

**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 ¹
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 ²
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 ³
KUNF (AM)	Washington, UT	1210 kHz	10 kW ND	BP-20100430ABZ

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

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

³KUNF 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 KSNN (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 KSNN (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)

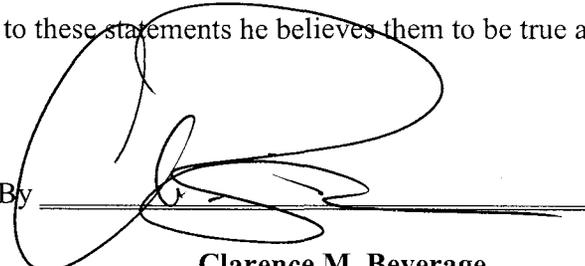
KSUB (AM), KDXU (AM), KUNF (AM), KXBN (FM), KXFF (FM) and KSNN (FM)

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 _____



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

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

TABLE I, PAGE 2

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

MAY 2010

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

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

MAY 2010

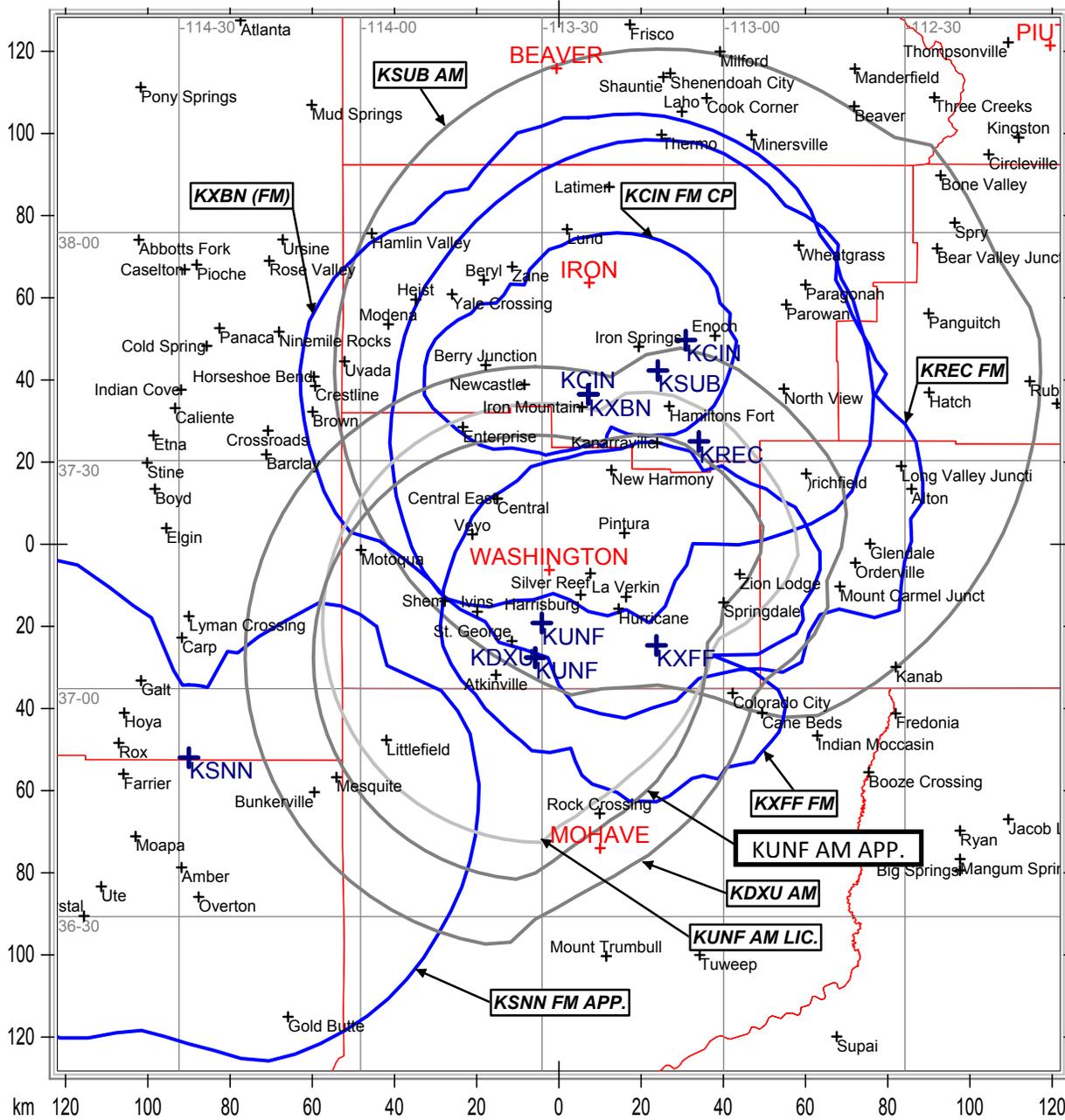
<u>CALL</u> <u>ARN</u>	<u>ST</u> <u>OWNER</u>	<u>CITY</u> <u>LATITUDE</u>	<u>FREQ</u> <u>LONGITUDE</u>	<u>CL</u> <u>HAAT:m</u>	<u>ERP</u> <u>AMSL:m</u>	<u>STAT</u>
KRQX BLH20000317ABQ 37-53-44.0 N	NV CBL INVESTMENTS, LLC	PIOCHE 114-34-41.0 W	98.90000 1041.727 2870.000	C	5000.00	LIC
KURR BLH20070807AEG 36-50-49.0 N	UT WESTERN BROADCASTING LS, LLC	HURRICANE 113-29-28.0 W	103.10000 588.091 1960.000	C	100000.00	LIC
KZHK BLH19970130KB 36-50-49.0 N	UT MARVIN KENT FRANSEN	ST. GEORGE 113-29-28.0 W	95.90000 591.091 1963.000	C	100000.00	LIC
KONY BMLH20020215ABJ 36-50-49.0 N	UT CANYON MEDIA CORPORATION	ST. GEORGE 113-29-28.0 W	99.90000 619.091 1991.000	C	89000.00	LIC
KSGU BLED20051107AED 36-50-49.0 N	UT NEVADA PUBLIC RADIO	ST. GEORGE 113-29-28.0 W	90.30000 549.091 1921.000	C2	2000.00	LIC
KXDS BLED20090612ADX 36-50-49.0 N	UT DIXIE COLLEGE	ST. GEORGE 113-29-28.0 W	91.30000 559.091 1931.000	C3	360.00	LIC
KAER BLED20060301ADG 36-50-49.0 N	UT EDUCATIONAL MEDIA FOUNDATION	ST. GEORGE 113-29-28.0 W	89.50000 549.091 1921.000	C1	7000.00	LIC
KSUU BLED19850219KK 37-38-55.0 N	UT SOUTH STATE UNIVERSITY	CEDAR CITY 113-05-32.0 W	91.10000 -146.065 1892.000	C3	10000.00	LIC
KCDC BLH20090615AFM 38-31-09.0 N	UT COCHISE BROADCASTING LLC	MILFORD 113-17-07.0 W	98.50000 1188.158 2940.000	C1	520.00	LIC
KPLD BLH20000809AAL 37-17-45.0 N	UT MARATHON MEDIA GROUP, L.L.C.	KANAB 112-50-34.0 W	101.10000 591.507 2536.000	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	UT SANPETE COUNTY BROADCASTING CO. N 112-19-57.0	MONROE W 1003.040	100.50000 3600.000	C	33000.00	LIC
KCYQ BMLH20081106ACE 38-32-30.0	UT MID-UTAH RADIO, INC. N 112-03-31.0	ELSINORE W 869.896	97.70000 3353.000	C	43000.00	LIC
KSNN BPH20070108AAW 36-50-55.0	NV CCR-ST. GEORGE IV, LLC N 114-28-23.0	LOGANDALE W 631.083	106.10000 1619.000	C	92000.00	APP
KSNN CP BMLH20060918AHN 36-50-49.0	UT CCR-ST. GEORGE IV, LLC N 113-29-28.0	ST. GEORGE W 567.091	106.10000 1939.000	C2	2000.00	LIC

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



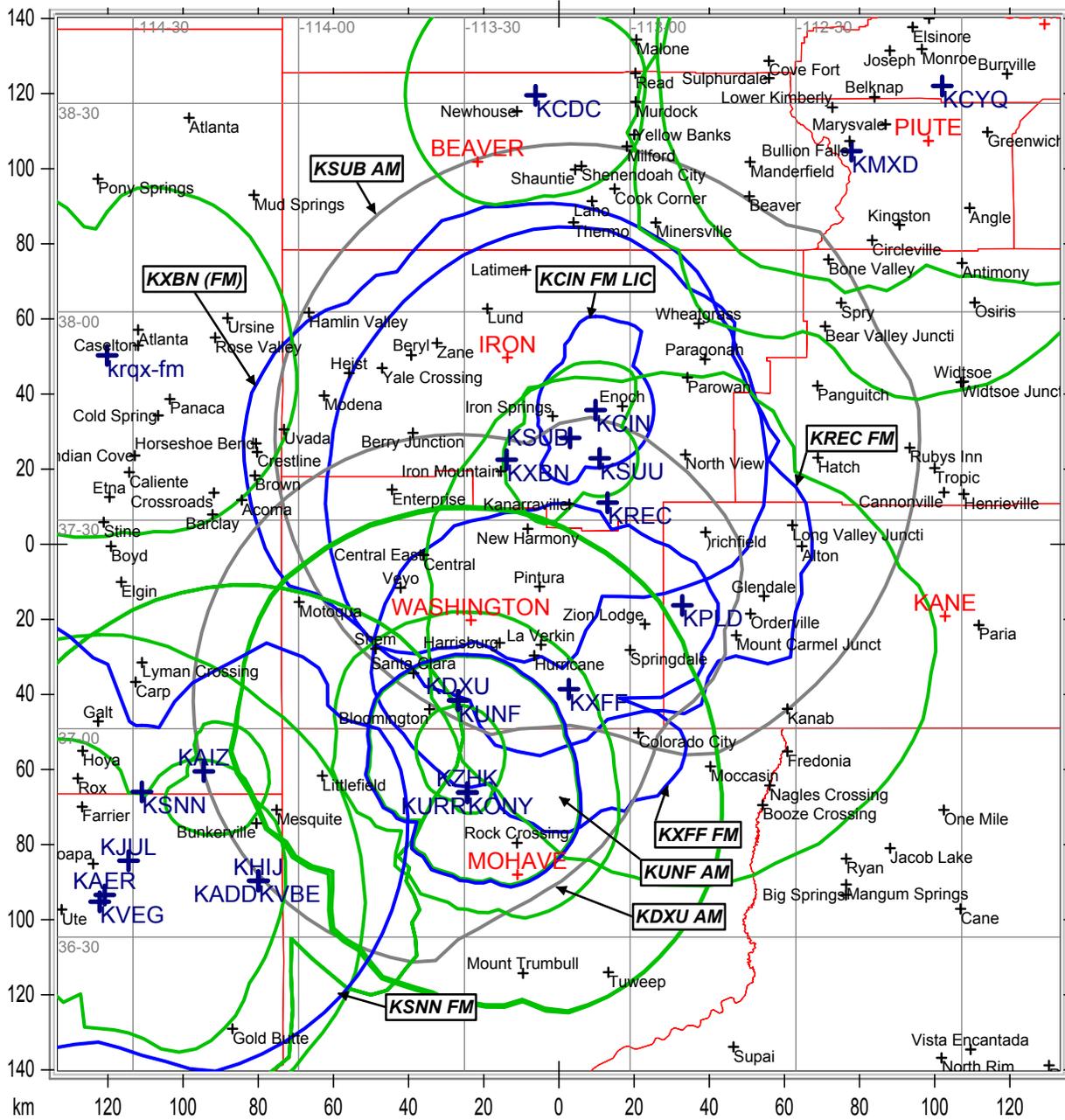
Communications Technologies, Inc. Marlton, New Jersey

County Borders Lat/Lon Grid

Map Scale: 1:1600000 1 cm = 16.00 km V\H Size: 256.48 x 243.95 km

FIGURE 1A

CCR STATIONS ARIZONA, NEVADA & UTAH BLUE =FM GRAY = AM OTHER FM = GREEN



Communications Technologies, Inc. Marlton, New Jersey

County Borders Lat/Lon Grid

Map Scale: 1:1750000 1 cm = 17.50 km V\H Size: 280.53 x 266.82 km

FIGURE 3