

**ENGINEERING STATEMENT COVERING  
BROADCAST MULTIPLE OWNERSHIP STUDY  
GAP BROADCASTING LUFKIN LICENSE, LLC  
WELLS, TEXAS & LUFKIN TEXAS MARKETS**

**AUGUST 3, 2007**

This engineering statement and supporting tabulations and figures have been prepared on behalf of **GAP Broadcasting Lufkin License, LLC (“GAP”)**. The purpose of this statement is to demonstrate **GAP’s** compliance with *Section 73.3555* of the Commission’s Rules with respect to multiple ownership of AM and FM broadcast facilities.

An analysis has been undertaken of stations proposed for common ownership in two markets as described below.

**Market 1**

KVLL-FM, KYKS(FM), KAFX-FM and KSFA(AM) – FM contours are plotted in Blue and the AM contour is plotted in red on Figure 1 attached. It is noted that KYKS(FM), KAFX-FM and KSFA(AM) are a part of the Lufkin, TX Arbitron market.

**Market 2 – stations from Lufkin, TX Arbitron Rated Market**

KTBQ(FM), KYKS(FM), KAFX-FM and KSFA(AM) - FM contours are plotted in Blue and the AM contour is plotted in red on Figure 1 attached.

Figure 2 attached, depicts the stations in markets 1 & 2 with other AM stations which duplicate a portion of the market plotted in gray. Figure 3 attached, depicts the stations in markets 1 & 2 with other FM stations which duplicate a portion of the market plotted in green. For purposes of determining the number of other stations which duplicate some portion of the market the KYKS(FM) contour has been chosen as the extent of the market since the KYKS(FM) contour envelops the majority of the attributable station’s principal community contours.

## **RADIO MARKETS & METHODOLOGY**

The radio markets described herein are 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).

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. 3-second computer database for each of the FM stations, using radials spaced every 5 degrees of azimuth.

## **CONCLUSION**

Based on the above analysis, the proposed common ownership of stations complies with *Section 73.3555* of the Commission’s Rules based on both the Arbitron analysis<sup>1</sup> and the Interim Contour Methodology. Two markets have been analyzed herein and the results are summarized below.

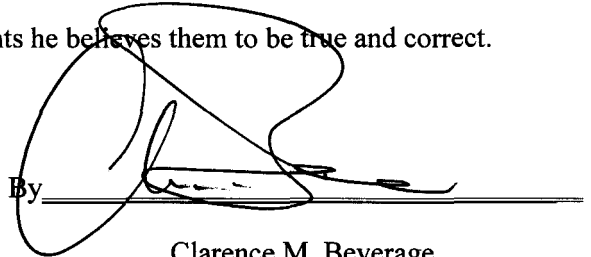
The principal community contours for the stations plotted on *Figures 1 – 3* are tabulated in Exhibit I. There are a total of 7 AM stations and 20 FM stations in the market as defined by the KYKS(FM) contour. Each market consists of one AM and three FM stations. Of the 7 AM stations one is attributable to **GAP**. Of the 20 FM stations 4 are attributable to **GAP**. Thus, there are 22 non attributable stations who duplicate some portion of the market. Based on this analysis the proposed ownership complies with *Rule Section 73.3555(a)(1)(iii)*.

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<sup>1</sup>Arbitron data for applicable markets is on file and not addressed herein.

The foregoing was prepared on behalf of **GAP Broadcasting Lufkin License, 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 handwritten signature in black ink, appearing to read 'Clarence M. Beverage', is written over a horizontal line. The signature is stylized with a large loop at the beginning and a long, sweeping tail.

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

August 3, 2007

## EXHIBIT I

### AM & FM SERVICES CONSIDERED IN MULTIPLE OWNERSHIP ANALYSIS GAP BROADCASTING LUFKIN LICENSE, LLC WELLS, TEXAS & LUFKIN, TEXAS MARKETS

AUGUST 3, 2007

#### AM STATIONS

CALL	ST CITY	FREQ	PAT	AG	PWR	DESC
	ARN	OWNER				
LATITUDE	LONGITUDE					

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KSFA	TX NACOGDOCHES	860.00000	LD	1.000	ND2	
	BL20050614ADL	CAPSTAR TX LIMITED PARTNERSHIP				
31-31-36.0 N	94-39-29.0 W					

KTBB	TX TYLER	600.00000	LD	5.000	DA2	
	BL19830705AH	GLEISER COMMUNICATIONS, LLC				
32-16-18.0 N	95-12-23.0 W					

KETX	TX LIVINGSTON	1440.00000	LD	5.000	ND1	
	BL	LONE STAR NETWORK				
30-44-23.0 N	94-55-30.0 W					

KDET	TX CENTER	930.00000	LD	1.000	ND1	
	BL	CENTER BROADCASTING COMPANY, INC.				
31-50-03.0 N	94-12-53.0 W					

KSML	TX DIBOLL	1260.00000	LD	4.500	ND2	
	BL20030107ABI	KASA FAMILY LIMITED PARTNERSHIP				
31-21-53.0 N	94-43-08.0 W					

KRBA	TX LUFKIN	1340.00000	LU	1.000	ND1	
	BL19990325DC	KASA FAMILY LIMITED PARTNERSHIP				
31-21-53.0 N	94-43-08.0 W					

KCOX	TX JASPER	1350.00000	LD	5.000	ND1	
	BL19810929AF	LASTING VALUE RADIO, INC.				
30-55-11.0 N	93-58-13.0 W					

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AM & FM SERVICES CONSIDERED IN MULTIPLE OWNERSHIP ANALYSIS  
GAP BROADCASTING LUFKIN LICENSE, LLC  
WELLS, TEXAS & LUFKIN, TEXAS MARKETS

FM STATIONS

CALL	ST	CITY	FREQ	CHN	CL	ERP	STAT
ARN	OWNER						
LATITUDE	LONGITUDE	HAAT:m	AMSL:m				
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KVLL-FM	TX	WELLS	94.70000	C2		50000.00	LIC
BLH20030429ABE RADIO WOODVILLE, INC.							
31-06-47.0 N 94-48-32.0 W 118.309 175.000							
KYKS	TX	LUFKIN	105.10000	C		100000.00	LIC
BLH19900827KA CAPSTAR TX LIMITED PARTNERSHIP							
31-22-08.0 N 94-38-45.0 W 324.691 403.000							
KTBQ	TX	NACOGDOCHES	107.70000	C3		13000.00	LIC
BLH20060214AAM CAPSTAR TX LIMITED PARTNERSHIP							
31-34-50.0 N 94-40-15.0 W 122.456 219.000							
KTHT	TX	CLEVELAND	97.10000	C		100000.00	LIC
BLH20001031AAA COX RADIO, INC.							
30-32-06.0 N 95-01-04.0 W 564.147 609.000							
KIVY-FM	TX	CROCKETT	92.70000	C2		50000.00	LIC
BLH19910222KB LEON HUNT							
31-18-20.0 N 95-27-06.0 W 149.544 248.000							
KLJT	TX	JACKSONVILLE	102.30000	C2		50000.00	LIC
BLH19991112ACI WALLER BROADCASTING, INC.							
31-52-18.0 N 95-10-00.0 W 151.618 280.000							
KWRW	TX	RUSK	97.70000	C3		14500.00	LIC
BLH19940124KB E. H. WHITEHEAD							
31-49-12.0 N 95-10-19.0 W 123.294 258.000							

# EXHIBIT I PAGE 3

## AM & FM SERVICES CONSIDERED IN MULTIPLE OWNERSHIP ANALYSIS GAP BROADCASTING LUFKIN LICENSE, LLC WELLS, TEXAS & LUFKIN, TEXAS MARKETS

### FM STATIONS

CALL	ST	CITY	FREQ	CHN	CL	ERP	STAT
ARN	OWNER						
LATITUDE	LONGITUDE	HAAT:m	AMSL:m				

KETX-FM TX LIVINGSTON 92.30000 C2 32000.00 LIC  
BLH19910923KA PEGGY SUE MARSH, ADMINISTRATOR  
30-44-18.0 N 94-55-26.0 W 187.838 256.000

KSWP TX LUFKIN 90.90000 C1 100000.00 LIC  
BLED19980219KA LUFKIN EDUCATIONAL BROADCASTING FOUNDATION  
31-22-08.0 N 94-38-45.0 W 247.691 326.000

KQBB TX CENTER 100.50000 A 2050.00 LIC  
BLH19991103ABU CENTER BROADCASTING CO., INC.  
31-43-34.0 N 94-15-27.0 W 172.574 280.000

KAVX TX LUFKIN 91.90000 C2 23000.00 LIC  
BLED19981120KC LUFKIN EDUCATIONAL BROADCASTING FOUNDATION  
31-22-08.0 N 94-38-45.0 W 223.691 302.000

KSAU TX NACOGDOCHES 90.10000 C3 3500.00 LIC  
BLED19890731KA STEPHEN F. AUSTIN STATE UNIVERSITY  
31-37-45.0 N 94-40-44.0 W 137.985 246.000

KAFX-FM TX DIBOLL 95.50000 C1 100000.00 LIC  
BLH19860312KB CAPSTAR TX LIMITED PARTNERSHIP  
31-24-28.0 N 94-45-53.0 W 176.485 257.000

KLDN TX LUFKIN 88.90000 C1 50000.00 LIC  
BLED19910418KA BD SUPERVISORS, LOUISIANA STATE UNIVERSITY & A&M  
COLLEGE  
31-24-28.0 N 94-45-53.0 W 201.485 282.000

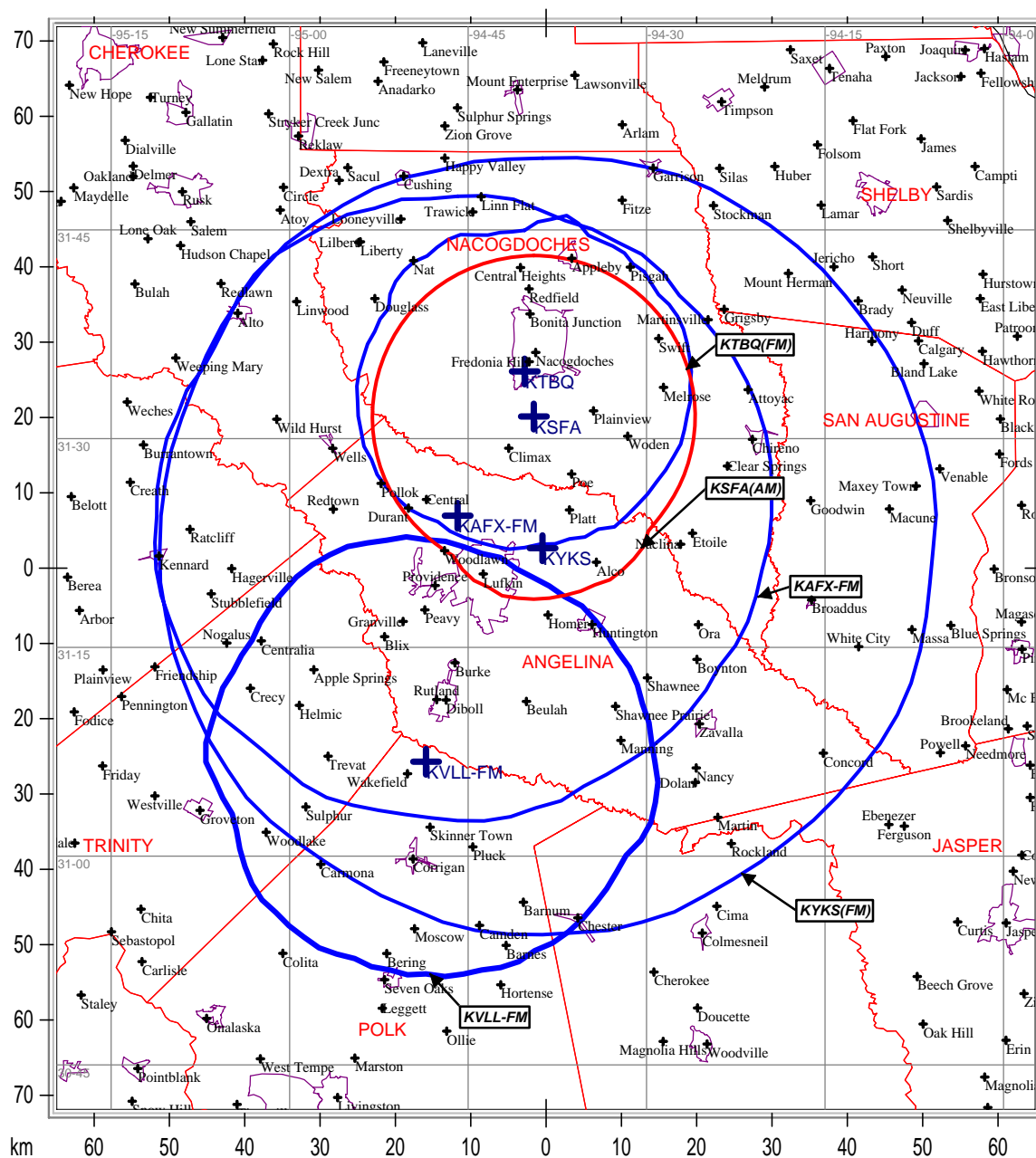
EXHIBIT I PAGE 4

AM & FM SERVICES CONSIDERED IN MULTIPLE OWNERSHIP ANALYSIS  
GAP BROADCASTING LUFKIN LICENSE, LLC  
WELLS, TEXAS & LUFKIN, TEXAS MARKETS

**FM STATIONS**

CALL	ST	CITY	FREQ	CHN	CL	ERP	STAT
ARN		OWNER					
LATITUDE	LONGITUDE	HAAT:m	AMSL:m				
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KSML-FM	TX	HUNTINGTON	101.90000	C2	24500.00	LIC	
BLH19960304KA KASA FAMILY LIMITED PARTNERSHIP							
31-22-08.0 N 94-38-45.0 W 203.691 282.000							
KQSI	TX	SAN AUGUSTINE	92.50000	A	1400.00	LIC	
BLH19940103KD CENTER BROADCASTING COMPANY, INC.							
31-31-44.0 N 94-05-59.0 W 67.985 171.000							
KLSN	TX	HUDSON	96.30000	A	1350.00	LIC	
BLH20020318AAA PEGGY SUE MARSH, ADMINISTRATOR							
31-21-55.0 N 94-45-59.0 W 216.044 297.000							
KYBI	TX	LUFKIN	100.10000	C2	25000.00	LIC	
BMLH20011009ABF KASA FAMILY LIMITED PARTNERSHIP							
31-24-28.0 N 94-45-53.0 W 215.485 296.000							
KJCS	TX	NACOGDOCHES	103.30000	C2	22500.00	LIC	
BLH20020228AAD RADIO LICENSING, INC.							
31-25-59.0 N 94-49-03.0 W 224.956 304.000							
KTXJ-FM	TX	JASPER	102.70000	C2	26000.00	LIC	
BLH19961009KG LASTING VALUE RADIO, INC.							
31-03-36.0 N 93-57-42.0 W 135.368 225.000							

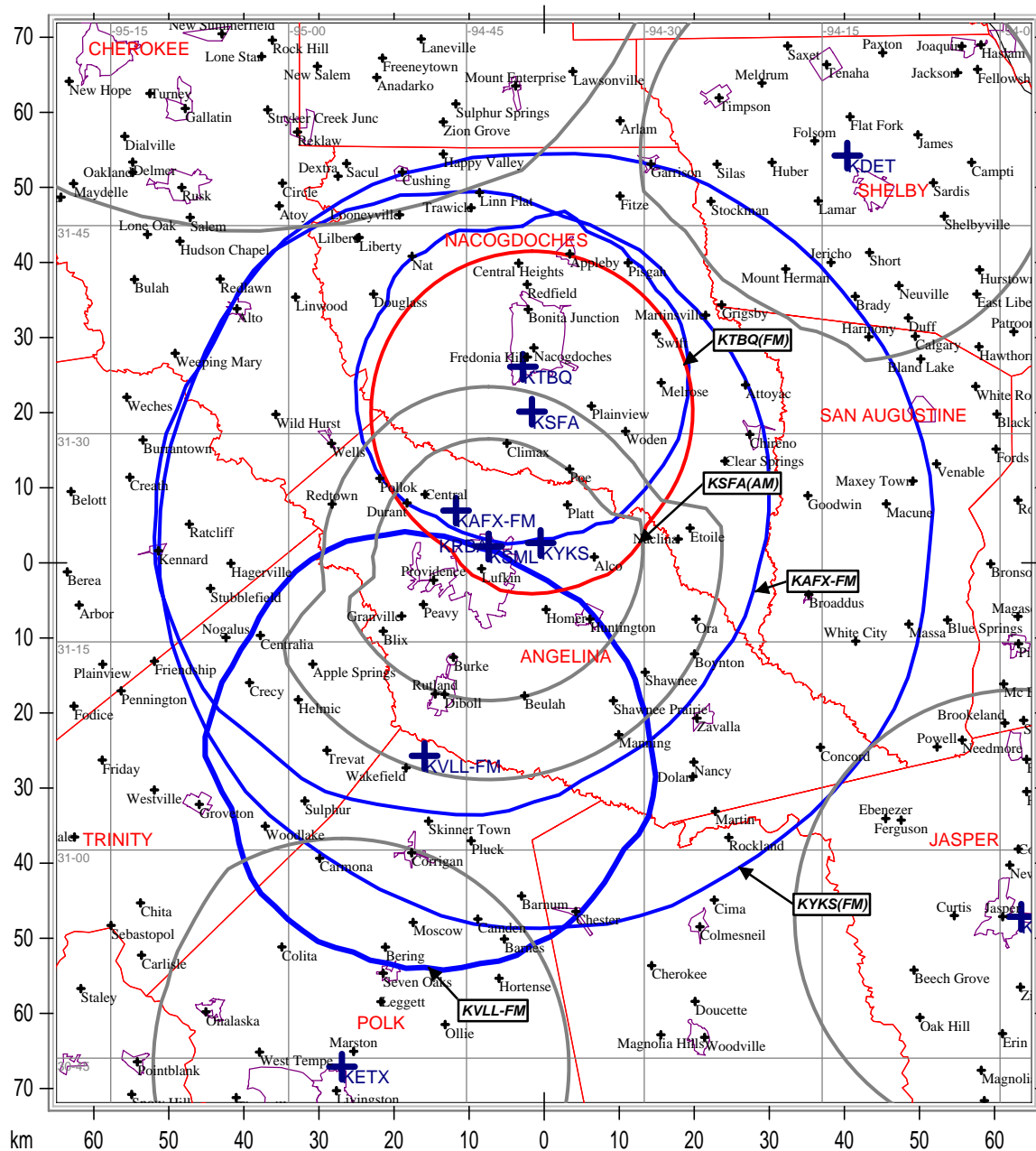
GAP CLEAR CHANNEL PURCHASE BLUE CONTOURS = FM RED = AM AND KVLL-FM = BLUE BOLD CONTOUR



Communications Technologies, Inc. Marlton, New Jersey



GAP CLEAR CHANNEL PURCHASE BLUE CONTOURS = FM RED = AM AND KVLL-FM = BLUE BOLD OTHER AM = GRAY



Communications Technologies, Inc. Marlton, New Jersey

— National Borders    — County Borders    — City Borders    — Lat/Lon Grid

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Figure 3