

## ENGINEERING STATEMENT

This study was prepared to determine compliance with 47 C.F.R. § 73.3555 for common multiple station ownership.

The applicant, Wolfhouse Radio Group, Inc., is proposing to co-own stations KRAY-FM, Channel 278A, Salinas; KHMZ(FM), Channel 250A, Salinas; KZSL(FM), Channel 230B1, King City; KHNZ(FM), Channel 292A, Soledad; KCTY, 980 kHz, Salinas; and KTGE, 1570 kHz, Salinas, California. Figure 1 shows the city grade contours of the aforementioned stations. Figures 2 and 3 show city grade contours of the FM and AM stations that contribute to the proposed market.

A radio market is defined to be the union of the principal community contours of the stations in question. For the purposes of this study, the principal community contour for FM stations is the predicted 3.16 mV/m contour and for AM stations the predicted or measured 5 mV/m contour. Market contributors are those commercial licensed stations whose principal community contours overlap, in whole or in part, with the principal community contours of the stations in question (i.e., the station for which an authorization is sought and any station in the same service that would be commonly owned whose principal community contour overlaps the principal community contour of that station).

### I. FM 3.16 mV/m CONTOURS

Technical data for FM broadcast stations were obtained from the latest version of the FCC CDBS Database. The operational status of each station was based on information contained within the appropriate database records.

For each FM station, terrain elevation data from three to sixteen kilometers on radials spaced at one-degree azimuthal intervals starting with True North were extracted from topographic data obtained from the computerized Defense Mapping Agency three arc-second point elevation database. Along each radial 261 points were linearly interpolated according to § 73.312(d). The height above average terrain along each of the 360 radials was computed by averaging the elevations between three and sixteen kilometers below the antenna radiation center in accordance with § 73.313(d)(3).

The locations of the 3.16 mV/m F(50,50) principal community contours of all FM stations shown on the attached map were calculated according to the computer methods outlined in F.C.C. publication PB-249144, *Field Strength Calculations for TV And FM Broadcasting*. The computer methods use digitized data taken directly

from the graph of § 73.333 Figure 1. Intermediate values are obtained using bivariate interpolation techniques for surface fitting.

## **II. AM 5 mV/m CONTOURS**

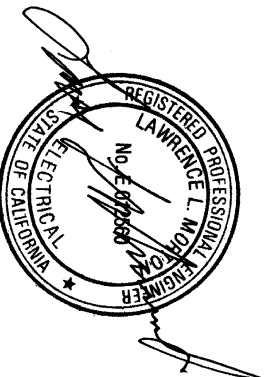
Technical data for AM broadcast stations were obtained from the latest version of the FCC CDBS Database. Soil conductivities used in the determination of distances to the 5 mV/m groundwave contours were derived from the computerized FCC M-3 soil conductivity database. Conductivity data were extracted for every one degree of azimuth.

For stations employing directional antenna systems, the Standard Radiation using the theoretical operating parameters contained within the AM Engineering Database was computed and used for inverse field strength. In the case of nondirectional stations, the effective field strengths at one kilometer were employed.

In accordance with § 73.183(e), the “equivalent-distance” (Kirke) method was used to determine the distances to the 5 mV/m groundwave contours where more than one conductivity zone exists over the path length.

Distances to contours along intermediate azimuths were obtained mathematically by third order piecewise polynomial approximations.

**Lawrence L. Morton, P.E.**  
**Consulting Telecommunications Engineer**  
**Hollywood Hills, California**



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State of California

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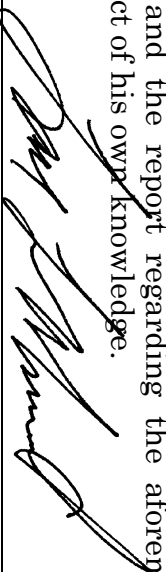
County of Los Angeles

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Lawrence L. Morton, being first duly sworn upon oath, deposes and says:

- That he is a qualified engineer,
- That he is a Registered Professional Engineer in the State of California,
- That he is a member of the Association of Federal Communications Consulting Engineers,
- That his qualifications are a matter of record with the Federal Communications Commission,
- That he has prepared many broadcast applications and engineering exhibits that have been filed with and granted by the Federal Communications Commission,
- That he has carried out such engineering work and that the results thereof are attached hereto and form part of this affidavit, and
- That the foregoing statement and the report regarding the aforementioned engineering work are true and correct of his own knowledge.

Date: March 28, 2000



Lawrence L. Morton, P.E.

On March 28, 2000, before me, Linda Lu, a Notary Public, in and for the State of California, personally appeared Lawrence L. Morton known to me to be the person whose name is subscribed to the within instrument, and acknowledged to me that he executed the same.

My Commission expires 11/30/2001

*Linda Lu*

Notary Public



**RADIO MARKET DUOPOLY ANALYSIS**  
**March 2001**

**Proposed Station Combination**

STATION	FREQUENCY	LOCATION
KRAY-FM	103.5 MHz	Salinas, California
KHMZ(FM)	97.9 MHz	Salinas, California
KZSL(FM)	93.9 MHz	King City, California
KHNZ(FM)	106.3 MHz	Soledad, California
KCTY	980. kHz	Salinas, California
KTGE	1570. kHz	Salinas, California

**FM Market Contributors**

CUMULATIVE MARKET SIZE	STATION	LOCATION	FREQUENCY IN MHz
1	KRAY-FM	SALINAS, CA	103.5
2	KHMZ	SALINAS, CA	97.9
3	KZSL	KING CITY, CA	93.9
4	KHNZ	SOLEDAD, CA	106.3
5	KSJO	SAN JOSE, CA	92.3
6	KMLJ	MARINA, CA	92.7
7	KCDU	HOLLISTER, CA	93.5
8	KHIP	FELTON, CA	93.7
9	KBAY	GILROY, CA	94.5
10	KBOQ	CARMEL, CA	95.5
11	KWAV	MONTEREY, CA	96.9
12	KUFX	SAN JOSE, CA	98.5
13	KZOL	SANTA CRUZ, CA	99.1
14	KLOK-FM	GREENFIELD, CA	99.5
15	KBRG	SAN JOSE, CA	100.3
16	KTOM-FM	SALINAS, CA	100.7
17	KXDC	CARMEL, CA	101.7
18	KRKC-FM	KING CITY, CA	102.1
19	KDON-FM	SALINAS, CA	102.5
20	KTEE	SEASIDE, CA	103.9
21	KMBY-FM	GONZALES, CA	104.3
22	KOCN	PACIFIC GROVE, CA	105.1
23	KARA	SANTA CLARA, CA	105.7
24	KEZR	SAN JOSE, CA	106.5
25	KSES-FM	SEASIDE, CA	107.1
26	KPIG	FREEDOM, CA	107.5
27	KSEA	GREENFIELD, CA	107.9

**AM Market Contributors**

<b>CUMULATIVE MARKET SIZE</b>	<b>STATION</b>	<b>LOCATION</b>	<b>FREQUENCY IN KHZ</b>
28	KCTY	SALINAS, CA	980
29	KTGE	SALINAS, CA	1570
30	KIEZ	CARMEL VALLEY, CA	540
31	KIDD	MONTEREY, CA	630
32	KNBR	SAN FRANCISCO, CA	680
33	KVRG	SOLEDAD, CA	700
34	KCBS	SAN FRANCISCO, CA	740
35	KCBC	RIVERBANK, CA	770
36	KGO	SAN FRANCISCO, CA	810
37	KKMC	GONZALES, CA	880
38	KSCO	SANTA CRUZ, CA	1080
39	KZSJ	SAN MARTIN, CA	1120
40	KLOK	SAN JOSE, CA	1170
41	KNRY	MONTEREY, CA	1240
42	KAZA	GILROY, CA	1290
43	KOMY	LA SELVA BEACH, CA	1340
44	KTOM	SALINAS, CA	1380
45	KRML	CARMEL, CA	1410
46	KTXX	SALINAS, CA	1460
47	KRKC	KING CITY, CA	1490
48	KSJX	SAN JOSE, CA	1500
49	KMPG	HOLLISTER, CA	1520

