

**ENGINEERING STATEMENT COVERING  
BROADCAST MULTIPLE OWNERSHIP STUDY**

**CCR-ST. GEORGE IV, LLC**

**LOGANDALE, NEVADA, BRIAN HEAD, CEDAR CITY, ST. GEORGE,  
WASHINGTON, UTAH & COLORADO CITY, ARIZONA**

MAY 2010

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This engineering statement is submitted for the purpose of reflecting a change in KUNF(AM) 1210 kHz, Washington, Utah facilities associated with a pending 301 Application for Construction Permit, BP-20100430ABZ. It is noted that the facilities specified in BP-20100430ABZ are essentially identical to those authorized in BP-20050506ABL. This statement, supporting tabulations and figures have been prepared on behalf of **CCR-St. George IV, LLC (“CCR”)**. This statement demonstrates **CCR** compliance with *Section 73.3555* of the Commission’s Rules with respect to multiple ownership of AM and FM broadcast facilities.

**CCR** proposes common ownership in the following eight stations:

KREC (FM)	Brian Head, UT	98.1 MHz	54 kW	BLH-19881123KC
KSUB (AM)	Cedar City, UT	590 kHz	5 kW DAN	BL-20060501AOZ
KXBN (FM)	Cedar City, UT	92.1 MHz	95 kW	BLH-20071113ADC
KCIN (FM)	Cedar City, UT	94.9 MHz	55 kW	BLH-19890717KF <sup>1</sup>
KCIN (FM)	Cedar City, UT	94.9 MHz	5 kW	BPH-20070716ABS
KXFF (FM)	Colorado City, AZ	107.3 MHz	35 kW	BLH-20030313AXW
KSNN(FM)	St. George, UT	106.1 MHz	2 kW	BMLH-20060918AHN <sup>2</sup>
KSNN (FM)	Logandale, NV	106.1 MHz	92 kW	BPH-20070108AAW
KDXU (AM)	St. George, UT	890 kHz	10 kW DA-2	BL-20060216AMX
KUNF (AM)	Washington, UT	1210 kHz	10 kW ND	BL-19820816AK <sup>3</sup>
KUNF (AM)	Washington, UT	1210 kHz	10 kW ND	BP-20100430ABZ

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<sup>1</sup> KCIN has a construction permit, BPH-20070716ABS. This facility is evaluated on page 3 of this statement and on Map [Figure 1A](#).

<sup>2</sup> KSNN has an application for construction permit, BPH-20070108AAW. This facility is evaluated on page 3 of this statement and on Map [Figure 1A](#).

<sup>3</sup> KUNF has an application for construction permit, BP-20100430ABZ. This facility is evaluated on page 3 of this statement and on Map [Figure 1A](#).

These eight stations are considered as three separate markets since the principal community contours for KCIN (FM), KXFF (FM) and KSNM (FM) do not have an area of common overlap.

- Market 1: KSUB (AM), KDXU (AM), KUNF (AM), KXBN(FM), KCIN (FM) and KREC (FM)  
2: KSUB (AM), KDXU (AM), KUNF (AM), KXBN (FM), KXFF (FM) and KREC (FM)  
3: KSUB (AM), KDXU (AM), KUNF (AM), KXBN (FM), KXFF (FM) and KSNM (FM)

In markets 1 - 3 there are three AM and three FM stations based on licensed facilities and the KUNF application.

A multiple ownership analysis was prepared considering the above described radio stations, in markets 1 - 3, under proposed common ownership or control, which stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) in accordance with *Section 73.3555* of the FCC Rules.

### **RADIO MARKETS & METHODOLOGY**

The radio market is defined as the area encompassed by the principal community contours (predicted or measured 5 mV/m groundwave contour for AM; predicted 3.16 mV/m contour for FM) of the stations that are both mutually overlapping and proposed to be “commonly attributable” post-transaction. The number of radio stations in this defined radio market (i.e., the numerator) will not exceed the limits set forth in *Section 73.3555(a)*. A commonly attributable station whose contour overlaps the contour of some but not all of the contours of the stations that define the radio market was not counted toward the local radio ownership limits (i.e., is not counted in the numerator). Counties in the market are Beaver, Piute, Garfield, Iron, Kane, and Washington, Utah, Mohave, Arizona and Lincoln and Clark, Nevada. Clark County is located in an Arbitron defined survey area. Since the existing licensed stations are in counties which are not Arbitron Metro counties, stations counted as part of the market are determined on the basis of contour overlap.

The KSNN and KUNF applications, and KCIN CP, are discussed as follows.

KSNN - In market 3 there are two AM stations and one FM station, based on the proposed KSNN Logandale, Nevada facility. It is noted that Logandale is in Clark County which is the Las Vegas Arbitron Metro. Since KSNN would be the sole owned CCR facility in the Las Vegas Metro no multiple ownership issue is believed to be associated with respect to the pending KSNN application in regard to Arbitron analysis. Please also see Figure 1A.

KCIN & KUNF- Figure 1A depicts the principal community contours for all eight stations for which common ownership is proposed with the CP facilities for KCIN(FM) and the KUNF(AM) application and license contours shown. Since the CP and application facilities do not modify the market definitions the KSNN and KCIN unbuilt facilities are not considered further.

Figure 1 depicts the principal community contours for all eight stations for which common ownership is proposed. Figure 2 depicts other AM stations plus those depicted on Figure 1. Figure 3 depicts other FM stations plus those depicted on Figure 1. It is noted that the market perimeter is defined by the 5 mV/m AM contours and thus other stations considered as being part of markets 1 - 3 are the same.

Table I lists all AM stations whose 5 mV/m daytime contour duplicates some portion of the market. The contours for these stations are plotted on Figure 2 in black along with the market as depicted on Figure 1. Table I also lists all FM stations whose 70 dBu contour duplicates some portion of the market. The contours for these stations are plotted on Figure 3 in green along with the market.

Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's CDBS database using the appropriate Ground Wave Field Strength versus Distance Graph of 47 CFR 73.184. Ground conductivities were obtained from FCC Figure M3. Distances to the FM contours were determined based on the methodology of 47 CFR 73.313. Terrain data was derived from the N.G.D.C. 30-second computer database for each of the FM stations, using radials spaced every 5 degrees of azimuth.

## **CONCLUSION**

Based on the above analysis, it is believed that the proposed common ownership of stations complies with *Section 73.3555(a)(1)(iii)* of the Commission's Rules. There are 18 other FM and 3 other AM stations considered in this study which have principal community contours that overlap some portion of the attributable stations principal community contours. AM stations KSUB and KDXU are a part of each of the three markets and their contours represent the boundary of the market for all practical purposes as stated above. Stations in each market are listed as follows:

### **Market 1: Attributable Stations - 6 Stations (3 AM & 3 FM)**

KSUB (AM), KDXU (AM), KUNF (AM), KXBN(FM), KCIN (FM) and KREC (FM)

### **Non Attributable Stations in Market = 20**

KENT (AM), KDWN (AM), KAER (FM), KAIZ (FM), KRQX (FM), KCYQ (FM), KJUL (FM), KONY (FM), KPLD (FM), KSGU (FM), KSUU (FM), KVEG (FM), KVBE (FM), KHIJ (FM), KADD (FM), KURR(FM), KXDS(FM), KCDC (FM), KMXD (FM) and KZHK (FM)

### **Market 2: Attributable Stations - 6 Stations (3 AM & 3 FM)**

KSUB (AM), KDXU (AM), KUNF (AM), KXBN (FM), KXFF (FM) and KREC (FM)

### **Non Attributable Stations in Market = 20**

KENT (AM), KDWN (AM), KAER (FM), KAIZ (FM), KRQX (FM), KCYQ (FM), KJUL (FM), KONY (FM), KPLD (FM), KSGU (FM), KSUU (FM), KVEG (FM), KVBE (FM), KHIJ (FM), KADD (FM), KURR(FM), KXDS(FM), KCDC (FM), KMXD (FM) and KZHK (FM)

Market 3: Attributable Stations - 6 Stations (3 AM & 3 FM)

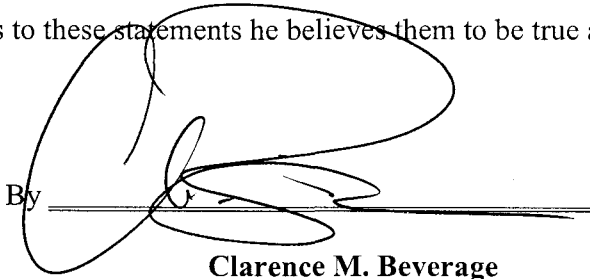
KSUB (AM), KDXU (AM), KUNF (AM), KXBN (FM), KXFF (FM) and KSNN (FM)

Non Attributable Stations in Market = 20

KENT (AM), KDWN (AM), KAER (FM), KAIZ (FM), KRQX (FM), KCYQ (FM), KJUL (FM), KONY (FM), KPLD (FM), KSGU (FM), KSUU (FM), KVEG (FM), KVBE (FM), KHIJ (FM), KADD (FM), KURR(FM), KXDS(FM), KCDC (FM), KMXD (FM) and KZHK (FM)

The foregoing was prepared on behalf of **CCR-St. George IV, LLC** by Clarence M. Beverage of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The undersigned certifies, under penalty of perjury, that the statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.

By

A large, stylized handwritten signature in black ink, written over a horizontal line. The signature is cursive and appears to be 'Clarence M. Beverage'.

**Clarence M. Beverage**  
for Communications Technologies, Inc.  
Marlton, New Jersey

May 7, 2010

# TABLE I

## AM STATIONS IN THE CCR-ST.GEORGE IV, LLC MARKET ANALYSIS

MAY 2010

CALL ARN	ST OWNER	CITY LATITUDE	FREQ LONGITUDE	PAT	PWR	DESC
KSUB BL20060501AOZ 37-41-51.0 N	UT CCR-ST. GEORGE IV, LLC	CEDAR CITY 113-10-52.0 W	590.00000	LD	5.000	DAN
KUNF BL19820816AK 37-08-38.0 N	UT CCR-ST. GEORGE IV, LLC	WASHINGTON 113-30-03.0 W	1210.00000	LD	10.000	ND1
KUNF BP20100430ABZ 37-04-06.0 N	UT CCR-ST. GEORGE IV, LLC	WASHINGTON 113-31-04.0 W	1210.00000	AP	10.000	ND2
KDXU BL20060216AMX 37-04-05.0 N	UT CCR-ST. GEORGE IV, LLC	ST. GEORGE 113-31-08.0 W	890.00000	LD	10.000	DAN
KZNU BL20050414ACX 37-02-17.0 N	UT CANYON MEDIA CORPORATION	ST. GEORGE 113-38-12.0 W	1450.00000	LD	1.000	ND2
KENT BL20060703ADG 37-48-22.0 N	UT AM RADIO 1400, INC.	PAROWAN 112-56-40.0 W	1400.00000	LD	1.000	ND2
KDWN BL20091120AGY 36-04-22.0 N	NV KDWN LICENSE LIMITED PARTNERSHIP	LAS VEGAS 114-58-20.0 W	720.00000	LD	50.000	NDD

**TABLE I, PAGE 2**

**FM STATIONS IN THE CCR-ST. GEORGE IV, LLC MARKET STUDY ANALYSIS**

**MAY 2010**

CALL ARN	ST OWNER	CITY LATITUDE	FREQ LONGITUDE	CL HAAT:m	ERP AMSL:m	STAT
KREC	UT	BRIAN HEAD	98.10000	C	54000.00	LIC
BLH19881123KC		CCR-ST. GEORGE IV, LLC				
37-32-32.0 N 113-04-05.0 W 759.111			3078.000			
KXFF	AZ	COLORADO CITY	107.30000	C1	35000.00	LIC
BLH20030313AXW		CCR-ST. GEORGE IV, LLC				
37-05-41.0 N 113-11-06.0 W 343.556			1728.000			
KXBN	UT	CEDAR CITY	92.10000	C	95000.00	LIC
BLH20071113ADC		CCR-ST. GEORGE IV, LLC				
37-38-43.0 N 113-22-22.0 W 531.514			2432.000			
KCIN	UT	CEDAR CITY	94.90000	C1	55000.00	LIC
BLH19890717KF		CCR-ST. GEORGE IV, LLC				
37-45-51.0 N 113-06-15.0 W -33.458			1733.000			
KVBE	NV	MOAPA	94.50000	C	93000.00	LIC
BLH20080229AAT		AURORA MEDIA, LLC				
36-38-07.0 N 114-07-18.0 W 662.016			1755.000			
KHIJ	NV	MESQUITE	96.70000	C	93000.00	LIC
BLH20081030ABH		COLLEGE CREEK MEDIA, LLC				
36-38-07.0 N 114-07-18.0 W 662.016			1755.000			
KJUL	NV	MOAPA VALLEY	104.70000	C1	100000.00	LIC
BLH20041115ACG		SUMMIT AMERICAN, INC.				
36-41-00.0 N 114-30-48.0 W 192.861			775.000			
KVEG	NV	MESQUITE	97.50000	C	100000.00	LIC
BLH20010711AAI		KEMP BROADCASTING, INC.				
36-35-06.0 N 114-36-01.0 W 616.746			1203.000			
KAIZ	NV	MESQUITE	91.10000	A	400.00	LIC
BLED20050630AGN		EDUCATIONAL MEDIA FOUNDATION				
36-53-51.0 N 114-17-10.0 W 263.651			1145.000			
KADD	NV	LOGANDALE	93.50000	C	93000.00	LIC
BLH20080201BGH		M&M BROADCASTING LLC				
36-38-07.0 N 114-07-18.0 W 662.016			1755.000			



**TABLE I, PAGE 3**  
**FM STATIONS IN THE CCR-ST. GEORGE IV, LLC MARKET STUDY ANALYSIS**

**MAY 2010**

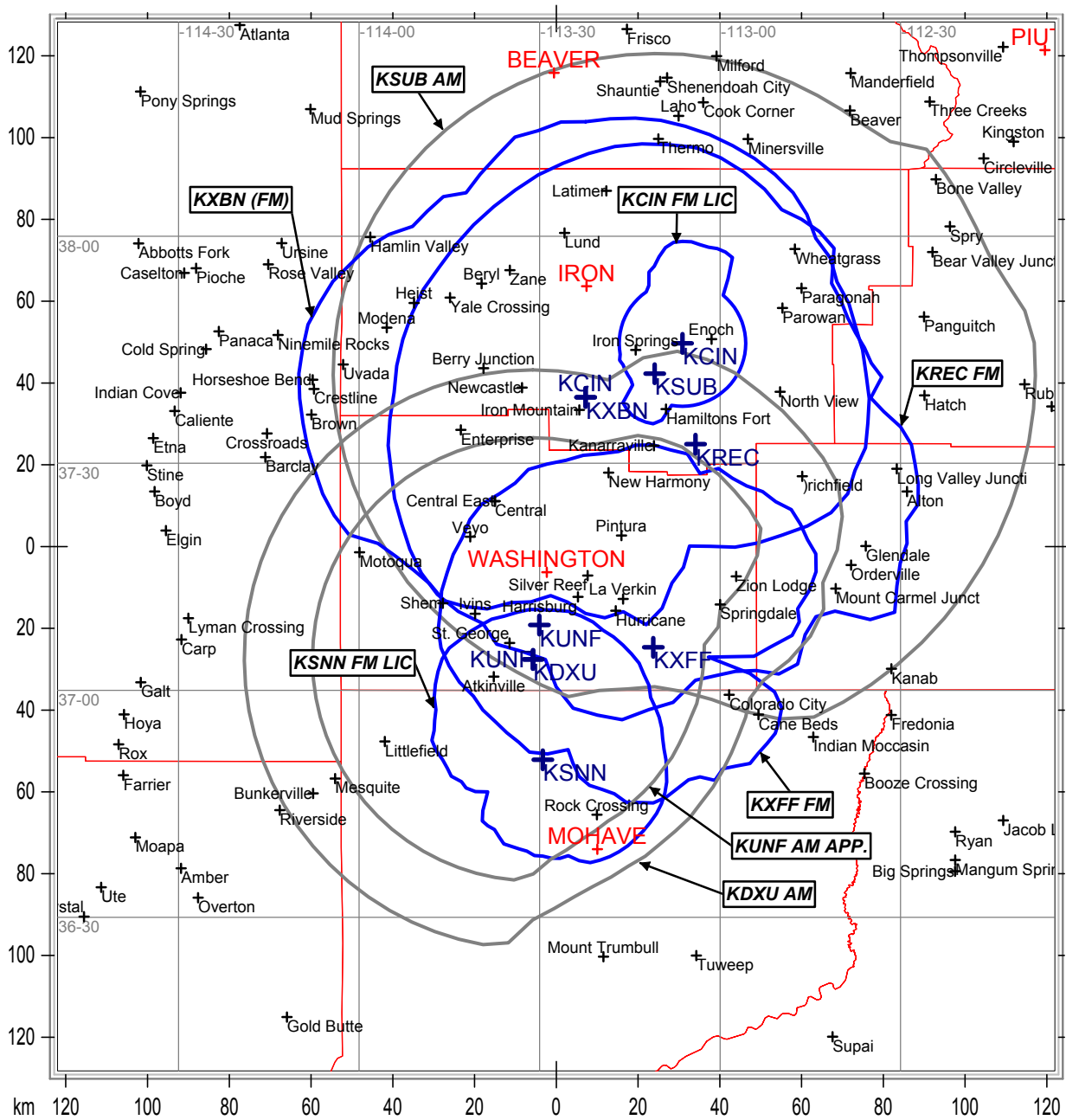
CALL ARN	ST OWNER	CITY LATITUDE	FREQ LONGITUDE	CL HAAT:m	ERP AMSL:m	STAT
KRQX BLH20000317ABQ 37-53-44.0 N 114-34-41.0 W 1041.727 2870.000	NV CBL INVESTMENTS, LLC	PIOCHE	98.90000	C	5000.00	LIC
KURR BLH20070807AEG 36-50-49.0 N 113-29-28.0 W 588.091 1960.000	UT WESTERN BROADCASTING LS, LLC	HURRICANE	103.10000	C	100000.00	LIC
KZHK BLH19970130KB 36-50-49.0 N 113-29-28.0 W 591.091 1963.000	UT MARVIN KENT FRANDSEN	ST. GEORGE	95.90000	C	100000.00	LIC
KONY BMLH20020215ABJ 36-50-49.0 N 113-29-28.0 W 619.091 1991.000	UT CANYON MEDIA CORPORATION	ST. GEORGE	99.90000	C	89000.00	LIC
KSGU BLED20051107AED 36-50-49.0 N 113-29-28.0 W 549.091 1921.000	UT NEVADA PUBLIC RADIO	ST. GEORGE	90.30000	C2	2000.00	LIC
KXDS BLED20090612ADX 36-50-49.0 N 113-29-28.0 W 559.091 1931.000	UT DIXIE COLLEGE	ST. GEORGE	91.30000	C3	360.00	LIC
KAER BLED20060301ADG 36-50-49.0 N 113-29-28.0 W 549.091 1921.000	UT EDUCATIONAL MEDIA FOUNDATION	ST. GEORGE	89.50000	C1	7000.00	LIC
KSUU BLED19850219KK 37-38-55.0 N 113-05-32.0 W -146.065 1892.000	UT SOUTH STATE UNIVERSITY	CEDAR CITY	91.10000	C3	10000.00	LIC
KCDC BLH20090615AFM 38-31-09.0 N 113-17-07.0 W 1188.158 2940.000	UT COCHISE BROADCASTING LLC	MILFORD	98.50000	C1	520.00	LIC
KPLD BLH20000809AAL 37-17-45.0 N 112-50-34.0 W 591.507 2536.000	UT MARATHON MEDIA GROUP, L.L.C.	KANAB	101.10000	C	100000.00	LIC

**TABLE I, PAGE 4**  
**FM STATIONS IN THE CCR-ST. GEORGE IV, LLC MARKET STUDY ANALYSIS**

**MAY 2010**

CALL ARN	ST OWNER	CITY LATITUDE	FREQ LONGITUDE	CL HAAT:m	ERP AMSL:m	STAT
KMXD BLH20080122ADT 38-23-08.0 N	UT SANPETE COUNTY BROADCASTING CO.	MONROE 112-19-57.0 W	100.50000 1003.040	C 3600.000	33000.00	LIC
KCYQ BMLH20081106ACE 38-32-30.0 N	UT MID-UTAH RADIO, INC.	ELSINORE 112-03-31.0 W	97.70000 869.896	C 3353.000	43000.00	LIC
KSNN BPH20070108AAW 36-50-55.0 N	NV CCR-ST. GEORGE IV, LLC	LOGANDALE 114-28-23.0 W	106.10000 631.083	C 1619.000	92000.00	APP
KSNN CP BMLH20060918AHN 36-50-49.0 N	UT CCR-ST. GEORGE IV, LLC	ST. GEORGE 113-29-28.0 W	106.10000 567.091	C2 1939.000	2000.00	LIC


CCR STATIONS ARIZONA, NEVADA &amp; UTAH BLUE =FM GRAY = AM



Communications Technologies, Inc. Marlton, New Jersey

County Borders      Lat/Lon Grid

[illegible]

 County Borders       Lat/Lon Grid

[illegible]

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FIGURE 2

[illegible]

 County Borders       Lat/Lon Grid