

**ENGINEERING STATEMENT COVERING
BROADCAST MULTIPLE OWNERSHIP STUDY
CUMULUS LICENSING LLC
HUMBOLDT, NEBRASKA**

DECEMBER 2004

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This engineering statement and supporting tabulations and figures has been prepared on behalf of **Cumulus Licensing LLC (“Cumulus”)**. The purpose of the statement is to demonstrate **Cumulus** compliance with *Section 73.3555* of the Commission’s Rules with respect to multiple ownership of AM & FM broadcast facilities.

Cumulus proposes common ownership or control in the following eight stations in the geographic region. The following stations have been considered in the study to determine if the proposed Humboldt, Nebraska facility will result in 70 dBu overlap.

Proposed CH 244A HUMBOLDT, NE 100.1 MHz A APP

KQTP KS ST. MARYS 102.9 MHz C2 LIC
BLH20030326AHX CUMULUS LICENSING LLC

KDVV KS TOPEKA 100.3 MHz C LIC
BLH19890718KB CUMULUS LICENSING LLC

KMAJ-FM KS TOPEKA 107.7 MHz C LIC
BLH19861103KC CUMULUS LICENSING LLC

KWIC KS TOPEKA 99.3 MHz C3 CP
BPH20020927ACC CUMULUS LICENSING LLC

KCHZ KS OTTAWA 95.7 MHz C1 LIC
BLH20010621AAJ CUMULUS KC LICENSING CORP.

KMAJ KS TOPEKA 1440 KHz LD LIC
BL CUMULUS LICENSING LLC

KTOP KS TOPEKA 1490 KHz LU LIC
BL19960415AC CUMULUS LICENSING LLC

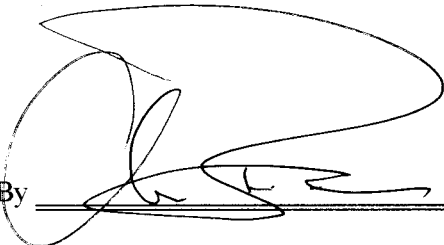
The principal community contours for these eight stations are plotted on map Figure 1, attached. Humboldt, Nebraska is plotted in Blue, the remaining FM stations in Green and the two AM stations in Red. It is noted that KMAJ-FM has an application pending, BPH20040406ACG, to move to Shawnee, Kansas utilizing the KCHZ tower. The proposed 70 dBu lies entirely within the KCHZ 70 dBu and thus has no impact on this study.

By examination of the map it is apparent that the Humboldt, Nebraska CH 244A proposal has no contour overlap with the seven **Cumulus** facilities analyzed.

Distances to the FM contours were determined based on the methodology of 47 CFR 73.313. Terrain data was derived from the FCC 30 second terrain database for each of the FM stations, using radials spaced every 5 degrees of azimuth. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's AM database and the appropriate Ground Wave Field Strength versus Distance Graph of 47 CFR 73.184. Ground conductivities were obtained from FCC Figure M3.

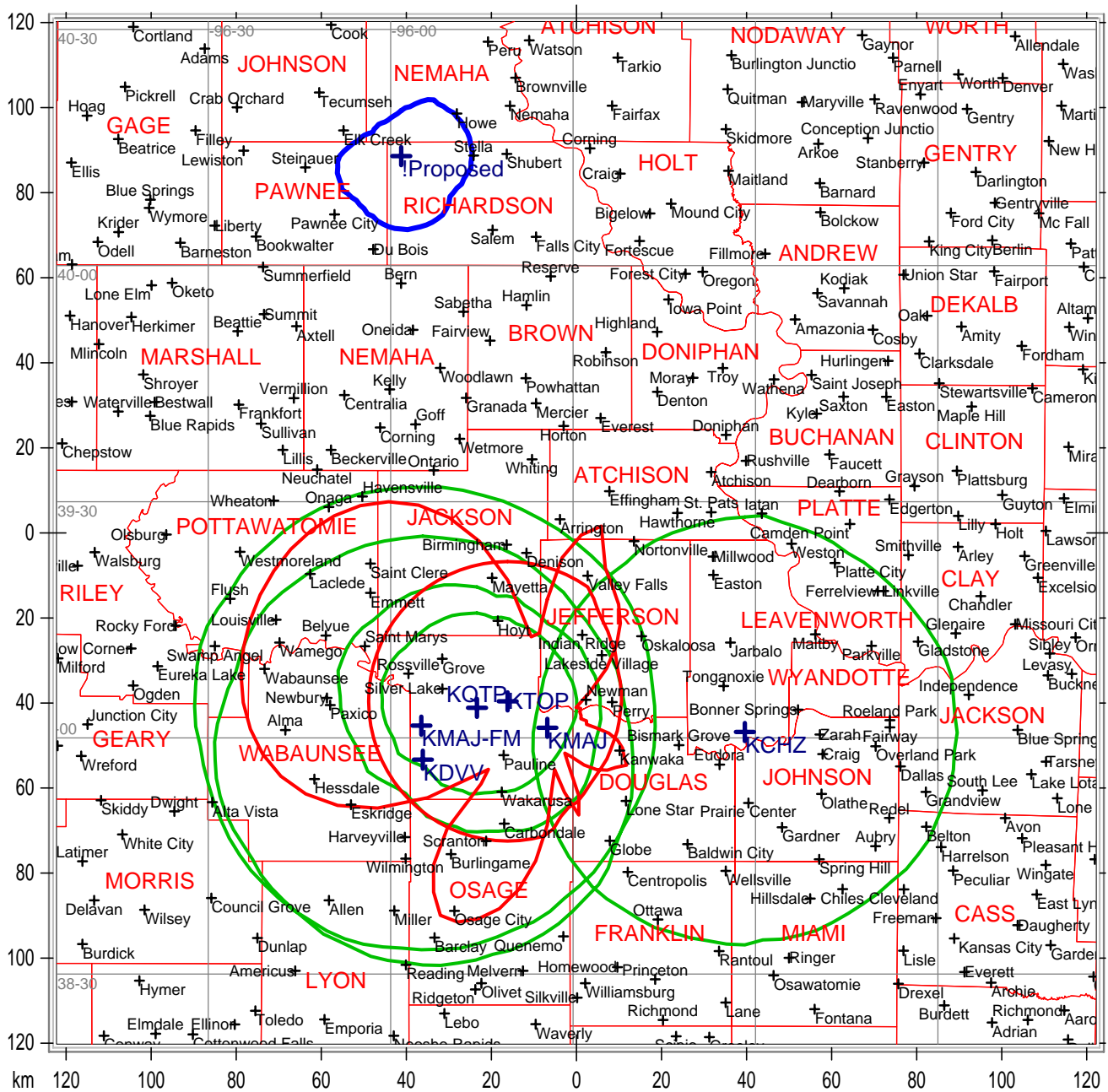
Based on the above analysis, it is believed that the **Cumulus** ownership of the proposed Humboldt facility complies with *Section 73.3555* of the Commission's Rules since there is no principal community overlap with any other **Cumulus** facility.

The foregoing was prepared on behalf of **Cumulus Licensing 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 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

CUMULUS LICENSING LLC CH 244A 6 kW @ 100 M HAAT HUMBOLDT, NEBRASKA



Communications Technologies, Inc. Marlton, New Jersey

County Borders Lat/Lon Grid