

Multiple Ownership Study

The following engineering statement and attached exhibits have been prepared for **NRG Media, LLC**, and contain a multiple ownership study relative to the acquisition of facilities in, or near, the state of Nebraska.

Due to the number of stations within Nebraska under consideration, the grouping of Nebraska stations is being split into a western Nebraska sub-group, a northeast Nebraska sub-group, and an Omaha sub-group. The first map in this study depicts the principal community coverage contours of the facilities considered in the Nebraska grouping.

Following this first map is a map, which depicts the common facilities in the western Nebraska sub-group. Within this sub-group, there are three different markets defined. Two of these markets are new markets, while the third concerns the acquisition of KSYZ-FM, the study for which has previously been submitted to the Commission.

The first market under consideration is defined by the common overlap between KODY(AM) and KXNP(FM), both of which are licensed to North Platte, Nebraska. This market is comprised of the common overlap between two facilities, one in each service. Since this combination results in common overlap

between one AM station and one FM station, it is automatically in compliance with the provisions of Section 73.3555 of the Commission's Rules.

Nebraska Market #2 is comprised of the common overlap between KUVR(AM) and KMTY-FM at Holdrege, Nebraska, KGFW(AM), KRNY(FM), and KQKY(FM) at Kearney, Nebraska, and KLIQ(FM) at Hastings, Nebraska. In addition, Waitt Radio, Inc., the principals of which are principals in NRG, hold a joint sales agreement in KROR(FM) at Hastings, Nebraska. Since this JSA was in effect prior to the implementation of the revised multiple ownership rules, it is grandfathered and will not count against NRG for the number of stations in which NRG has an attributable interest.

This market is therefore defined by the common overlap between six (6) stations, four (4) of which are FM facilities. As a result, it is necessary and sufficient to demonstrate that there are at least fifteen (15) stations serving the market, which would comply with the interim contour methodology. The map analyzing this market depicts an additional twelve (12) facilities, the principal community coverage contour of which overlap with the market in question. The transmitter site for each of these twelve stations is located within 92 kilometers of the perimeter of the common overlap defining the market. As a result, it is respectfully submitted that this market would be in compliance with the provisions of Section 73.3555 of the Commission's Rules.

Market #3 is defined by the common overlap between KGFW(AM), KRNY(FM), and KQKY(FM) at Kearney, Nebraska, KSYZ-FM at Grand Island, Nebraska, and KLIQ(FM) at Hastings, Nebraska. In addition, the principal community coverage contour of KROR(FM) at Hastings, Nebraska also contributes to this market, however, for the reasons discussed in the previous market, it has been omitted from analysis in this market.

This market is therefore defined by the common overlap between five (5) stations, four of which are FM facilities. As a result of this grouping, it is necessary and sufficient to demonstrate that there are at least fifteen stations serving the market, which comply with the interim contour methodology provisions. As the map analyzing this market demonstrates, there are an additional twelve (12) stations serving the market, therefore, there are at least 17 stations in the market. Each of the twelve additional stations has a transmitter site located within 92 kilometers of the perimeter of the common overlap defining the market. As a result, this market is in compliance with Section 73.3555 of the Commission's Rules.

It was previously alluded to in this text that there was one market that had been previously submitted to the Commission for approval. This market, market #3 is that market. It has been included in this study for the benefit of the Staff,

although no changes in the concentration of facilities has been or is being proposed.

These three markets complete the analysis of the western Nebraska sub-group. The next four markets to be studied are located in what has been defined in this study as the northeast Nebraska sub-group. The next map in this report depicts the principal community coverage contours of the facilities involved in this sub-group, and by the orange shading, the markets defined for consideration.

Market #4 is comprised of the common overlap between KTCH(AM) at Wayne, Nebraska, and KKYA(FM) at Yankton, South Dakota. Since this market is comprised of one AM and one FM station, it is automatically in compliance with the provisions of Section 73.3555 of the Commission's Rules. It should be noted that in the discussion within the South Dakota grouping, a market involving KKYA(FM) with a station in Nebraska was mentioned. This market is that market to which that reference was made.

The fifth market is comprised of the common overlap between KNEN(FM) at Norfolk, Nebraska, and KTCH(AM) and KTCH-FM both at Wayne Nebraska. This market is therefore defined by the common overlap between three facilities, two of which are FM stations. As a result, it is necessary and sufficient to demonstrate that the proponent would not control greater than fifty percent (50%)

of the stations serving the market. As the map analyzing this market demonstrates, there are at least five (5) other stations, the principal community coverage contours of which overlap the market in question. Each of these five additional stations has a transmitter site located within 92 kilometers of the perimeter of the common overlap defining this market. It is therefore respectfully submitted that this market is in compliance with Section 73.3555 of the Commission's Rules.

Market #6 is defined by the common overlap between KTCH(AM) at Wayne, Nebraska, KTCH-FM at Wayne, Nebraska, and KZSR(FM) at Onawa, Iowa. KZSR(FM) was included in the Nebraska groupings because of its proximity to other facilities in Nebraska even though it is licensed to a community within Iowa.

This market is therefore defined by the common overlap between three facilities, two of which are FM stations. As a result, it is necessary and sufficient to demonstrate that the proponent would control no more than fifty percent (50%) of the stations serving the market. As the map analyzing this market demonstrates, there are an additional five (5) stations serving the market. This market would therefore comply with Section 73.3555 of the Commission's Rules.

The seventh Nebraska market is defined by the common overlap between KKYY(FM) at Whiting, Iowa, and KZSR(FM) at Onawa, Iowa. This market has also been included in the Nebraska grouping although both facilities are licensed to communities in Iowa. Although the transmitter site for KKYY(FM) is located within Woodbury County, Iowa, which is one of the Sioux City rated market constituent counties, the interim contour methodology is being utilized as both Whiting, Iowa and Onawa, Iowa are located in counties outside the rated metro market.

Since this market is defined by two FM stations with common overlap, it is necessary and sufficient to demonstrate that the proponent would not control greater than fifty percent of the stations serving the market. As the map analyzing this market demonstrates, there are at least an additional three stations serving the market. As a result, it is respectfully submitted that this market would comply with Section 73.3555 of the Commission's Rules.

The remaining three Nebraska markets are located within the Omaha sub-group. The map following the market #7 analysis depicts the facilities and markets considered under this sub-group. The orange shading depicts the areas where markets are defined under Section 73.3555 of the Commission's Rules.

Market #8 is defined by the common overlap between KZSR(FM) at Onawa, Iowa, KBLR-FM at Blair, Nebraska, the construction permit for KKAR(AM) at Omaha, Nebraska, and KOIL(AM) at Plattsmouth, Nebraska. It should be noted that the only facility in this market that is being acquired by NRG is KZSR(FM). The authorizations for the other three facilities are held by Waitt Omaha, LLC. They have been included in this study, however, since NRG would have an attributable interest in the Waitt facilities since they share principal officers.

Since this market is comprised of four stations, two of which are FM's and two of which are AM's, it is necessary and sufficient to demonstrate that the proponent would not control greater than fifty percent of the stations serving the market. The map analyzing this market demonstrates that there are at least an additional six (6) facilities serving the market. Each of these six facilities has a transmitter site which is located within 92 kilometers of the perimeter of the common overlap defining the market.

Although each of the facilities defining the market is licensed to a community within the Omaha-Council Bluffs rated market, Onawa, Iowa, which is the community of license is not. Therefore pursuant to the report and order pertaining to the revised multiple ownership rules, the interim contour methodology has been triggered.

The remaining two markets are illustrated on abbreviated maps. Due to congestion and the sheer number of stations required to be shown, the facility identifier markers and most map attributes have been stripped from the market #9 and market #10 analysis maps. In addition, those commercial stations licensed to Omaha have also been omitted since it is clear that they would be other stations in the market as the market encompasses the city of Omaha. The facility index indicates those facilities which were considered and included, but the contours of which were omitted from the market analysis maps. In the case of both of these markets, the interim contour methodology was utilized as at least one of the communities of license of the stations involved is outside the counties defining the Omaha-Council Bluffs market. In addition, expanded AM band station KOZN(AM) enters into both markets, but has also been omitted from consideration as an attributable station per the Commission's Rules.

Market #9 is defined by the common overlap between KBLR-FM at Blair, Nebraska, KHUB(AM) at Fremont, Nebraska, the licensed and CP facilities of KKAR(AM) at Omaha, Nebraska (which count as a single facility), KOIL(AM) at Plattsmouth, Nebraska, expanded band AM station KOZN(AM) at Bellevue, Nebraska, KYDZ(AM) at Bellevue, Nebraska, KLTQ(FM) at Lincoln, Nebraska, and KQKQ-FM at Council Bluffs, Iowa. Each of the facilities defining this market, with the exception of KHUB(AM) is licensed to Waitt Omaha, LLC. They have

been included for reasons already stated even though KHUB(AM) is the only station being acquired by NRG.

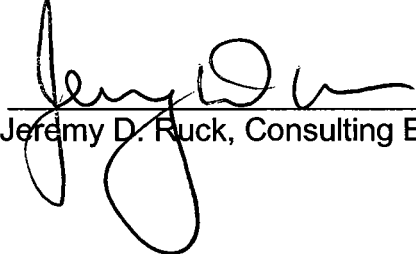
Since this market is comprised of seven (7) facilities (excluding the expanded band station), four of which are AM stations, it is necessary and sufficient to demonstrate that there are at least 30 stations serving the market which meet the interim contour methodology requirements. As indicated on the analysis map and facility index, there are at least twenty-five (25) other facilities the transmitter site of which is located within 92 kilometers of the perimeter of the market definition. It is therefore respectfully submitted that this market would be in compliance with Section 73.3555 of the Commission's Rules.

The final market under consideration is also comprised of seven stations and includes all of the stations defining the previous market with the exception of KBLR-FM at Blair. In its place to achieve the seven stations defining the market is KFMT-FM at Fremont, Nebraska. KFMT-FM is being acquired by NRG although KBLR-FM was not. Nevertheless, the concentration of facilities in which NRG would have an attributable interest would not change. It is therefore necessary and sufficient to demonstrate that there are at least thirty (30) facilities serving this market. The analysis map and facility index indicate that there are at least and additional twenty-five (25) facilities, the transmitter sites of which are located within 92 kilometers of the perimeter of the common overlap defining the

market. It is therefore respectfully submitted that this market would be in compliance with Section 73.3555 of the Commission's Rules.

The preceding statement and attached exhibits have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.

3/30/2005
Date


Jeremy D. Ruck, Consulting Engineer

Index to Facilities Depicted on Exhibit MapsWestern Nebraska Sub-Group Common Facilities:

1-	KODY(AM)	North Platte, Nebraska
2-	KXNP(FM)	North Platte, Nebraska
3-	KUVR(AM)	Holdrege, Nebraska
4-	KMTY-FM	Holdrege, Nebraska
5-	KGFW(AM)	Kearney, Nebraska
6-	KROR(FM)	Hastings, Nebraska (Grandfathered JSA)
7-	KRNY(FM)	Kearney, Nebraska
8-	KQKY(FM)	Kearney, Nebraska
9-	KLIQ(FM)	Hastings, Nebraska
10-	KSYZ-FM	Grand Island, Nebraska

Nebraska Market #2 Analysis:

1-	KUVR(AM)	Holdrege, Nebraska
2-	KMTY-FM	Holdrege, Nebraska
3-	KGFW(AM)	Kearney, Nebraska
4-	KRNY(FM)	Kearney, Nebraska
5-	KQKY(FM)	Kearney, Nebraska
6-	KLIQ(FM)	Hastings, Nebraska
7-	KROR(FM)	Hastings, Nebraska (Grandfathered JSA)
8-	KCNT(FM)	Hastings, Nebraska
9-	KLNE-FM	Lexington, Nebraska
10-	KFKX(FM)	Hastings, Nebraska
11-	KLPR(FM)	Kearney, Nebraska
12-	KRVN-FM	Lexington, Nebraska
13-	KROA(FM)	Grand Island, Nebraska
14-	KRGI-FM	Grand Island, Nebraska
15-	KRGY(FM)	Aurora, Nebraska
16-	KKPR-FM	Kearney, Nebraska
17-	KRVN(AM)	Lexington, Nebraska
18-	KHAS(AM)	Hastings, Nebraska
19-	KRGI(AM)	Grand Island, Nebraska

Nebraska Market #3 Analysis:

1-	KSYZ-FM	Grand Island, Nebraska
2-	KROR(FM)	Hastings, Nebraska (Grandfathered JSA)
3-	KGFW(AM)	Kearney, Nebraska
4-	KRNY(FM)	Kearney, Nebraska
5-	KQKY(FM)	Kearney, Nebraska
6-	KLIQ(FM)	Hastings, Nebraska
7-	KRGI(AM)	Grand Island, Nebraska
8-	KCNT(FM)	Hastings, Nebraska
9-	KLNE-FM	Lexington, Nebraska
10-	KFKX(FM)	Hastings, Nebraska
11-	KLPR(FM)	Kearney, Nebraska
12-	KRVN-FM	Lexington, Nebraska
13-	KROA(FM)	Grand Island, Nebraska
14-	KRGI-FM	Grand Island, Nebraska
15-	KRGY(FM)	Aurora, Nebraska
16-	KKPR-FM	Kearney, Nebraska
17-	KRVN(AM)	Lexington, Nebraska
18-	KHAS(AM)	Hastings, Nebraska

Nebraska Market #5 Analysis:

1-	KNEN(FM)	Norfolk, Nebraska
2-	KTCH-FM	Wayne, Nebraska
3-	KTCH(AM)	Wayne, Nebraska
4-	KUSO(FM)	Albion, Nebraska
5-	WNAX-FM	Yankton, South Dakota
6-	KSUX(FM)	Winnebago, Nebraska
7-	KEXL(FM)	Norfolk, Nebraska
8-	KWSC(FM)	Wayne, Nebraska

Nebraska Market #6 Analysis:

1-	KTCH(AM)	Wayne, Nebraska
2-	KTCH-FM	Wayne, Nebraska
3-	KZSR(FM)	Onawa, Iowa
4-	KXNE-FM	Norfolk, Nebraska
5-	KWSC(FM)	Wayne, Nebraska
6-	KGLI(FM)	Sioux City, Iowa
7-	WNAX-FM	Yankton, South Dakota
8-	KSUX(FM)	Winnebago, South Dakota

Nebraska Market #7 Analysis:

- | | | |
|----|-----------------|-------------------------|
| 1- | KKYY(FM) | Whiting, Iowa |
| 2- | KZSR(FM) | Onawa, Iowa |
| 3- | KGLI(FM) | Sioux City, Iowa |
| 4- | KSEZ(FM) | Sioux City, Iowa |
| 5- | KTFC(FM) | Sioux City, Iowa |

Nebraska Market #8 Analysis:

- | | | |
|-----|-----------------|---|
| 1- | KZSR(FM) | Onawa, Iowa |
| 2- | KBLR-FM | Blair, Nebraska (Waitt-Omaha facility) |
| 3- | KKAR(AM) | Omaha, Nebraska (CP facility; Waitt-Omaha) |
| 4- | KOIL(AM) | Plattsmouth, Nebraska |
| 5- | KWPN-FM | West Point, Nebraska |
| 6- | KILV(FM) | Castana, Iowa |
| 7- | KWIT(FM) | Sioux City, Iowa |
| 8- | KSEZ(FM) | Sioux City, Iowa |
| 9- | KKMA(FM) | La Mars, Iowa |
| 10- | KAYA(FM) | Hubbard, Nebraska |

Nebraska Markets #9 and #10 Analyses:*Facilities Depicted:*

KHUB(AM)	Fremont, Nebraska
KBLR-FM	Blair, Nebraska (Waitt-Omaha facility) *
KKAR(AM)	Omaha, Nebraska (CP and license; Waitt-Omaha)
KOIL(AM)	Plattsmouth, Nebraska (Waitt-Omaha facility)
KYDZ(AM)	Bellevue, Nebraska (Waitt-Omaha facility)
KLTQ(FM)	Lincoln, Nebraska (Waitt-Omaha facility)
KQKQ-FM	Council Bluffs, Iowa (Waitt-Omaha facility)
KOZN(AM)	Bellevue, Nebraska (expanded band; Waitt-Omaha)
KFMT-FM	Fremont, Nebraska **
KMLV(FM)	Ralston, Nebraska
KVSS(FM)	Omaha, Nebraska
KIWR(FM)	Council Bluffs, Iowa
KVNO(FM)	Omaha, Nebraska
KXKT(FM)	Glenwood, Nebraska
KHUS(FM)	Bennington, Nebraska
KWPN-FM	West Point, Nebraska
KRKR(FM)	Lincoln, Nebraska
KZKX(FM)	Seward, Nebraska
KBBX-FM	Nebraska City, Nebraska
KFRX(FM)	Lincoln, Nebraska
KBBK(FM)	Lincoln, Nebraska

Facilities Included but not depicted:

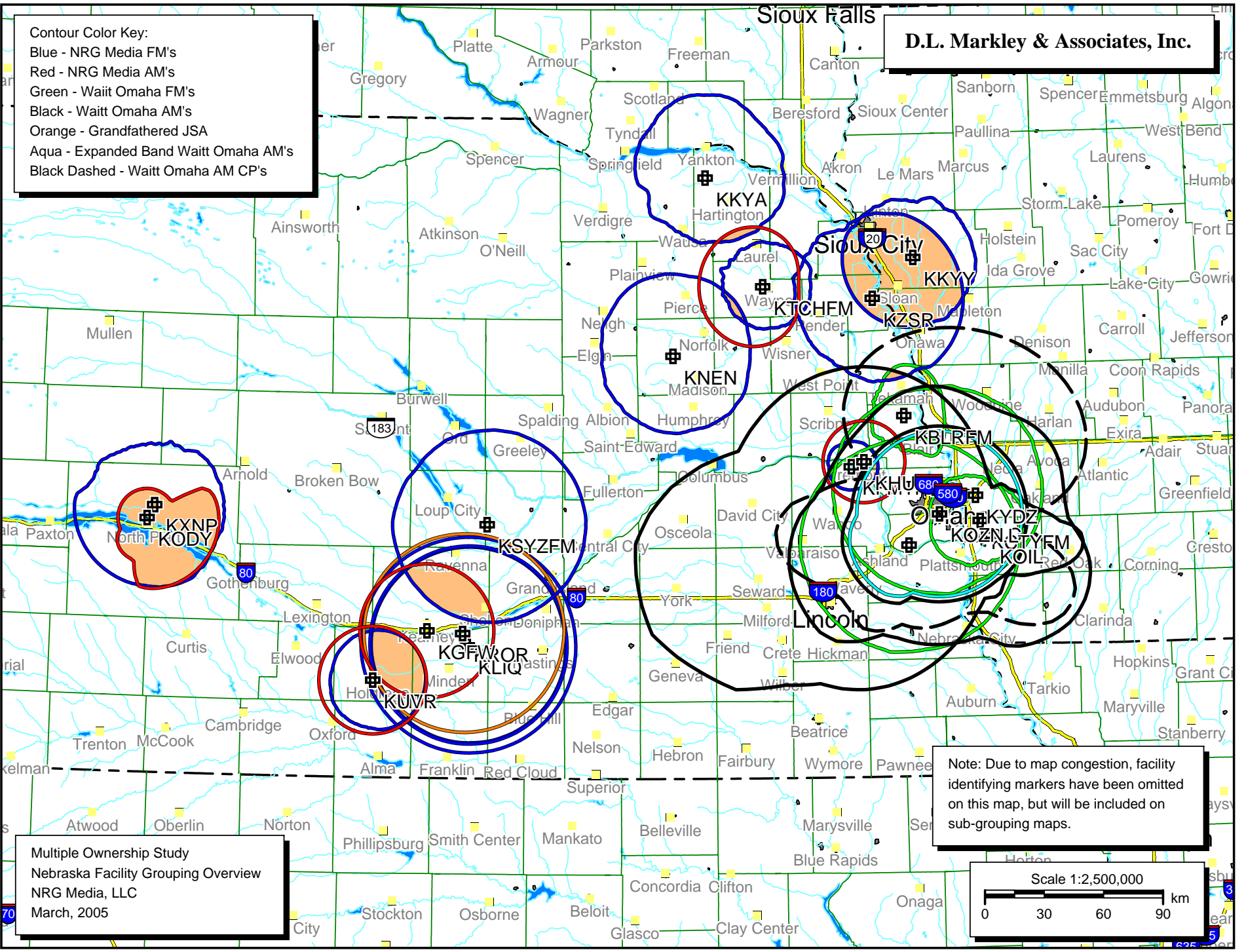
KEZO-FM	Omaha, Nebraska
KQCH(FM)	Omaha, Nebraska
KEFM(FM)	Omaha, Nebraska
KGOR(FM)	Omaha, Nebraska
KGBI-FM	Omaha, Nebraska
KSRZ(FM)	Omaha, Nebraska
KKCD(FM)	Omaha, Nebraska
KOMJ(AM)	Omaha, Nebraska
KCRO(AM)	Omaha, Nebraska
KFAB(AM)	Omaha, Nebraska
KHLP(AM)	Omaha, Nebraska
KOSR(AM)	Omaha, Nebraska

* Indicated on market #9 only since it does not enter into market #10.

** Indicated on market #10 only since it does not enter into market #9.

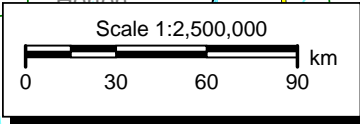
Contour Color Key:

- Blue - NRG Media FM's
- Red - NRG Media AM's
- Green - Waitt Omaha FM's
- Black - Waitt Omaha AM's
- Orange - Grandfathered JSA
- Aqua - Expanded Band Waitt Omaha AM's
- Black Dashed - Waitt Omaha AM CP's



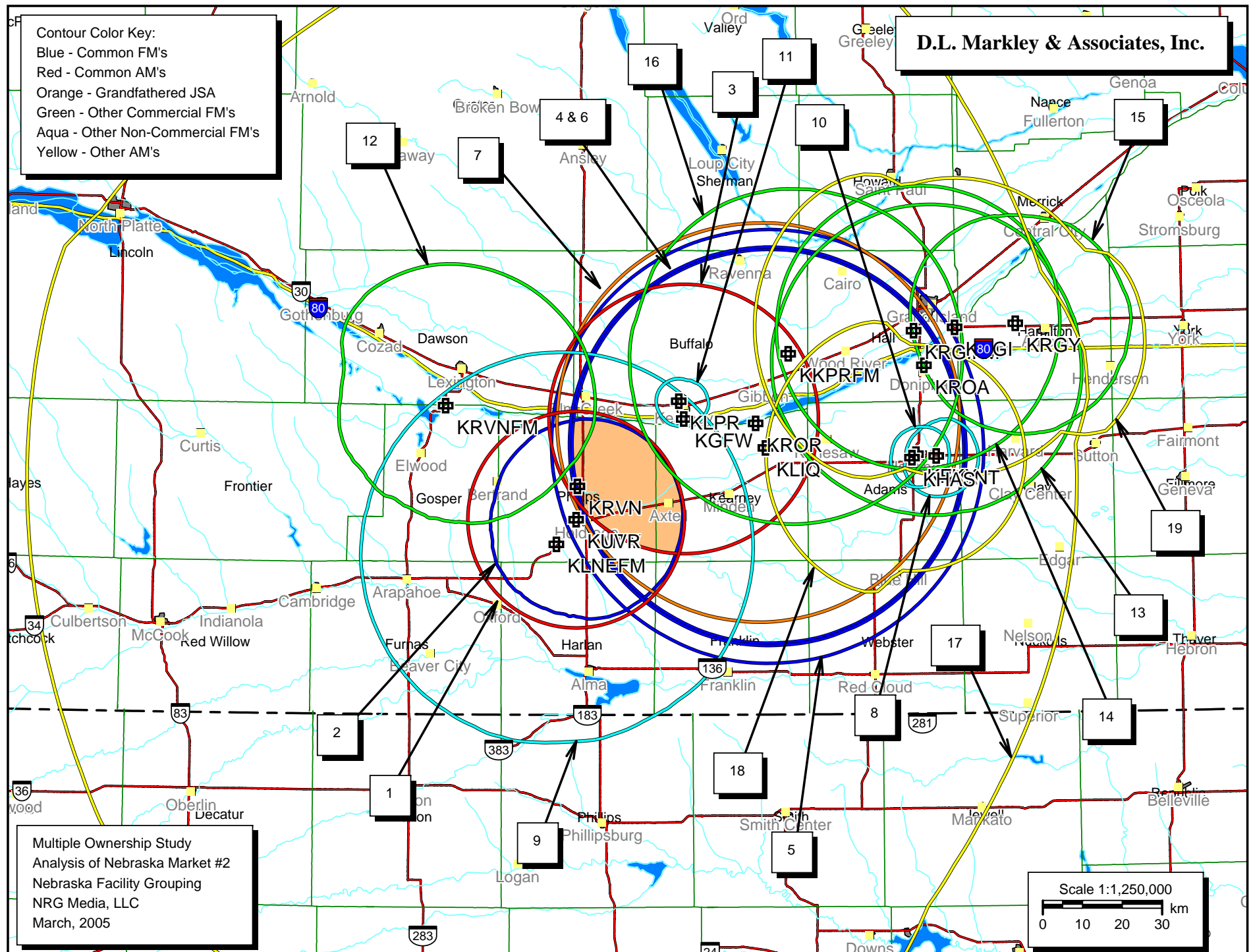
Note: Due to map congestion, facility identifying markers have been omitted on this map, but will be included on sub-grouping maps.

Multiple Ownership Study
Nebraska Facility Grouping Overview
NRG Media, LLC
March, 2005



D.L. Markley & Associates, Inc.

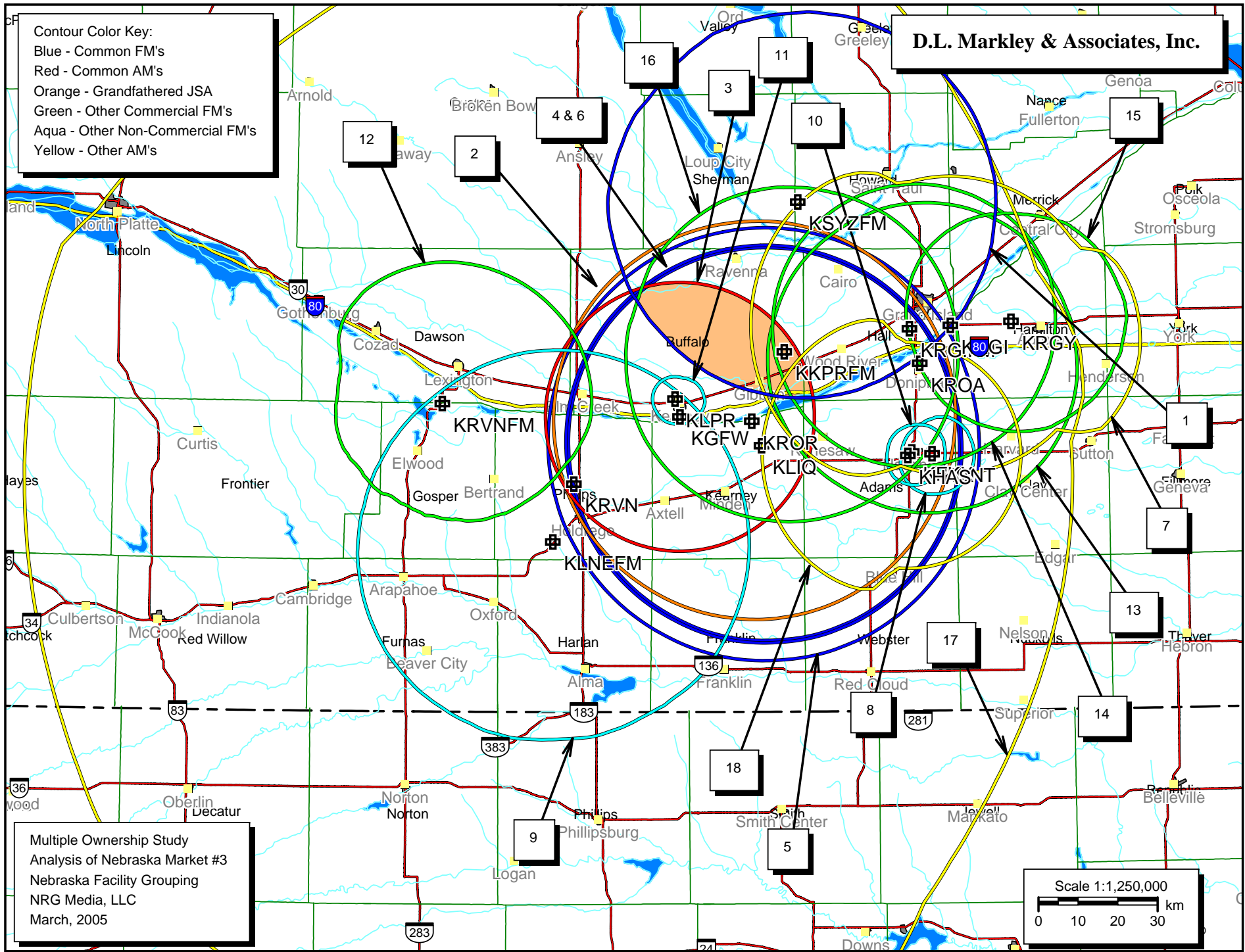
Contour Color Key:
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Red - Common AM's
Orange - Grandfathered JSA
Green - Other Commercial FM's
Aqua - Other Non-Commercial FM's
Yellow - Other AM's



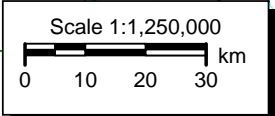
Multiple Ownership Study
Analysis of Nebraska Market #2
Nebraska Facility Grouping
NRG Media, LLC
March, 2005

D.L. Markley & Associates, Inc.

- Contour Color Key:
- Blue - Common FM's
 - Red - Common AM's
 - Orange - Grandfathered JSA
 - Green - Other Commercial FM's
 - Aqua - Other Non-Commercial FM's
 - Yellow - Other AM's

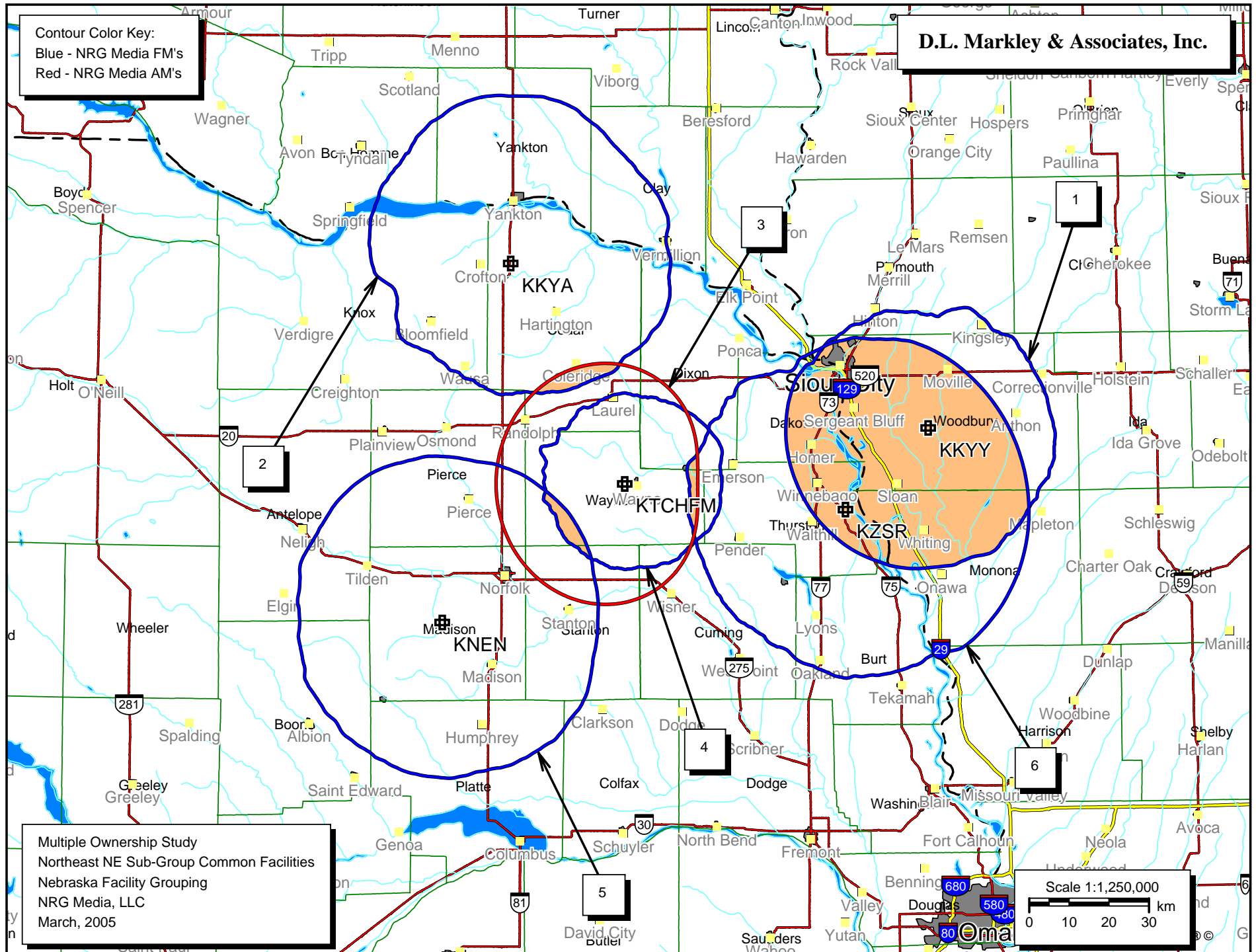


Multiple Ownership Study
Analysis of Nebraska Market #3
Nebraska Facility Grouping
NRG Media, LLC
March, 2005



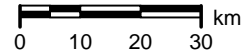
D.L. Markley & Associates, Inc.

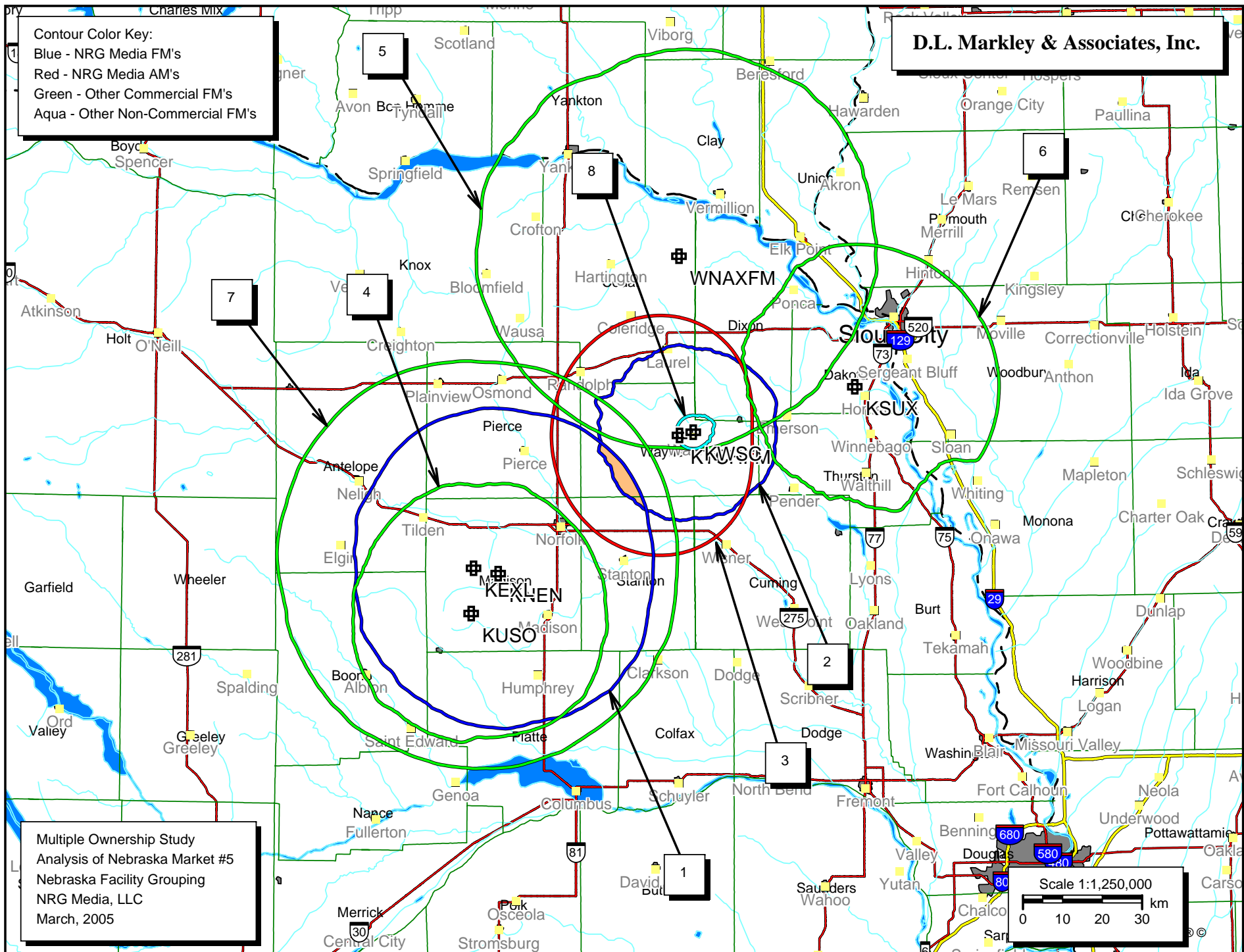
Contour Color Key:
Blue - NRG Media FM's
Red - NRG Media AM's



Multiple Ownership Study
Northeast NE Sub-Group Common Facilities
Nebraska Facility Grouping
NRG Media, LLC
March, 2005

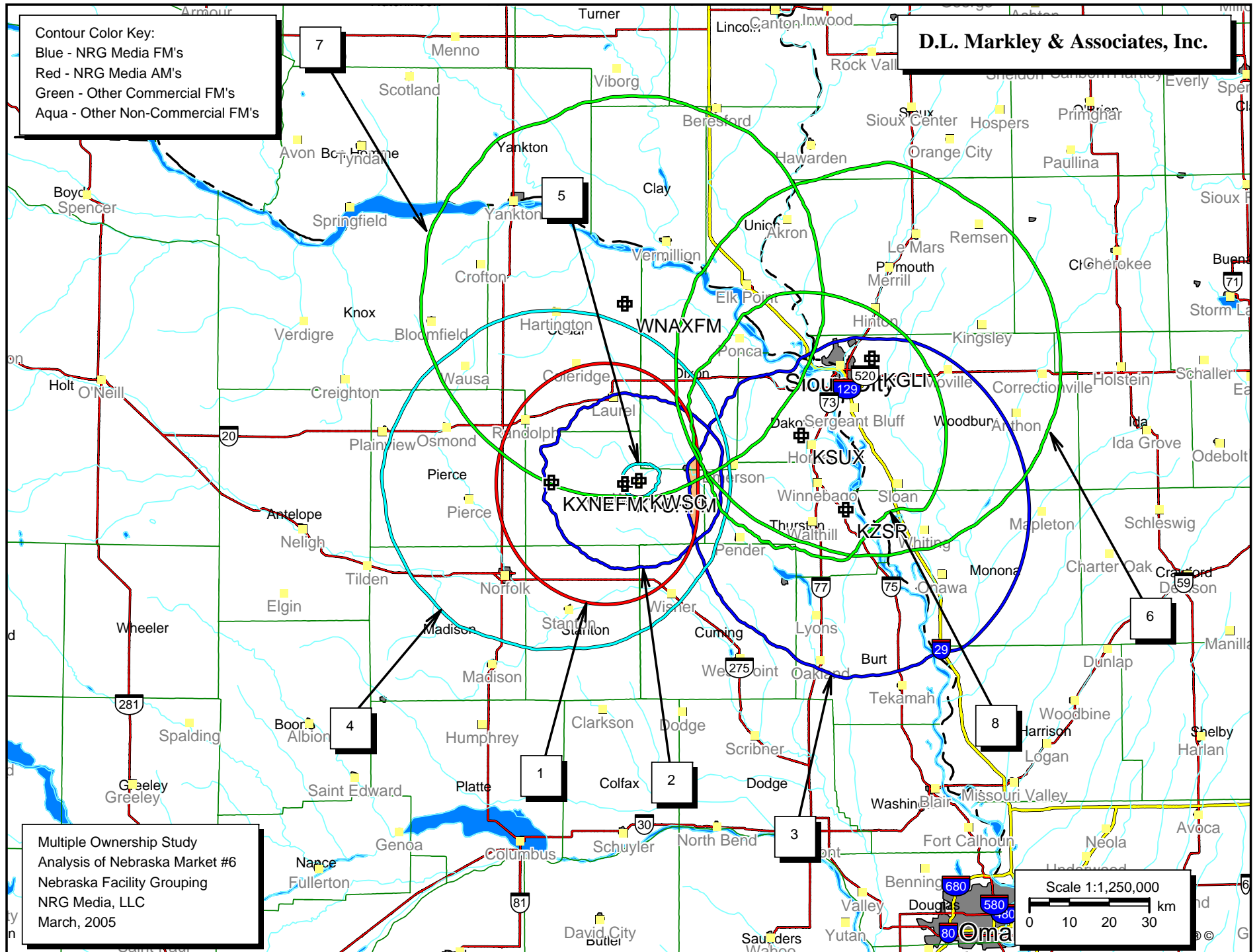
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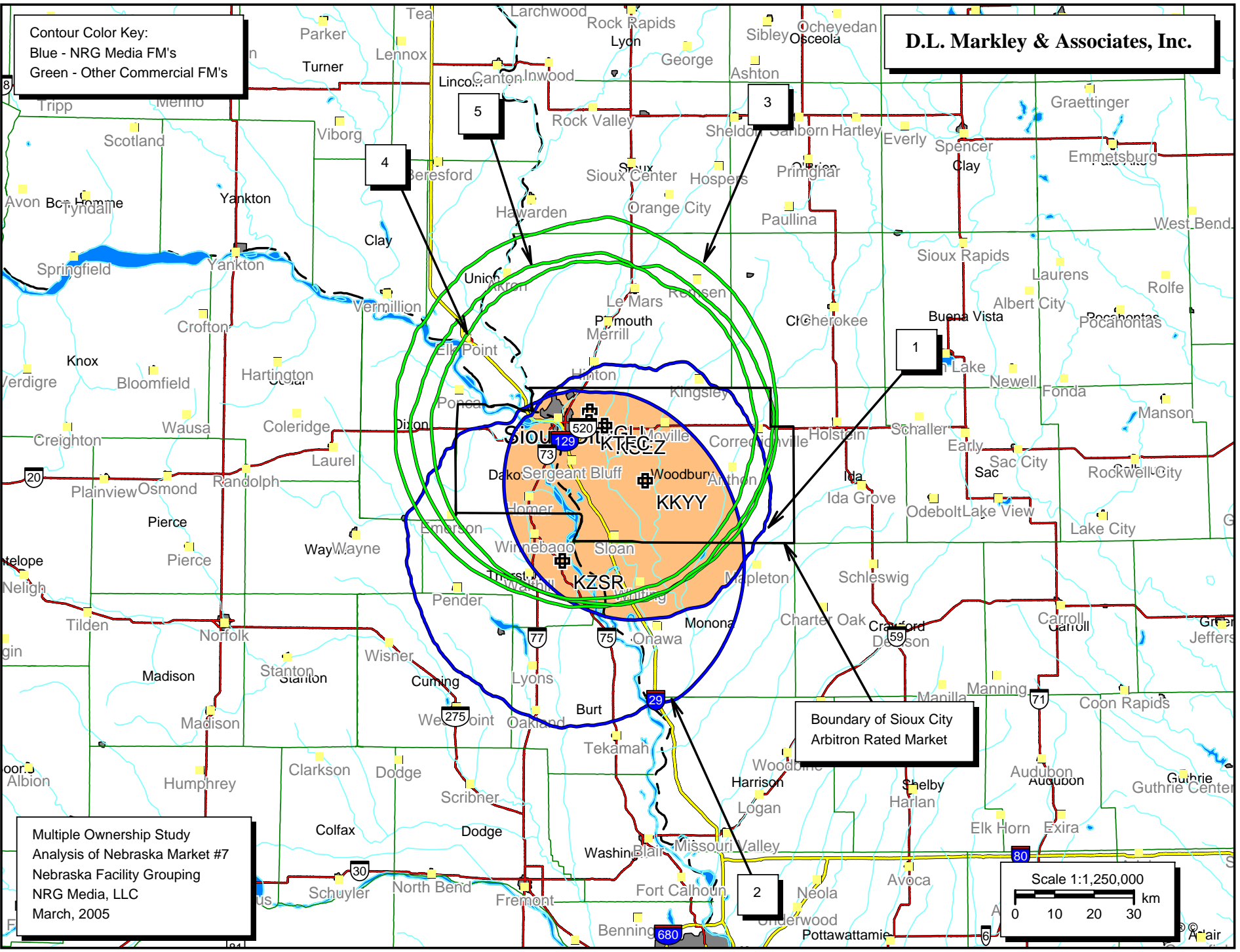
D.L. Markley & Associates, Inc.

Contour Color Key:
Blue - NRG Media FM's
Red - NRG Media AM's
Green - Other Commercial FM's
Aqua - Other Non-Commercial FM's

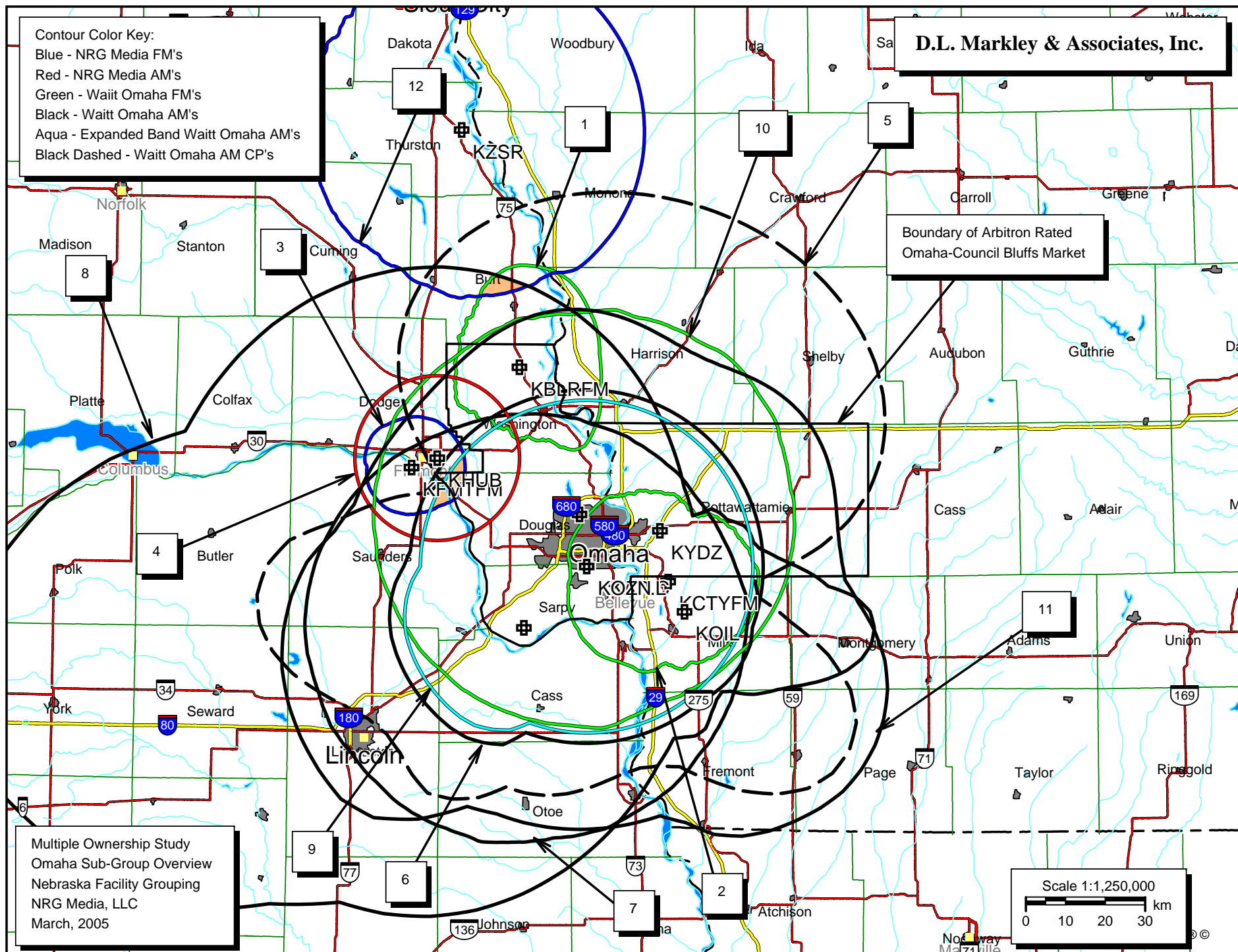


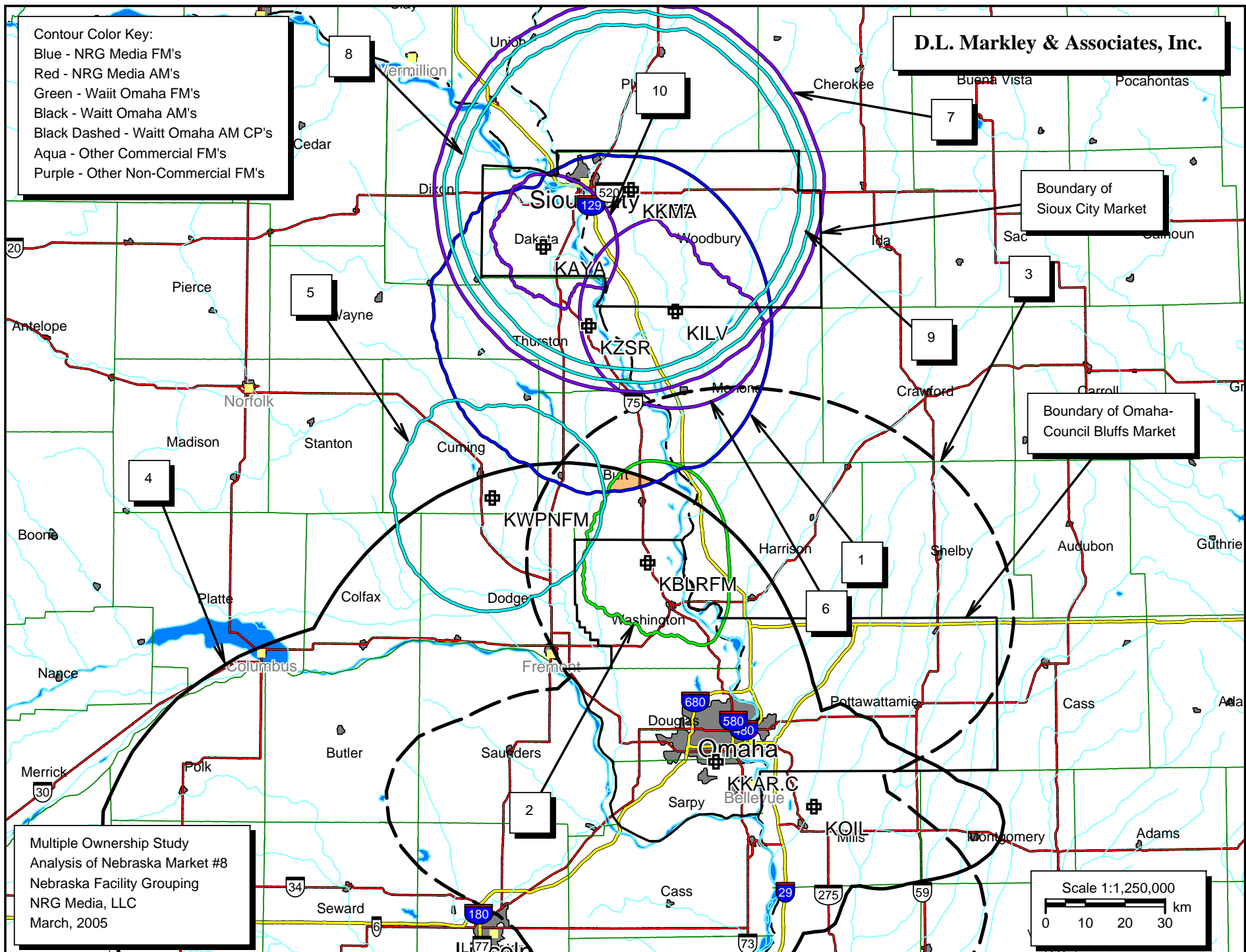
Contour Color Key:
Blue - NRG Media FM's
Green - Other Commercial FM's

Multiple Ownership Study
Analysis of Nebraska Market #7
Nebraska Facility Grouping
NRG Media, LLC
March, 2005



Boundary of Sioux City
Arbitron Rated Market

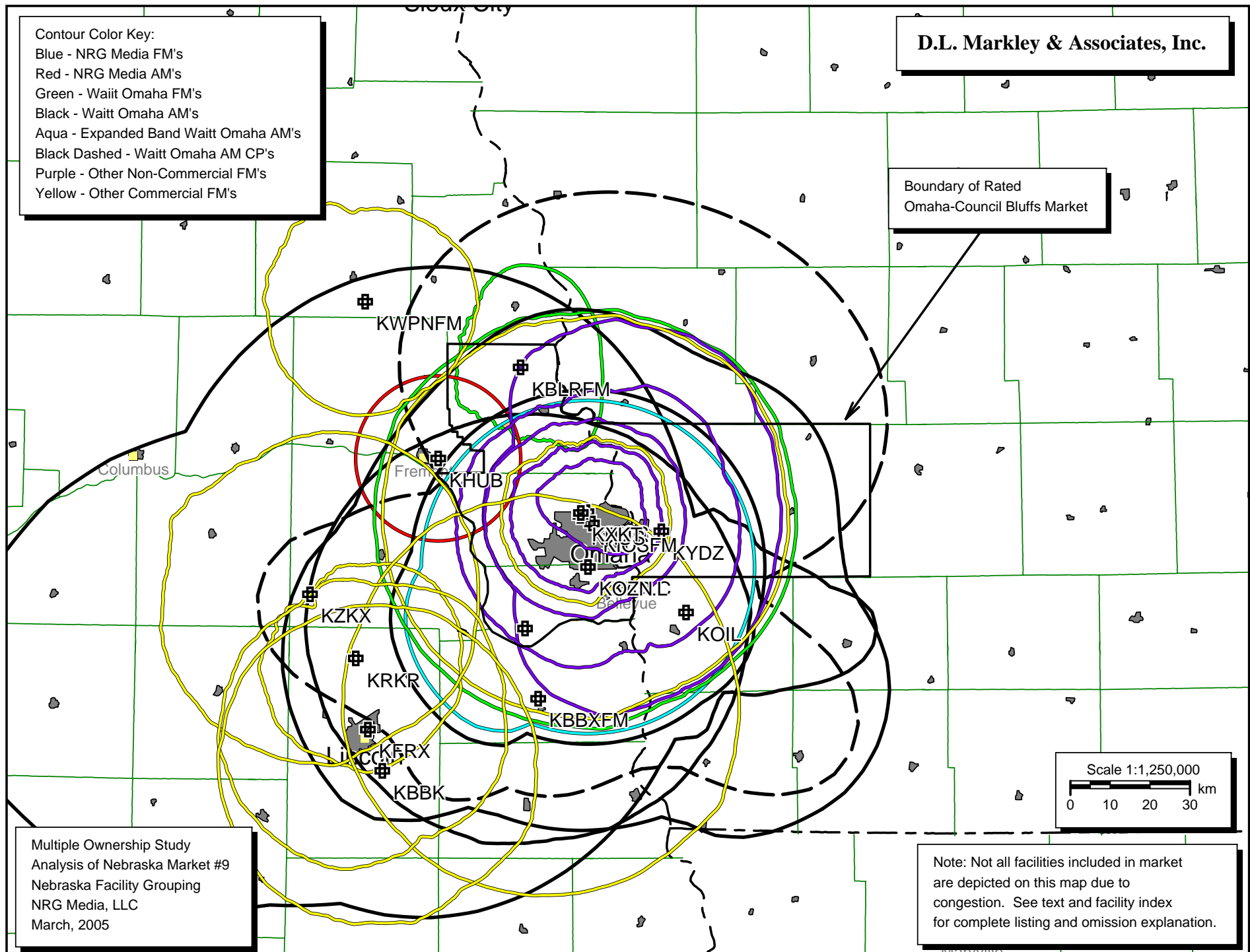




D.L. Markley & Associates, Inc.

Contour Color Key:
Blue - NRG Media FM's
Red - NRG Media AM's
Green - Waitt Omaha FM's
Black - Waitt Omaha AM's
Aqua - Expanded Band Waitt Omaha AM's
Black Dashed - Waitt Omaha AM CP's
Purple - Other Non-Commercial FM's
Yellow - Other Commercial FM's

Boundary of Rated
Omaha-Council Bluffs Market



Multiple Ownership Study
Analysis of Nebraska Market #9
Nebraska Facility Grouping
NRG Media, LLC
March, 2005

Note: Not all facilities included in market
are depicted on this map due to
congestion. See text and facility index
for complete listing and omission explanation.

D.L. Markley & Associates, Inc.

Contour Color Key:

- Blue - NRG Media FM's
- Red - NRG Media AM's
- Green - Waitt Omaha FM's
- Black - Waitt Omaha AM's
- Aqua - Expanded Band Waitt Omaha AM's
- Black Dashed - Waitt Omaha AM CP's
- Purple - Other Non-Commercial FM's
- Yellow - Other Commercial FM's

Boundary of Rated
Omaha-Council Bluffs Market

Scale 1:1,250,000

0 10 20 30 km

Multiple Ownership Study
Analysis of Nebraska Market #10
Nebraska Facility Grouping
NRG Media, LLC
March, 2005

Note: Not all facilities included in market are depicted on this map due to congestion. See text and facility index for complete listing and omission explanation.