

MULLANEY ENGINEERING, INC.

9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

ENGINEERING EXHIBIT EE-DUOP-1:

**PROPOSED LMA / OWNERSHIP OF
KTCM 262C3 - KINGMAN, KS
WITH EXISTING OWNERSHIP OF
FOUR FM STATIONS IN KANSAS**

SEPTEMBER 1, 2007

ENGINEERING STATEMENT IN SUPPORT OF
COMPLIANCE WITH RADIO DUOPOLY RULES
CONTOUR OVERLAP METHOD

Prepared On Behalf Of

Ad Astra Per Aspera Broadcasting, Inc.



Declaration Concerning Compliance with Radio Duopoly Rules

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E. and my qualifications are known to the Federal Communications Commission, and that I am an principal engineer in the firm of Mullaney Engineering, Inc., and that I have provided engineering services in the area of telecommunications since 1977. My qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission.

The firm of Mullaney Engineering, Inc., has been requested to prepare the instant engineering exhibit which demonstrates that the proposed LMA / Acquisition of KTCM 262C3 - Kingman, KS, in addition to the four other FM stations controlled by Ad Astra Per Aspera Broadcasting, Inc. is in compliance with the Radio Duopoly Rules. Since none of the five stations are in a rated Arbitron Market the contour overlap method is being used.

Figure A is a map showing the 70 dBu city grade contour of all five FM stations. The 70 dBu city grade contour of KTCM(FM) **does not overlap** the city grade contour of any other commonly owned station. All contours are based upon information taken from a recent version of the FCC's CDBS data base. Although not currently in that data base, KGGG is in the process of preparing a minor modification of its CP (0.85 km move). This proposed modification has been included in this exhibit.

Proposed LMA / Ownership of KTCM(FM) - Kingman, KS
by Ad Astra Per Aspera Broadcasting, Inc.
September 2007



The following five FM stations are involved:

KTCM(FM)	Kingman, KS	Fac_ID: 1137	Ch. 291C1Acquiring
KXKU(FM)	Lyons, KS	Fac_ID: 430	Ch. 291C1 Existing
KSKU(FM)	Sterling, KS	Fac_ID: 431	Ch. 234C2 Existing
KWHK(FM)	Hutchinson, KS	Fac_ID: 164086	Ch. 240A Existing
KGGG(FM)	Haven, KS	Fac_ID: 59995	Ch. 246C2 Existing/Mod

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in blue ink, reading 'John J. Mullaney', is written over a horizontal line.

John J. Mullaney, Consulting Engineer

Executed on the 1st day of September 2007.

FIGURE A - COMMONLY OWNED STATIONS

LMA / Acquisition of KTCM Kingman, KS
Ad Astra Per Aspera Broadcasting, Inc.

All Contours are
FM 70 dBu

KSKU-Lic
234C2

KXKU-LIC
291C1

NO CHANGE
Existing Duopoly
3 FM Overlap

KWHK-Lic
240A

IGNORE
KGGG-Old
CP for New City



Lyons

Sterling

Hutchinson

Haven

Kingman

KTCM-Lic
262C3

DUOPOLY ANALYSIS
KGGG-CP.MOD & KXKU
27 STATIONS IN MARKET
(only 4 needed)

Wichita Market has
25 radio stations

Proposed Duopoly
2 FM Overlap

KGGG-CP
246C2

KGGG-CP-MOD
246C2

Scale 1:1,100,000
0 10 20 30 km

Scale 1:1,100,000
0 10 20 30 mi