

**ENGINEERING STATEMENT COVERING
BROADCAST MULTIPLE OWNERSHIP STUDY
CCR-BUTTE IV, LLC
BUTTE, MONTANA**

JANUARY 2014

This engineering statement and supporting tabulations and figures have been prepared on behalf of **CCR-Butte IV, LLC** (“CCR”). The purpose of this statement is to demonstrate continued CCR compliance with *Section 73.3555* of the Commission’s Rules with respect to multiple ownership of AM and FM broadcast facilities. This study is filed for the purpose of reflecting a change in ownership structure for the commonly owned stations in the market. No facility changes are associated with this filing.

CCR proposes continued common ownership in the following three stations in the Butte, Montana market:

KXTL(AM)	Butte, MT.	1370 kHz	5 kW DA-N	Fac. ID #63871
KMBR(FM)	Butte, MT.	95.5 MHz	50.0 kW	Fac. ID #63875
KAAR(FM)	Butte, MT.	92.5 MHz	4.5 kW	Fac. ID #63877

The stations are not licensed to Arbitron Metro counties and thus the contour method was used to determine the number of stations in the market. These three stations are considered as one market since the principal community contours for all three stations have an area of common overlap. It is noted that CCR owned stations KBLL-FM and KZMT(FM), both allocated to Helena, Montana, overlap a portion of the KMBR and KAAR contours. These stations are not counted in this market and are addressed fully in the market study prepared for CCR-Helena IV, LLC. The market coverage analysis was undertaken by BIA and is attached.

A review of the BIA study shows that 22 other stations duplicate some portion of the market. Based on the above analysis, it is believed that the proposed common ownership of stations complies with *Section 73.3555(a)(1)(iii)* of the Commission’s Rules. There are 17 other FM and 5 other AM stations considered in this study which are listed on pages 6 and 7 of the BIA study and whose principal community contours overlap some portion of the KMBR (FM) 70 dBu contour. Since CCR can own up to four stations in the

same service, overlap with KMBR(FM) and KAAR(FM) is permitted as is demonstrated fully in the CCR-Helena IV, LLC market analysis.

The foregoing was prepared on behalf of **CCR-Butte IV, LLC** (“CCR”) by Clarence M. Beverage of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The undersigned certifies, under penalty of perjury, that 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

January 31, 2014

Communications Technologies Inc
Marlton, NJ

Page 1
Friday, January 31, 2014

Dataworld LMA/Duopoly Market Coverage Analysis

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Job Title: CCR-Butte IV LLC

Primary Stations

Title: CCR-Butte IV LLC

Database: DW

City of license Licensee	St	Call sign	Srv	Auth Owner	FCC file number	Freq	Cls LMA status	ERP/ DkW	HAAT/ NkW	Latitude Longitude
Butte CCR-Butte IV, LLC	MT	KXTL	AM	Lic	BL-20070521AIX	1370 kHz	B/B LMA record	5.000	5.000	N 46° 00' 21.0" W 112° 37' 54.0"
Butte CCR-Butte IV, LLC	MT	KAAR	FM	Lic	BLH-19950106KC	92.5 MHz	C1 LMA record	4.500	549.9	N 46° 00' 29.0" W 112° 26' 30.0"
Butte CCR-Butte IV, LLC	MT	KMBR	FM	Lic	BLH-19800128AE	95.5 MHz	C LMA record	50.000	554.7	N 46° 00' 29.0" W 112° 26' 30.0"

>> End of Primary Stations <<

Jointly Owned Stations

Title: CCR-Butte IV LLC

Database: DW

City of license Licensee	St	Call sign	Srv	Auth Owner	FCC file number	Freq	Cls LMA status	ERP/ DkW	HAAT/ NkW	Latitude Longitude
Helena CCR-Helena IV, LLC	MT	*KBLL-FM	FM	Lic	BLH-20060206ABG	99.5 MHz	C1 LMA record	12.000	589.0	N 46° 44' 52.0" W 112° 19' 48.0"
Helena CCR-Helena IV, LLC	MT	*KZMT	FM	Lic	BLH-20041122ACA	101.1 MHz	C LMA record	91.200	607.0	N 46° 44' 52.0" W 112° 19' 48.0"

*See explanation in Helena, Montana market study.

>> End of Jointly Owned Stations <<

**Communications Technologies Inc
Marlton, NJ**

Distance to City Grade Contour for Proposed LMA/Duopoly Stations

Title: CCR-Butte IV LLC

Database: DW

Bearing (deg)	KXTL Dist. (km)	KMBR Dist. (km)	KAAR Dist. (km)
.0	19.2	57.5	34.6
5.0	19.2	60.0	36.6
10.0	19.2	60.8	37.2
15.0	19.2	60.1	36.7
20.0	19.2	57.2	34.3
25.0	19.2	51.4	30.4
30.0	19.2	44.2	25.5
35.0	19.2	40.5	23.0
40.0	19.2	38.5	21.5
45.0	19.2	36.3	20.1
50.0	19.2	34.7	19.1
55.0	19.3	35.3	19.5
60.0	19.3	37.0	20.6
65.0	19.3	38.8	21.7
70.0	19.3	41.6	23.7
75.0	19.3	41.9	23.9
80.0	19.3	42.5	24.4
85.0	19.3	48.6	28.6
90.0	19.3	52.2	31.0
95.0	19.3	54.2	32.3
100.0	19.3	56.7	34.0
105.0	19.3	61.2	37.5
110.0	19.3	62.9	39.1
115.0	19.3	62.9	39.1
120.0	19.3	62.7	38.9
125.0	19.3	63.0	39.2
130.0	19.2	61.9	38.3
135.0	19.2	60.7	37.1
140.0	19.2	58.7	35.5
145.0	19.2	57.3	34.4
150.0	19.2	55.9	33.5
155.0	19.2	56.2	33.7
160.0	19.2	56.0	33.5
165.0	19.2	53.2	31.6
170.0	19.2	50.0	29.6
175.0	19.2	52.4	31.1
180.0	19.2	55.0	32.8
185.0	19.2	60.1	36.7
190.0	19.2	62.7	38.9
195.0	19.2	64.4	40.5
200.0	19.2	65.3	41.4
205.0	19.2	66.9	42.9
210.0	19.2	67.7	43.6
215.0	19.2	67.6	43.5
220.0	19.2	67.4	43.3
225.0	19.2	67.3	43.2
230.0	19.2	66.4	42.4
235.0	19.3	66.1	42.1
240.0	19.3	66.3	42.3
245.0	19.3	67.2	43.1
250.0	19.3	67.6	43.4

Communications Technologies Inc
Marlton, NJ

Distance to City Grade Contour for Proposed LMA/Duopoly Stations

Title: CCR-Butte IV LLC

Database: DW

<u>Bearing</u> <u>(deg)</u>	<u>KXTL</u> <u>Dist. (km)</u>	<u>KMBR</u> <u>Dist. (km)</u>	<u>KAAR</u> <u>Dist. (km)</u>
255.0	19.3	68.2	44.1
260.0	19.3	68.7	44.5
265.0	19.3	69.1	44.9
270.0	19.3	69.0	44.8
275.0	19.3	68.2	44.0
280.0	19.3	67.3	43.2
285.0	19.3	66.5	42.4
290.0	19.3	65.2	41.2
295.0	19.3	65.1	41.1
300.0	19.3	64.3	40.4
305.0	19.3	63.4	39.6
310.0	19.2	62.4	38.7
315.0	19.2	60.3	36.8
320.0	19.2	58.5	35.4
325.0	19.2	53.9	32.1
330.0	19.2	53.1	31.6
335.0	19.2	51.7	30.6
340.0	19.2	50.5	29.9
345.0	19.2	51.5	30.5
350.0	19.2	54.7	32.7
355.0	19.2	56.4	33.8

>> End of Distance to City Grade Contour for Proposed LMA/Duopoly Stations <<

Communications Technologies Inc
Marlton, NJ

Stations Processed in LMA/Duopoly Study

Title: CCR-Butte IV LLC

Database: DW

City of license Licensee	St	Call sign	Srv	Auth Owner	FCC file number	Freq	Cls LMA status	ERP/ DkW	HAAT/ NkW	Latitude Longitude
Anaconda A.W.A.R.E., Inc.	MT	KANA	AM	Lic	BL-20020104ABA	580 kHz	D/B Xmtr in Con.	1.000	0.197	N 46° 07' 43.0" W 112° 55' 25.0"
Butte Butte Broadcasting Inc.	MT	KBOW	AM	Lic		550 kHz	B/B Xmtr in Con.	5.000	1.000	N 45° 58' 30.0" W 112° 34' 18.0"
Deer Lodge Robert Cummings Toole	MT	KBCK	AM	Lic	BL-20061219ADJ	1400 kHz	C/C Xmtr in Con.	1.000	1.000	N 46° 24' 53.0" W 112° 43' 17.0"
East Helena KGR, LLC	MT	KKGR	AM	Lic	BL-20080603ADL	680 kHz	D/B Con. Overlap	5.000		N 46° 34' 08.0" W 111° 54' 32.0"
Helena Montana Radio Company, LLC	MT	KMTX	AM	Lic		950 kHz	B/B Con. Overlap	5.000	5.000	N 46° 40' 28.0" W 112° 01' 05.0"
Anaconda Butte Broadcasting Inc.	MT	KGLM	FM	Lic	BLH-20090511AHC	97.7 MHz	C3 Xmtr in Con.	2.750	300.0	N 46° 06' 04.0" W 112° 56' 59.0"
Belgrade Hi-Line Radio Fellowship, Inc.	MT	KGCM	FM	Lic	BLED-20060504ACK	90.9 MHz	C3 Con. Overlap	5.500	190.0	N 45° 57' 25.0" W 111° 22' 11.0"
Bozeman Educational Media Foundation	MT	KLBZ	FM	Lic	BLED-20070927AIK	89.3 MHz	C2 Con. Overlap	7.000	207.0	N 45° 57' 25.0" W 111° 22' 11.0"
Bozeman Board of Regents - Montana Unive	MT	KGLT	FM	Lic	BLED-20040217ADI	91.9 MHz	C2 Con. Overlap	12.000	261.0	N 45° 57' 25.0" W 111° 22' 11.0"
Bozeman Townsquare Media Bozeman License	MT	KZMY	FM	Lic	BLH-20031120AAI	103.5 MHz	C1 Con. Overlap	100.000	289.0	N 45° 57' 25.0" W 111° 22' 11.0"
Butte Family Stations, Inc.	MT	KFRD	FM	Lic	BMLE-20130716AAS	88.9 MHz	C1 Xmtr in Con.	2.800	527.0	N 46° 00' 27.0" W 112° 26' 30.0"
Butte Hi-Line Radio Fellowship, Inc.	MT	KJLF	FM	Lic	BLED-20080211ADA	90.5 MHz	C2 Xmtr in Con.	1.000	530.0	N 46° 00' 22.0" W 112° 26' 33.0"
Butte University of Montana	MT	KAPC	FM	Lic	BLED-19990222KB	91.3 MHz	C2 Xmtr in Con.	0.800	571.0	N 46° 00' 27.0" W 112° 26' 30.0"
Butte Butte Broadcasting Inc.	MT	KOPR	FM	Lic	BLH-19880902KA	94.1 MHz	C Xmtr in Con.	60.000	566.0	N 46° 00' 23.0" W 112° 26' 28.0"
Butte Associated Students of Montana T	MT	KMSM	FM	Lic	BLH-20110816ABB	103.9 MHz	A Xmtr in Con.	0.740	-68.0	N 46° 00' 44.0" W 112° 33' 26.0"
Deer Lodge Robert Cummings Toole	MT	KQRV	FM	Lic	BLH-20000407ACG	96.9 MHz	C1 Xmtr in Con.	20.000	300.0	N 46° 06' 03.0" W 112° 57' 00.0"
Dillon Dead-Air Broadcasting Company, I	MT	KBEV	FM	Lic	BLH-19930625KB	98.3 MHz	C3 Con. Overlap	10.500	150.9	N 45° 14' 22.0" W 112° 40' 03.0"

Communications Technologies Inc
Marlton, NJ

Stations Processed in LMA/Duopoly Study

Title: CCR-Butte IV LLC

Database: DW

City of license Licensee	St	Call sign	Srv	Auth Owner	FCC file number	Freq	Cls LMA status	ERP/ DkW	HAAT/ NkW	Latitude Longitude
Helena Hi-Line Radio Fellowship, Inc.	MT	KVCM	FM	Lic	BLED-20060327AFZ	103.1 MHz	C1 Con. Overlap	30.000	235.0	N 46° 46' 07.0" W 112° 01' 21.0"
Helena Montana Radio Company, LLC	MT	KMTX	FM	Lic	BLH-19900314KB	105.3 MHz	C Con. Overlap	100.000	593.0	N 46° 44' 52.0" W 112° 19' 47.0"
Whitehall Educational Media Foundation	MT	KQLR	FM	Lic	BLED-20061227AAI	89.7 MHz	C2 Xmtr in Con.	1.450	547.0	N 46° 00' 22.0" W 112° 26' 33.0"
Helena Valley SE Montana Radio Company, LLC	MT	KIMO	FM	Lic	BLH-20111017AAN	107.3 MHz	C Con. Overlap	86.000	659.0	N 46° 49' 30.0" W 111° 42' 13.0"
Whitehall Montana Radio Company, LLC	MT	KKRK	FM	Lic	BLH-20130918ACT	106.5 MHz	A Xmtr in Con.	2.800	0.0	N 46° 04' 54.0" W 112° 06' 53.0"

>> End of Stations Processed in LMA/Duopoly Study <<

**Communications Technologies Inc
Marlton, NJ**

Transmitter Site-to-Site Distance and Bearing Calculations

Title: CCR-Butte IV LLC

Database: DW

Stations Processed	KXTL		KMBR		KAAR	
	Dist. (km)	Br. (deg)	Dist. (km)	Br. (deg)	Dist. (km)	Br. (deg)
KANA	26.3	301.3	39.5	290.0	39.5	290.0
KBOW	5.8	126.5	10.7	249.9	10.7	249.9
KBCK	46.0	351.4	50.1	334.6	50.1	334.6
KKGR	83.7	41.3	74.6	33.1	74.6	33.1
KMTX	88.0	32.1	80.9	23.5	80.9	23.5
KGLM-FM	26.7	293.5	40.5	285.0	40.5	285.0
KGCM	97.6	92.7	83.0	93.5	83.0	93.5
KLBZ	97.6	92.7	83.0	93.5	83.0	93.5
KGLT	97.6	92.7	83.0	93.5	83.0	93.5
KZMY	97.6	92.7	83.0	93.5	83.0	93.5
KFRD	14.7	89.2	.1	180.0	.1	180.0
KJLF	14.6	89.8	.2	196.5	.2	196.5
KAPC	14.7	89.2	.1	180.0	.1	180.0
KOPR	14.7	89.7	.2	167.1	.2	167.1
KMSM-FM	5.8	82.9	8.9	273.0	8.9	273.0
KORV	26.7	293.4	40.6	284.9	40.6	284.9
KBEV-FM	85.3	181.9	87.2	191.7	87.2	191.7
KVCM	96.8	28.6	90.5	20.7	90.5	20.7
KMTX-FM	85.7	15.6	82.7	5.9	82.7	5.9
KQLR	14.6	89.8	.2	196.5	.2	196.5
KIMO	115.7	218.3	107.1	31.6	107.1	31.6
KKRK	40.8	77.9	26.5	71.9	26.5	71.9

>> End of Transmitter Site-to-Site Distance and Bearing Calculations <<

Communications Technologies Inc
Marlton, NJ

Summary of Proposed LMA/Duopoly Analysis

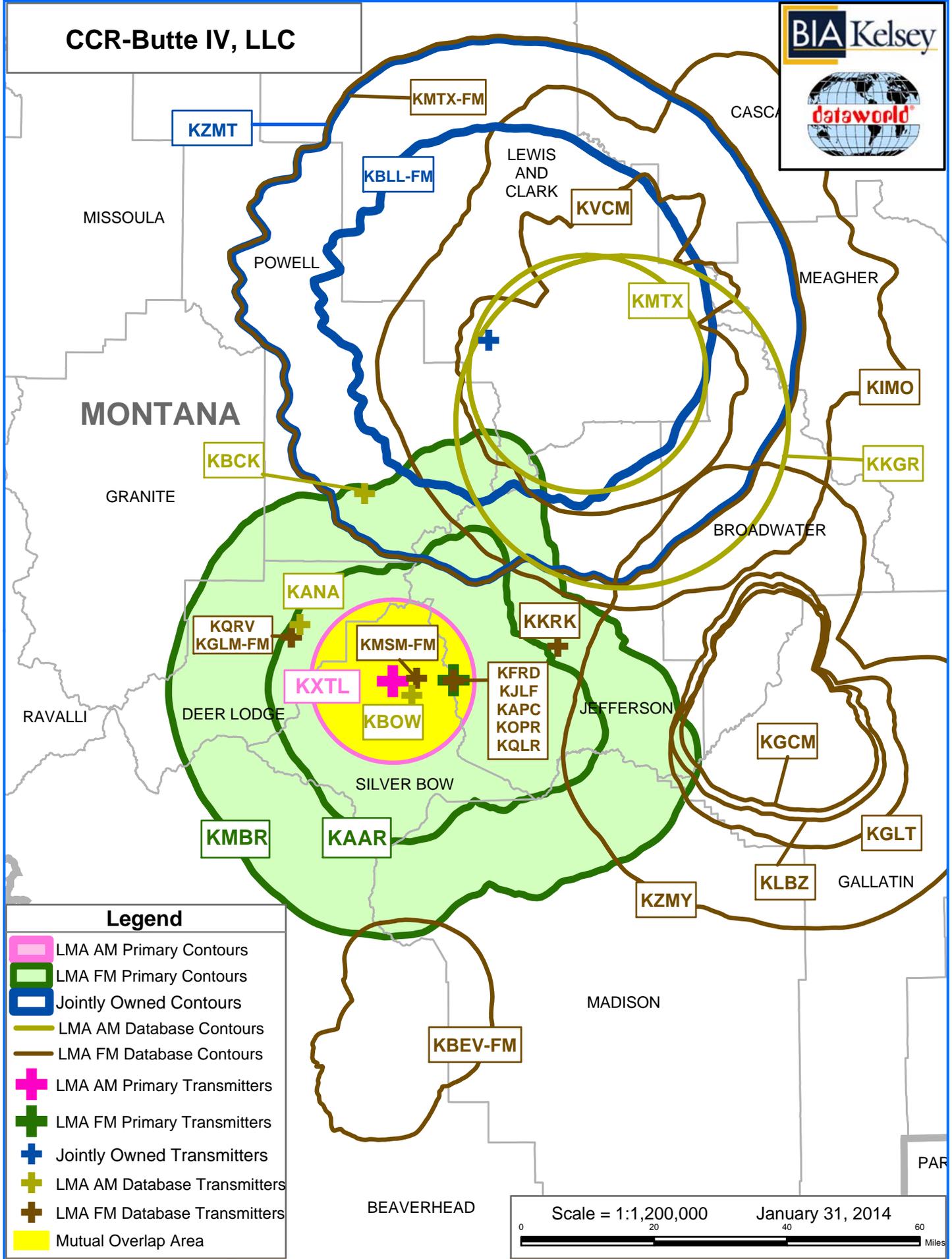
Title: CCR-Butte IV LLC

Database: DW

<u>Stations Processed</u>	<u>KXTL LMA Status</u>	<u>KMBR LMA Status</u>	<u>KAAR LMA Status</u>
KANA	Con. Overlap	Xmtr in Con.	Xmtr in Con.
KBOW	Xmtr in Con.	Xmtr in Con.	Xmtr in Con.
KBCK		Xmtr in Con.	
KKGR		Con. Overlap	
KMTX		Con. Overlap	
KGLM-FM	Con. Overlap	Xmtr in Con.	Xmtr in Con.
KGCM		Con. Overlap	
KLBZ		Con. Overlap	
KGLT		Con. Overlap	
KZMY		Con. Overlap	Con. Overlap
KFRD	Xmtr in Con.	Xmtr in Con.	Xmtr in Con.
KJLF	Xmtr in Con.	Xmtr in Con.	Xmtr in Con.
KAPC	Xmtr in Con.	Xmtr in Con.	Xmtr in Con.
KOPR	Xmtr in Con.	Xmtr in Con.	Xmtr in Con.
KMSM-FM	Xmtr in Con.	Xmtr in Con.	Xmtr in Con.
KORV	Con. Overlap	Xmtr in Con.	Xmtr in Con.
KBEV-FM		Con. Overlap	
KVCM		Con. Overlap	
KMTX-FM		Con. Overlap	Con. Overlap
KQLR	Xmtr in Con.	Xmtr in Con.	Xmtr in Con.
KIMO		Con. Overlap	Con. Overlap
KKRK		Xmtr in Con.	Con. Overlap

>> End of Summary of Proposed LMA/Duopoly Analysis <<

CCR-Butte IV, LLC



Legend

- LMA AM Primary Contours
- LMA FM Primary Contours
- Jointly Owned Contours
- LMA AM Database Contours
- LMA FM Database Contours
- LMA AM Primary Transmitters
- LMA FM Primary Transmitters
- Jointly Owned Transmitters
- LMA AM Database Transmitters
- LMA FM Database Transmitters
- Mutual Overlap Area

Scale = 1:1,200,000 January 31, 2014