

**RAMAR COMMUNICATIONS II, LTD.  
STATION KHDY(FM)  
ASSIGNEE'S EXHIBIT 14 AND 15**

**SHOWING OF COMPLIANCE WITH  
SECTION 73.3555 OF THE COMMISSION'S RULES**

**I. Summary of Transaction**

By this application, Ramar Communications II, Ltd. ("*Ramar*") proposes to acquire the licenses of Station KHDY(FM), Plainview, Texas. There is overlap of the principal community service contours among Station KHDY(FM) and other stations owned by Ramar.

Attached hereto is an Engineering Statement prepared by Neal Ardman, Consulting Engineer, which analyzes the overlap of Station KHDY(FM) and stations currently owned by Ramar. Mr. Ardman's statement confirms that the acquisition proposed by this application is in full accord with the multiple ownership rules.

**II. Compliance with the Radio-Television Cross Ownership Rule**

Ramar is the licensee of television station KJTV-TV, Channel 34, Lubbock, Texas, and the licensee or proposed licensee of the commercial radio stations listed below.

<u>Call Sign</u>	<u>Location</u>	<u>Licensee</u>
KXTQ-FM	Lubbock, TX	Ramar Communications II, Ltd.
KLZK(FM)	Brownfield, TX	Ramar Communications II, Ltd.
KJTV(AM)	Lubbock, TX	Ramar Communications II, Ltd.
KHDY(FM)	Plainview, TX	(proposed acquisition)

The predicted Grade A contour of Station KJTV-TV encompasses the communities of license of Lubbock and Brownfield, Texas, but does not encompass

Plainview, Texas, the community of license Station KHDY(FM), the station proposed to be acquired by Ramar; however, upon modification of Station KHDY(FM) as authorized by FCC File No. BPH-20000705ACX, the 1 mV/m contour of Station KHDY(FM) will encompass Lubbock, Texas. *See* attached maps prepared by Neal Ardman, Consulting Engineer. The combination of one television station and four radio stations is permissible under Section 73.3555(c)(2)(ii) of the Commission's Rules (the Radio-Television Cross Ownership Rule), which provides that an entity may own, operate, or control two commercial television stations (to the extent permitted by the television duopoly rule) and four commercial radio stations if at least 10 independently owned media voices would remain in the market post-merger. Television station KJTV-TV and each of the four listed radio stations are located in the Lubbock, Texas DMA and the Lubbock, Texas Radio Metro, as delineated by Arbitron.

There will be at least 10 independently owned and operated media voices in the Lubbock, Texas Radio Metro following the consummation of the proposed merger. *See* attached map (Exhibit E-2) prepared by Neal Ardman, Consulting Engineer. (Note that no effort has been made to identify all independently owned and operated media voices in the Lubbock, Texas market, and the applicant hereby reserves the right to supplement this showing with additional independent media voices if necessary). Ramar may therefore control one commercial television station and four commercial radio stations in the Lubbock, Texas market under the Radio-Television Cross Ownership Rule.

### **III. Compliance with the Radio Contour Overlap Rule**

As previously indicated, Ramar is the licensee of Stations KXTQ-FM and KJTV(AM), Lubbock, Texas, and KLZK(FM), Brownfield, Texas, and seeks to acquire

Station KHDY(FM), Plainview, Texas. Upon modification of Station KHDY(FM) as authorized by FCC File No. BPH-20000705ACX, the service contours of all four stations will overlap. Overlap of this nature is permitted under Section 73.3555(a)(1)(iv) of the ownership rules, which provides that in a radio market with 14 or fewer commercial radio stations, a party may own up to five commercial stations, not more than 3 of which are in the same service, except that a party may not own, operate or control more than 50 percent of the stations in such market. As depicted on the attached maps (Exhibits E-1 and E-2) prepared by Neal Ardman, Consulting Engineer, there are at least 10 commercial radio stations in the Lubbock, Texas market and Ramar proposes to own only four such stations. (Note that no effort has been made to identify all commercial radio stations Lubbock, Texas Radio Metro, and the applicant hereby reserves the right to supplement this showing with additional commercial radio stations if necessary). Ramar may therefore control four commercial radio stations in the Lubbock, Texas market under the Radio Contour Overlap Rule.



### Multiple Ownership Study

The following engineering statement and attached exhibits have been prepared for Ramar Communications II, LTD., and contains the results of a multiple ownership study for certain stations in the Lubbock Texas area.

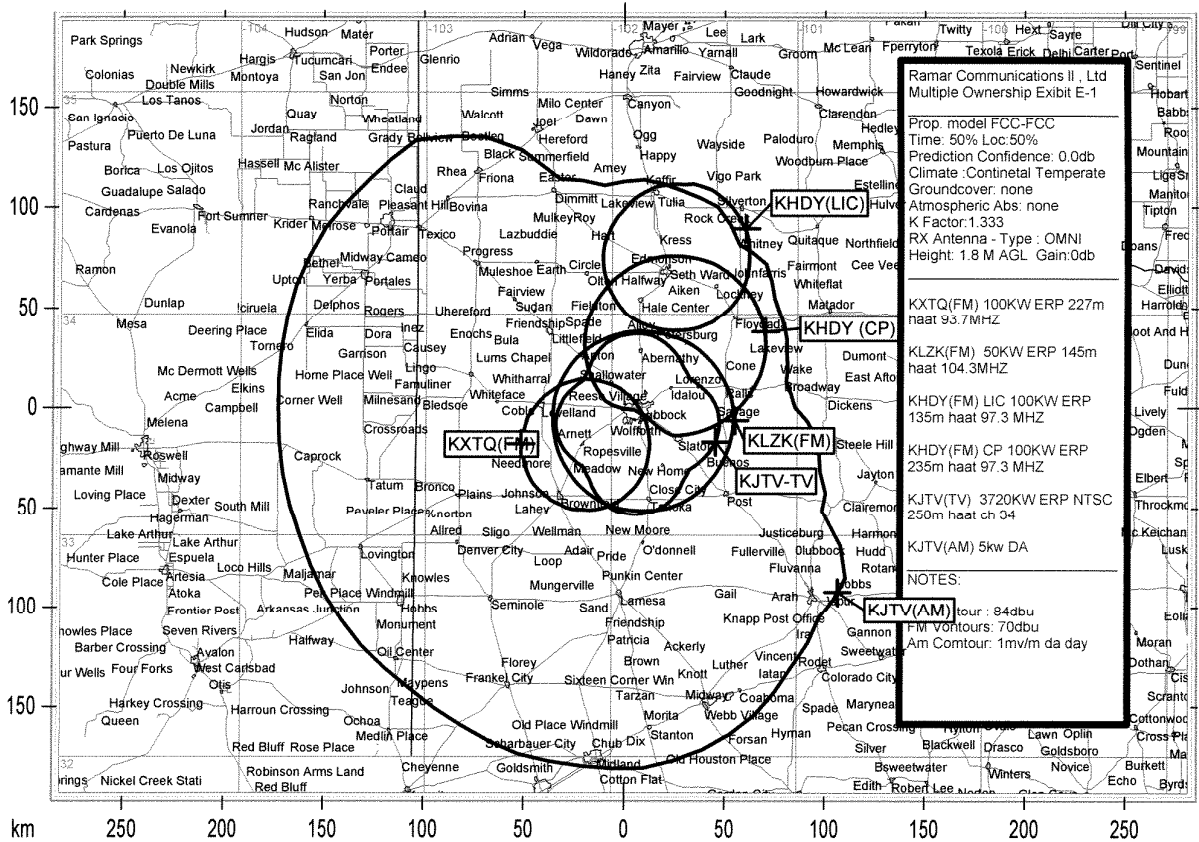
Ramar Communications currently controls four stations in the market. Of these four one is a UHF TV, two are FM's and one is an AM. These facilities are listed on the index, which follows this statement and precedes the exhibit maps, and are depicted on exhibit E-1. It is proposed that Ramar Communications acquire KHDY(FM) at Plainview Texas.

This analysis will only pertain to the acquisition of KHDY by Ramar Communications. Exhibit E-2 will show the required ten other voices in the market. Since this study shows that the accession of KHDY by Ramar will be in full compliance with Section 73.3555 regardless of which facilities of KHDY are used it is respectfully submitted that the proposed acquisition of KHDY at Plainview Texas would not violate the Commission's rules.

The preceding statements 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.

A handwritten signature in dark ink, appearing to read "Neal Ardman", followed by the date "5/13/02". Below the signature and date, the text "Neal Ardman, Consulting Engineer" is printed.

Neal Ardman, Consulting Engineer



State Borders
  City Borders
  Highways
  Lat/Lon Grid

