

RADIO MARKET ANALYSIS
DEER CREEK BROADCASTING, LLC
KPAY/KMXI RADIO STATION
CHICO, CALIFORNIA
KEWE/KHHZ-FM RADIO STATION
OROVILLE, CALIFORNIA
KHSL-FM RADIO STATION
PARADISE, CALIFORNIA
May 2004

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared on behalf of Deer Creek Broadcasting, LLC (“Deer Creek”), proposed assignee of KPAY¹, 1290 kHz, and KMXI, Channel 236B, Chino, California; KEWE, 1340 kHz, and KHHZ, Channel 249B1, Oroville, California; and KHSL-FM², Channel 278B1, Paradise, California. Based on where the contours overlap, three distinct markets are created (see Exhibit #1). The first market consists of AM stations KPAY and KEWE and FM stations KHHZ and KMXI. The second market consists of AM stations KPAY and KEWE and FM stations KMXI and the pending KHSL-FM application. The third and final market consists of AM station KPAY and FM stations KMXI and KHSL-FM (both license and application).

2. A study has been conducted to demonstrate this proposal complies with the Commission’s ownership rules. The city grade contours of the subject stations establish the “Radio Market” boundary. Since AM station KPAY is a subject station in each of the three

1) There is an outstanding permit for KPAY, BP-20031014AKQ, which corrects the coordinates of the station. This permit was used in this study, since it reflects the actual KPAY facility.

2) There is a pending application to make minor changes in the facility of KHSL-FM, BPH-20031124APF. This application is considered in this instant review.

markets its city grade contour will be used to determine how many other stations have either transmitter sites within, or provide coverage to, the KPAY contour. Those stations will then be added to the relevant subject stations in each radio market.

3. Exhibit #2 is a depiction of the other AM and FM stations within the KPAY/Radio Market boundary. Exhibit #3 is a tabulation of the stations in Radio Market #1 (KPAY/KEWE/KHHZ/KMXI). The map and tabulation show there are ten stations, including the four subject stations. The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules.³ At this level, common ownership or control of up to five stations, with no more than three in the same service, is permissible.

4. Exhibit #4 is a tabulation of the stations in Radio Market #2 (KPAY/KEWE/KMXI/KHSL-FM appl). The map and tabulation show there are ten stations, including the four subject stations. The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules.⁴ At this level, common ownership or control of up to five stations, with no more than three in the same service, is permissible.

5. Exhibit #5 is a tabulation of the stations in Radio Market #3 (KPAY/KMXI/KHSL-FM lic and appl). The map and tabulation show there are nine stations, including the four subject stations. The number of stations depicted falls in the fourteen or fewer stations tier of

3) Although there are additional stations providing service to the Radio Market, they are not considered since the number of stations was ample to demonstrate compliance with the rules based on the number of stations proposed to be commonly owned.

4) See Footnote 3 supra.

§73.3555(a)(1)(iv) of the Commission's rules.⁵ At this level, common ownership or control of up to five stations, with no more than three in the same service, is permissible.

6. Based on Deer Creek's interests in the above referenced stations, it has been demonstrated that the proposed acquisition of KPAY, KMXI, KEWE, KHHZ and KHSL-FM is in compliance with the Commission's multiple ownership rules, as detailed in §73.3555 of the rules.

7. The foregoing technical statement was prepared on behalf of Deer Creek Broadcasting, LLC, by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities was extracted from the CDBS database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.

5) See Footnote 3 supra.

Graham Brock, Inc. - Broadcast Technical Consultants

KMXI
 BLH-19840306DD
 Latitude: 39-56-46 N
 Longitude: 121-43-17 W
 ERP: 8.70 kW
 Channel: 236B
 AMSL Height: 1056.0 m

KHSL-FM
 BMLH-20011025ABV
 Latitude: 39-57-29 N
 Longitude: 121-42-50 W
 ERP: 1.60 kW
 Channel: 278B1
 AMSL Height: 1122.0 m

KHSL-FM App.
 BPH-20031124APF
 Latitude: 39-56-46 N
 Longitude: 121-43-17 W
 ERP: 2.10 kW
 Channel: 278B1
 AMSL Height: 1039.0 m

KPAY
 Latitude: 39-42-38 N
 Longitude: 121-47-16 W
 ERP: 5.00 kW
 Frequency: 1290 kHz

KHHZ
 BLH-19970501KD
 Latitude: 39-30-18 N
 Longitude: 121-18-35 W
 ERP: 1.50 kW
 Channel: 249B1
 AMSL Height: 1003.0 m

KEWE
 Latitude: 39-30-32 N
 Longitude: 121-35-54 W
 ERP: 1.00 kW
 Frequency: 1340 kHz

KMXI 3.16 mV/m

KHSL-FM LIC. 3.16 mV/m

KPAY 5.0 mV/m

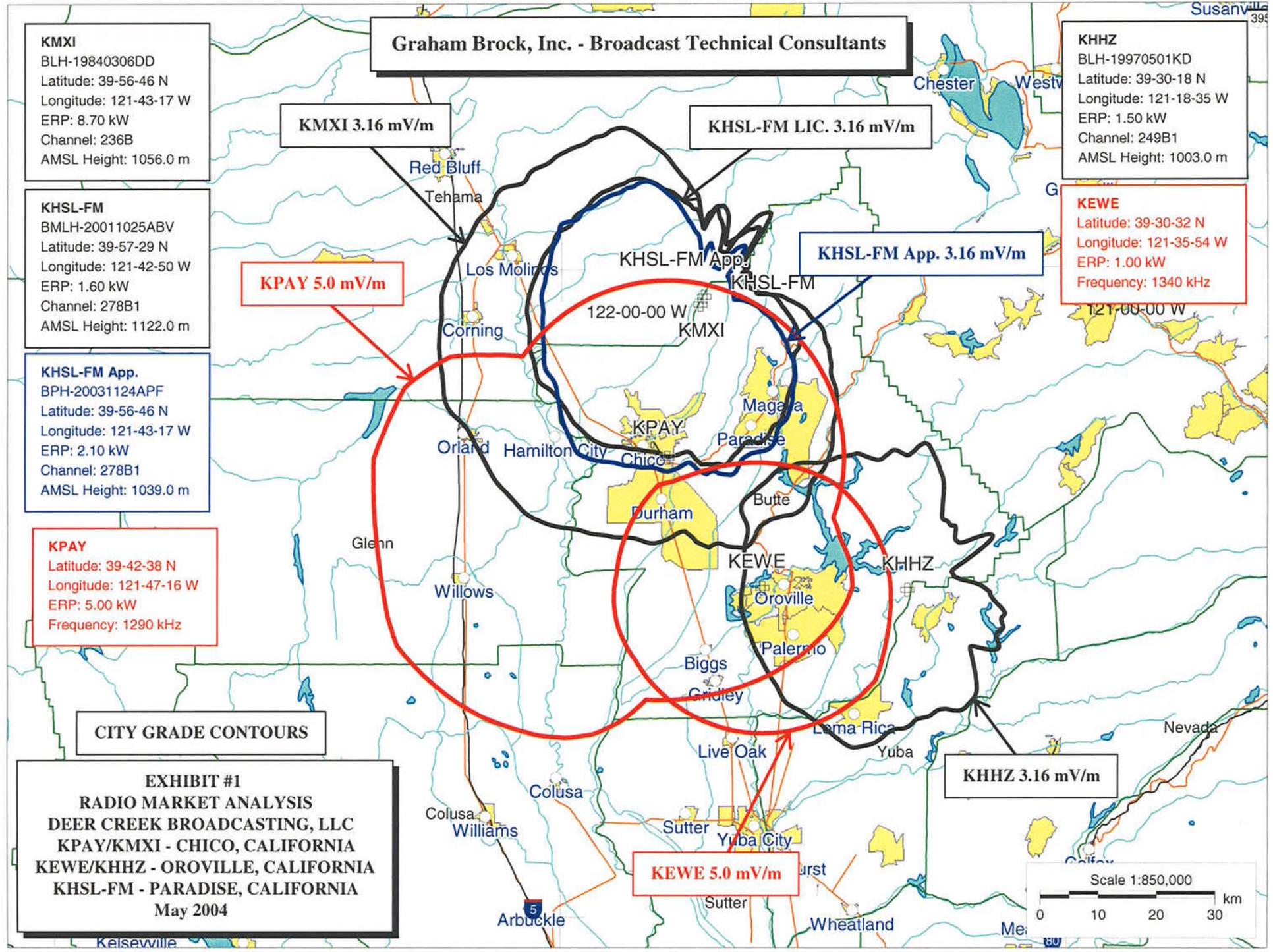
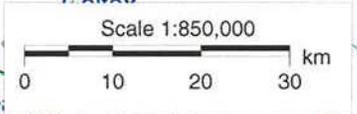
KHSL-FM App. 3.16 mV/m

KHHZ 3.16 mV/m

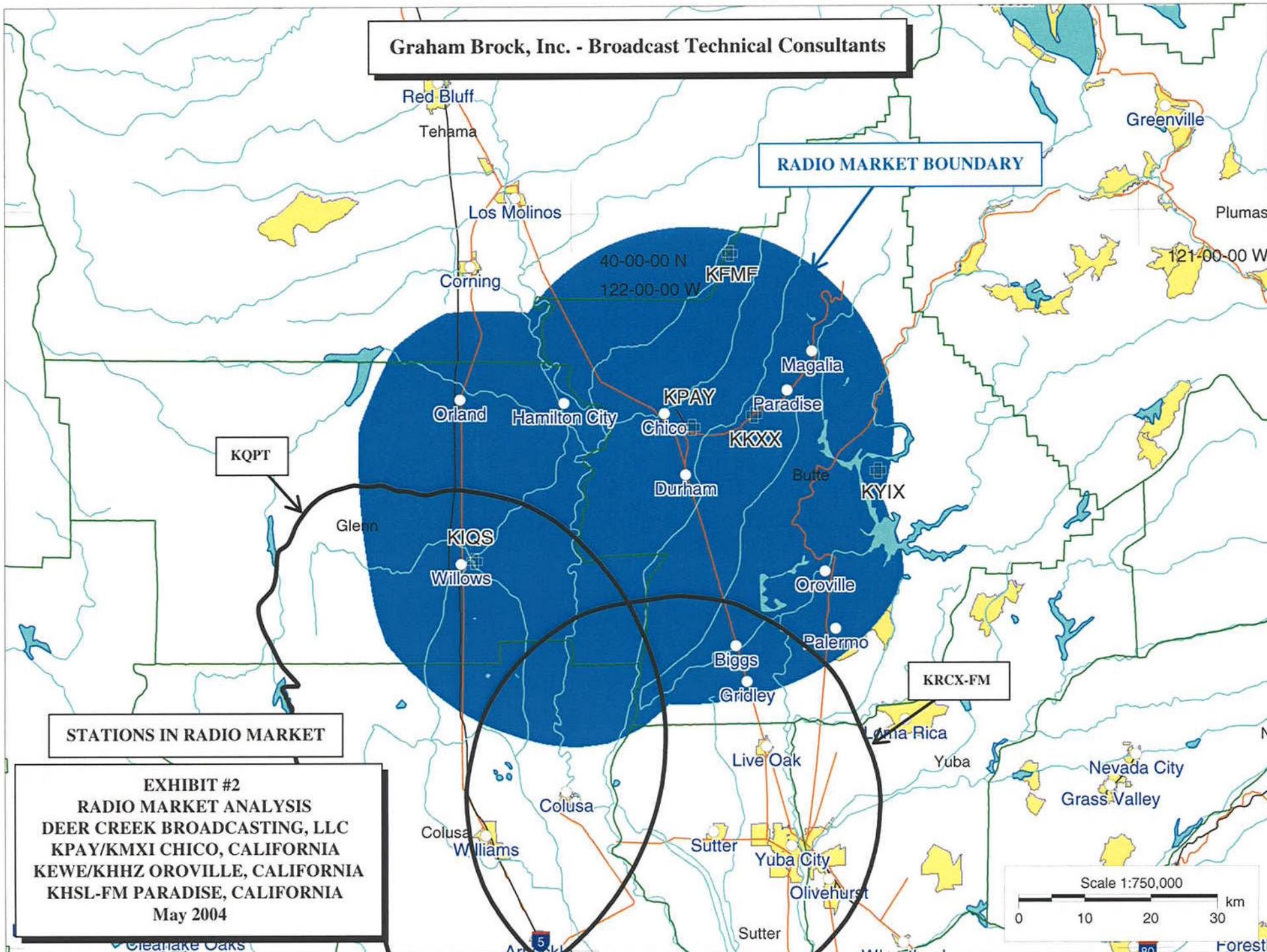
KEWE 5.0 mV/m

CITY GRADE CONTOURS

EXHIBIT #1
RADIO MARKET ANALYSIS
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KPAY/KMXI - CHICO, CALIFORNIA
KEWE/KHHZ - OROVILLE, CALIFORNIA
KHSL-FM - PARADISE, CALIFORNIA
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Graham Brock, Inc. - Broadcast Technical Consultants



RADIO MARKET BOUNDARY

KQPT

KRCX-FM

STATIONS IN RADIO MARKET

**EXHIBIT #2
RADIO MARKET ANALYSIS
DEER CREEK BROADCASTING, LLC
KPAY/KMXI CHICO, CALIFORNIA
KEWE/KHHZ OROVILLE, CALIFORNIA
KHSL-FM PARADISE, CALIFORNIA
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EXHIBIT #3

Tabulation of Stations in Radio Market #1

AM Stations

	KKXX	930 kHz	Paradise, California
*	KPAY	1290 kHz	Chino, California
*	KEWE	1340 kHz	Oroville, California
	KIQS	1560 kHz	Willows, California

Total AM Stations - 4

FM Stations

	KFMF	Ch 230B1	Chico, California
*	KMXI	Ch 236B	Chino, California
*	KHHZ	Ch 249B1	Oroville, California
+	KRCX-FM	Ch 260B	Marysville, California
	KYIX	Ch 285A	South Oroville, California
+	KQPT	Ch 298B	Colusa, California

Total FM Stations - 6

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 10

- * Subject station.
- + Provides city grade coverage to radio market.

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EXHIBIT #4

Tabulation of Stations in Radio Market #2

AM Stations

	KKXX	930 kHz	Paradise, California
*	KPAY	1290 kHz	Chino, California
*	KEWE	1340 kHz	Oroville, California
	KIQS	1560 kHz	Willows, California

Total AM Stations - 4

FM Stations

	KFMF	Ch 230B1	Chico, California
*	KMXI	Ch 236B	Chino, California
+	KRCX-FM	Ch 260B	Marysville, California
*	KHSL-FM	Ch 278B1	Paradise, California
	KYIX	Ch 285A	South Oroville, California
+	KQPT	Ch 298B	Colusa, California

Total FM Stations - 6

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 10

- * Subject station.
- + Provides city grade coverage to radio market.

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EXHIBIT #5

Tabulation of Stations in Radio Market #3

AM Stations

	KKXX	930 kHz	Paradise, California
*	KPAY	1290 kHz	Chino, California
	KIQS	1560 kHz	Willows, California

Total AM Stations - 3

FM Stations

	KFMF	Ch 230B1	Chico, California
*	KXMI	Ch 236B	Chino, California
+	KRCX-FM	Ch 260B	Marysville, California
*	KHSL-FM	Ch 278B1	Paradise, California
	KYIX	Ch 285A	South Oroville, California
+	KQPT	Ch 298B	Colusa, California

Total FM Stations - 6

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 9

- * Subject station.
- + Provides city grade coverage to radio market.

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Deer Creek Broadcasting, LLC, to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

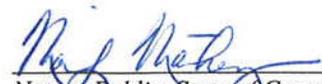
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 27th day of May, 2004.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 27th day of May, 2004.*



Notary Public, State of Georgia
My Commission Expires: September 3, 2007