

KUPI-FM Multiple Ownership Study

Pursuant to the Commission’s Newly Revised ownership rules in Section 73.3555, the following Multiple Ownership Study was conducted to determine if a grant of the instant application for KUPI will comply with the Rules. The KUPI Community of License is Idaho Falls, ID. Idaho Falls is not included in an Arbitron Rated Market. Also, KUPI is not considered as “home” to a rated Arbitron Market as defined by BIA. Therefore, the modified Contour Overlap Method must be used to evaluate the impact a grant of the Instant Application would have on multiple ownership dynamic in the area.

Radio station KUPI-FM is owned by Sandhill Media Group, LLC. Sandhill Media Group, LLC has an attributable interest in the following radio stations in the Idaho Falls, ID area:

<u>Station</u>	<u>Channel/Class/Status</u>	<u>City of License</u>	<u>Overlap with KUPI-FM</u>
KUPI-FM	256C1 Lic, App	Idaho Falls, ID	n/a
KUPI-AM	980 kHz Lic	Ammon, ID ¹	YES
KQEO	296C1 Lic	Idaho Falls, ID ¹	YES
KADQ	232C2 Lic	Rexburg, ID ¹	YES

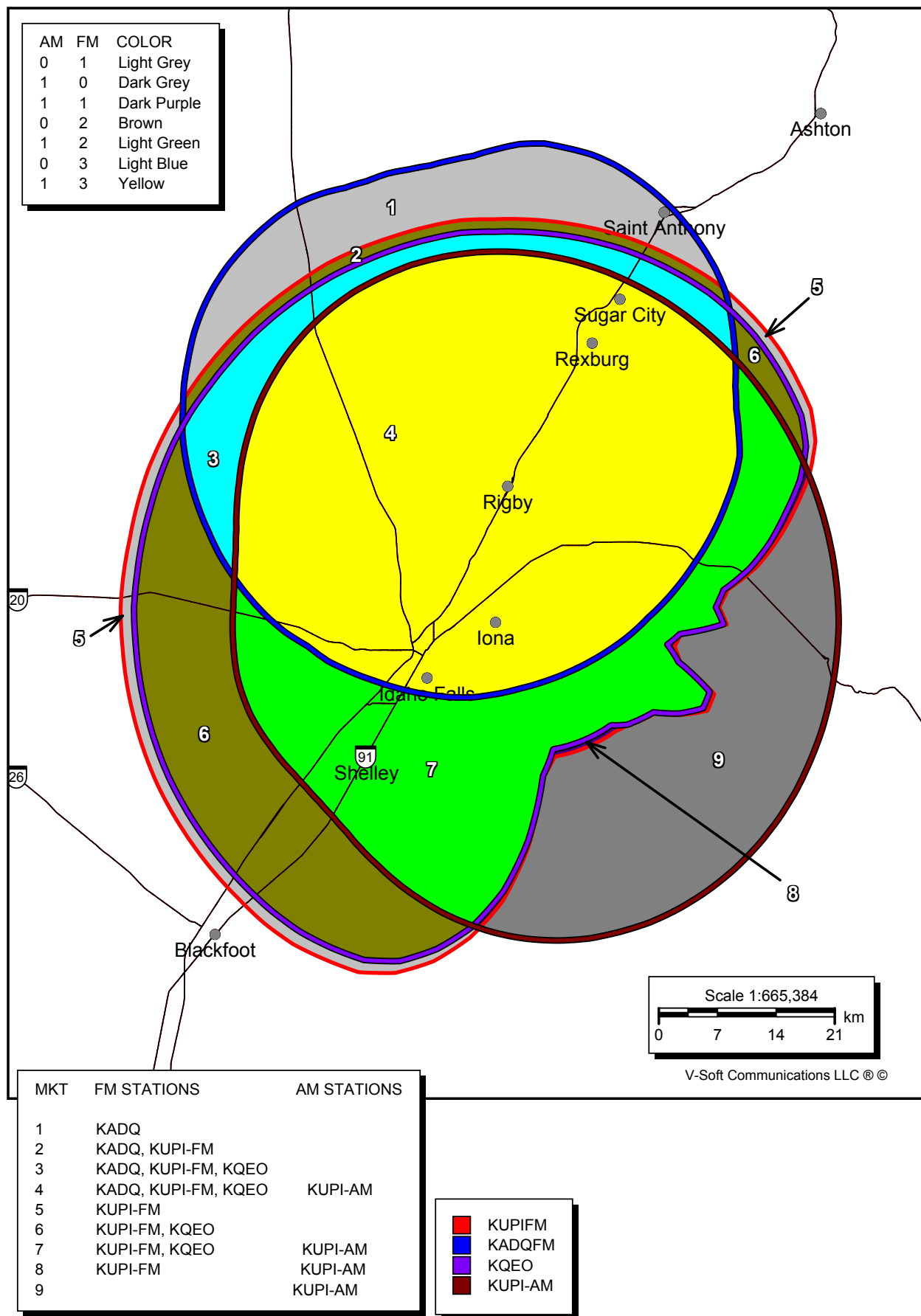
Of the three nearby stations which share a cognizable interest with KUPI-FM, all of them share a mutual overlap area with the proposed facilities of the KUPI-FM instant application. The accompanying map illustrates the predicted 5 mV/m groundwave AM contours and the predicted 3.16 mV/m FM contours of these eleven stations.

As can be shown on the map, the principals of KUPI-FM have facilities forming 9 “mutual overlap” Radio Markets with the following stations under common control.

TABLE 2

	<u>FM Stations</u>	<u>AM Stations</u>
Radio Market #1:	KADQ	
Radio Market #2:	KADQ, KUPI-FM	
Radio Market #3:	KADQ, KUPI-FM, KQEO	
Radio Market #4:	KADQ, KUPI-FM, KQEO	KUPI-AM
Radio Market #5:	KUPI-FM	
Radio Market #6:	KUPI-FM, KQEO	
Radio Market #7:	KUPI-FM, KQEO	KUPI-AM
Radio Market #8:	KUPI-FM	KUPI-AM
Radio Market #9:		KUPI-AM

¹ Sand Hill Media Group, LLC, also owns KUPI-AM, KQEO, and KADQ.



Radio Market Denominator:

The “numerator” of each Radio Market will be the stations listed in the table above for the particular radio market. For the sake of simplicity, the “denominator” of ALL nine radio markets will only include those stations listed in Table 3. Granted, some of the radio markets may include stations in addition to those listed in Table 3. However, ALL of the stations listed in Table 3 are included in the denominator of all nine Radio Markets.

The stations listed in Table 3 all meet the following conditions:

- All overlap with KUPI FM - the station in question
- All have transmitters within 92 kilometers of all nine Mutual Overlap Areas.
- All stations which are commonly attributable with KUPI FM overlap each other and, thus, can be counted in the denominator.
- Commercial and Noncommercial stations have been counted.

With this in mind, the following 18 stations in Table 3 will be included in the “denominator” for each of the nine radio markets:

TABLE 3

1 KADQFM.L 434520N 1115756W 232C2 45.00 User Reference
2 KBJX.L 433234N 1115307W 0.1 294 292C1 100 Shelley ID BLH19991215ABL
3 KBYL.L 434544N 1115730W 25.1 346 263C1 100 Rexburg ID BLED19980722KA
4 KBYRFM.L 434909N 1114651W 31.9 15 218A 0.1 Rexburg ID BLED19931215KB
5 KCHQ.L 434242N 1112056W 47.1 66 271C1 4 Driggs ID BLH20040226AAC
6 KCVL.L 433003N 1123943W 63 266 268C 100 Blackfoot ID BMLH20030825ANH
7 KFTZ.L 432106N 1120022W 23.4 204 277C1 100 Idaho Falls ID BLH19940420KB
8 KGTM.L 433234N 1115307W 0.1 294 251C1 100 Rexburg ID BLH20011127ABJ
9 KID.L 433335N 1115515W 3.5 303 590 5 IDAHO FALLS ID BL
10 KID-FM.L 432951N 1123950W 63.2 265 241C 100 Idaho Falls ID BLH5305
11 KIGO.L 435823N 1113928W 51.2 20 1400 1 ST. ANTHONY ID BL11389
12 KLCE.L 433003N 1123943W 63 266 247C 100 Blackfoot ID BMLH20030825ANI
13 KQEO.L 433233N 1115304W 0 0 296C1 82 Idaho Falls ID BLH20030408ABD
14 KRXX.L 435050N 1114703W 34.8 13 1230 1 REXBURG ID BL
15 KSSL.L 433115N 1115933W 9.1 254 1260 5 IDAHO FALLS ID BL
16 KTHK.L 432106N 1120022W 23.4 204 288C1 100 Idaho Falls ID BLH19931014KD
17 KUPI.L 433123N 1120036W 10.4 258 980 5 AMMON ID BL19830308AA
18 KUPIFM.L 433233N 1115304W 0 0 256C1 100 Idaho Falls ID BLH19851101KB

In a radio market with between 15 and 29 (inclusive) commercial radio stations, Section 73.3555 of the Commission’s rules allows a party to own, operate, or control up to six (6) commercial radio stations, not more than four (4) of which are in the same service (AM or FM). Again, each of the 9 radio markets listed in Table 2 of this exhibit includes between 15 and 29 (inclusive) stations in the denominator.

In the case of each Radio Market, the principals for KUPI-FM will have common control over not more than three (3) stations in the FM service and one (1) station in the AM service in each of the 9 Radio Markets. In some markets, the principals for KUPI-FM will have common control of fewer than three FM stations and one AM station.

Therefore, the instant application for KUPI-FM appears to comply with Section 73.3555 of the Commission's Rules with regard to each Radio Market.

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