

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS

This radio multiple ownership analysis was prepared to demonstrate that ownership of the following stations complies with the FCC's "Interim" contour analysis method.¹ Specifically, the following stations were analyzed:

Call Sign / Facility ID	Location	Facilities
KKXK(FM) / 73624 Licensed Facility	Montrose, CO	Channel 231C 100 kW 574 m
KSNN(FM) / 89280 Licensed Facility	Ridgway, CO	Channel 279C2 4.1 kW 480 m
KUBC(AM) / 73626 Licensed Facility	Montrose, CO	580 kHz, 5 kW-D/1 kW-N, DA-N

The principal community contours of these stations are depicted on a map included herein as Figure 1. Since the principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) of all three (3) stations are involved in common overlap, an ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

Radio Markets

The "radio market" applicable to common ownership of the subject stations are defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. As listed in the Table below, there is one (1) defined "radio market" formed by the subject stations:

Defined Radio Market	Stations that Define the Radio Market	
	AM Stations	FM Station
Market 1	KUBC	KKXK, KSNN

¹ See Report and Order and Notice of Proposed Rulemaking, MB Docket 02-277, FCC 03-127, Released July 2, 2003.

Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating stations having principal community contours that overlap or intersect the principal community contours, which define the radio market. Only those stations located within 92 km of the perimeter of the mutual overlap area of the defined market area were employed in the count of stations. Commonly owned stations, other than those that form the market in question were not considered in the count of stations in the defined market. The results of the analysis are tabulated below:

Defined Radio Markets	Total Number of Stations in the Radio Market
Market 1	8 AM, 34 FM, 42 Total

Figure 1 also depicts the principal community contours of other FM stations in the defined market. Figure 2 is a tabulation of the AM and FM stations in the defined market. Only known licensed, operating AM and FM 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 conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR 73.313. Terrain data was derived from the USGS 1-second computer database for each of the FM stations using radials evenly-spaced every 5 degrees of azimuth.

Pursuant to Section 73.3555(a)(1)(ii), in a radio market with between 30 and 44 (inclusive) full-power, commercial and noncommercial radio stations, an entity may have a cognizable interest in up to 7 commercial radio stations in total, with not more than 4 commercial stations in the same service (AM or FM).

Therefore, ownership of the aforementioned stations complies with Section 73.3555(a)(1)(ii) of the FCC Rules.

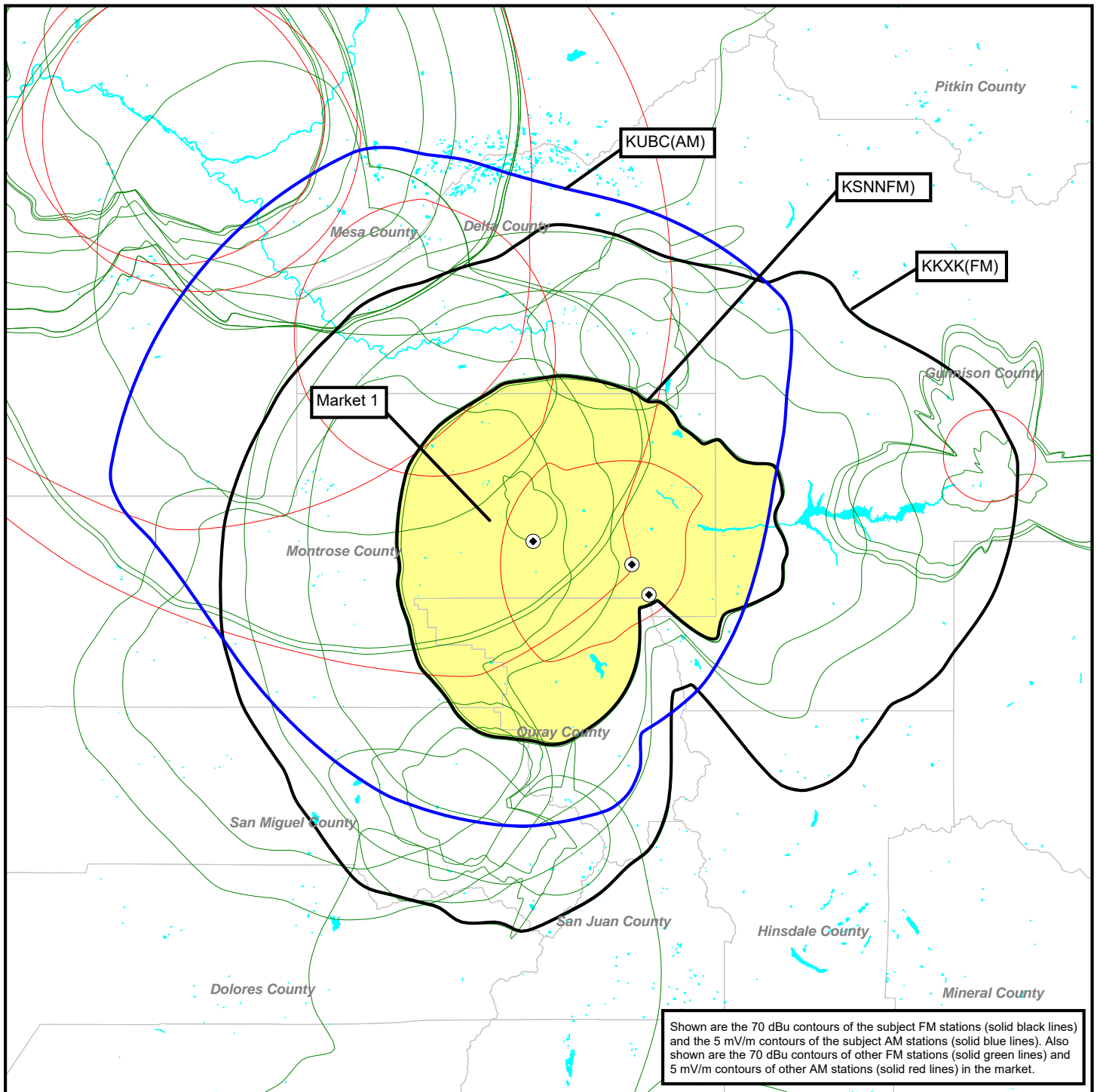
A handwritten signature in black ink, appearing to read "W. Jeffrey Reynolds". The signature is fluid and cursive, with the first name "W." and last name "Reynolds" clearly distinguishable.

W. Jeffrey Reynolds

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Figure 1



MARKET 1
PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS
AND OF OTHER AM AND FM STATIONS IN THE MARKET

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

Taulation of Stations in Radio Market

Market 1

FM Contours

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Status</u>	<u>Ch./Freq.</u>
KLJH	BAYFIELD	CO	L2C	296 C
KPRU	DELTA	CO	L2C	277 C2
KKNN	DELTA	CO	MOD	236 C0
KEKB	FRUITA	CO	L2C	260 C0
KGJX	FRUITA	CO	AMD	268 C2
KBKL	GRAND JUNCTION	CO	L2C	300 C
KMGJ	GRAND JUNCTION	CO	L2C	226 C0
KMOZ-FM	GRAND JUNCTION	CO	L2C	222 C
KMSA	GRAND JUNCTION	CO	L2C	217 C2
KMXY	GRAND JUNCTION	CO	L2C	282 C0
KPRN	GRAND JUNCTION	CO	L2C	208 C1
KLFV	GRAND JUNCTION	CO	MOD	212 C2
KKVT	GRAND JUNCTION	CO	AMD	264 C1
KEJJ	GUNNISON	CO	L2C	252 C3
KGNI	GUNNISON	CO	L2C	204 C3
KWSB-FM	GUNNISON	CO	L2C	216 A
KVLE-FM	GUNNISON	CO	AMD	272 C3
KLHQ	HOTCHKISS	CO	L2C	258 A
KJOL-FM	MONTROSE	CO	L2C	220 A
KKXK	MONTROSE	CO	L2C	231 C
KPRH	MONTROSE	CO	L2C	202 C1
KTMH	MONTROSE	CO	L2C	210 C1
KVMT	MONTROSE	CO	L2C	206 C1
KSTR-FM	MONTROSE	CO	MOD	241 C0
KRKQ	MOUNTAIN VILLAGE	CO	MOD	238 A
KRYD	NORWOOD	CO	L2C	285 C1
KSYF	OLATHE	CO	MOD	298 C1
KNOZ	ORCHARD MESA	CO	L2C	249 C2
KWGL	OURAY	CO	L2C	289 C
KVNF	PAONIA	CO	L2C	215 A
KLMQ	PLACERVILLE	CO	L2C	214 A
KSNN	RIDGWAY	CO	AMD	279 C2
KZKS	RIFLE	CO	L2C	287 C
<u>KOTO</u>	<u>TELLURIDE</u>	<u>CO</u>	<u>L2C</u>	<u>219 C3</u>
Total 34				

AM Contours

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Status</u>	<u>Ch./Freq.</u>
KAVP	COLONA	CO	Lic	1450
KJYE	DELTA	CO	Lic	1400
KNZZ	GRAND JUNCTION	CO	Lic	1100
KEXO	GRAND JUNCTION	CO	Lic	1230
KJOL	GRAND JUNCTION	CO	Lic	620
KTMM	GRAND JUNCTION	CO	Lic	1340
KPKE	GUNNISON	CO	Lic	1490
<u>KUBC</u>	<u>MONTROSE</u>	<u>CO</u>	<u>Lic</u>	<u>580</u>
Total 8				