

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
BUCKLEY BROADCASTING CORP. OF CALIFORNIA

This statement and the attached figures were prepared on behalf of Buckley Broadcasting Corp. of California ("Buckley"). Buckley is proposing the acquisition of radio station KRME(FM) at Shafter, California. Buckley presently owns nearby stations KLLY(FM), KNZR(AM) and KKBB(FM). Therefore, a multiple ownership analysis was prepared considering the following radio stations under proposed common ownership or control:

Call Sign	Location	Facilities
KNZR(AM)	Bakersfield, CA	1560 kHz 50 kW-D 10 kW-N DA-N
KLLY(FM)	Oildale, CA	CH 237B1 12.5 kW 141 M
KKBB(FM)	Bakersfield, CA	CH 257B1 1.2 kW 410 M
KRME(FM)	Shafter, CA	CH 249A 3 kW 100 M

Since these stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations), an ownership study has been prepared in accordance with the Federal Communications Commission multiple ownership rules (See Section 73.3555 of the FCC Rules).

Count of Stations in Defined Market

The number of radio stations in a "radio market" is determined by counting the operating, commercial stations having principal community contours which overlap the principal community contours which define the radio market, plus the subject stations to be co-owned. The results of the analysis are tabulated below:

Defined Radio Market	Minimum Number of Stations in Radio Market
KKBB(FM)/KLLY(FM)/KNZR(AM)/KRME(FM)	11-AM/15-FM/26 Total

As can be seen from the map in Figure 2, implementation of the KRME(FM) construction permit or proposed application will not change the radio market envelope. Therefore, the number of stations in the radio market is not dependent with respect to the licensed, authorized or proposed KRME(FM).

Figure 2 is a tabulation of the radio stations identified in the defined Radio Market. Only known operating commercial 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 47 CFR 73.184. Ground conductivities were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR 73.313.

Based on the above, it is concluded that the proposed combination of stations complies with Section 73.3555(a) of the FCC Rules.

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Tabulation of Stations Defined in Radio Market

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KUZZ	Bakersfield	CA	550
KHIS	Bakersfield	CA	800
KAFY	Bakersfield	CA	970
KMAP	Frazier Park	CA	1050
KZPM	Bakersfield	CA	1100
KERI	Wasco-Greenacres	CA	1180
KGEO	Bakersfield	CA	1230
KBID	Bakersfield	CA	1350
KERN	Bakersfield	CA	1410
KWAC	Bakersfield	CA	1490
KNZR	Bakersfield	CA	1560
KIWI	Bakersfield	CA	92.1
KMYX-FM	Arvin	CA	92.5
KISV	Bakersfield	CA	94.1
KLLY	Oildale	CA	95.3
KKXX-FM	Bakersfield	CA	96.5
KRME	Shafter	CA	97.7
KDFO	Delano	CA	98.5
KKBB	Bakersfield	CA	99.3
KGFM	Bakersfield	CA	101.5
KSUV-FM	Mcfarland	CA	102.9
KCOO	Shafter	CA	104.3
KKDJ	Delano	CA	105.3
KRAB	Greenacres	CA	106.1
KCWR	Bakersfield	CA	107.1
KUZZ-FM	Bakersfield	CA	107.9