

ENGINEERING STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS

FIRST BROADCASTING KANSAS CITY, LLC

This statement and the attached figures have been prepared on behalf of First Broadcasting Kansas City, LLC. First Broadcasting Kansas City, LLC proposes the common ownership of stations KCSX(FM), WHB(AM), and KCTE(AM). Therefore, a multiple ownership analysis was prepared considering the following radio stations under proposed common ownership or control:

Call Sign / Facility ID	Location	Facilities
KCSX(FM) / 4933	Moberly, MO	Channel 247C3 25 kW 100 m
KCSX(FM)/ 4933 Authorized CP	Lee's Summit, MO	Channel 247C1 55 kW 357 m
WHB(AM) / 6384	Kansas City, MO	810 kHz 5 kW D (DA-N)
KCTE(AM)/ 64637	Independence, MO	1510 kHz 10 kW D (DA-D)

The principal community contours of these stations are depicted on a map included herein as Figure 1. Since the stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations), an ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

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.* There is one

* 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).

“radio market” defined for analysis under the Commission’s Rules. The table below lists the defined market:

Defined Radio	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	WHB(AM), KCTE(AM)	KCSX(FM) Authorized CP

Count of Stations in Defined Markets

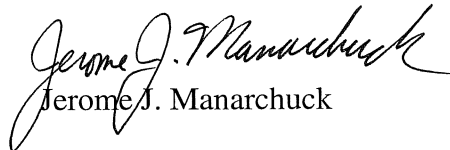
The number of radio stations in a “radio market” is determined by counting operating, commercial stations having principal community contours which overlap or intersect the principal community contours which define the radio market, plus the subject stations to be co-owned. Only those stations having principal community contour overlap with the defined market areas were employed in the count of stations. The results of the analysis are tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	15 AM, 15 FM; (At least 30 stations)

Figure 2 is a tabulation of some of the radio stations identified in the defined radio market. It is noted that there are at least 30 stations in the defined market. 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 N.G.D.C. 30-second computer database for each of the FM stations using radials evenly-spaced every 10 degrees of azimuth.

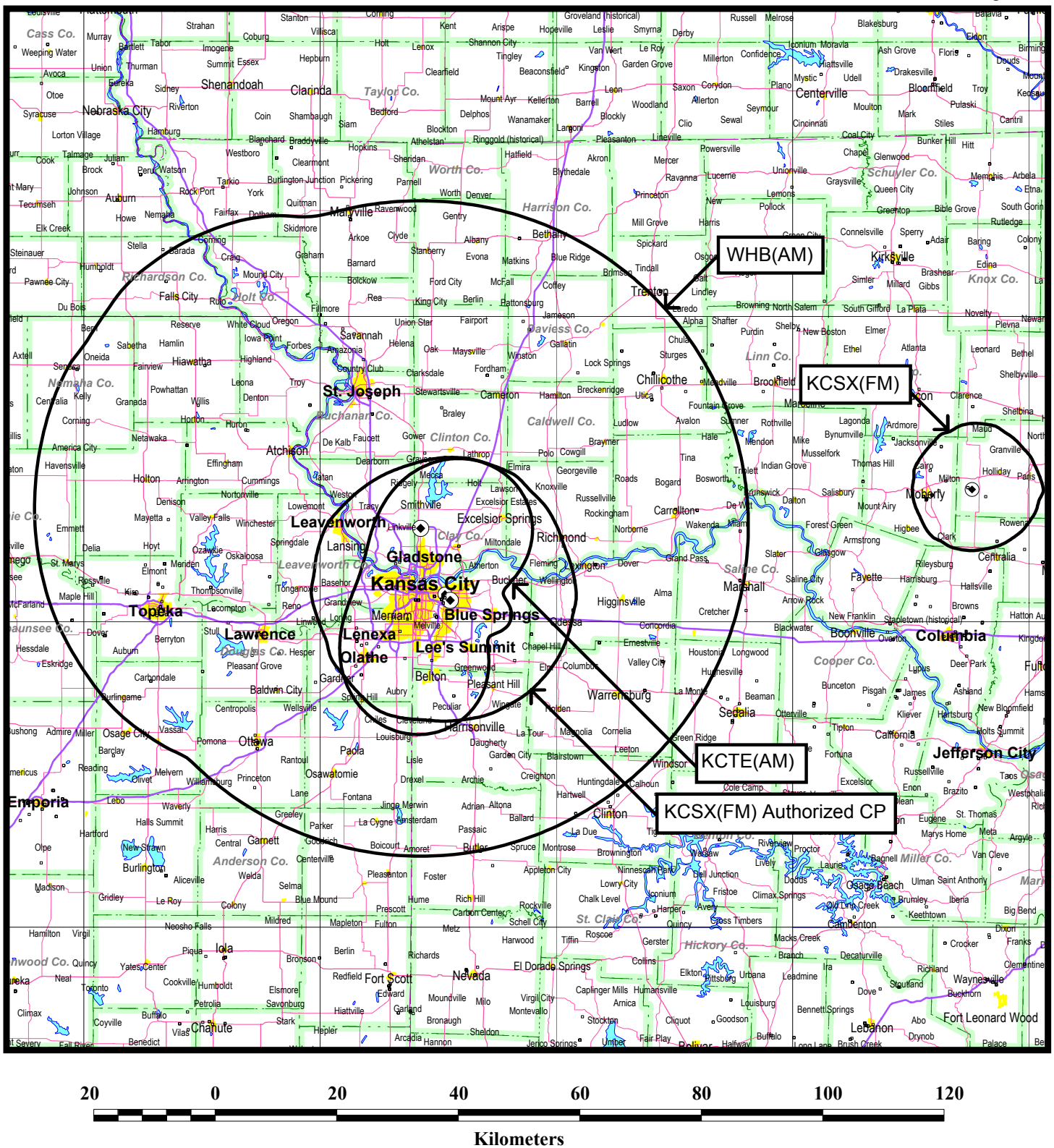
Based on the above, it is believed the proposed combination of stations complies with Section 73.3555(a) of the FCC Rules.

A handwritten signature in black ink, reading "Jerome J. Manarchuck". The signature is fluid and cursive, with the first name "Jerome" and last name "Manarchuck" clearly legible. The middle initial "J." is also present.

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

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Figure 1



PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

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Tabulation of FM Stations Defined in Radio Market 1

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Channel</u>
KMZA	SENECA	KS	221
KCCV-FM	OLATHE	KS	222
KAYX	RICHMOND	MO	223
KCVT	SILVER LAKE	KS	223
KSJQ	SAVANNAH	MO	224
KAIR-FM	HORTON	KS	229
KCMO-FM	KANSAS CITY	MO	235
KCHZ	OTTAWA	KS	239
KNIM-FM	MARYVILLE	MO	246
WIBW-FM	TOPEKA	KS	247
KRLI	MALTA BEND	MO	248
KUDL	KANSAS CITY	KS	251
KWIC	TOPEKA	KS	257
KKWK	CAMERON	MO	261
KDVV	TOPEKA	KS	262

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Tabulation of AM Stations Defined in Radio Market 1

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
WDAF	KANSAS CITY	MO	610
KFEQ	ST. JOSEPH	MO	680
KCMO	KANSAS CITY	MO	710
KCCV	OVERLAND PARK	KS	760
WHB	KANSAS CITY	MO	810
KAAN	BETHANY	MO	870
KMBZ	KANSAS CITY	MO	980
KEXS	EXCELSIOR SPRINGS	MO	1090
KPHN	KANSAS CITY	MO	1190
KOFO	OTTAWA	KS	1220
KTNC	FALLS CITY	NE	1230
KCNW	FAIRWAY	KS	1380
KKLO	LEAVENWORTH	KS	1410
KAOL	CARROLLTON	MO	1430
KSFT	ST. JOSEPH	MO	1550