

**ENGINEERING STATEMENT COVERING
BROADCAST MULTIPLE OWNERSHIP STUDY
UNITED STATES CP, LLC
RYE & WESTCLIFFE, COLORADO**

JANUARY 2005

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This engineering statement and supporting tabulations and figures has been prepared on behalf of **United States CP, LLC ("USCP")**. The purpose of the statement is to demonstrate **USCP** compliance with *Section 73.3555* of the Commission's Rules with respect to multiple ownership of AM & FM broadcast facilities.

USCP is filing 301 applications for two new FM channels. They are Channel 285A Rye, Colorado and Channel 249A Westcliffe, Colorado. Map Figure 1 attached depicts the 70 dBu in Blue for the two facilities:

CALL	ST	CITY	FREQ	CHN	CL	ERP	STAT
		LATITUDE	LONGITUDE	HAAT:m	AMSL:m		

WESTCLIFFE			97.7 MHz	A	6000.00	APP	
		37-59-39.4 N	105-27-40.0 W	-156.069	2659.000		

RYE			104.9 MHz	A	6000.00	APP	
		37-56-40.0 N	104-59-56.0 W	19.306	2560.000		

By examination of this map it is apparent that the **USCP** Rye and Westcliffe facilities are not associated with principal community contour overlap with each other. A search of the FCC CDBS revealed one FM station which duplicates the Westcliffe 70 dBu and 5AM stations which enter the Rye 70 dBu. These facilities are also plotted on Figure 1. The FM 70 dBu contour is plotted in green while the AM 5 mV/m contours are plotted in red. The stations are listed below:

Other FM

CALL	ST	CITY	FREQ	CHN	CL	ERP	STAT
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ARN OWNER

LATITUDE	LONGITUDE	HAAT:m	AMSL:m
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KWMV-LP	CO	WESTCLIFFE	95.90000	LP100	100.00	CP MOD	
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BMPL20040511AAR CRYSTAL MOUNTAIN CENTER FOR THE PERFORMING ARTS

		38-08-04.0 N	105-27-41.0 W	-149.014	2423.000		
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Other AM

CALL	ST	CITY	FREQ	PAT	AG	PWR	DESC
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ARN OWNER

LATITUDE LONGITUDE

KAVA	CO	PUEBLO	1480.00000	LD	AG	1.000	DA2
	BL	LATINO COMMUNICATIONS, LLC					
38-18-56.0 N 104-37-03.0 W							

KRMX	CO	PUEBLO	690.00000	LD		0.250	ND1
	BL	METROPOLITAN RADIO GROUP, INC.					
38-17-48.0 N 104-38-47.0 W							

KKPC	CO	PUEBLO	1230.00000	LD		1.000	ND1
		BML20010529ADH PUBLIC BROADCASTING OF COLORADO, INC.					
38-16-38.0 N 104-39-13.0 W							

KGHF	CO	PUEBLO	1350.00000	LD		5.000	ND1
		BL19981105KA CLEAR CHANNEL BROADCASTING LICENSES, INC.					
38-16-38.0 N 104-39-13.0 W							

KFEL	CO	PUEBLO	970.00000	LD		3.200	ND1
		BL19890502AD WELLSPRING HARVEST MINISTRIES, INC.					
38-15-57.0 N 104-40-44.0 W							

RADIO MARKETS & METHODOLOGY

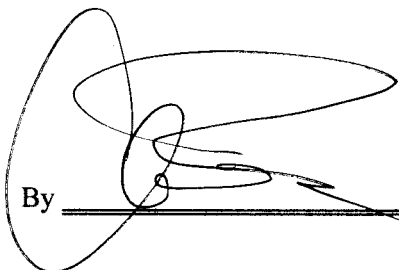
The “radio market” applicable to common ownership or control of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. In this case there are two markets made up of the two FM station applications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

Westcliffe, Colorado is located in Custer County, Colorado which is not part of any Arbitron metro using the Arbitron Market definition for Fall 2004. Rye, Colorado is located in Pueblo County which is the metro county for the Pueblo, Colorado Arbitron Market.

Only known CP or licensed operating full service stations were employed in the study. 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.

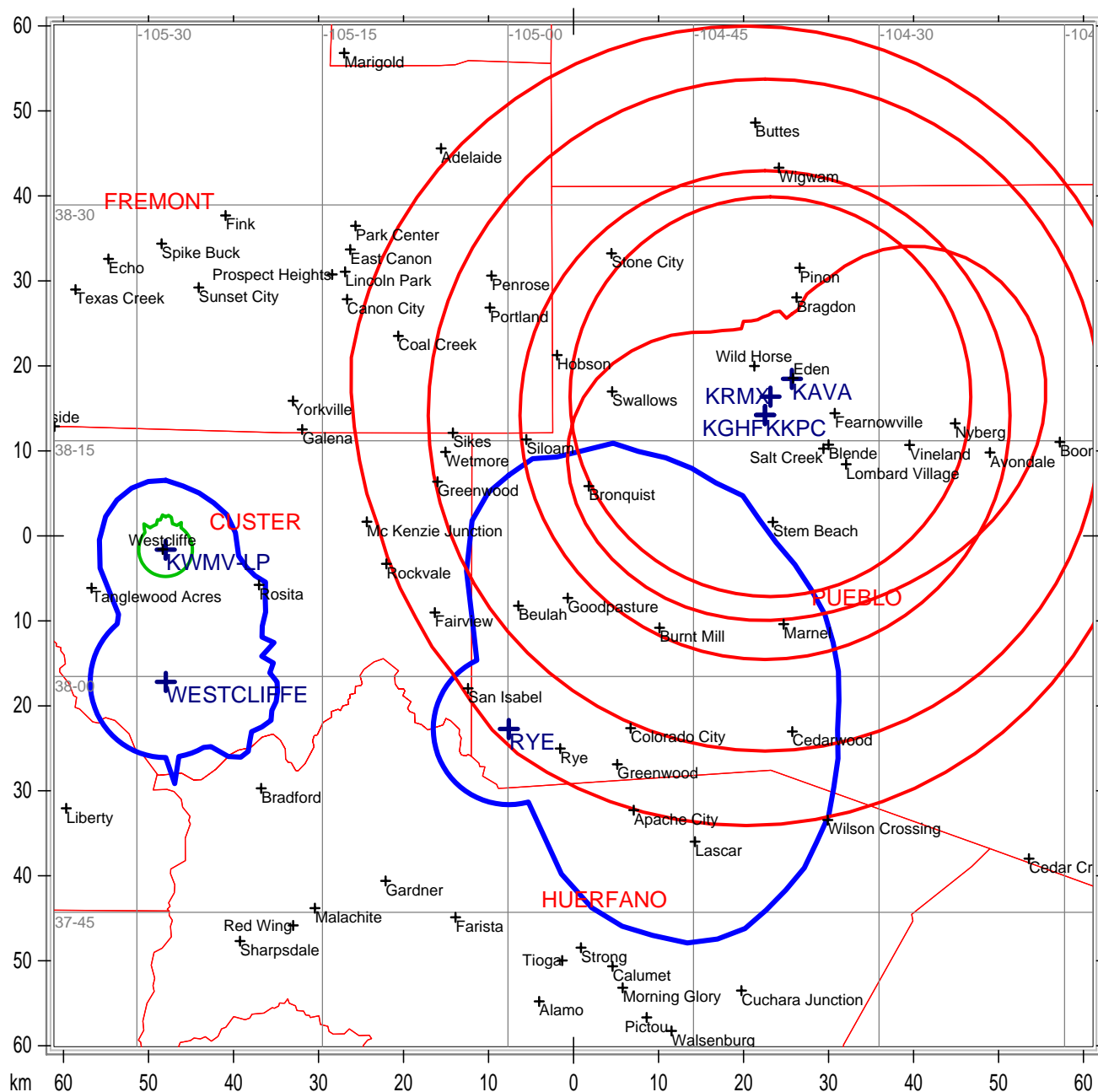
Based on the above analysis, it is believed that the proposed common ownership of stations complies with *Section 73.3555* of the Commission’s Rules as there is no principal community contour overlap associated with the proposed Rye and Westcliffe facilities and neither facility is without at least one other service that duplicates some portion of the principal community contour.

The foregoing was prepared on behalf of **United States CP, 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  _____

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

UNITED STATES CP, LLC CH 285A RYE, CO & CH 249A WESTCLIFFE, CO WITH OTHER SERVICES



Communications Technologies, Inc. Marlton, New Jersey

County Borders Lat/Lon Grid