

Multiple Ownership Study

The following engineering statement and attached exhibits have been prepared for Three Eagles Communications, Inc., and contain a multiple ownership study relative to certain transactions in the vicinity of Lincoln, Nebraska.

Currently Three Eagles is the licensee of four commercial broadcast stations in the vicinity of Lincoln, Nebraska. These four stations are KLMS(AM), KFOR(AM), KFRX(FM), and KRKR(FM) all licensed to Lincoln, Nebraska. It is proposed that Three Eagles acquire KIBZ(FM) at Crete, Nebraska, KLMY(FM) at Lincoln, Nebraska, KTGL(FM) at Beatrice, Nebraska, and KZKX(FM) at Seward, Nebraska, and divest KFRX(FM) and KRKR(FM) both at Lincoln, Nebraska. KLMS(AM) and KFOR(AM) both at Lincoln would remain licensed to Three Eagles.

Each of the stations proposed for acquisition and divestment are considered by BIA to be home to the Lincoln, Nebraska Arbitron rated market as are the AM stations under consideration. The Lincoln, Nebraska Arbitron market is defined as containing Lancaster County Nebraska. KIBZ(FM), KTGL(FM), and KZKX(FM), although considered home to the Lincoln Arbitron market, are licensed to communities located outside of Lancaster County. In addition, the

transmitter sites specified on the current licenses for each of these facilities also lies outside of Lancaster County. It should, however, be noted that KIBZ(FM) has a pending construction permit which would specify a site within Lancaster County.

As a result of this situation, the multiple ownership situation must be studied under two different methodologies. The first of these methodologies to be discussed in this study is the Arbitron rated market. Following this discussion, the necessary contour method will also be presented and appropriately discussed.

In the case of the Arbitron rated market, the applicant would control a total of six stations, four of which are in the same service. As a result of this grouping, it is necessary and sufficient to demonstrate that there are at least fifteen stations considered home to the Lincoln, Nebraska Arbitron market. The latest BIA data indicate that there are sixteen stations considered home to this market. It is therefore submitted that the proposed transaction would be in compliance with Section 73.3555 of the Commission's Rules relative to the rated market method. For reference purposes, the table at the top of the next page lists the stations considered home to the Lincoln market by BIA.

KBBK(FM)	Lincoln, NE
KFOR(AM)	Lincoln, NE
KFRX(FM)	Lincoln, NE
KIBZ(FM)	Crete, NE
KLMY(FM)	Lincoln, NE
KLNC(FM)	Lincoln, NE
KLIN(AM)	Lincoln, NE
KLMS(AM)	Lincoln, NE
KRKR(FM)	Lincoln, NE
KTGL(FM)	Beatrice, NE
KZKX(FM)	Seward, NE
KFGE(FM)	Milford, NE
KLCV(FM)	Lincoln, NE
KUCV(FM)	Lincoln, NE
KRNU(FM)	Lincoln, NE
KZUM(FM)	Lincoln, NE

Since the city of license for three of the stations proposed to be acquired is outside of Lancaster County, the contour method was also utilized to demonstrate that compliance with the provisions of Section 73.3555 of the Commission' Rules would be maintained. Exhibit E-1 depicts the overview of the multiple ownership situation for this transaction. It should be noted that only the facilities which would be controlled by Three Eagles following the transaction are indicated on this map. As the map demonstrates, the common overlap of the pertinent facilities would result in the creation of four different contour markets. The third and fourth markets are similar and differ only in whether the construction permit or license for KIBZ(FM) is utilized.

In the case of market #1, which is analyzed on Exhibit E-2, common overlap would exist between KZEN(FM) at Central City, Nebraska, KZKX(FM) at Seward, Nebraska, and KLIR(FM), KKOT(FM), KTTT(AM), and KJSK(AM) all at

Columbus, Nebraska. This market is therefore defined by the common overlap between six stations, four of which are in the same service. It is therefore necessary and sufficient to demonstrate that at least fifteen stations serve the market.

As Exhibit E-2 demonstrates, there would be at least eleven additional stations serving the market. Therefore, there is a total of at least seventeen stations in the market, which clearly complies with the provisions of Section 73.3555 of the Commission's Rules. Each of the stations considered under this analysis has a transmitter site that is located less than 92 kilometers from the perimeter of the common overlap area.


The second contour map, analyzed on exhibit E-3, is defined by the common overlap between KLIR(FM) at Columbus, Nebraska, KZKX(FM) at Seward, Nebraska, and KLMS(AM) and KFOR(AM) both at Lincoln, Nebraska. In the case of this market, it is necessary and sufficient to demonstrate that the applicant would not control greater than fifty percent of the stations serving the market. As the map analyzing this market demonstrates, there are at least six additional stations serving the market whose transmitter sites are located less than 92 kilometers from the perimeter of the common overlap area. Since KLTQ(FM) at Lincoln and KGBI(FM) at Omaha have identical contours, they

have both been designated as "2" on this map. This market also complies with the provisions of Section 73.3555 of the Commission's Rules.

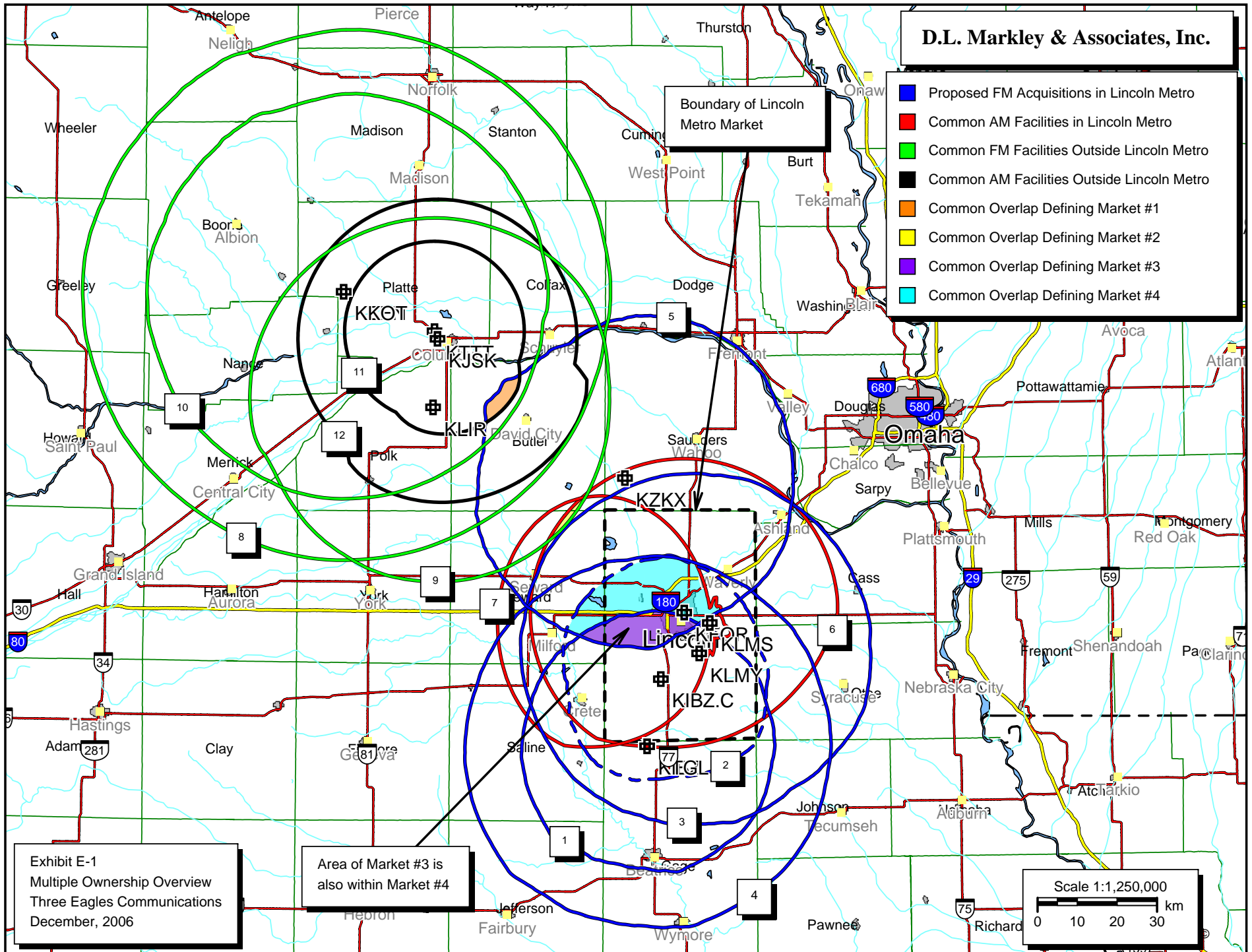
Markets #3 and #4 differ only in the facilities for KIBZ(FM) utilized. In each case, the market is defined by the common overlap between KIBZ(FM) at Crete, KTGL(FM) at Beatrice, KZKX(FM) at Seward, and KLMY(FM), KFOR(AM), and KLMS(AM) all at Lincoln. These markets are comprised of six stations, four of which are in the same service. It is therefore necessary to demonstrate that at least fifteen stations serve these markets. The maps for these analyses illustrate the contours of at least eleven additional stations located within 92 kilometers of the overlap perimeter. This market is also deemed to be in compliance with Section 73.3555 of the Commission's Rules. KGBI(FM) and KLTQ(FM) are also utilized in these analyses and are only illustrated once since their contours are congruent.

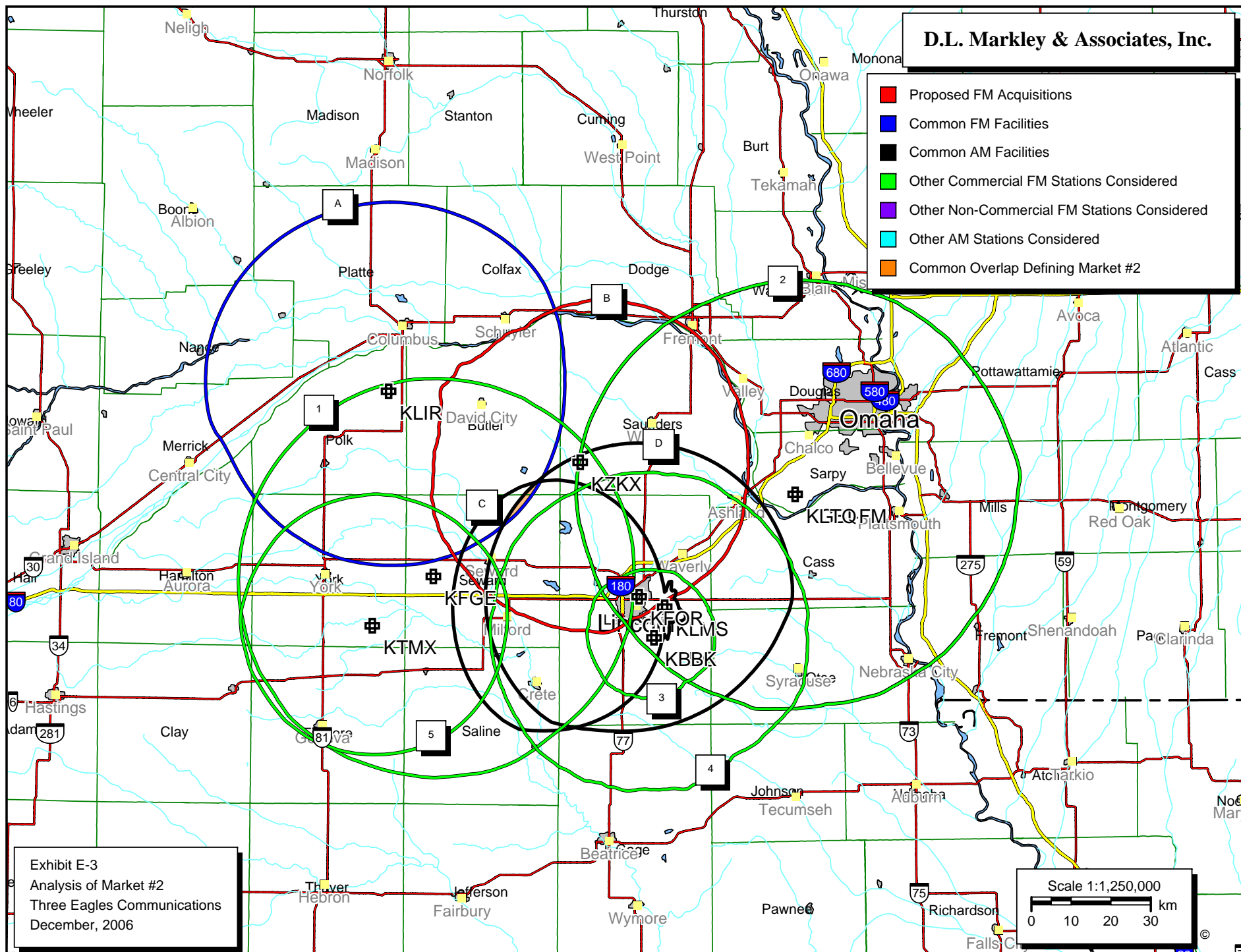
It is therefore respectfully submitted that since all four contour markets as well as the Arbitron rated market of Lincoln, NE would comply with provisions of Section 73.3555 of the Commission's Rules the proposed transaction also complies with the Commission's Rules. The preceding statement and attached exhibits have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.

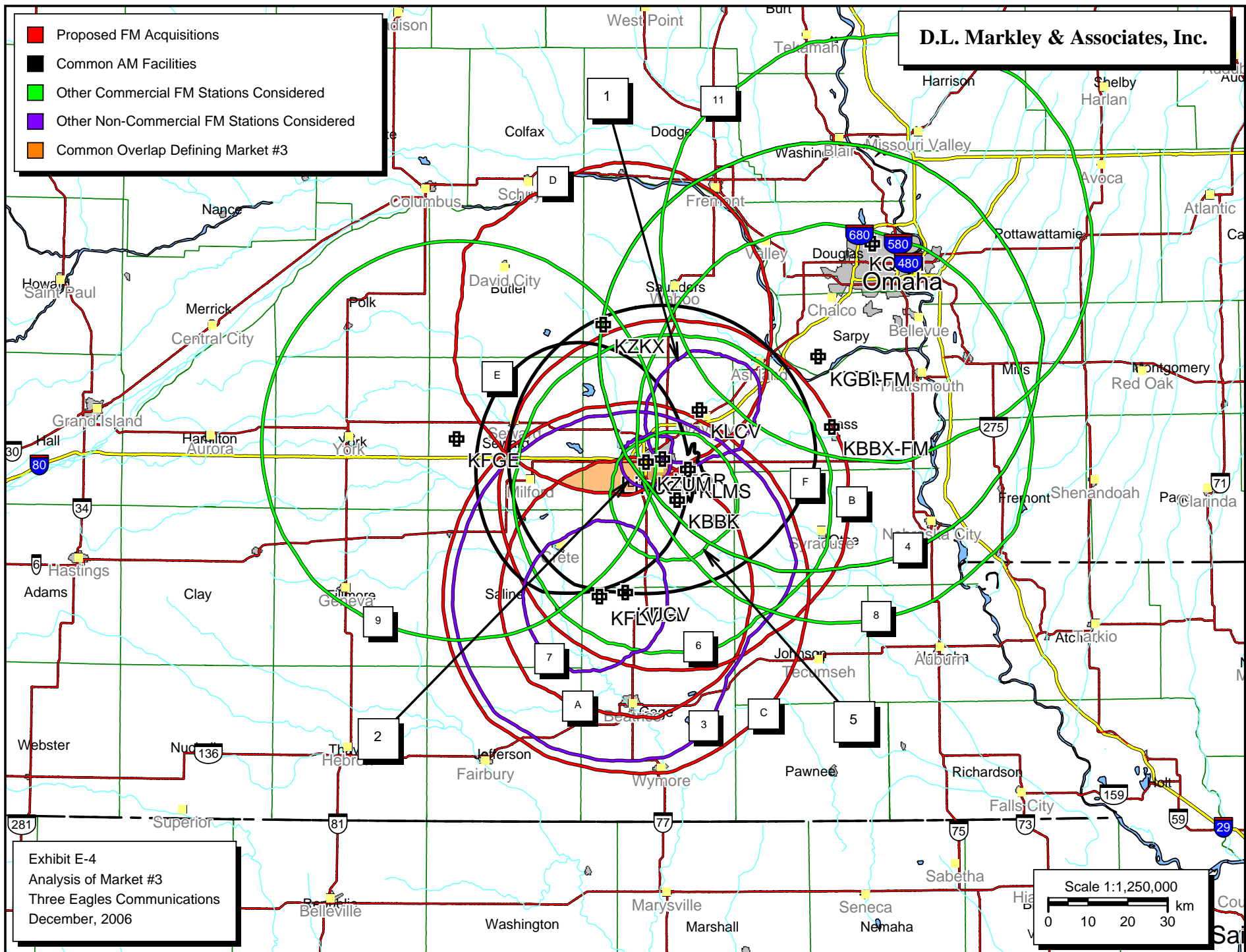
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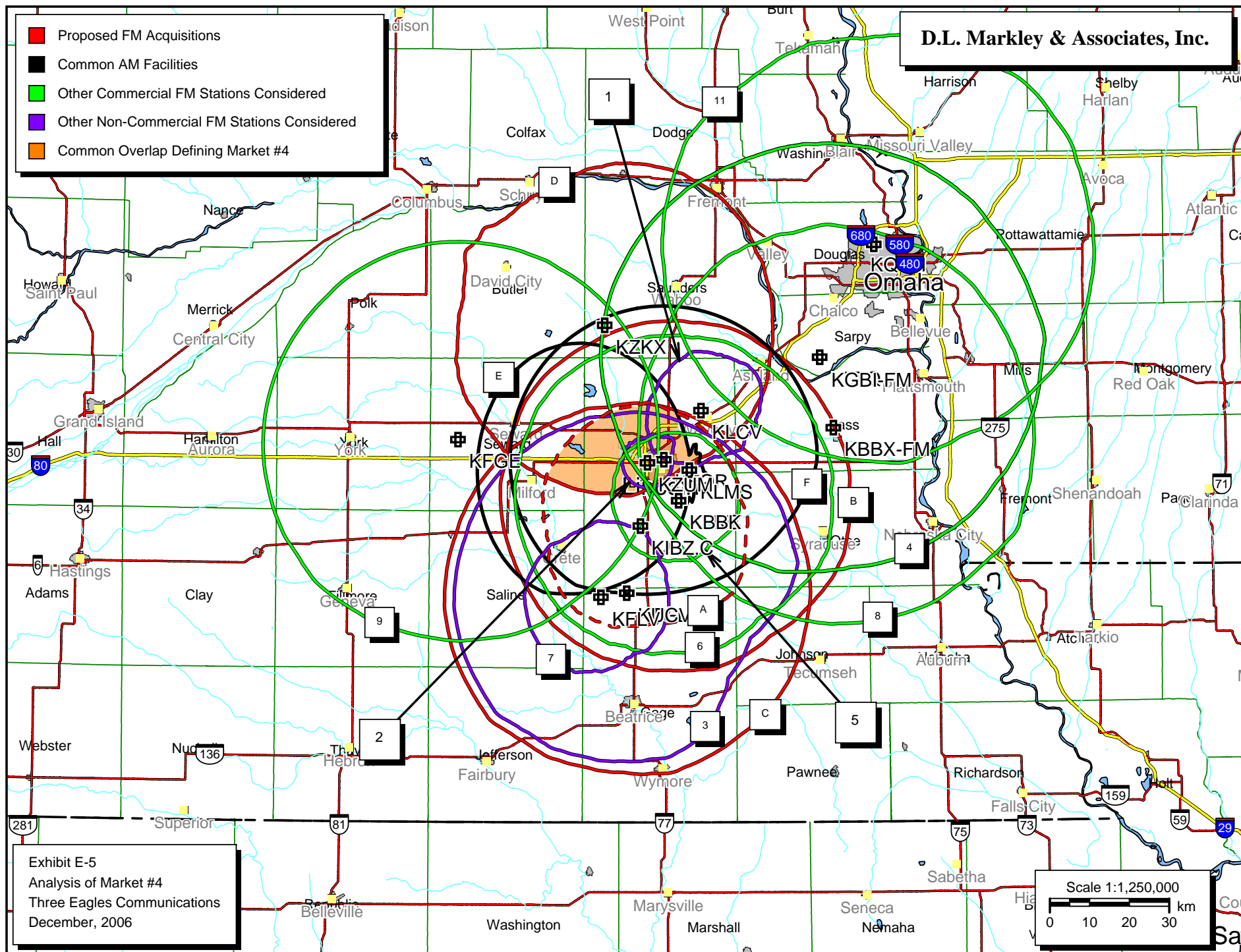


Jeremy D. Ruck, Consulting Engineer









Index to Facilities/Contours Depicted on Exhibit Maps**Exhibit E-1 – Multiple Ownership Overview:**

1	KIBZ(FM)	Crete, Nebraska (Licensed Facilities)
2	KIBZ(FM)	Crete, Nebraska (Construction Permit Facilities)
3	KLMY(FM)	Lincoln, Nebraska
4	KTGL(FM)	Beatrice, Nebraska
5	KZKX(FM)	Seward, Nebraska
6	KFOR(AM)	Lincoln, Nebraska
7	KLMS(AM)	Lincoln, Nebraska
8	KZEN(FM)	Central City, Nebraska
9	KLIR(FM)	Columbus, Nebraska
10	KKOT(FM)	Columbus, Nebraska
11	KTTT(AM)	Columbus, Nebraska
12	KJSK(AM)	Columbus, Nebraska

Exhibit E-2 – Analysis of Contour Market #1

A	KZEN(FM)	Central City, Nebraska
B	KLIR(FM)	Columbus, Nebraska
C	KKOT(FM)	Columbus, Nebraska
D	KZKX(FM)	Seward, Nebraska
E	KTTT(AM)	Columbus, Nebraska
F	KJSK(AM)	Columbus, Nebraska
1	KEXL(FM)	Norfolk, Nebraska
2	KNEN(FM)	Norfolk, Nebraska
3	KBBK(FM)	Lincoln, Nebraska
4	KTMX(FM)	York, Nebraska
5	KFGE(FM)	Milford, Nebraska
6	KUSO(FM)	Albion, Nebraska
7	KLCV(FM)	Lincoln, Nebraska
8	KPNO(FM)	Norfolk, Nebraska
9	WJAG(AM)	Norfolk, Nebraska
10	KMMJ(AM)	Grand Island, Nebraska
11	KTIC(AM)	West Point, Nebraska

Exhibit E-3 – Analysis of Contour Market #2

A	KLIR(FM)	Columbus, Nebraska
B	KZKX(FM)	Seward, Nebraska
C	KLMS(AM)	Lincoln, Nebraska
D	KFOR(AM)	Lincoln, Nebraska
1	KFGE(FM)	Milford, Nebraska
2	KGBI(FM)	Omaha, Nebraska*
2	KLTV(FM)	Lincoln, Nebraska*
3	KLNC(FM)	Lincoln, Nebraska
4	KBBK(FM)	Lincoln, Nebraska
5	KTMX(FM)	York, Nebraska

*KGBI(FM) and KLTV(FM) are co-located and have identical 70 dBu service contours.

Exhibit E-4 – Analysis of Contour Market #3

A	KIBZ(FM)	Crete Nebraska*
B	KLMY(FM)	Lincoln, Nebraska
C	KTGL(FM)	Beatrice, Nebraska
D	KZKX(FM)	Seward, Nebraska
E	KLMS(AM)	Lincoln, Nebraska
F	KFOR(AM)	Lincoln, Nebraska
1	KLCV(FM)	Lincoln, Nebraska
2	KZUM(FM)	Lincoln, Nebraska
3	KUCV(FM)	Lincoln, Nebraska
4	KLTV(FM)	Lincoln, Nebraska**
4	KGBI(FM)	Omaha, Nebraska**
5	KLNC(FM)	Lincoln, Nebraska
6	KBBK(FM)	Lincoln, Nebraska
7	KFLV(FM)	Wilber, Nebraska
8	KBBX-FM	Nebraska City, Nebraska
9	KFGE(FM)	Milford, Nebraska
11	KQCH(FM)	Omaha, Nebraska

* The licensed facilities for KIBZ(FM) are depicted in this market. Market #4 pertains to the market which includes the authorized construction permit to relocate KIBZ(FM).

** KGBI(FM) and KLTV(FM) are co-located and have identical 70 dBu service contours. The designation "10" was intentionally omitted from this map as a result of this situation.

Exhibit E-5 – Analysis of Contour Market #4

A	KIBZ(FM)	Crete Nebraska*
B	KLMY(FM)	Lincoln, Nebraska
C	KTGL(FM)	Beatrice, Nebraska
D	KZKX(FM)	Seward, Nebraska
E	KLMS(AM)	Lincoln, Nebraska
F	KFOR(AM)	Lincoln, Nebraska
1	<i>KLCV(FM)</i>	<i>Lincoln, Nebraska</i>
2	<i>KZUM(FM)</i>	<i>Lincoln, Nebraska</i>
3	<i>KUCV(FM)</i>	<i>Lincoln, Nebraska</i>
4	KLTV(FM)	Lincoln, Nebraska**
4	KGBI(FM)	Omaha, Nebraska**
5	KLNC(FM)	Lincoln, Nebraska
6	KBBK(FM)	Lincoln, Nebraska
7	<i>KFLV(FM)</i>	<i>Wilber, Nebraska</i>
8	KBBX-FM	Nebraska City, Nebraska
9	KFGE(FM)	Milford, Nebraska
11	KQCH(FM)	Omaha, Nebraska

* The authorized construction permit facilities for KIBZ(FM) are depicted in this market. Market #3 pertains to the market which includes the licensed KIBZ(FM) facilities.

** KGBI(FM) and KLTV(FM) are co-located and have identical 70 dBu service contours. The designation "10" was intentionally omitted from this map as a result of this situation.

- Bold faced type indicates facilities under the common control of Three Eagles.

- Italicized type indicates facilities which are licensed as non-commercial educational.