

Multiple Ownership Study

The following engineering statement and attached exhibits have been prepared for Three Eagles of Luverne, Inc. and related entities Three Eagles of Communications, Inc., and Three Eagles Communications, LLC, and are in support of their multiple ownership study for the purpose of acquisition of the KQYK(FM) construction permit at Lake Crystal, Minnesota.

The applicant seeks to acquire the construction permit for KQYK(FM) from William C. Doleman. Although the applicant would acquire this construction permit, it already has an attributable interest in the authorization. As a result, the acquisition of the construction permit by Three Eagles of Luverne would not increase their facility concentration in the region. Currently Three Eagles of Luverne, or one of its associated entities, is the licensee of KEEZ-FM at Mankato, Minnesota and KRBI(AM) and KRBI-FM at St. Peter, Minnesota.

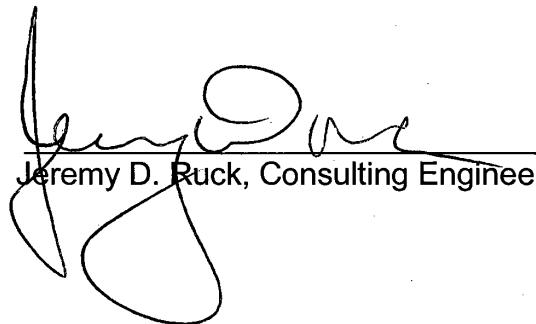
As the attached map demonstrates the predicted 70 dBu service contour of KQYK(FM) would overlap the predicted 70 dBu service contour of KEEZ-FM at Mankato, Minnesota. There would be no overlap between KQYK(FM) and either KRBI(AM) or KRBI-FM at St. Peter, Minnesota. The community of license for each of these four facilities is located within the geographic boundaries of the Mankato-New Ulm-St. Peter, Minnesota Arbitron rated market. The boundaries

of this market are also indicated on the attached map, and include the Minnesota counties of Brown, Blue Earth, and Nicollet.

Currently there are fifteen stations that would be considered home to this market. Three Eagles would have an attributable interest in one AM station; KRBI(AM) at St. Peter, and three FM stations. The three FM facilities in question are KRBI-FM at St. Peter, KEEZ-FM at Mankato, and KQYK(FM) at Lake Crystal. Since the market is comprised of between 15 and 29 facilities, Three Eagles would not have a concentration greater than that permitted under Section 73.3555 of 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.

6/28/05
Date


Jeremy D. Ruck, Consulting Engineer

