

RADIO MARKET ANALYSIS
PACIFIC RADIO GROUP, INC.
KAPA/KPVS RADIO STATIONS

HILO, HAWAII

KLUA RADIO STATION

KAILUA KONA, HAWAII

KAGB RADIO STATION

WAIMEA, HAWAII

KKON RADIO STATION

KEALAKEKUA, HAWAII

October 2004

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared on behalf of Pacific Radio Group, Inc. ("PRG"), proposed assignee of stations KPVS, Channel 240C2, Hilo; KAPA, Channel 262C2, Hilo; KLUA, Channel 230C, Kailua Kona; KAGB, Channel 256C, Waimea; and KKON, 790 kHz, Kealakekua, Hawaii. PRG already is the authorized assignee of KLEO, Channel 291C, Kahaluu; KKBG, Channel 250C2¹, Hilo; and KHLO, 850 kHz, Hilo, Hawaii. This study is prepared using the FCC's new multiple ownership rules that became effective on September 3, 2004. The stations are not located in any Arbitron rated market, therefore, the revised contour overlap rules are used to demonstrate compliance. Exhibit #1 is a map depicting the stations in which PRG will have attributable interests. Since there is no overlap between the stations located on the east side of the Big Island and those located on the west side, two distinct markets will be reviewed.

2. Therefore, a study has been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission's rules. The city grade contours of the subject

1) There is an outstanding application proposing changes in the facilities of KKBG, which is considered as part of this analysis.

stations will be used to define the market boundary, hereinafter referred to as the "Radio Market (East/West)". The study will determine the number of other commercial AM and FM stations that either have transmitter sites within, or provide coverage to, the subject radio market.²

3. Exhibit #2 is a depiction of the stations on the east side of the Big Island within the Radio Market boundary, and shows the transmitter sites of eleven AM and FM stations. Exhibit #3 is a tabulation of the stations in the radio market (east). The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules. At the fourteen or fewer stations level, common ownership or control of up to five stations, with no more than three in the same service (provided the number of stations to be commonly held does not exceed 50% of the stations in the market), is permissible. Therefore, PRG's proposed ownership of KHLO, KKBG, KAPA and KPVS is in compliance with §73.3555 of the rules.

4. Exhibit #4 is a depiction of the stations on the west side of the Big Island within the Radio Market boundary, and shows the transmitter sites or city grade contours of eight AM and FM stations. Exhibit #5 is a tabulation of the stations in the radio market (west). The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules. At the fourteen or fewer stations level, common ownership or control of up to five stations, with no more than three in the same service (provided the number of stations to be commonly held does not exceed 50% of the stations in the market), is permissible. Therefore, PRG's proposed ownership of KLEO, KAGB, KLUA and KKON is in compliance with §73.3555 of the rules.

2) Further, no station owned which is not relevant to the market under study has been counted in the number of stations serving the market.

5. As demonstrated, each of the markets is in compliance with the Commission's rules. Therefore, the ownership of KAPA, KKBG, KPVS, KHLO, KAGB, KLUA, KLEO and KKON to PRG is in compliance with the rules.

6. The foregoing technical statement was prepared on behalf of Pacific Radio Group, Inc., 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.

Graham Brock, Inc. - Broadcast Technical Consultants

KAGB
 BLH-20000609ABH
 Latitude: 19-43-15 N
 Longitude: 155-55-16 W
 ERP: 42.00 kW
 Channel: 256C

KLUA
 BLH-19920113KK
 Latitude: 19-43-15 N
 Longitude: 155-55-16 W
 ERP: 40.00 kW
 Channel: 230C

KLEO
 BLH-20000731ABE
 Latitude: 19-43-16 N
 Longitude: 155-55-15 W
 ERP: 7.30 kW
 Channel: 291C

KKON
 Latitude: 19-31-10 N
 Longitude: 155-55-08 W
 ERP: 5.00 kW
 Frequency: 790 KHz

KKBG
 BLH-19800723AC
 Latitude: 19-44-11 N
 Longitude: 155-01-48 W
 ERP: 35.00 kW
 Channel: 250C2

KKBG Application
 BPH-20010315AAG
 Latitude: 19-44-11 N
 Longitude: 155-01-48 W
 ERP: 33.00 kW
 Channel: 250C2

KAPA
 BLH-20000918AAX
 Latitude: 19-50-19 N
 Longitude: 155-06-43 W
 ERP: 35.00 kW
 Channel: 262C2

KPVS
 BLH-20000918AAY
 Latitude: 19-50-19 N
 Longitude: 155-06-43 W
 ERP: 39.00 kW
 Channel: 240C2

KHLO
 Latitude: 19-41-48 N
 Longitude: 155-03-05 W
 ERP: 5.00 kW
 Frequency: 850 KHz

KAGB 3.16 mV/m

KLUA 3.16 mV/m

CITY GRADE CONTOURS

**EXHIBIT #1
 RADIO MARKET ANALYSIS
 PACIFIC RADIO GROUP, INC.
 BIG ISLAND OF HAWAII
 October 2004**

KLEO 3.16 mV/m

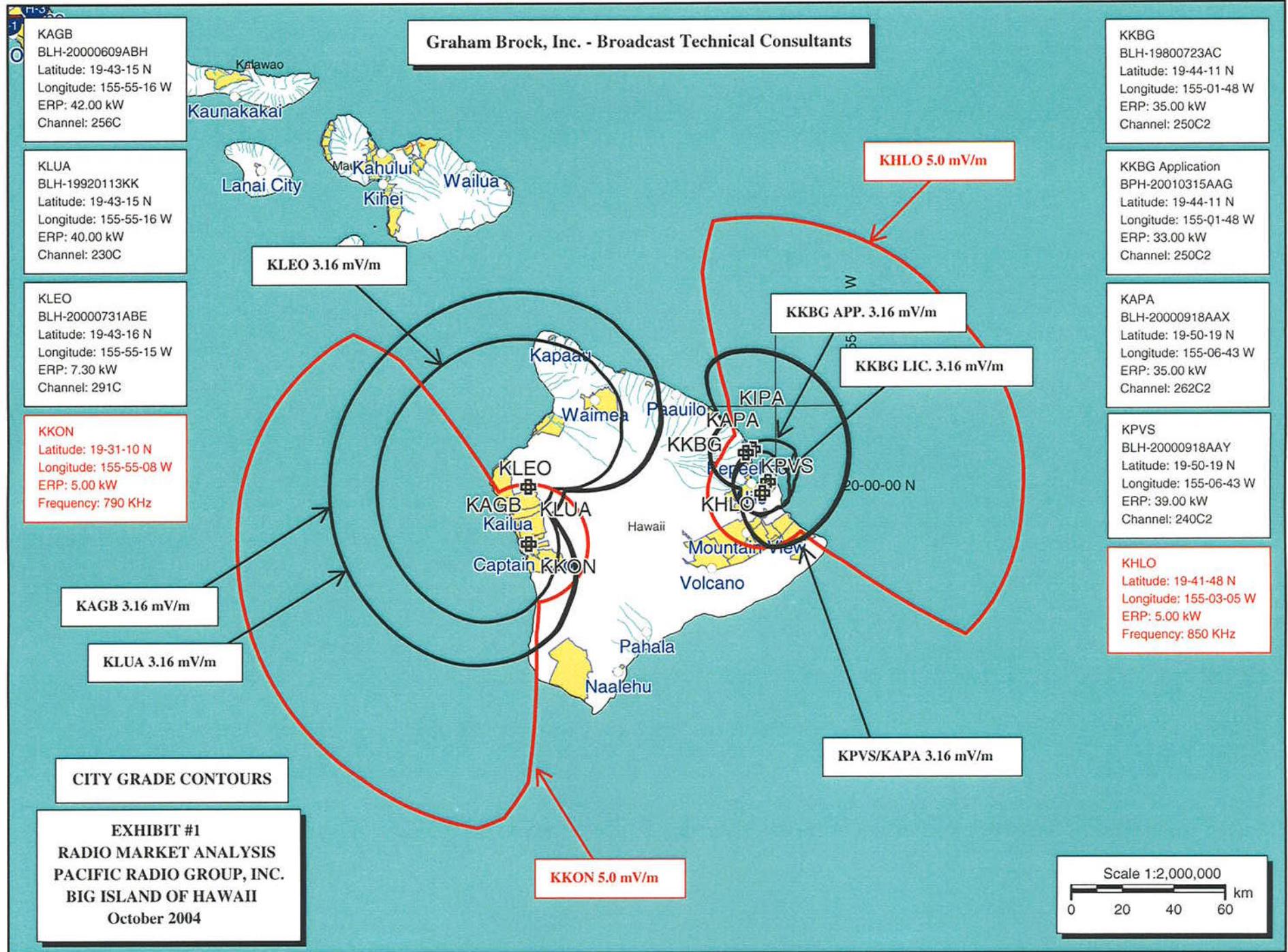
KHLO 5.0 mV/m

KKBG APP. 3.16 mV/m

KKBG LIC. 3.16 mV/m

KPVS/KAPA 3.16 mV/m

KKON 5.0 mV/m



Graham Brock, Inc. - Broadcast Technical Consultants

RADIO MARKET BOUNDARY

KBGX

KKOA

KIPA
Honolulu
KAPA/KHWI/KPVS
Paia
KNWB/KPUA/KWXX-FM

KCIF
KKBG
KHLO/KHBC

Keaau

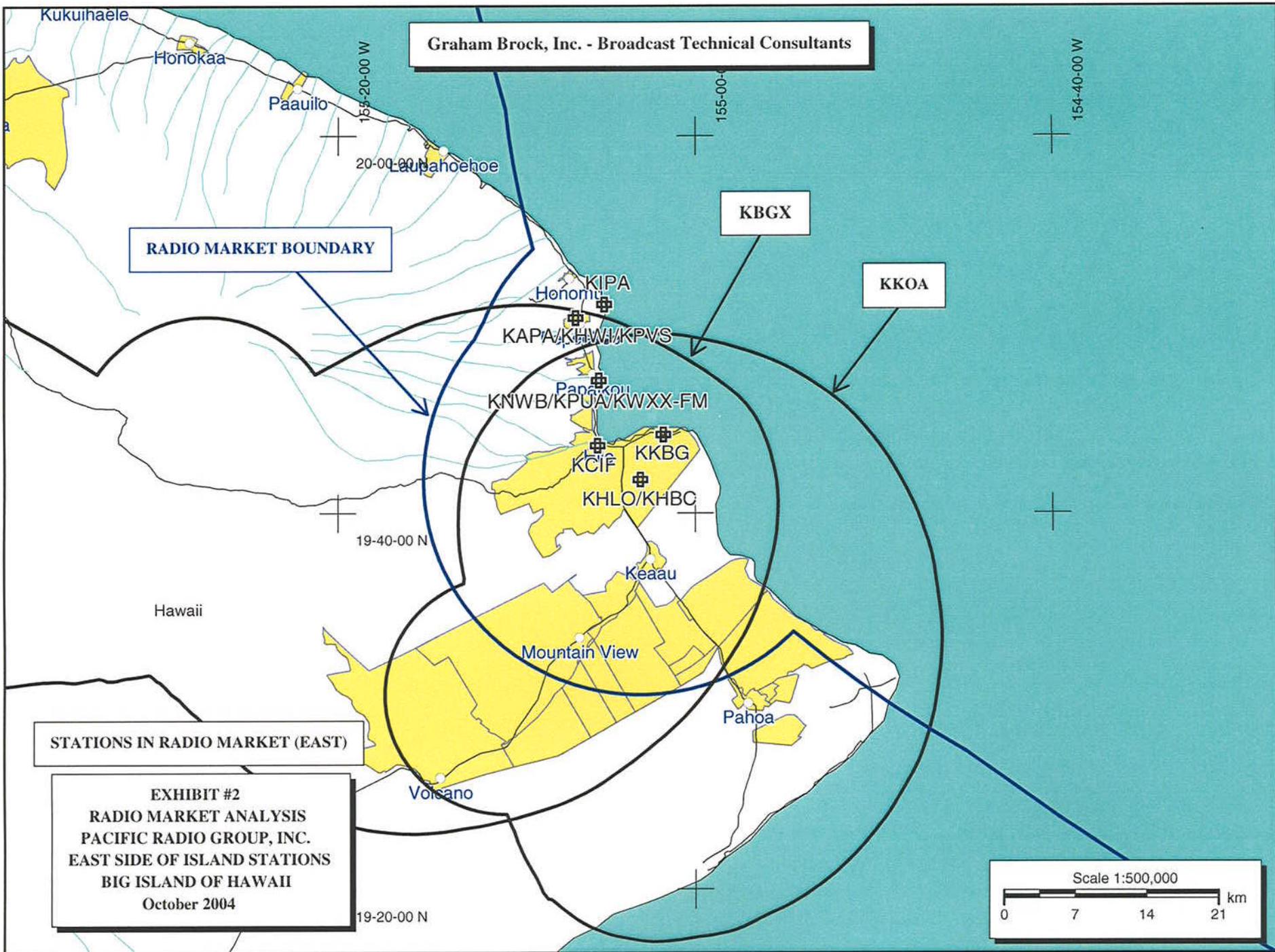
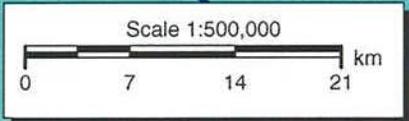
Mountain View

Pahoa

Volcano

STATIONS IN RADIO MARKET (EAST)

EXHIBIT #2
RADIO MARKET ANALYSIS
PACIFIC RADIO GROUP, INC.
EAST SIDE OF ISLAND STATIONS
BIG ISLAND OF HAWAII
October 2004



RADIO MARKET ANALYSIS
PACIFIC RADIO GROUP, INC.
KAPA/KPVS RADIO STATIONS
HILO, HAWAII
KLUA RADIO STATION
KAILUA KONA, HAWAII
KAGB RADIO STATION
WAIMEA, HAWAII
KKON RADIO STATION
KEALAKEKUA, HAWAII
October 2004

EXHIBIT #3

Tabulation of Stations in Radio Market (East)

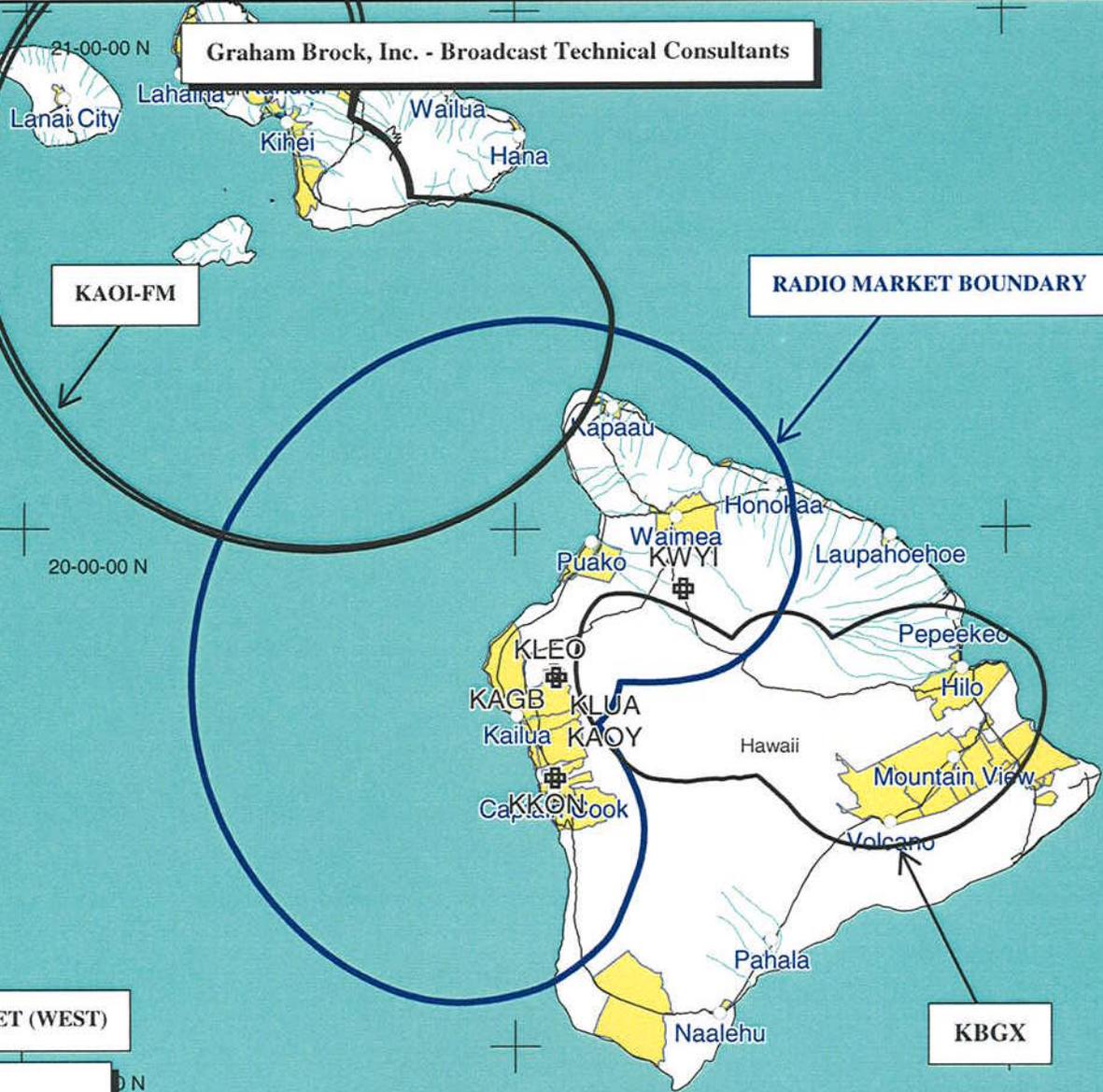
Study Center = 19 44 11 N, 155 01 48 W

Call	Coordinates	Dist	Bear	Chan	Pwr(kW)	City	State	File #
1 KHLO.L	194148N 1550305W	4.9	206	850	5	Hilo	HI	BL-19980911A
2 KKBG.L	194411N 1550148W	0	0	250C2	35	Hilo	HI	BLH-19800723
3 KKO.A.L	193017N 1551040W	30	211	299C3	18	Volcano	HI	BLH-19961001
4 KAPA.L	195019N 1550643W	14.2	323	262C2	35	Hilo	HI	BLH-20000918
5 KHBC.L	194148N 1550305W	4.9	206	1060	5	HILO	HI	BL-20021115A
6 KHWI.L	195019N 1550643W	14.2	323	224C3	9	Hilo	HI	BLH-20000918
7 KBGX.L	194318N 1552723W	44.7	268	287C2	28	Keaau	HI	BLH-20040714
8 KIPA.L	195102N 1550507W	13.9	335	620	5	HILO	HI	BL-19980831A
9 KNWB.L	194702N 1550525W	8.2	310	246C2	38	Hilo	HI	BLH-19971223
10 KPUA.L	194702N 1550525W	8.2	310	670	10	HILO	HI	BL-19850815A
11 KPVS.L	195019N 1550643W	14.2	323	240C2	39	Hilo	HI	BLH-20000918
12 KWXXFM.L	194702N 1550525W	8.2	310	234C1	51	Hilo	HI	BLH-19980921
13 KCIF.L	194336N 1550529W	6.5	260	212A	0.85	Hilo	HI	BLED-19980720
14 KANO.L	193518N 1550725W	19.1	210	216C2	26	Hilo	HI	BLED-20001220

Number of stations in list = 14
Total subject stations = 4
Other stations in market = 10

Note : Subject stations are in bold type.

Graham Brock, Inc. - Broadcast Technical Consultants



KNUQ

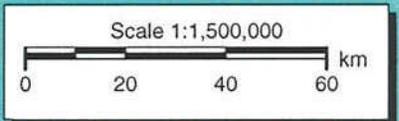
KAOL-FM

RADIO MARKET BOUNDARY

STATIONS IN RADIO MARKET (WEST)

EXHIBIT #4
RADIO MARKET ANALYSIS
PACIFIC RADIO GROUP, INC.
WEST SIDE OF ISLAND STATIONS
BIG ISLAND OF HAWAII
October 2004

KBGX



RADIO MARKET ANALYSIS
PACIFIC RADIO GROUP, INC.
KAPA/KPVS RADIO STATIONS
HILO, HAWAII
KLUA RADIO STATION
KAILUA KONA, HAWAII
KAGB RADIO STATION
WAIMEA, HAWAII
KKON RADIO STATION
KEALAKEKUA, HAWAII
October 2004

EXHIBIT #5

Tabulation of Stations in Radio Market (West)

Study Center = 19 43 15 N, 155 55 16 W

Call	Coordinates	Dist	Bear	Chan	Pwr(kW)	City	State	File #
1 KLUA.L	194315N 1555516W	0	276	230C	40	Kailua Kona	HI	BLH19920113
2 KAGB.L	194315N 1555516W	0	276	256C	42	Waimea	HI	BLH20000609
3 KAOIFM.L	203812N 1562324W	112.6	334	236C	100	Wailuku	HI	BLH19940318
4 KAOY.L	194256N 1555500W	0.7	141	268C1	7.1	Kealakekua	HI	BLH19940803
5 KKON.L	193110N 1555508W	22.3	179	790	5	KEALAKEKUA	HI	
6 KLEO.L	194316N 1555515W	0	41	291C	7.3	Kahaluu	HI	BLH20000731
7 KNUQ.L	203818N 1562301W	112.5	334	279C	100	Paauilo	HI	BLH19900425
8 KWYI.L	195309N 1553928W	33.1	56	295A	5.5	Kawaihae	HI	BLH19931202
9 KBGX.L	194318N 1552723W	48.7	89	287C2	28	Keaau	HI	BLH-20040714

Number of stations in list = 9
 Total subject stations = 4
 Other stations in market = 4

Note : Subject stations are in bold type.

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 Pacific Radio Group, Inc., 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.

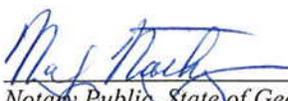
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 22nd of October, 2004.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 22nd day of October, 2004.*



Notary Public, State of Georgia
My Commission Expires: April 16, 2006