

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
ENTERCOM DENVER LICENSE, LLC.

This statement and the attached figures have been prepared on behalf of Entercom Denver License, LLC. (EDLL), as part of a study to determine if the radio stations tabulated below could be commonly owned or controlled. EDLL has attributable interest in stations KOSI(FM), KKHK(FM), and KEZW(AM) and proposes to acquire FM station KALC(FM).

Call Sign	Location	Facilities
KALC(FM)	Denver, CO	Channel 290C, 100 kW (DA), 448 m
KOSI(FM) Lic. Facility	Denver, CO	Channel 266C, 100 kW (DA), 495 m
KOSI(FM) Authorized CP	Denver, CO	Channel 266C, 100 kW (DA), 495 m
KKHK(FM) Lic. Facility	Denver, CO	Channel 258C, 100 kW (DA), 495 m
KKHK(FM) Authorized CP	Denver, CO	Channel 258C, 100 kW (DA), 495 m
KEZW(AM)	Aurora, CO	1430 kHz, 10 kW-D, DA-N

Since these stations have overlapping principal community contours (3.16 mV/m for FM stations, 5 mV/m for AM stations), an ownership study has been prepared in accordance with the Federal Communications Commission multiple ownership rules (See Section 73.3555 of the FCC Rules).

Radio Market

The "radio market" applicable to common ownership 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.\* The predicted principal contours of the stations tabulated above are shown on Figure 1 herein. There is one "radio market" for analysis under the Commission's Rules. The table below lists the defined market:

Defined Radio Market	Stations that Define Radio Market
	FM/AM stations
Market 1	KALC(FM), KOSI(FM), KKHK(FM), KEZW(AM)

#### Count of Stations in Defined Markets

The number of radio stations in a "radio market" is determined by counting the operating, commercial stations having principal community contours which overlap or intersect the principal community contours which define the radio market, plus the subject stations to be co-owned. The result of the analysis is tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	6 AM, 6 FM; (At least 12 stations)

Figure 2, is a tabulation of radio stations identified in the defined radio market. It is noted that there are at least 12 stations in the defined market.<sup>†</sup> Only known licensed, operating commercial stations were employed for the study. 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 conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR 73.313. Terrain data was derived from the

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\* See Order in Implementation of Section 202(a) and 202(b)(1) of the Telecommunications Act of 1996 (Broadcast Radio Ownership) FCC 96-90, released March 8, 1996 and Memorandum Opinion and Order in Revision of Radio Rules and Policies 7 FCC Rcd 6387, 6395 para. 39 (1992).

<sup>†</sup> There are several other stations within the defined market, however 12 stations was more than enough to show compliance with Section 73.3555(a) of the FCC Rules.

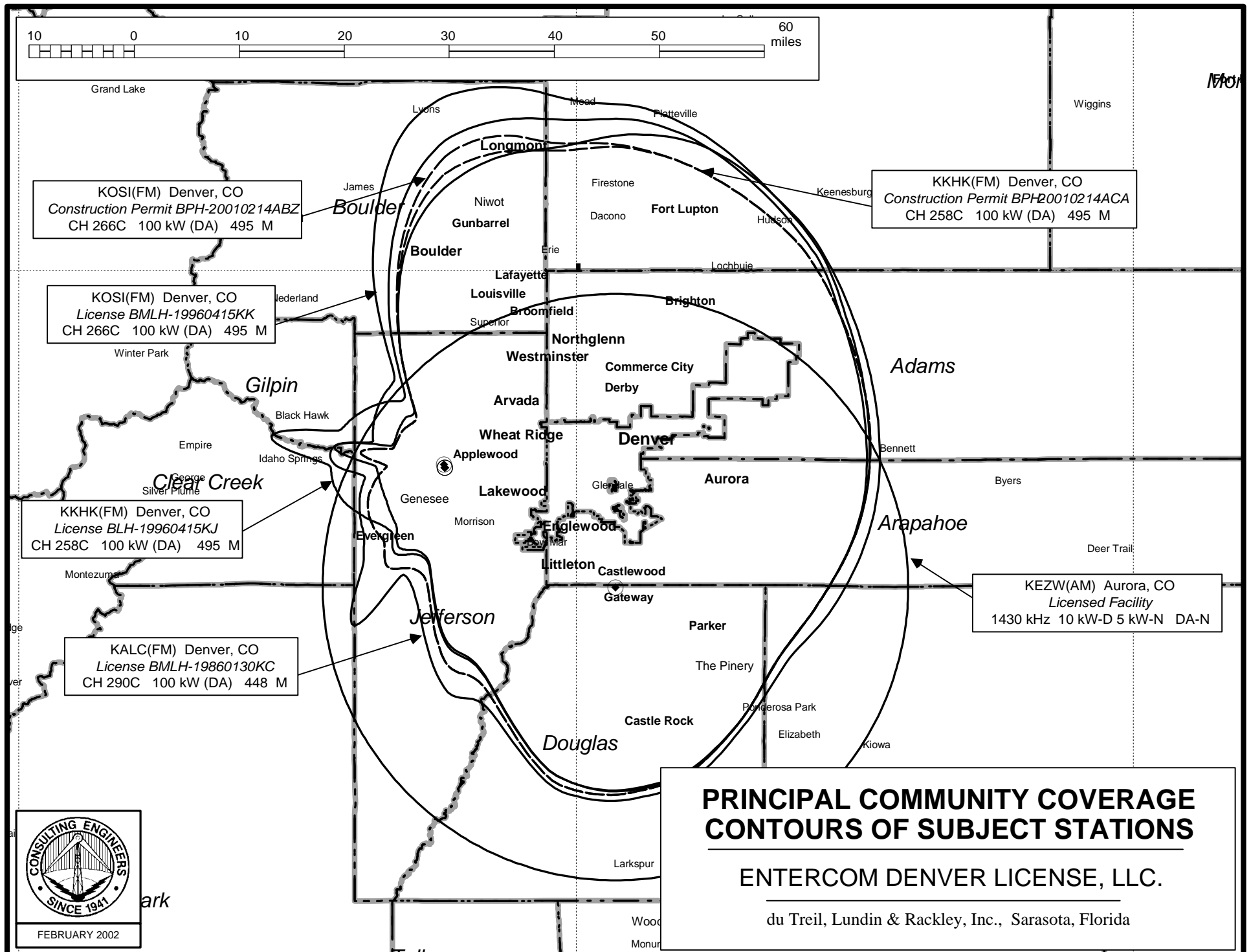
N.G.D.C. 30-second computer database for each of the FM stations using radials evenly-spaced every 10 degrees of azimuth.

Based on the above, it is believed the proposed combination of stations complies with Section 73.3555(a) of the FCC Rules.

Jerome J. Manarchuck

du Treil, Lundin & Rackley, Inc.  
201 Fletcher Ave.  
Sarasota, Florida 34237  
(941)329-6000

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Tabulation of Stations in the Radio Market

Market 1	
Number	Station
AM Stations	
1	KLZ(AM), Denver, CO, 560 kHz
2	KHOW(AM), Denver, CO, 630
3	KLTT(AM), Commerce City, CO, 670
4	KNUS(AM), Denver, CO, 710
5	KKZN(AM), Thornton, CO, 760
6	KLDC(AM), Brighton, CO, 800
FM Stations	
1	KJMN(FM), Castle Rock, CO, Ch. 221
2	KDJM(FM), Greeley, CO, Ch. 223
3	KTCL(FM), Fort Collins, CO, Ch. 227
4	KRKS-FM, Boulder, CO, Ch. 234
5	KFMD(FM), Denver, CO, Ch. 239
6	KBCO-FM, Boulder, CO, Ch. 247