

Multiple Ownership Study

The following engineering statement and attached exhibits have been prepared for Three Eagles of Luverne, Inc., and contain the results of a multiple ownership study for three different markets in that vicinity.

It is proposed that Three Eagles acquire KWOA and KWOA-FM at Worthington, Minnesota, KITN(FM) at Worthington, Minnesota, KLGR and KLGR-FM at Redwood Falls, Minnesota, and the construction permit for KGBP at Belview, Minnesota. These acquisitions are in addition to the 22 stations currently operated by Three Eagles and its associated corporate entities.

Because of the locations of the stations to be acquired relative to each other, it is necessary to split the stations into three different markets. The first of these markets, indicated by the first map in this exhibit, is defined by the common contour overlap between KLGR, KLGR-FM and the construction permit for KGBP. The second market is defined by common overlap between KWOA, KWOA-FM, KITN, and KLQL. The third and final market, depicted on the last map, is defined by overlap between KWOA, KWOA-FM, KLQL, and KQAD.

In the case of the first market, Three Eagles proposes to control a total of three stations with common contour overlap. Of these three stations, two are FM facilities, with the remaining an AM facility. Since three stations, no more than

three of which are in the same service would be under common control, it is necessary and sufficient to demonstrate that the proponent would not control greater than fifty percent of the stations in the market. As the map indicates, there are at least three other aural facilities whose principal contours would overlap with the market in question.

For the second market, the proponent seeks to control a total of four facilities with common overlap, three of which are FM stations. As with the previous market, it is necessary and sufficient to demonstrate that no more than fifty percent of the stations serving the market would be under common control. The map indicates coverage contours of six other facilities. As a result, this market would comply with the provisions of Section 73.3555 of the Commission's Rules.

In the third and final market, a total of four commonly controlled facilities would be involved. These four facilities are evenly divided between FM and AM stations. It is therefore necessary and sufficient to demonstrate that Three Eagles would not control greater than fifty percent of the stations in the market. The third map depicts that at least six other facilities would have contour overlap with the market. As a result, it is respectfully submitted that this market complies with Section 73.3555 of the Commission's Rules.

As previously mentioned, Three Eagles controls additional facilities in the region. None of the contours from any of their other holdings would be involved in this study, as they have no contour overlap with the markets in question. Therefore, based on the above information and the attached maps and station listings, it is respectfully submitted that the proposed station acquisitions by Three Eagles would comply with the Commission's Rules.

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.

10/10/99

Date


Jeremy D. Ruck, Consulting Engineer