

**ENGINEERING STATEMENT COVERING
BROADCAST MULTIPLE OWNERSHIP STUDY
KONA COAST RADIO, LLC
ROCK RIVER, WYOMING**

JANUARY 2005

**ENGINEERING STATEMENT COVERING
BROADCAST MULTIPLE OWNERSHIP STUDY
KONA COAST RADIO, LLC
ROCK RIVER, WYOMING**

JANUARY 2005

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

KCR owns, or controls, the following nine authorized facilities which are being considered along with the proposed Rock River facility to determine if the proposed Rock River facility will result in 70 dBu contour overlap.

Proposed CH 240A ROCK RIVER, WY 100.1 MHz A APP

KKHI CO KREMMLING 106.3 MHz C2 APP
BPH20040128AFO GRANBY MOUNTAIN BROADCASTING, LLC

KFMH SD BELLE FOURCHE 101.9 MHz C CP
BPH20040713AAE LARAMIE MOUNTAIN BROADCASTING, LLC

KRQU WY LARAMIE 104.5 MHz C2 CP
BPH19970314IB LARAMIE MOUNTAIN BROADCASTING, L.L.C.

KRKI WY NEWCASTLE 99.5 MHz C0 APP
BPH20030919AAU MICHAEL RADIO GROUP

KMQS ID VICTOR 92.3 MHz C3 APP
BMPH20041013AAG MICHAEL RADIO GROUP, LLC

KKTN ID VICTOR 103.7 MHz C3 APP
BMPH20041013AAF MICHAEL RADIO GROUP, LLC

KGRK WY GLENROCK 98.3 MHz A CP
BPH19971010MG MICHAEL RADIO GROUP, LLC

KJMP CO PIERCE 870 kHz LD DA2
BL20040709ADS RADIO FRONTIER BROADCASTING, LLC

KRKY CO GRANBY 930 kHz LD ND1
BL19880114AD GRANBY MOUNTAIN BROADCASTING, LLC

The principal community contours for these nine stations, along with the proposed Rock River, Wyoming facility, are plotted on map Figure 1 attached. Rock River, Wyoming is plotted in Blue, the remaining six FM stations in Green and the three AM stations in Red. Figure 1-A is an expanded scale plot depicting only the proposed Rock River and KRQU 70 dBu contours.

By examination of these maps it is apparent that the Rock River, Wyoming CH240A proposal is not associated with principal community contour overlap with any other owned, or controlled facility.

This multiple ownership analysis was prepared considering the above described radio stations under proposed common ownership or control, which stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) in accordance with *Section 73.3555* of the FCC Rules.

RADIO MARKETS & METHODOLOGY

The “radio market” applicable to common ownership or control of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. In this case the Market is made up of the single FM station as previously described.

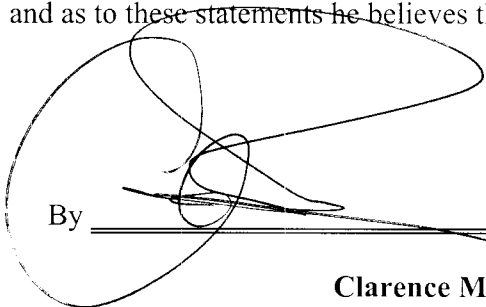
Rock River, Wyoming is located in Albany County, Wyoming which is not part of any Arbitron metro using the Arbitron Market definition for Fall 2004.

Only known CP or licensed operating full service stations were employed in the study with the exception of KKHI, KRKI, KMQS and KKTN where application facilities were employed due to the larger contour size. 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 proposed common ownership of stations complies with *Section 73.3555* of the Commission's Rules as there is no principal community contour overlap associated with the proposed Rock River, Wyoming facility and any other commonly owned or controlled facility.

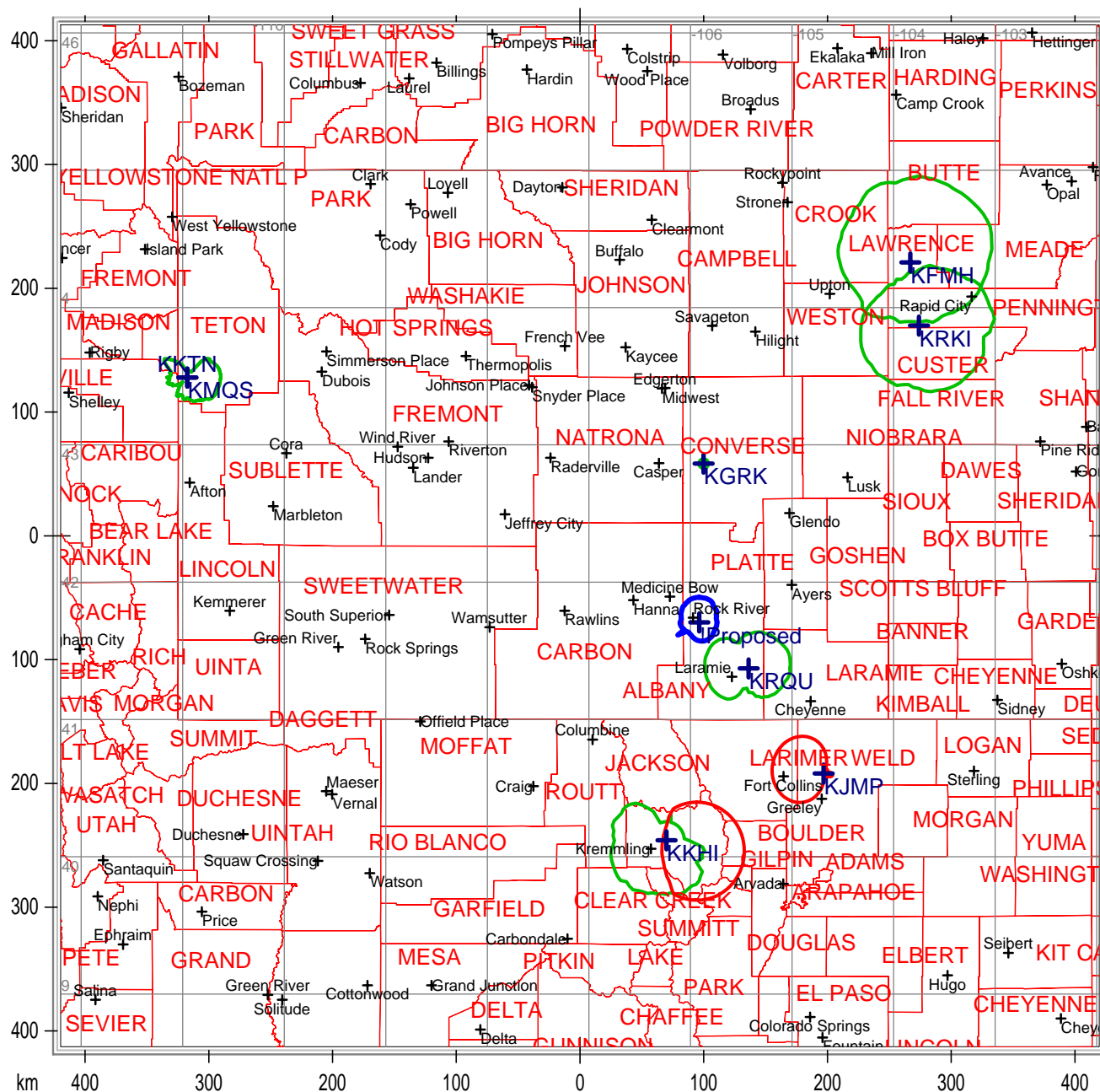
The foregoing was prepared on behalf of **Kona Coast Radio, LLC** by Clarence M. Beverage of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.

By

A large, stylized handwritten signature in black ink, appearing to be 'C. Beverage', is written over a horizontal line.

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

KONA COAST RADIO, LLC CH 240A 3.4 kW @ 134 MHAAT ROCK RIVER, WYOMING



Communications Technologies, Inc. Marlton, New Jersey

County Borders Lat/Lon Grid

Map Scale: 1:5149659 1 cm = 51.50 km V/H Size: 825.50 x 839.34 km

Figure 1

A map of the Fort Collins area, Colorado, showing the locations of various radio stations and their coverage areas. The map includes latitude and longitude coordinates (41-00 to 42-30 N, 104-00 to 105-00 W) and a scale bar from 0 to 100 km. The map is divided into three counties: PLATTE, LARAMIE, and LARIMER. A blue circle labeled 'Proposed' is centered around the intersection of the 41-30 N latitude line and the 105-30 W longitude line, near the town of Rock River. A green circle labeled 'KRQU' is centered around the intersection of the 41-30 N latitude line and the 105-00 W longitude line, near the town of Fort Collins. A red circle is centered around the intersection of the 41-00 N latitude line and the 105-00 W longitude line, near the town of Fort Collins. The map also shows the locations of several towns and cities, including Fort Collins, Rock River, and the surrounding areas.

 County Borders
 Lat/Lon Grid