

**ENGINEERING STATEMENT COVERING**

**BROADCAST MULTIPLE OWNERSHIP STUDY**

**CCR-HELENA IV, LLC**

**HELENA, EAST HELENA, MONTANA CITY, GREAT FALLS**

**AND BUTTE, MONTANA**

**JANUARY 2014**

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This engineering statement and supporting tabulations and figures have been prepared on behalf of **CCR-Helena IV, LLC (“CCR”)**. The purpose of this statement is to demonstrate continued **CCR** compliance with *Section 73.3555* of the Commission’s Rules with respect to multiple ownership of AM and FM broadcast facilities. This study is filed for the purpose of reflecting a change in ownership structure for the commonly owned stations in the market. No facility changes are associated with this filing.

**CCR** proposes continued common ownership in the following nine stations in the Helena, East Helena, Montana City, Great Falls and Butte, Montana market:

KZMT(FM)	Helena, MT	101.1Mhz	90.5 kW	Fac. ID #50357
KCAP(AM)	Helena, MT	1340 kHz	1 kW ND U	Fac. ID #50355
KBMI-FM	E. Helena, MT	104.1 MHz	5.0 kW	Fac. ID #49724
KBLL(AM)	Helena, MT	1240 kHz	1 kW ND U	Fac. ID #27515
KBLL-FM	Helena, MT	99.5 MHz	12.0 kW	Fac. ID #27517
KOYT(FM)	Montana City, MT	98.5 MHz	6.0 kW	Fac. ID #170988
KMBR(FM)	Butte, MT	95.5 MHz	50.0 kW	Fac. ID #63875
KAAR(FM)	Butte, MT	92.5 MHz	4.5 kW	Fac. ID #63877
KMON(AM)	Great Falls, MT	560 kHz	5 kW DA-N	Fac. ID #62330

These nine stations are considered as four markets since the principal community contours for KAAR(FM), KMBR(FM) and KMON(AM) have no common overlap with AM stations KCAP and KBLL and FM stations KBMI-FM and KOYT(FM).

- Market 1: KZMT(FM), KCAP(AM), KBMI-FM, KBLL(AM), KBLL-FM and KOYT(FM)
- 2: KZMT(FM), KBLL-FM and KMBR(FM)
- 3: KZMT(FM), KAAR(FM) and KMBR(FM)
- 4: KZMT(FM), KBLL-FM and KMON(AM)

A 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 is 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). Since the stations are in counties which are not Arbitron Metro counties, stations counted as part of the market are determined on the basis of contour overlap. *Figure 1* depicts the principal community contours for all eight stations for which common ownership is proposed as currently licensed. *Figure 2* depicts other AM stations plus those depicted on *Figure 1*. *Figure 3* depicts other FM stations plus those depicted on *Figure 1*.

*Table I* lists all AM stations whose 5 mV/m daytime contour duplicates some portion of the market. The contours for these stations are plotted on *Figure 2* in black along with the market as depicted on *Figure 1*. *Table I* also lists all FM stations whose 70 dBu contour duplicates some portion of the market. The contours for these stations are plotted on *Figure 3* with owned FM stations plotted in blue and other FM stations plotted in green.

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 Radiosoft Comstudy 3 second terrain database, which has been found to be in good agreement with

the FCC 30 second terrain database, for each of the FM stations, using radials spaced every 5 degrees of azimuth.

## **CONCLUSION**

Based on the above analysis, it is believed that the proposed common ownership of stations complies with *Section 73.3555(a)(1)(ii)* of the Commission's Rules. There are 17 other FM and 5 other AM stations considered in this study which are listed on *Table I* and whose principal community contours overlap some portion of the KZMT(FM) 70 dBu contour and that contour encompasses the contours of all other attributable stations in the Helena market. Other stations whose principal community contour overlaps a portion of an owned station in the adjacent Butte or Great Falls, Montana were not considered.

The foregoing was prepared on behalf of **CCR-Helena IV, 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 \_\_\_\_\_

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

January 31, 2014

**TABLE I**  
**AM STATIONS IN THE CCR-HELENA IV, LLC MARKET STUDY**  
**JANUARY 2014**

CALL ARN	ST	CITY OWNER	FREQ	PAT	AG	PWR	DESC LATITUDE	LONGITUDE
KCAP BL	MT	HELENA CCR-HELENA IV, LLC	1340.0	LU		1.000	ND1 46-36-43.0 N 112-03-13.0 W	
KBLL BL20051021AHF	MT	HELENA CCR-HELENA IV, LLC	1240.00000	LD		1.000	ND2 46-36-43.0 N 112-03-13.0 W	
KMON BMML20110415ABP	MT	GREAT FALLS CCR-GREAT FALLS IV, LLC	560.00000	LD		5.000	DAN 47-25-29.0 N 111-17-20.0 W	
KBOW BL10294	MT	BUTTE BUTTE BROADCASTING INCORPORATED	550.00000	LD		5.000	DAN 45-58-30.0 N 112-34-18.0 W	
KMTX BL	MT	HELENA THE MONTANA RADIO COMPANY, LLC	950.00000	LD		5.000	DAN 46-40-28.0 N 112-01-05.0 W	
KBCK BL20061219ADJ	MT	DEER LODGE ROBERT CUMMINGS TOOLE	1400.00000	LD		1.000	ND2 46-24-52.5 N 112-43-16.5 W	
KANA BL20020104ABA	MT	ANACONDA A.W.A.R.E., INC.	580.00000	LD		1.000	ND2 46-07-43.0 N 112-55-25.0 W	
KKGR BL20080603ADL	MT	EAST HELENA KGR, LLC	680.00000	LD		5.000	NDD 46-34-08.0 N 111-54-32.0 W	

**FM STATIONS IN THE CCR-HELENA IV, LLC MARKET STUDY**

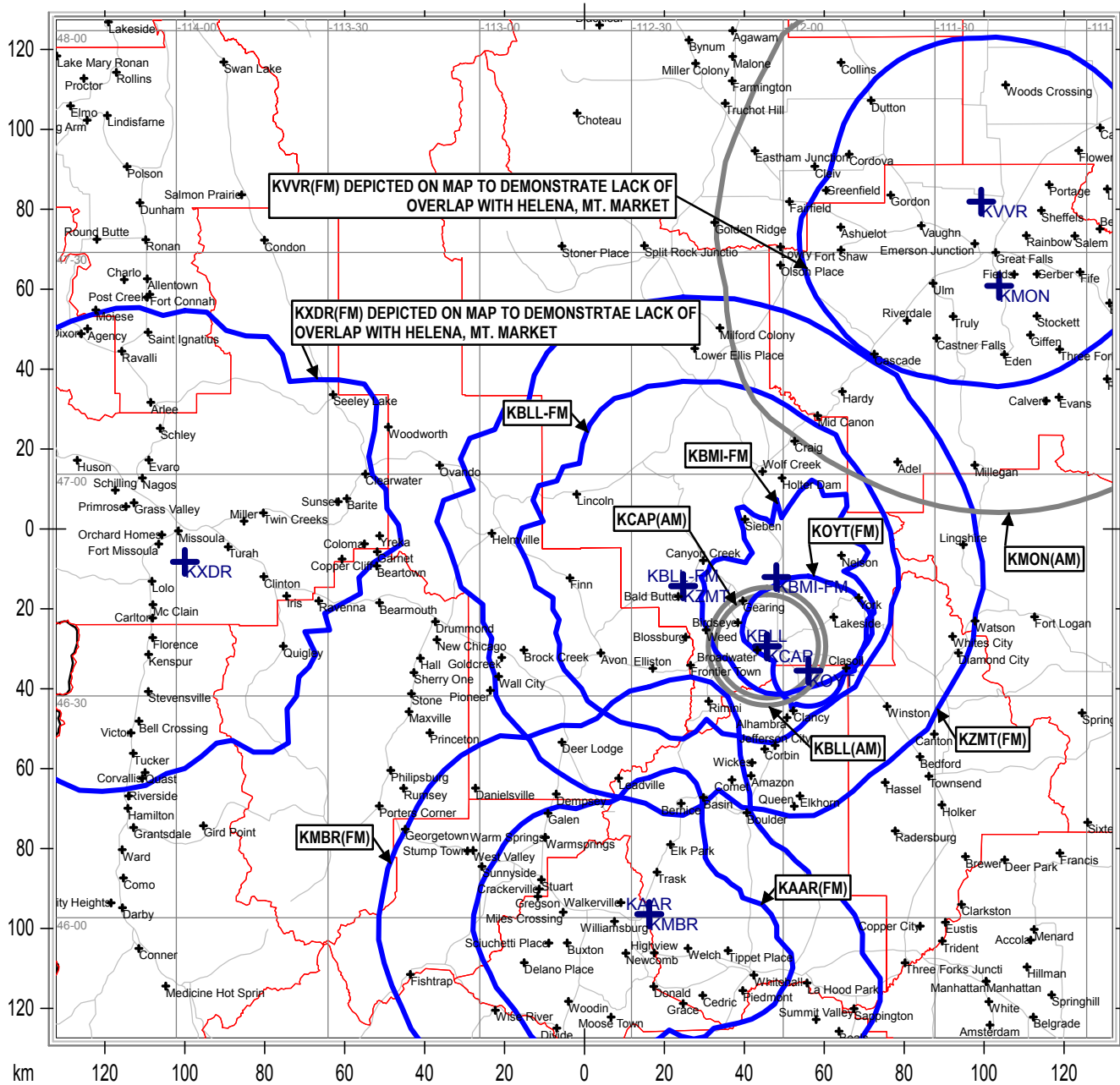
CALL ARN	ST	CITY OWNER	FREQ	CHN	CL	ERP	STAT LONGITUDE	HAAT:m	AMSL:m
KZMT BLH-20041122ACA	MT	HELENA CCR-HELENA IV, LLC	101.10000		C	90500.00	LIC 46-44-51.8 N 112-19-47.6 W	604.964	2278.000
KBMI-FM BLH-20130201ACY	MT	EAST HELENA CCR-HELENA IV, LLC	104.10000		C3	5000.00	LIC 46-46-06.0 N 112-01-21.6 W	204.821	1515.000
KBLL-FM BLH-20060206ABG	MT	HELENA CCR-HELENA IV, LLC	99.50000		C1	12000.00	LIC 46-44-51.8 N 112-19-47.6 W	586.964	2260.000
KOYT BLH-20071217ABS	MT	MONTANA CITY CCR-HELENA IV, LLC	98.50000		A	6000.00	LIC 46-33-25.8 N 111-55-01.4 W	-27.976	1360.000
KMBR BLH-19800128AE	MT	BUTTE CCR-BUTTE IV, LLC	95.50000		C	50000.00	LIC 46-00-29.0 N 112-26-30.0 W	562.810	2544.000

# TABLE I

## FM STATIONS IN THE CCR-HELENA IV, LLC MARKET STUDY

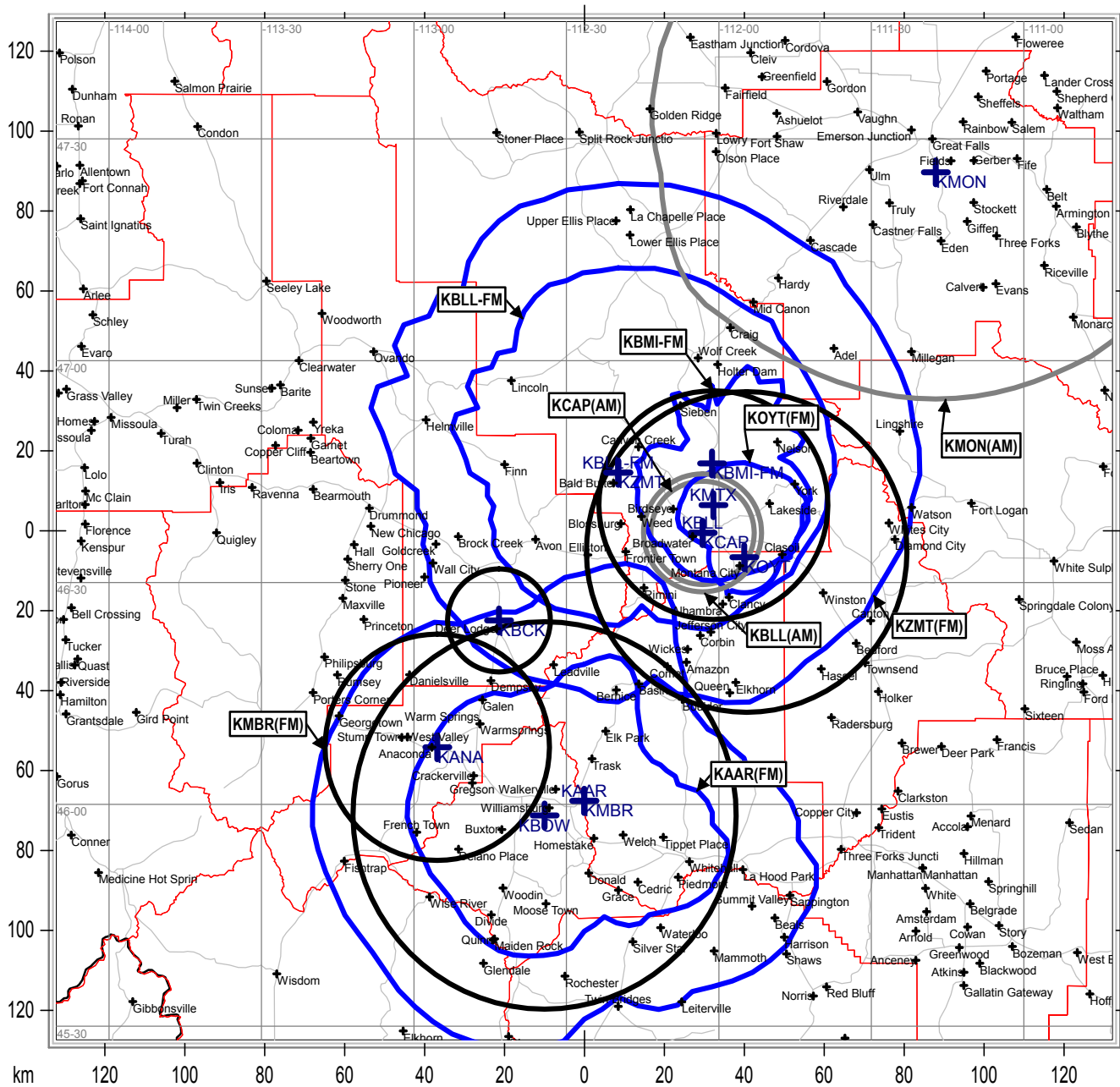
CALL ARN	ST	CITY OWNER	FREQ	CHN	CL	ERP LATITUDE	STAT LONGITUDE	HAAT:m	AMSL:m
KAAR	MT	BUTTE	92.50000		C1	4500.00	LIC		
BLH-19950106KC		CCR-BUTTE IV, LLC	46-00-29.0	N	112-26-30.0	W	549.810	2531.000	
KMTX-FM	MT	HELENA	105.30000		C	87000.00	LIC		
BLH-19900314KB		THE MONTANA RADIO COMPANY, LLC	46-44-52.0	N	112-19-47.0	W	591.954	2268.000	
KHLV	MT	HELENA	90.10000		C3	3500.00	LIC		
BLED-20051116AAJ		EDUCATIONAL MEDIA FOUNDATION	46-46-07.0	N	112-01-21.0	W	195.420	1509.000	
KUHM	MT	HELENA	91.70000		A	910.00	LIC		
BLED-19990507KB		THE UNIVERSITY OF MONTANA	46-46-11.0	N	112-01-22.0	W	228.306	1543.000	
KVCM	MT	HELENA	103.10000		C1	30000.00	LIC		
BLED-20060327AFZ		HI-LINE RADIO FELLOWSHIP, INC.	46-46-07.0	N	112-01-21.0	W	224.420	1538.000	
KQLR	MT	WHITEHALL	89.70000		C2	1450.00	LIC		
BLED-20061227AAI		EDUCATIONAL MEDIA FOUNDATION	46-00-22.0	N	112-26-33.0	W	547.466	2523.000	
KOPR	MT	BUTTE	94.10000		C	58000.00	LIC		
BLH-19880902KA		BUTTE BROADCASTING INCORPORATED	46-00-23.0	N	112-26-28.0	W	568.673	2545.000	
KQRV	MT	DEER LODGE	96.90000		C1	20000.00	LIC		
BLH-20000407ACG		ROBERT CUMMINGS TOOLE	46-06-03.0	N	112-57-00.0	W	301.964	2215.000	
KGLM-FM	MT	ANACONDA	97.70000		C3	2750.00	LIC		
BLH-20090511AHC		BUTTE BROADCASTING, INCORPORATED	46-06-04.0	N	112-56-59.0	W	296.778	2209.000	
KFRD	MT	BUTTE	88.90000		C1	2800.00	LIC		
BMLD-20130716AAS		FAMILY STATIONS, INC.	46-00-27.0	N	112-26-30.0	W	529.145	2507.000	
KZMY	MT	BOZEMAN	103.50000		C1	100000.00	LIC		
BLH-20031120AAI		TOWNSQUARE MEDIA BOZEMAN LICENSE,LLC	45-57-25.0	N	111-22-11.0	W	287.049	1724.000	
KMXM	MT	HELENA VALLEY NE	102.30000		C2	1450.00	LIC		
BMLH-20130607AAM		THE MONTANA RADIO COMPANY, LLC	46-49-30.0	N	111-42-13.0	W	632.474	2369.000	
KIMO	MT	HELENA VALLEY SE	107.30000		C	86000.00	LIC		
BLH-20111017AAN		THE MONTANA RADIO COMPANY, LLC	46-49-30.0	N	111-42-13.0	W	639.474	2376.000	
KYPH	MT	EAST HELENA	89.10000		C3	140.00	LIC		
BLED-20111013AAW		MONTANA STATE UNIVERSITY - BILLINGS	46-49-30.0	N	111-42-13.0	W	646.474	2383.000	
KINX	MT	FAIRFIELD	102.70000		C1	93300.00	LIC		
BMLH-20101029ADF		STARADIO CORP.	47-36-24.0	N	111-21-31.0	W	279.286	1362.000	
KIKF	MT	CASCADE	104.90000		C	94000.00	LIC		
BLH-20011210ABW		STARADIO CORP.	47-09-34.0	N	111-00-39.0	W	605.586	2179.000	
KLSK	MT	GREAT FALLS	100.30000		C1	100000.00	LIC		
BLH-20030225ABF		FLINN BROADCASTING CORPORATION	47-15-57.0	N	111-08-39.0	W	143.190	1491.000	
KWGF	MT	VAUGHN	101.70000		C1	93400.00	LIC		
BLH-20111021AEC		STARADIO CORP.	47-36-24.0	N	111-21-31.0	W	279.286	1362.000	

## CCR-HELENA IV, LLC WITH PERTINENT CONTOURS FROM SURROUNDING MARKETS



Communications Technologies, Inc. Marlton, New Jersey 08053

## CCR-HELENA IV, LLC WITH PERTINENT CONTOURS FROM SURROUNDING MARKETS

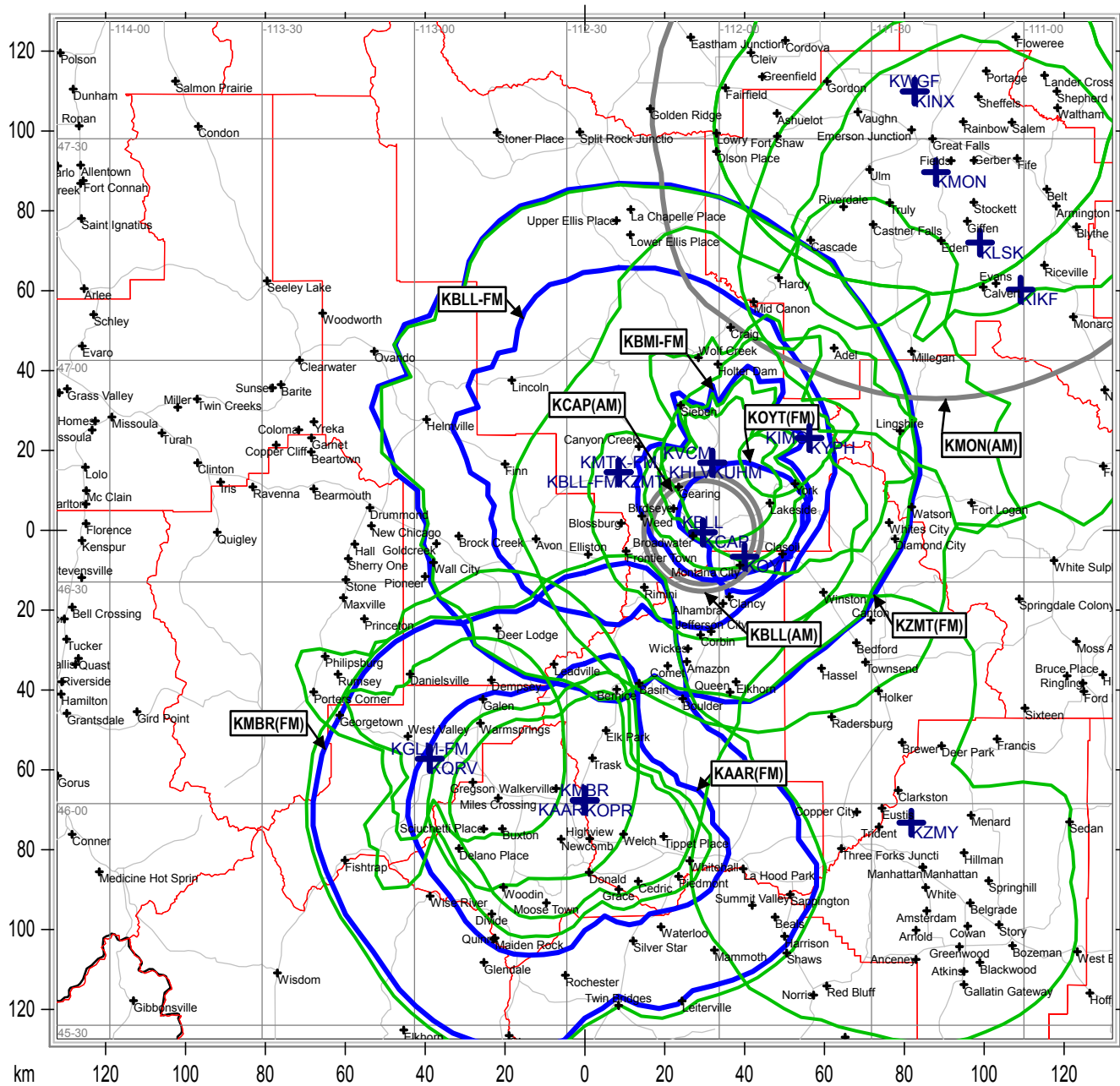


Communications Technologies, Inc. Marlton, New Jersey 08053

— County Borders   
 — State Borders   
 — Highways   
 — Lat/Lon Grid



CCR-HELENA IV, LLC WITH PERTINENT CONTOURS FROM SURROUNDING MARKETS



Communications Technologies, Inc. Marlton, New Jersey 08053

 County Borders
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