

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
HOT SPRINGS, ARKANSAS
MARKET AREA

This radio multiple ownership analysis was prepared to demonstrate that ownership of the following stations in the Hot Springs, Arkansas market complies with the FCC's "Interim" contour analysis method.¹

Call Sign / Facility ID	Location	Facilities
KZNG / 16570 Licensed Facility	Hot Springs, AR	1340 kHz, 1 kW-U
KLXQ / 33874 Licensed Facility	Hot Springs, AR	Channel 244A (96.7 MHz) 0.94 kW 246 m
KQUS-FM/ 16572 Licensed Facility	Hot Springs, AR	Channel 248C3 (97.5 MHz) 100 kW 264 m
KLBL / 39368 Licensed Facility	Malvern, AR	Channel 268A (101.5 MHz) 6 kW 98 m
KLAZ / 48947 Licensed Facility	Hot Springs, AR	Channel 290C1 (105.9 MHz) 95 kW 303 m

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 five 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:

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

Defined Radio Market	Stations that Define the Radio Market	
	AM Stations	FM Station
Market 1	KZNG	KLXQ, KQUS-FM, KLBL, KLAZ

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	9 AM, 29 FM, 38 Total

Figure 1 also depicts the principal community contours of other AM and 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.

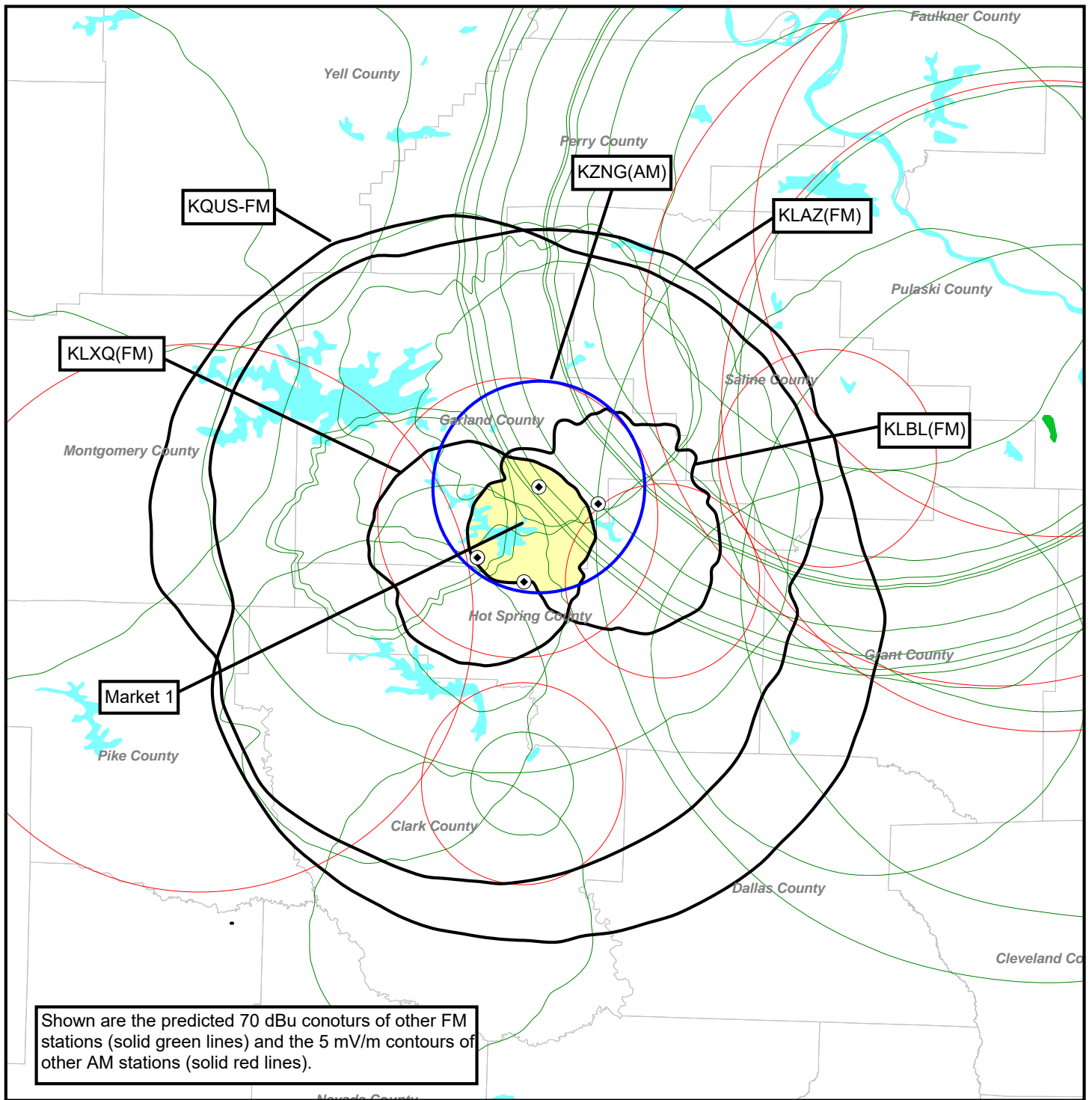
A handwritten signature in black ink, appearing to read "W. Jeffrey Reynolds". The signature is fluid and cursive, with the first name "W." and last name "Reynolds" clearly distinguishable.

W. Jeffrey Reynolds

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Figure 1



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

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

Tabulation of Other Stations in Defined Radio Market**FM Stations**

<u>Call Sign</u>	<u>Status</u>	<u>Community of License</u>	<u>State</u>	<u>Freq./Channel</u>
KDEL-FM	L2C	ARKADELPHIA	AR	265 A
KBZU	L2C	BENTON	AR	294 C2
KPWA	AMD	BISMARCK	AR	228 C3
KWPS-FM	L2C	CADDO VALLEY	AR	259 A
KMJX	MOD	CONWAY	AR	286 C1
KLFH	L2C	FORT SMITH	AR	214 C0
KYXK	L2C	GURDON	AR	295 C3
KALR	L2C	HOT SPRINGS	AR	218 C3
KLAZ	L2C	HOT SPRINGS	AR	290 C1
KLXQ	MOD	HOT SPRINGS	AR	244 A
KQUS-FM	MOD	HOT SPRINGS	AR	248 C1
KLRO	AMD	HOT SPRINGS	AR	211 C1
KVRE	L2C	HOT SPRINGS VILLAGE	AR	225 C3
KDJE	MOD	JACKSONVILLE	AR	262 C1
KABF	L2C	LITTLE ROCK	AR	202 C1
KKPT	L2C	LITTLE ROCK	AR	231 C
KSSN	L2C	LITTLE ROCK	AR	239 C
KUAR	L2C	LITTLE ROCK	AR	206 C1
KURB	L2C	LITTLE ROCK	AR	253 C0
KABZ	MOD	LITTLE ROCK	AR	279 C
KLBL	L2C	MALVERN	AR	268 A
KHKN	L2C	MAUMELLE	AR	235 C
KTTG	L2C	MENA	AR	242 C1
KJDS	AMD	MOUNTAIN PINE	AR	270 A
KHHS	L2C	PEARCY	AR	283 A
KIPR	L2C	PINE BLUFF	AR	222 C1
KANX	L2C	SHERIDAN	AR	216 C2
KARN-FM	L2C	SHERIDAN	AR	275 C2
<u>KLAL</u>	<u>L2C</u>	<u>WRIGHTSVILLE</u>	<u>AR</u>	<u>299 C1</u>

Total 29**AM Stations**

<u>Call Sign</u>	<u>Status</u>	<u>Community of License</u>	<u>State</u>	<u>Freq./Channel</u>
KVRC	Lic	ARKADELPHIA	AR	1240
KAFN	Lic	BENTON	AR	690
KHGZ	Lic	GLENWOOD	AR	670
KZNG	Lic	HOT SPRINGS	AR	1340
KBHS	Lic	HOT SPRINGS	AR	1420
KAAY	Lic	LITTLE ROCK	AR	1090
KZYP	Lic	MALVERN	AR	1310
KLRG	Lic	SHERIDAN	AR	880
<u>KMTL</u>	<u>Lic</u>	<u>SHERWOOD</u>	<u>AR</u>	<u>760</u>

Total 9