

KXCD MULTIPLE OWNERSHIP EXHIBIT

INTRODUCTION

A Multiple Ownership Study was executed for the applicant using the modified contour method. The applicant has ownership in 7 other stations, 4 FM and 3 AM. The following information confirms that the proposed station facility modification for the ownership group is compliant with FCC Rule 73.3555.

STATIONS IN MARKET

As there is no BIA/KELSEY market defined for this area, the modified contour overlap approach is used to determine whether the proposed application will be compliant with FCC multiple ownership rules. Lee Family Broadcasting (LFB) owned stations were first plotted to determine what commonly owned stations should be considered as “in-market”. This is shown in Exhibit #1. The proposed modification for KXCD and other LFB owned stations in the area include KART-AM, KBAR-AM, KKRK-AM, and FM stations KZDX, KEDJ, KKMV, KEDJ, and KXTA. To determine the number of commonly owned stations “in market”, contour overlap was used to identify which stations had overlap with the proposed facility for KXCD.

The intersection area of the commonly owned LFB stations is shown in Exhibit #2. The intersection area involves 4 total stations including the proposed KXCD facility. The stations beside KXCD are KART-AM, KEDJ, and KXTA. The union of the contour overlap area of these stations has been plotted in Exhibit #3. Any stations with contour overlap with this union area shall be included as stations “in the market” (excluding commonly owned LFB stations not “in market”). Exhibit #4 shows the map identifying all stations within a 92 km radius of the KXCD xmtr site that have some contour overlap with the area defined by the union of the mentioned contours.

The stations having contour overlap with the combined contour union area are shown in Exhibit #4 are listed on the left side of this exhibit. The LFB commonly owned group of stations “in market” consists of 1 AM and 3 FM stations. The total number of commercial and non-commercial stations “in-market” is 27 (excluding any other LFB commonly owned stations besides the 3 that have overlap with KXCD).

SUMMARY

As determined by the list of commercial and non-commercial radio stations in the area where the proposed facility site, there are a total of 27 stations (20 FM and 7 AM including KSBW which is listed twice because both the current application and the licensed facility were considered). All of the principal city contours associated with these stations are shown on Exhibit 4. The list of stations considered “in the market” is provided on the left side of this exhibit.

Per FCC 73.3555 (a) (iii), in markets that have between 15 and 29 radio stations, common ownership is permitted for stations with no more than 6 stations total and no more than 4 stations in the same service.

There are 4 stations owned by Lee Family Broadcasting considered as "in-market". Using the modified contour approach compliance with the multiple ownership rule (FCC 73.3555) is demonstrated.

EXHIBIT #1—LEE FAMILY BROADCASTING RADIO STATIONS IN THE TWIN FALLS AREA

KXCD – CONTOUR OVERLAP WITH PROPOSED LEE FAMILY BROADCASTING

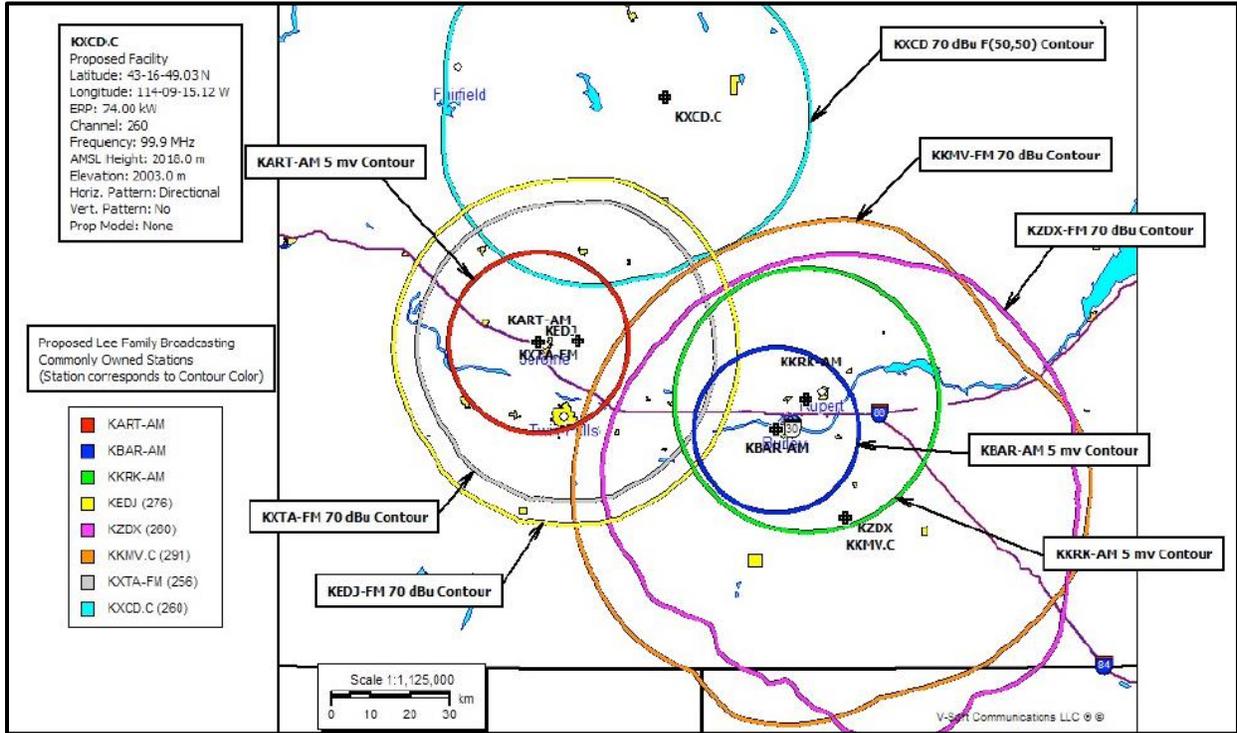


EXHIBIT #2—INTERSECTION OF COMMONLY OWNED LEE FAMILY BROADCASTING RADIO STATIONS

KXCD MARKET DEFINED BY COMMON CONTOUR OVERLAP

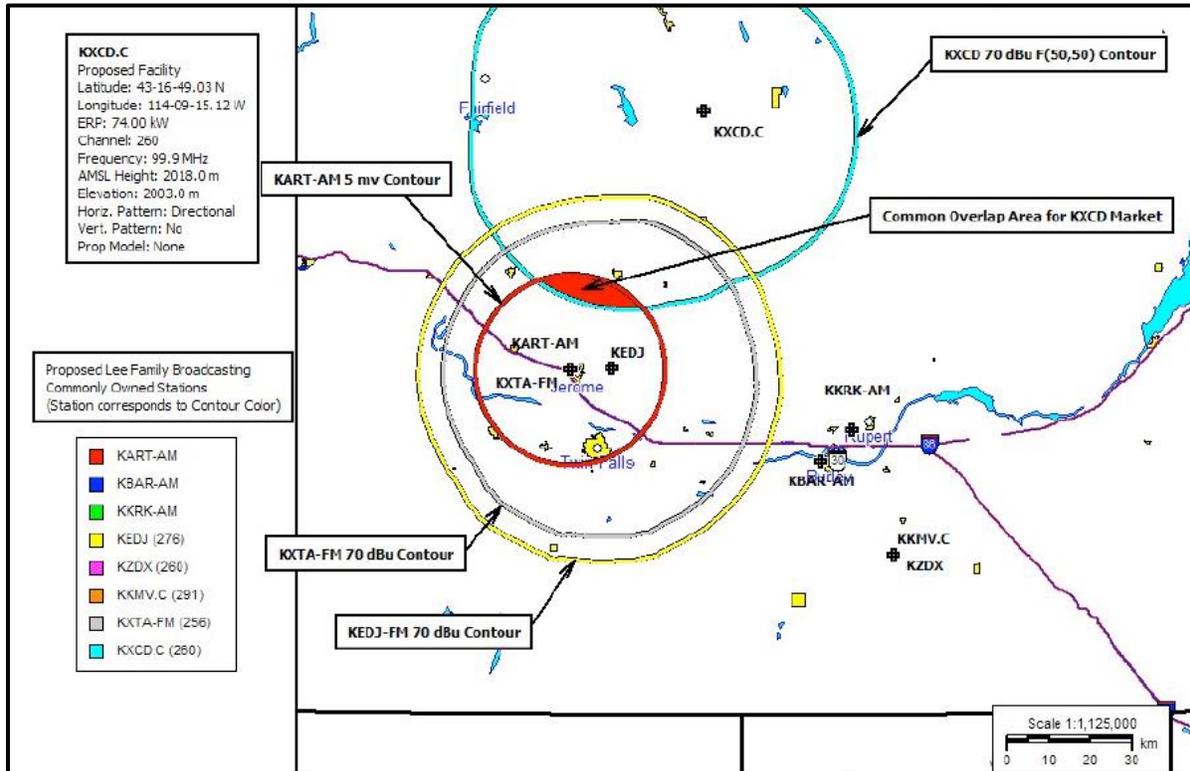


EXHIBIT #3—UNION OF “IN-MARKET” COMMONLY OWNED LEE FAMILY BROADCASTING RADIO STATIONS

UNION OF COMMONLY OWNED “KXCD MARKET” STATIONS

