

**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			

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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
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					
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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  
ARN            OWNER  
LATITUDE LONGITUDE

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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**

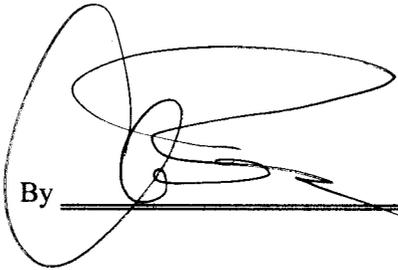
The “radio market” applicable to common ownership or control of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. In this case there are two markets made up of the two FM station applications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

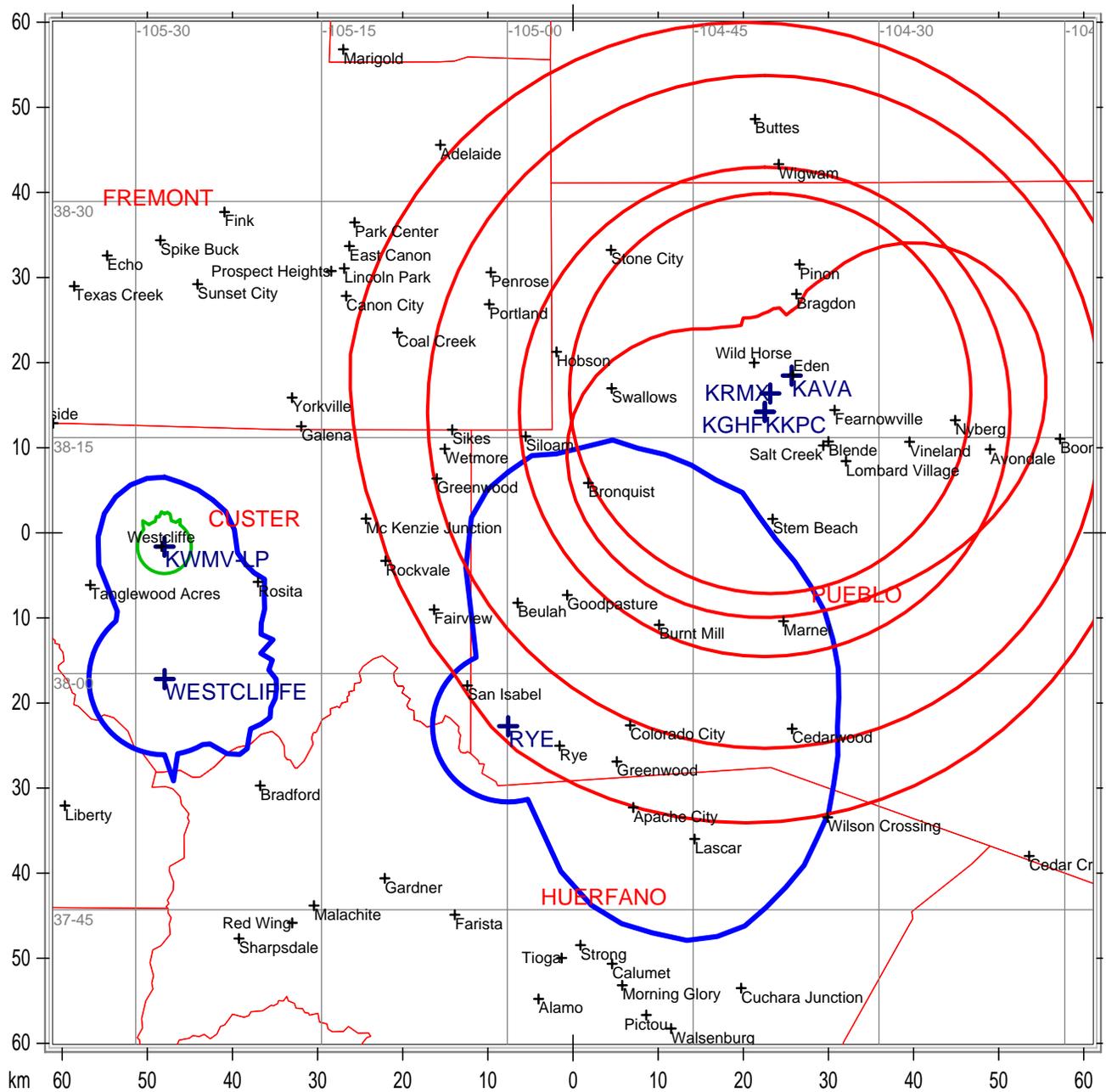
Based on the above analysis, it is believed that the proposed common ownership of stations complies with *Section 73.3555* of the Commission’s Rules as there is no principal community contour overlap associated with the proposed Rye and Westcliffe facilities and neither facility is without at least one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