

**ENGINEERING STATEMENT COVERING
BROADCAST MULTIPLE OWNERSHIP STUDY
BIG ISLAND BROADCASTING, INC.
CAPTAIN COOK AND HAIKU, HAWAII**

DECEMBER 2004

**ENGINEERING STATEMENT COVERING
BROADCAST MULTIPLE OWNERSHIP STUDY
BIG ISLAND BROADCASTING, INC.
CAPTAIN COOK AND HAIKU, HAWAII**

DECEMBER 2004

This engineering statement and supporting tabulations and figures has been prepared on behalf of **Big Island Broadcasting, Inc. (“BIB”)**. The purpose of the statement is to demonstrate **BIB** compliance with *Section 73.3555* of the Commission’s Rules with respect to multiple ownership of FM broadcast facilities.

BIB proposes common ownership in the following two stations:

NEW	Captain Cook, HI	CH 226CO	FM073
NEW	Haiku, HI	CH 293C	FM074

These two stations are considered as two markets since the principal community contour for the Captain Cook station does not overlap the principal community contour of the Haiku station.

A multiple ownership analysis was prepared considering the above described radio stations under proposed common ownership or control, which stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) in accordance with *Section 73.3555* of the FCC Rules.

RADIO MARKETS & METHODOLOGY

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. In this case, Market No. 1 is made up of the Channel 226CO Captain Cook facility while Market No. 2 is made up of the Channel 293C Haiku facility. The predicted principal community contours for both stations are shown on Figure 1, attached. Counties in the markets include:

Market 1 (Captain Cook, HI)

Hawaii

Market 2 (Haiku, HI)

Maui

Captain Cook, Hawaii is located in Hawaii County, Hawaii which is not part of any Arbitron metro. Based on the Arbitron Market Definition for Honolulu, Hawaii, Fall 2004, Honolulu County in Hawaii is the metro county. Haiku is located in Maui County, Hawaii and is not part of the metro. Since both communities all lie outside of an Arbitron metro, the markets are determined by contour overlap.

Since the principal community contours do not overlap a simplified analysis of other stations was undertaken to demonstrate that an adequate number of other services exist. In the case of Market 1 a total of four other FM stations have their primary transmitter sites located within 1 km of the FM 073 proposed site. These stations are listed below:

KAGB	CH 256C	Waimea, HI
KAQY	CH 268C1	Kealahou, HI
KLEO	CH 291C	Kahului, HI
KLUA	CH 230C	Kailua Kona, HI

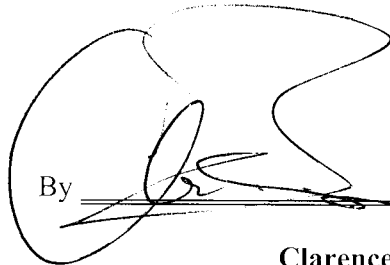
For Market 2 a total of five other FM stations have their primary transmitter sites on the same tower as that proposed for FM 074. These stations are listed below:

KPOA	CH 228C	Lahaina, HI
KJMD	CH 252C1	Pukalani, HI
KNUI	CH 260C	Kahului, HI
KLHI	CH 266C	Lahaina, HI
KONI	CH 284C	Lanai City, HI

Only known CP or licensed operating full service commercial 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 N.G.D.C. 3-second computer database for each of the FM stations, using radials spaced every 5 degrees of azimuth.

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 are a minimum of 5 FM stations in Market No. 1 and 6 FM stations in Market No. 2. **BIB** will own one FM station in each market.

The foregoing was prepared on behalf of **Big Island Broadcasting, Inc.** 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

SUBSCRIBED AND SWORN TO before me,

this 27th day of December, 2004,

Esther G. Sperbeck, NOTARY PUBLIC

ESTHER G. SPERBECK
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES OCT. 15, 2007

The map displays the Hawaiian Islands with a coordinate grid. Latitude lines are marked at 19-30, 20-00, 20-30, and 21-00. Longitude lines are marked at -157-00, -156-30, -156-00, and -155-30. A scale bar at the bottom left indicates distances in kilometers (km) from 0 to 120. The three major volcanoes are highlighted with red text and symbols: KALAWAO (Kilauea) on the Big Island, MAUI (Mauna Loa) on Maui, and HAWAII (Kilauea) on the island of Hawaii. Other locations labeled include Hilo, Kona, Maunaloa, and many smaller towns and landmarks across the islands. The map also shows the outlines of the islands and the surrounding ocean.

 National Borders
 County Borders
 City Borders
 Lat/Lon Grid