

STATEMENT OF EDWARD P. DELAHUNT
IN SUPPORT OF A
MULTIPLE OWNERSHIP SHOWING

RE: AMENDMENT MINOR CHANGE APPLICATION
KXGT(FM), JAMESTOWN, NORTH DAKOTA
FILE NO. BPH-20040526ADP

AMENDMENT MINOR CHANGE APPLICATION
KQDJ(FM), VALLEY CITY, NORTH DAKOTA
FILE NO. BPH-20040527AFW

APPLICATION FOR NEW(FM), WIMBLEDON, NORTH DAKOTA
AUCTION NO. 37A
FILE NO. BSFH-20040804AFN

I am a Radio Engineer. My education and experience are a matter of record with the Federal Communications Commission. I have been authorized to prepare this statement and exhibits in support of a Multiple Ownership showing.

This Multiple Ownership showing is prepared consistent with the Federal Communications Commission Public Notice entitled *REVISED FCC FORMS 301, 314, AND 315 APPROVED AND AVAILABLE FOR USE; MEDIA BUREAU ANNOUNCES END TO FREEZE ON THE FILING OF FORMS 301, 314, AND 315 FOR COMMERCIAL RADIO STATIONS*, DA 04-3204, released October 8, 2004.

The attached exhibits provide the requisite principal community contours. For AM stations the principal community contour is the predicted 5.0 mV/m daytime groundwave contour computed in accordance with Section 73.183 of the FCC Rules. For FM stations the principal

community contour is the predicted 70 dBu contour computed in accordance with Section 73.313 of the FCC Rules.

The proposed applications of KXGT(FM), KQDJ(FM) and the NEW(FM) create a radio duopoly market. This radio market is defined by the predicted principle community contours of commonly controlled stations:

KXGT(FM), Jamestown, North Dakota Ch 238C1

KQDJ(FM), Valley City, North Dakota Ch 266C1

KYNU(FM), Carrington, North Dakota Ch 252C1

NEW(FM), Wimbledon, North Dakota Ch 276C1

KOCV(AM), Valley City, North Dakota 1490 kHz

KQDJ(AM), Jamestown, North Dakota 1400 kHz

This market consists of 2 AM and 4 FM radio station. See Figure 1.

KXGT(FM), KQDJ(FM) and NEW(FM) have pending applications. Under a worst case analysis, assuming all pending applications were granted, there are at least 10 FM and AM radio stations (in addition to the subject stations) predicted to provide principal community coverage to a portion of the proposed new radio market.¹ See Figure 2.

In accordance with Section 73.3555(a)(1)(iii) of the FCC Rules, in a

¹ Sample of radio stations that provide principle community service to the defined market not commonly owned are: KSJB(AM), Jamestown, North Dakota; KQLX(AM), Lisbon, North Dakota; KPRJ(FM), Jamestown, North Dakota; KSJZ(FM), Jamestown, North Dakota; KDAM(FM), Hope, North Dakota; WDAY(FM), Fargo, North Dakota; KRNW(FM), Fargo, North Dakota; KKBX(FM), Fargo, North Dakota; KFBN(FM), Fargo, North Dakota; and KDSU(FM), Fargo, North Dakota.

radio market with between 15 and 29 (inclusive) full-power, commercial and non-commercial radio station, if the party has no more than 6 commercial radios stations and no more than 4 in the same service in the market, the party may own/operate this combination. The proposed applications are in full compliance with the requirements of Section 73.3555(a)(1)(iii).

This statement and the attached exhibits have been prepare for and by me and believe to be true and correct.


signed: Edward P De La Hunt

December 2004