

EXHIBIT 5
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MULTIPLE OWNERSHIP CONSIDERATIONS
Journal Broadcast Corporation.
Tucson, AZ

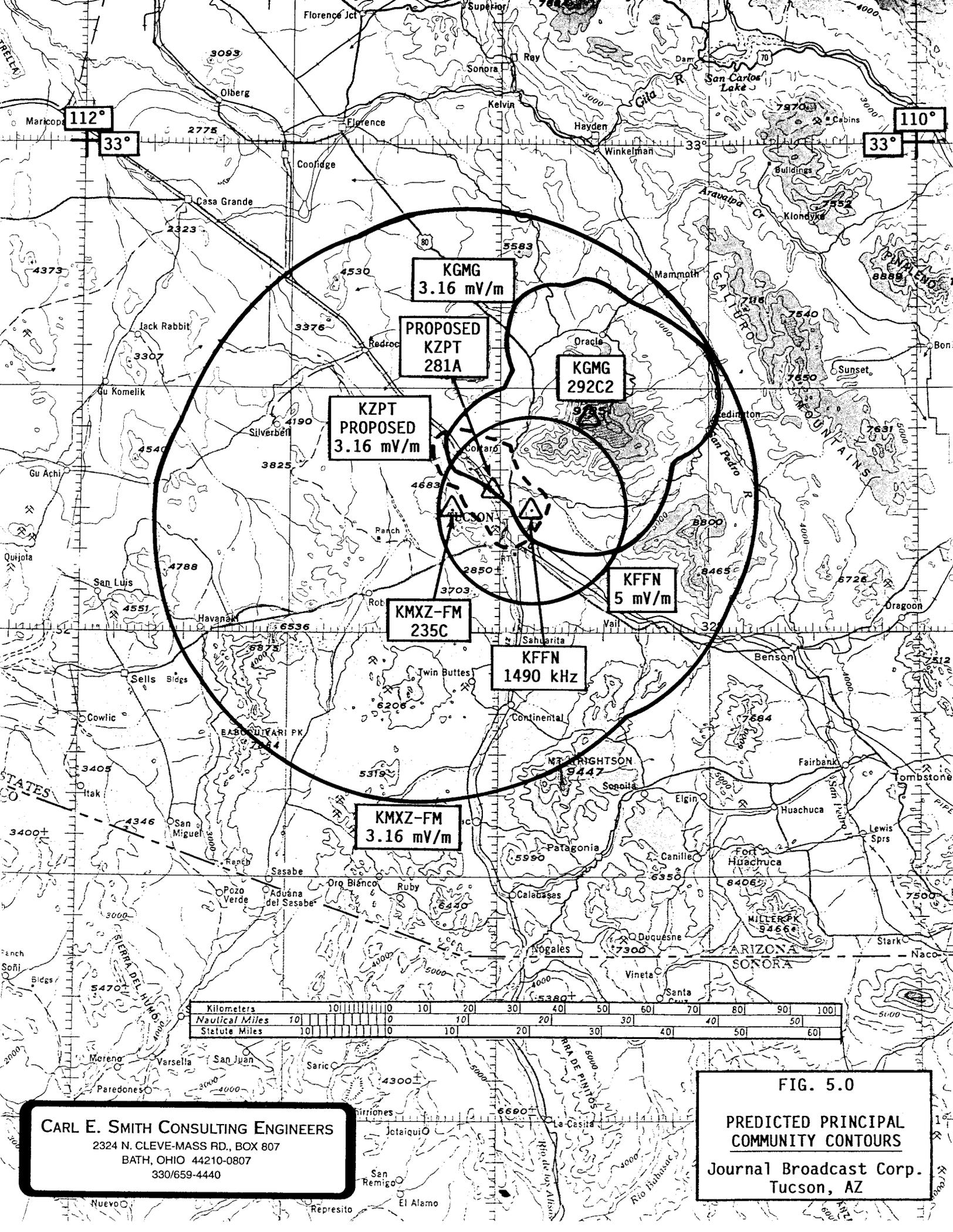
KZPT is commonly owned with KFFN(AM) - Tucson, Arizona; KMXZ-FM - Tucson, Arizona; and KGMG(FM) - Oracle, Arizona. Figure 5.0 shows the predicted principal community contour for the proposed KZPT facilities in relation to the principal community contours of these other commonly owned stations. The 5 mV/m daytime contour for KFFN was projected using the notified facilities from the FCC's Consolidated Database System ("CDBS") and conductivity data extracted from FCC Figure M3. The 3.16 mV/m contours for KMXZ-FM and KGMG were projected utilizing each station's notified facilities from the CDBS and terrain data extracted from the NGDC 30 second terrain database. Finally, the 3.16 mV/m contour for the proposed KZPT facilities was projected using the actual proposed operating facilities and terrain data from the NGDC 30 second terrain database. As shown in this figure, there is an area of common principal community contour overlap between these four stations. It should be noted that the principal community contour for the proposed KZPT facilities will not overlap the principal community contour of any other commonly owned station not specified above.

Figure 5.1 depicts the composite principal community contour for the market defined by these four stations. Also shown in this figure are the transmitter sites of all operating commercial stations located within this contour. Table 5.1 is a tabulation of the stations depicted in this figure. As shown by this data, there are 28 stations, including KFFN, KMXZ-FM, KZPT, and KGMG whose transmitter sites lie within this composite contour. Since it is obvious that the principal community contour of any station whose transmitter site is located within this composite contour will overlap this contour,

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it can be safely said that there are at least twenty-eight stations in this market. In fact, this number would be even higher if stations whose transmitter sites are located outside this contour but whose principal community contours overlap this contour were included. No such further analysis is necessary in this case, however, since, in markets containing between 15 and 29 stations, Section 73.3555(a)(1)(iii) of the FCC Rules permits the common ownership of up to six stations, not more than four of which are in the same service. The instant situation involves the common ownership of four stations, one AM and three FM, which does not exceed the permitted maximum.

Based upon the above information, the proposed KZPT facilities fully comply with the multiple ownership restrictions outlined in Section 73.3555 of the FCC Rules.



KGMG
3.16 mV/m

**PROPOSED
KZPT
281A**

KGMG
292C2

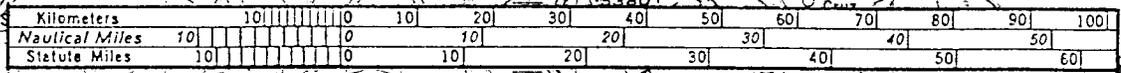
**KZPT
PROPOSED
3.16 mV/m**

KFFN
5 mV/m

KMZX-FM
235C

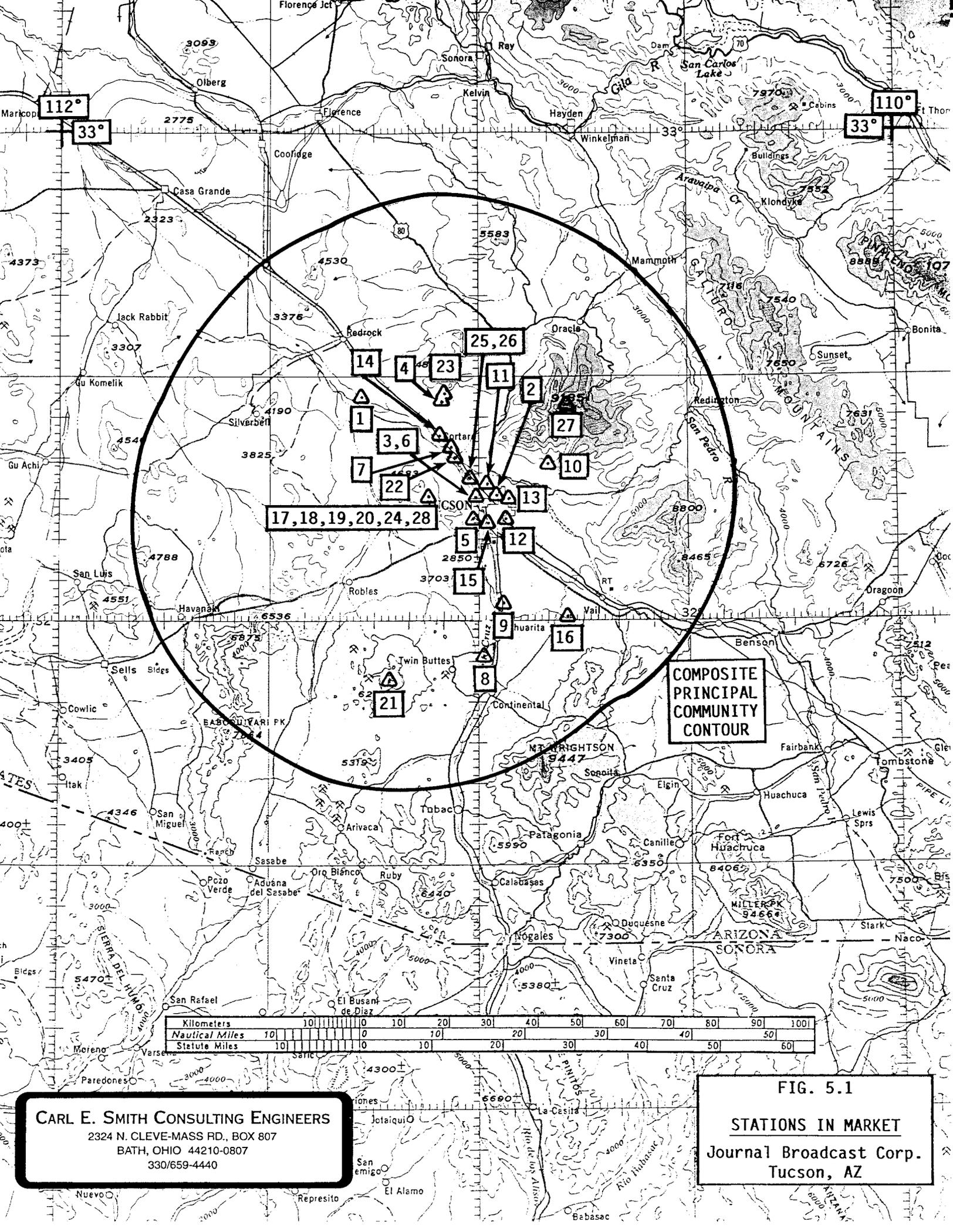
KFFN
1490 kHz

KMZX-FM
3.16 mV/m



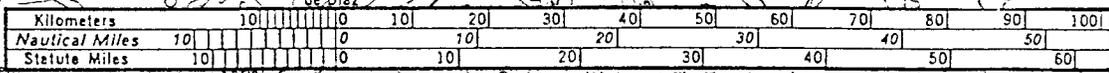
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FIG. 5.0
**PREDICTED PRINCIPAL
COMMUNITY CONTOURS**
Journal Broadcast Corp.
Tucson, AZ



17, 18, 19, 20, 24, 28

COMPOSITE
PRINCIPAL
COMMUNITY
CONTOUR



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FIG. 5.1
STATIONS IN MARKET
 Journal Broadcast Corp.
 Tucson, AZ

TABLE 5.1

STATIONS IN MARKET
Journal Broadcast Corporation
Tucson, AZ

<u>Station</u>	<u>Call</u>	<u>Frequency/ Channel</u>	<u>Location</u>
1	KSAZ	580	Marana, AZ
2	KVOI	690	Tucson, AZ
3	KNST	790	Tucson, AZ
4	KFLT	830	Tucson, AZ
5	KGMS	940	Tucson, AZ
6	KTKT	990	Tucson, AZ
7	KEVT	1030	Cortaro, AZ
8	KGVY	1080	Green Valley, AZ
9	KQTL	1210	Sahuarita, AZ
10	KJLL	1330	South Tucson, AZ
11	KTUC	1400	Tucson, AZ
12	KTZR	1450	Tucson, AZ
13	KFFN	1490	Tucson, AZ
14	KUAZ	1550	Tucson, AZ
15	KXEW	1600	South Tucson, AZ
16	KFMA	221C2	Green Valley, AZ
17	KOYT	225C	Tucson, AZ
18	KRQQ	229C	Tucson, AZ
19	KMXZ-FM	235C	Tucson, AZ
20	KLPX	241C	Tucson, AZ
21	KWFM-FM	246C3	Green Valley, AZ
22	KOAZ	248A	Oro Valley, AZ
23	KOHT	252A	Marana, AZ
24	KIIM-FM	258C	Tucson, AZ

TABLE 5.1 (cont'd)

<u>Station</u>	<u>Call</u>	<u>Frequency/ Channel</u>	<u>Location</u>
25	KCMT	270A	Oro Valley, AZ
26	KZPT	281A	Tucson, AZ
27	KGMG	292C2	Oracle, AZ
28	KHYT	298C	Tucson, AZ