

**ENGINEERING STATEMENT**

PREPARED FOR:

ENTERCOM PORTLAND LICENSE, LLC

MULTIPLE OWNERSHIP REPORT

PORTLAND, OREGON

MAY 2003

## **Engineering Statement**

This study has been prepared in a manner consistent with rules adopted in MM Docket Number 91-140, §73.3555, concerning common ownership of stations that involve overlap of the principal community coverage contours.

Entercom Portland License, LLC ("EPL"), subject to Federal Communications Commission ("FCC") approval, proposes to purchase AM broadcast station KOTK and FM broadcast station KWJJ. There is overlap of the licensed principal community contours of the two stations with six radio facilities already owned by EPL: Standard Broadcast stations KFXX and KKSJN-AM and FM broadcast stations KKSJN-FM, KGON (FM), KNRK (FM) and KRSK (FM). There is no overlap of the proposed additional principal community contours of KOTK and KWJJ by any other AM broadcast or FM broadcast station now owned by EPL or proposed to be acquired by EPL in any pending application.

The KOTK facility is licensed to Portland, OR and operates on 1080 kHz at 50 kW daytime and 10 kW nighttime (DA-2). KWJJ-FM is also licensed to Portland, OR and operates on channel 258C1 with an effective radiated power (ERP) of 52 kW at 386 meters height above average terrain (HAAT). KFXX, licensed to Vancouver, WA, operates on 910 kHz with 5 kW DA-2. The KKSJN-AM facility is licensed to Oregon City, OR and operates on 1520kHz with a 50kW daytime directional array and a 15kW nighttime directional array (DA-2). KKSJN-FM is licensed to Portland, OR and operates on channel 246C with

100kW ERP at 386 meters HAAT. KGON (FM) is licensed to Portland, OR and operates on channel 222C with 100 kW ERP at 386 meters HAAT. Station KNRK (FM) is licensed to Camas, WA on channel 234C2 with 17 kW ERP at 259 meters HAAT. KNRK (FM) is currently operating under Program Test Authority from its new main transmission facility with 6.3 kW at 403 meters HAAT (PTA granted April 3, 2003). The KRSK (FM) facility is licensed to Molalla, OR and operates on channel 286C with 100 kW ERP at 576 meters HAAT. KRSK (FM) currently holds a construction permit (CP) to relocate its main facility as a Class C1 operation, with 22.5 kW ERP at 470 meters HAAT. KWJJ-FM, KKSJ-FM, KGON (FM), and the KNRK (FM) PTA operation are co-located facilities. EPL also owns AM station KSLM, licensed to Salem, OR, which operates on 1390 kHz with 5 kW daytime and 0.60 kW nighttime, non-directional. The distance to each stations' respective signal contour is less than 92 km.

The attached map, Exhibit 1, shows the 3.16mV/m contour for each of the five FM facilities and the 5mV/m daytime groundwave signal contour for the subject AM station. For the purpose of applying the FCC's multiple ownership rules, the relevant "radio market" is that formed by the combined contours of these stations. To assist in determining the number of stations within the resulting radio market, I have prepared Table 1. Table 1 describes the locations and facilities of at least 39 licensed commercial AM and FM broadcast stations, in addition to the eight stations proposed to be owned by EPL. These additional 39 commercial radio stations operate with transmitter locations either inside the combined contours of the subject stations proposed to be owned by EPL or the stations provide intersecting principal community contours to at least a portion of

the composite area created by the principal community contours of the subject stations. The distance to each counted stations' signal contour is less than 92 km. Thus, the number of commercial stations in this analysis, including the eight stations that are to be commonly owned, serving this defined "market", totals at least 47. Therefore, EPL can own up to five FM stations and three AM broadcast stations in this defined market.

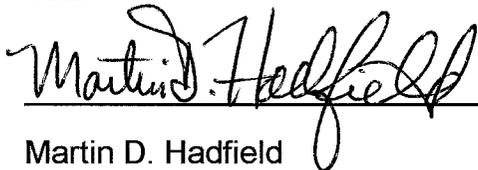
Relative to the market definition associated with EPL AM station KSLM, Exhibit 2 shows the 3.16mV/m contour for each of the four FM facilities, KWJJ-FM, KGON, KKSJN-FM, KRSK (licensed and CP) and the 5mV/m daytime groundwave signal contour for the subject AM station. The respective daytime 5 mV/m signal contours of AM stations KOTK, KKSJN-AM and KFXJ do not intersect with the 5 mV/m signal contour of KSLM. Similarly, the 3.16 mV/m signal contour for KNRK (both the licensed and PTA facilities) do not intersect with the KSLM 5 mV/m signal contour. Table 1 remains applicable in this situation and describes the locations and facilities of at least 39 licensed commercial AM and FM broadcast stations, in addition to the four FM stations and the KSLM facility proposed to be owned by EPL. These additional 39 commercial radio stations operate with transmitter locations either inside the combined contours of the subject stations proposed to be owned by EPL or the stations provide intersecting principal community contours to at least a portion of the composite area created by the principal community contours of the subject stations. The distance to each counted stations' signal contour is less than 92 km. Thus, the number of commercial stations in this particular market analysis, including the five stations that are to be commonly owned, serving this defined

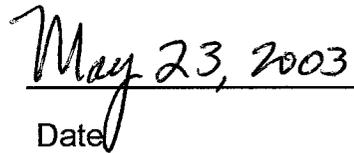
"market", totals at least 47. Therefore, EPL can own up to five FM stations and three AM broadcast stations in this defined market.

The contours and sites of the facilities depicted in Exhibit 1, Exhibit 2 and Table 1 were derived from information already on file with the FCC. The listed stations, their facilities and geographic coordinates (NAD 27) were obtained from the FCC's database, last updated May 18, 2003.

**Engineer's Certification**

This Engineering Statement and its associated exhibits have been prepared on behalf of Entercom Portland License, LLC and all representations herein are true and correct to the best of my knowledge and belief. I am an experienced radio engineer, whose qualifications are a matter of record with the Federal Communications Commission. The undersigned is the Vice President of Engineering for Entercom Portland License, LLC, and represents that neither Entercom Portland License, LLC, nor any party holding an attributable interest in Entercom Portland License, LLC is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862.

  
\_\_\_\_\_  
Martin D. Hadfield

  
\_\_\_\_\_  
Date

**TABLE 1****ENTERCOM PORTLAND LICENSE, LLP**

MAY 2003

Identification of 47 Commercial Aural Broadcast Stations  
 Providing Principal Community Service to the  
 KFXX / KKSJ AM/FM / KNRK(FM) / KGON(FM) / KRSK(FM) / KSLM  
 KOTK and KWJJ-FM  
 Radio Market

Station Count	Call Sign & Location	Facilities	Geographic Coordinates (° - ' - ")
1	KGON (FM) Portland, OR	Lic: 222C	45-29-20 NL 122-41-40 WL
2	KKSJ-FM Portland, OR	Lic: CH 246C	45-29-20 NL 122-41-40 WL
3	KWJJ-FM Portland, OR	Lic: CH 258C1	45-29-20 NL 122-41-40 WL
4	KRSK (FM) Molalla, OR	Lic: CH286C	45-00-35 NL 122-20-17 WL
4a	KRSK (FM) Molalla, OR	CP: CH 286C1	45-29-20 NL 122-41-40 WL
5	KNRK (FM) Camas, WA	Lic: CH 234C2	45-27-08 NL 122-32-47 WL
5a	KNRK (FM) Camas, WA	PTA: CH 234C2	45-29-20 NL 122-41-40 WL
6	KFXX Vancouver, WA	Lic: 910 kHz	45-33-28 NL 122-30-09 WL
7	KOTK Portland, OR	Lic: 1080 kHz	45-33-26 NL 122-29-08 WL
8	KKSJ-AM Oregon City, OR	Lic: 1520 kHz	45-24-44 NL 122-34-37 WL

**TABLE 1 (Continued)**  
**Identification of 47 Commercial Aural Broadcast Stations**  
**Providing Principal Community Service to the**  
**KFXX / KKSJ AM/FM / KNRK(FM) / KGON(FM) / KRSK(FM) / KSLM**  
**KOTK and KWJJ-FM**  
**Radio Market**

Station Count	Call Sign & Location	Facilities	Geographic Coordinates (° - ' - ")
9	KSLM Portland, OR	Lic: 1390 Khz	44-59-43 NL 123-04-15 WL
10	KLTH (FM) Lake Oswego, OR	Lic: CH 294C	45-30-58 NL 122-43-59 WL
11	KKSL Lake Oswego, OR	Lic: 1290KHz	45-24-44 NL 122-34-37 WL
12	KBMS Vancouver, WA	Lic: 1480KHz	45-36-06 NL 122-43-06 WL
13	KBNP Portland, OR	Lic: 1410KHz	45-28-24 NL 122-39-36 WL
14	KBZY Salem, OR	Lic: 1490KHz	44-57-03 NL 123-02-43 WL
15	KLYC McMinnville, OR	Lic: 1260KHz	45-14-04 NL 123-07-57 WL
16	KWBY Woodburn, OR	Lic: 940KHz	45-10-37 NL 122-50-58 WL
17	KUIK Hillsboro, OR	Lic: 1360KHz	45-29-13 NL 122-54-31 WL
18	KKRZ (FM) Portland, OR	Lic: CH 262C	45-31-21 NL 122-44-45 WL

**TABLE 1 (Continued)**  
**Identification of 47 Commercial Aural Broadcast Stations**  
**Providing Principal Community Service to the**  
**KFXX / KKSJ AM/FM / KNRK(FM) / KGON(FM) / KRSK(FM) / KSLM**  
**KOTK and KWJJ-FM**  
**Radio Market**

Station Count	Call Sign & Location	Facilities	Geographic Coordinates (° - ' - ")
19	KUFO(FM) Portland, OR	Lic: CH 266C	45-30-58 NL 122-43-59 WL
20	KTLK Portland, OR	Lic: 620 kHz	45-25-20 NL 122-33-57 WL
21	KCCS Salem, OR	Lic: 1220KHz	44-57-05 NL 122-58-10 WL
22	KDZR Lake Oswego, OR	Lic: 1640KHz	45-27-14 NL 122-32-47 WL
23	KEX Portland, OR	Lic: 1190KHz	45-25-20 NL 122-33-57 WL
24	KFIS (FM) Scappoose, OR	Lic: 281C2	45-29-20 NL 122-41-40 WL
25	KGUY Milwaukee, OR	Lic: 1010KHz	45-29-03 NL 122-24-40 WL
26	KHPE (FM) Albany, OR	Lic: CH300C	44-38-46 NL 123-16-11 WL
27	KINK (FM) Poprtlan, OR	Lic: CH270C	45-31-21 NL 122-44-45 WL
28	KKAD Vancouver, WA	Lic: 1550KHz	45-38-47 NL 122-30-51 WL

**TABLE 1 (Continued)**  
**Identification of 47 Commercial Aural Broadcast Stations**  
**Providing Principal Community Service to the**  
**KFXX / KKSJ AM/FM / KNRK(FM) / KGON(FM) / KRSK(FM) / KSLM**  
**KOTK and KWJJ-FM**  
**Radio Market**

Station Count	Call Sign & Location	Facilities	Geographic Coordinates (° - ' - ")
29	KKCW (FM) Beaverton, OR	Lic: CH 277C	45-31-21 NL 122-44-45 WL
30	KKGT Portland, OR	Lic: 1150 kHz	45-38-34 NL 122-36-49 WL
31	KKPZ Portland, OR	Lic: 1330 kHz	45-27-13 NL 122-32-45 WL
32	KLOO-FM Corvallis, OR	Lic: CH292C	44-38-45 NL 123-16-13 WL
33	KMCQ (FM) The Dalles, OR	Lic: CH 283C	45-42-44 NL 121-06-05 WL
34	KMUZ Gresham, OR	Lic: 1230KHz	45-29-03 NL 122-24-40 WL
35	KOHI St. Helens, OR	Lic: 1600KHz	45-51-15 NL 122-49-11 WL
36	KPAM Troutdale, OR	Lic: 860KHz	45-38-48 NL 122-30-49 WL
37	KPDQ-AM Portland, OR	Lic: 800KHz	45-28-39 NL 122-45-01 WL
38	KPDQ-FM Portland, OR	Lic: CH229C	45-29-20 NL 122-41-34 WL

**TABLE 1 (Continued)**  
**Identification of 47 Commercial Aural Broadcast Stations**  
**Providing Principal Community Service to the**  
**KFXX / KKSJ AM/FM / KNRK(FM) / KGON(FM) / KRSK(FM) / KSLM**  
**KOTK and KWJJ-FM**  
**Radio Market**

Station Count	Call Sign & Location	Facilities	Geographic Coordinates (° - ' - ")
39	KRKT-FM Albany, OR	Lic: CH 260C0	44-38-46 NL 123-16-11 WL
40	KRVO (FM) Vancouver, WA	Lic: CH 290C1	45-31-21 NL 122-44-45 WL
41	KUPL-AM Portland, OR	Lic: 970 kHz	45-30-56 NL 122-43-56 WL
42	KUPL-FM Portland, OR	Lic: CH254C1	45-30-58 NL 122-43-59 WL
43	KVMX Banks, OR	Lic: CH298C2	45-31-22 NL 122-45-07 WL
44	KWIP Dallas, OR	Lic: 880KHz	44-55-45 NL 123-17-22 WL
45	KXJM (FM) Portland, OR	Lic: CH238C	45-29-20 NL 122-41-40 WL
46	KXL Portland, OR	Lic: 750KHz	45-24-05 NL 122-26-47 WL
47	KYKN Keizer, OR	Lic: 1430KHz	44-55-36 NL 122-57-19 WL

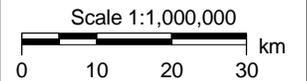
(c) ENTERCOM 2003

**See Table 1 for  
Facility Specific Details**

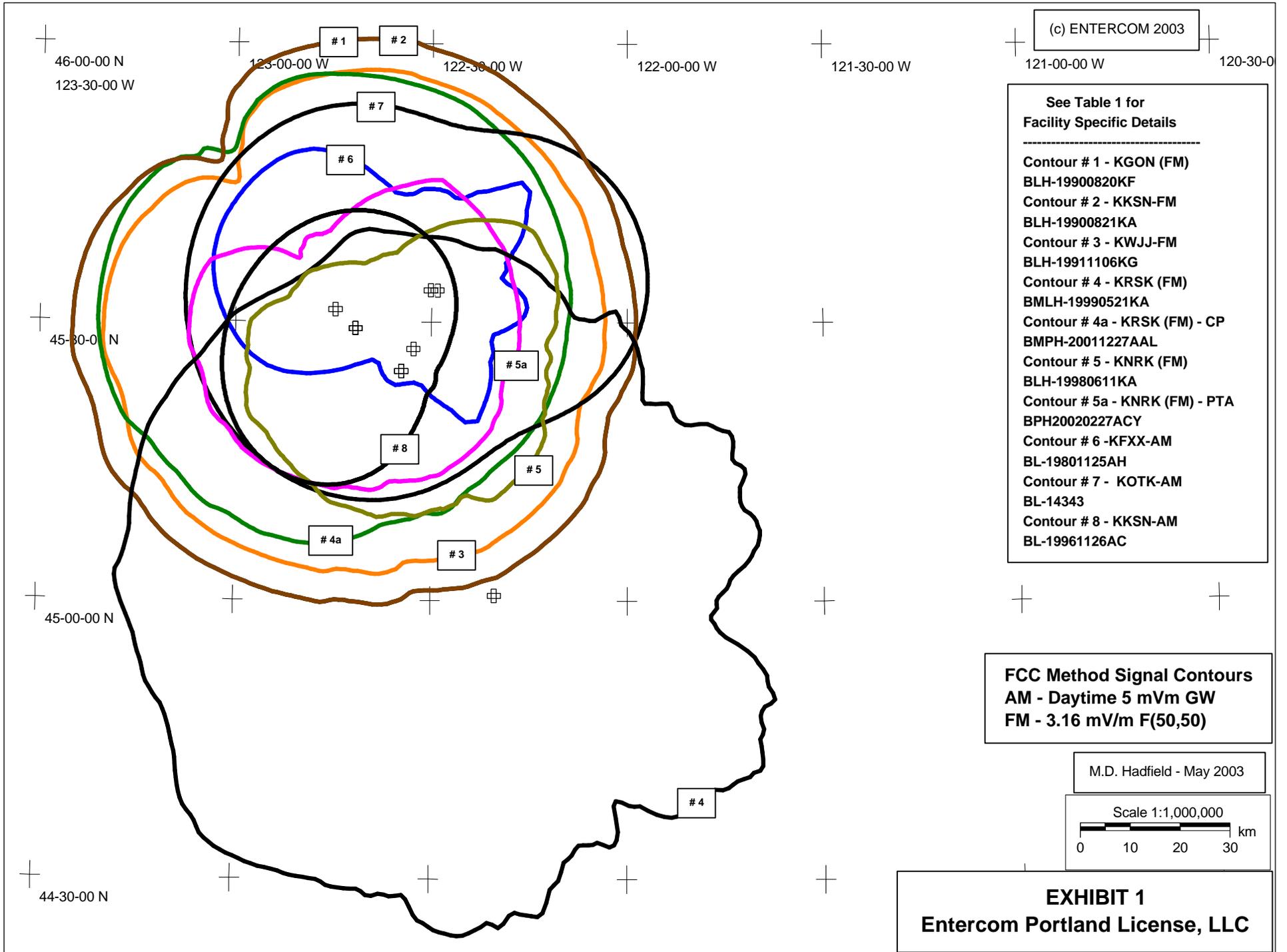
- Contour # 1 - KGON (FM)  
BLH-19900820KF
- Contour # 2 - KKSJN-FM  
BLH-19900821KA
- Contour # 3 - KWJJ-FM  
BLH-19911106KG
- Contour # 4 - KRSK (FM)  
BMLH-19990521KA
- Contour # 4a - KRSK (FM) - CP  
BMPH-20011227AAL
- Contour # 5 - KNRK (FM)  
BLH-19980611KA
- Contour # 5a - KNRK (FM) - PTA  
BPH20020227ACY
- Contour # 6 -KFXJ-AM  
BL-19801125AH
- Contour # 7 - KOTK-AM  
BL-14343
- Contour # 8 - KKSJN-AM  
BL-19961126AC

**FCC Method Signal Contours**  
AM - Daytime 5 mVm GW  
FM - 3.16 mV/m F(50,50)

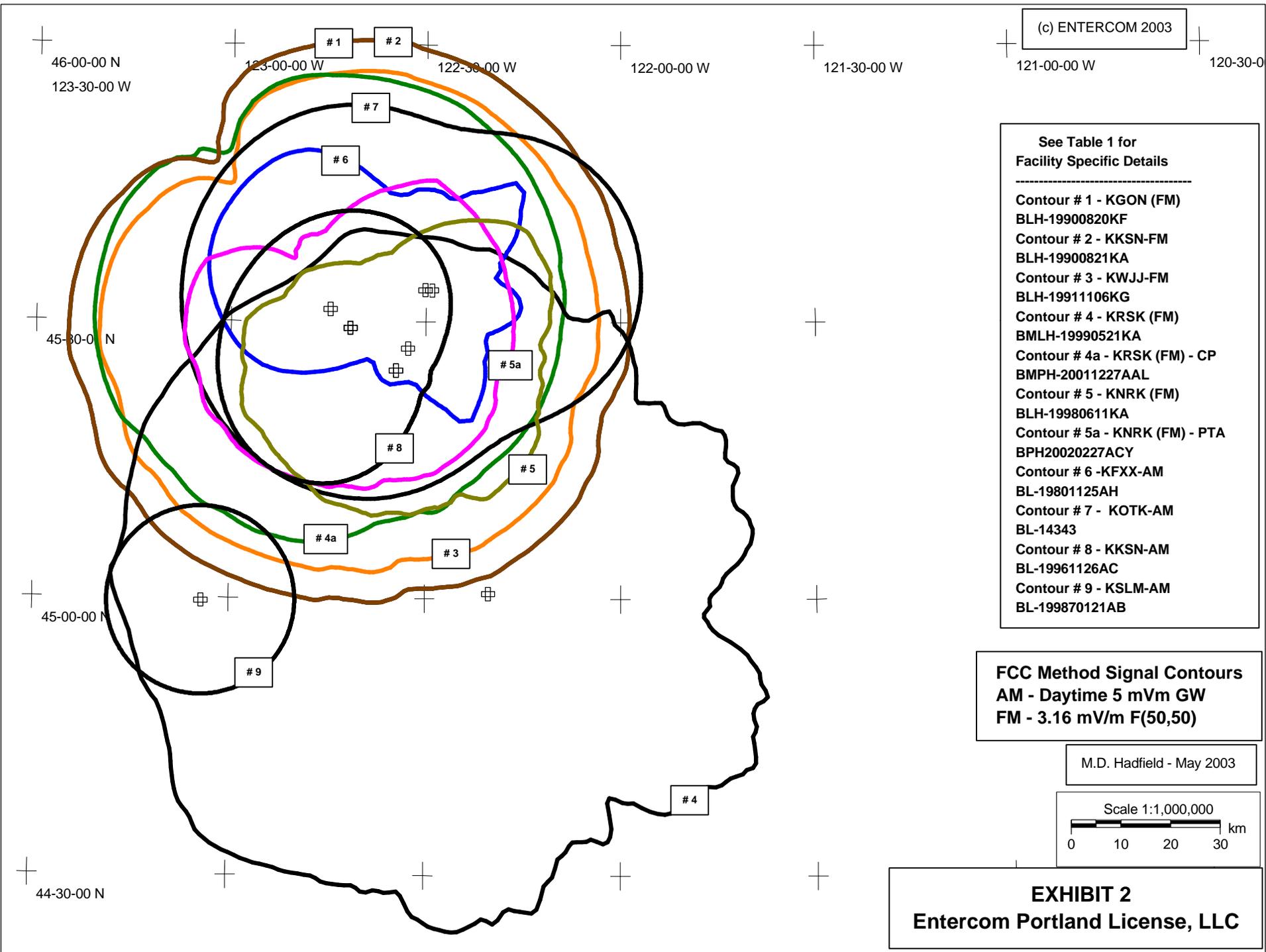
M.D. Hadfield - May 2003



**EXHIBIT 1  
Entercom Portland License, LLC**



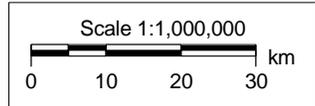
(c) ENTERCOM 2003



- See Table 1 for Facility Specific Details**
- Contour # 1 - KGON (FM)  
BLH-19900820KF
  - Contour # 2 - KKSJ-FM  
BLH-19900821KA
  - Contour # 3 - KWJJ-FM  
BLH-19911106KG
  - Contour # 4 - KRSK (FM)  
BMLH-19990521KA
  - Contour # 4a - KRSK (FM) - CP  
BMPH-20011227AAL
  - Contour # 5 - KNRK (FM)  
BLH-19980611KA
  - Contour # 5a - KNRK (FM) - PTA  
BPH20020227ACY
  - Contour # 6 -KFXX-AM  
BL-19801125AH
  - Contour # 7 - KOTK-AM  
BL-14343
  - Contour # 8 - KKSJ-AM  
BL-19961126AC
  - Contour # 9 - KSLM-AM  
BL-199870121AB

**FCC Method Signal Contours**  
**AM - Daytime 5 mVm GW**  
**FM - 3.16 mV/m F(50,50)**

M.D. Hadfield - May 2003



**EXHIBIT 2**  
**Entercom Portland License, LLC**