

### **Multiple Ownership Compliance Study - KDEL-FM.**

1. Clark County Broadcasting, Inc. (“Clark”), the licensee of KDEL-FM, Arkadelphia, Arkansas, seeks to upgrade KDEL-FM from a Class A to Class C-3. This study was conducted to demonstrate compliance with Section 73.3555 of the Commission’s Rules.
2. Clark is also the licensee of KVRG (AM), Arkadelphia, and KYXK(FM), Gurdon. The principals of Clark also have attributable interests in the licensee of KCXY, East Camden. As a Class C-3 at the proposed coordinates, KDEL-FM will overlap these three stations. Thus, the combined contours of KCXY, KYXK, KDEL-FM, and KVRG will form a Radio Market of 3 FM stations and 1 AM station.<sup>1</sup> (See Exhibits “A” and “B”). According to 47 C.F.R.73.3555(a)(iv): “In a radio market with 14 or fewer commercial radio stations, a party may own, operate, or control up to 5 commercial radio stations, not more than 3 of which are in the same service (AM or FM), except that a party may not own, operate, or control more than 50 percent of the stations in such market.”
3. Thus, the contour overlap of 3 FM stations and 1 AM station is permissible as long as Clark’s stations do not represent over 50 percent of the stations in the market. To do that, we need only prove that the relevant market receives service from at least 8 stations. We have identified the contours of the following stations, attributable to other parties, which intersect the four jointly-attributable stations (See Exhibit “B”). These four non-attributable stations include: KQUS-FM, Hot Springs, KLAZ(FM), Hot Springs, KZHE(FM), Stamps, and KBHS(AM), Hot Springs
4. As the Radio Market contains at least 8 stations, only 4 of which are attributable to Clark, the proposed upgrade of KDEL-FM complies with Section 73.3555 of the Commission’s rules.

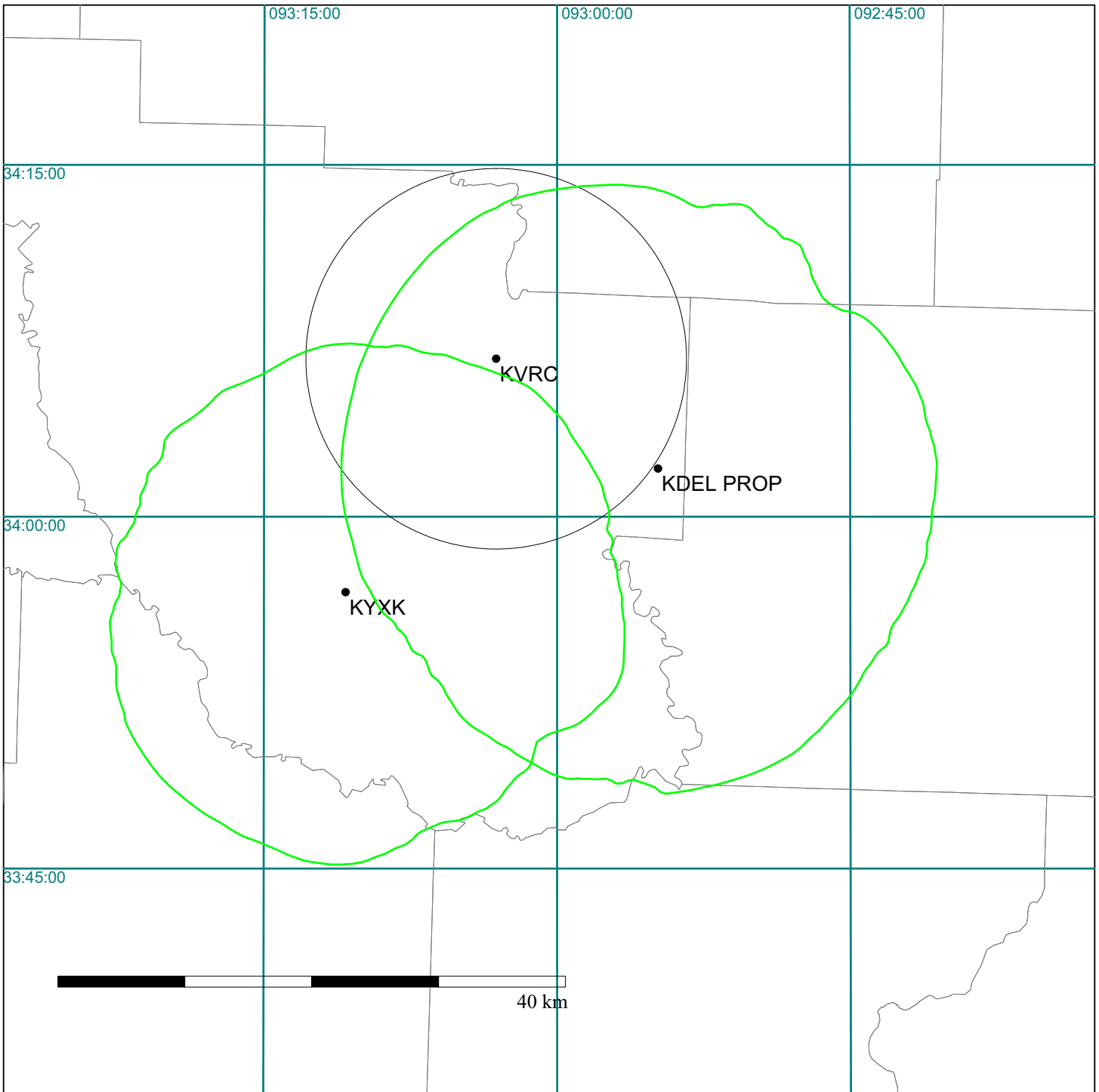
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<sup>1</sup> 1 In a previously approved combination, Clark is also attributed with KWXI(AM), Glenwood, AR. KWXI overlaps KVRG and KYXK, but not KDEL-FM (proposed). Because no changes are proposed for KVRG or KYXK, only those stations which affect the instant application to upgrade KDEL-FM are considered here. No other stations which are attributable to Clark intersect the Radio Market.

## **EXHIBIT A**

Commonly-owned stations comprising Radio Market

KVRC (AM)  
KDEL-FM (as proposed)  
KYXK (FM)



## **EXHIBIT B**

### Services to Radio Market

At least 8 stations serve parts of the Radio Market formed by the combination of KVRC, KDEL-FM, and KYXK.

