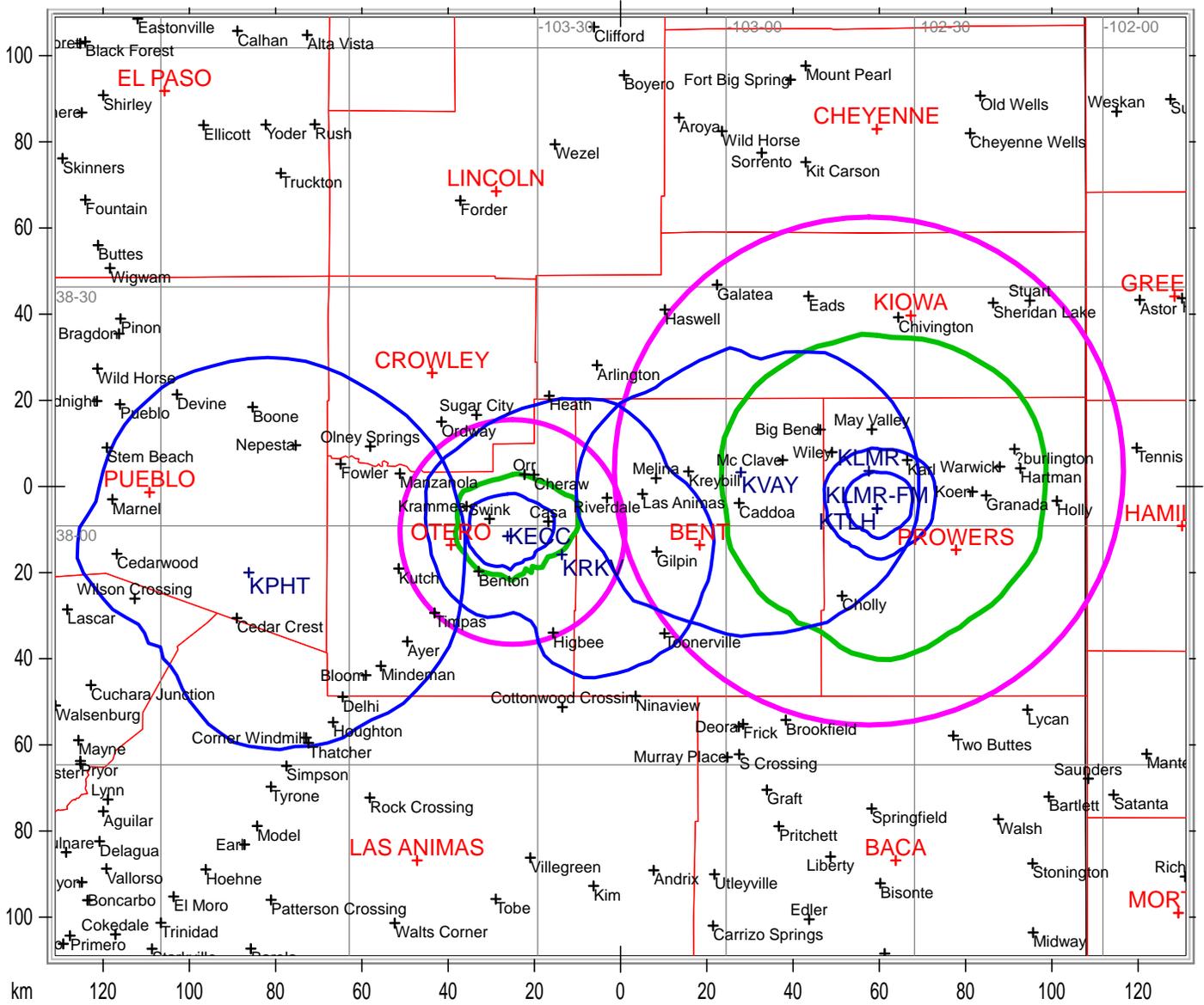
CCR-La Junta IV, LLC & CCR-Lamar IV, LLC stations Green = FM Pink = AM



Communications Technologies, Inc. Marlton, New Jersey

National Borders
  County Borders
  State Borders
  Lat/Lon Grid

CCR-La Junta IV, LLC & CCR-Lamar IV, LLC stations Green = FM Pink = AM, Blue = Other FM



Communications Technologies, Inc. Marlton, New Jersey

National Borders
  County Borders
  State Borders
  Lat/Lon Grid