

EXHIBIT 19
MULTIPLE OWNERSHIP

As described more fully in Exhibit 5, as part of the reorganization of Simmons Media Group, LLC (“SMG”), Simmons-SLC, LS, LLC (“SSLC”) must assign stations KDWY(FM), Diamondville, WY (Fac. ID No. 77947) and KEGH(FM), Brigham City, UT (Fac. ID No. 21607) to divestiture trusts.¹ Accordingly, SSLC, upon completion of the proposed restructuring of SMG, will be the licensee of the following eight radio stations (the “Stations”):

Call Sign	Service	Fac. ID No.	Community of License
KMER	AM	10335	Kemmerer, WY
KOVO	AM	65665	Provo, UT
KZNS	AM	60458	Salt Lake City, UT
KAOX	FM	31169	Kemmerer, WY
KEGA	FM	89255	Oakley, UT
KJQN	FM	88483	Coalville, UT
KXRK	FM	406	Provo, UT
KYMV	FM	81867	Woodruff, UT

Six of the Stations are located in the Salt Lake City, UT area, where there is an Arbitron Metro (the “SLC Metro”). The remaining two Stations are located in southwestern Wyoming, outside of any Arbitron Metro. No party to this application has an attributable interest in any other radio station that is located in the same market as, or has contour overlap with, any of the Stations. Because some of the Stations are not home to the SLC Metro and/or are licensed to communities that are geographically located outside of the SLC Metro (and all other Arbitron Metros), both an analysis based on a count of stations in the SLC Metro and an analysis under the FCC’s interim contour overlap methodology are required in order to demonstrate compliance with the FCC’s multiple ownership rules.

Arbitron Metro Analysis: The following six Stations (the “SLC Stations”) – 2 AM and 4 FM – are home to the SLC Metro and/or licensed to a community located within the SLC Metro:

Call Sign	Service	Fac. ID No.	Community of License
KOVO	AM	65665	Provo, UT
KZNS	AM	60458	Salt Lake City, UT
KEGA	FM	89255	Oakley, UT
KJQN	FM	88483	Coalville, UT
KXRK	FM	406	Provo, UT

¹ As described in Exhibit 5, applications seeking the Commission’s consent to these assignments are being filed concurrently herewith.

Call Sign	Service	Fac. ID No.	Community of License
KYMV	FM	81867	Woodruff, UT

According to BIA, there are 65 radio stations in the SLC Metro. In a market of this size, a single entity is permitted to have an attributable interest in not more than 8 radio stations in total and not more than 5 radio stations in one service (AM or FM).² Common ownership of the SLC Stations complies with these limitations.³

Contour Overlap Analysis: Please see the attached contour overlap study of Charles Cooper, which analyzes the markets created by the overlapping contours of the SLC Stations and the market created by the overlapping contours of KMER(AM) and KAOX(FM).⁴ Mr. Cooper's analysis confirms compliance with the Commission's multiple ownership rules.

² See *id* at § 73.3555(1)(1)(i).

³ KOVO(AM) holds a construction permit to move from Provo, UT to Bluffdale, UT. See FCC File No. BMJP-20041029AIM. However, since the station is already home to the SLC Metro, and since both Provo and Bluffdale are geographically located within the SLC Metro, this move will have no impact on the Arbitron Metro analysis.

⁴ KAOX(FM) has a pending application for a construction permit to move to Shelley, ID. See FCC File No. BPH-20080331AKT. When this move occurs, KAOX(FM) and KMER(AM) will no longer have contour overlap, and no party to this application will have an attributable interest in any other radio station that is located in the same market as, or has contour overlap with, either KAOX(FM) or KMER(AM). Since ownership of a single radio station in a market is always permissible under the FCC's multiple ownership restrictions, see 47 C.F.R. § 73.3555(1)(1)(iv), ownership of KAOX(FM) and KMER(AM) will be permissible.

ENGINEERING STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
SIMMONS-SLC, LS, LLC

This radio multiple ownership analysis was prepared to consider common ownership of the stations tabulated below under the FCC “Interim” contour analysis method.* Simmons-SLC, LS, LLC is the licensee of the below tabulated radio stations. An interim radio ownership analysis of these stations has been completed.

Call Sign / Facility ID	Location	Facilities
KMER(AM) / 10335 Licensed Facility	Kemmerer, WY	940 kHz 0.24 kW-D 0.15 kW-N ND
KOVO(AM)/65665 Licensed Facility	Provo, UT	960 kHz 5 kW-D 1 kW-N DA-N
KOVO(AM)/65665 CP Facility	Bluffdale, UT	960 kHz 50 kW-D 0.94 kW-N DA-2
KZNS(AM)/60458 Licensed Facility	Salt Lake City, UT	1280 kHz 50 kW-D 0.67 kW-N DA-2
KAOX(FM)/31169 Licensed Facility	Kemmerer, WY	Channel 297C2 13.5 kW 289 M
KEGA(FM)/89255 Licensed Facility	Oakley, UT	Channel 268C 89 kW 647 M
KJQN(FM)/88483 Licensed Facility	Coalville, UT	Channel 276C 89 kW 647 M
KYMV(FM)/81867 Licensed Facility	Woodruff, UT	Channel 264C 88 kW 647 M
KXRK(FM)/406 Licensed Facility	Provo, UT	Channel 242C 25 kW 1140 M

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

* See Report and Order and Notice of Proposed Rulemaking, MB Docket 02-277, FCC 03-127, Released July 2, 2003.

Radio Markets

The “radio markets” applicable to common ownership of the subject stations are defined as the areas encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. The table below lists the defined markets:

Defined Radio Market	Stations that Define Radio Market	
	AM Station(s)	FM Stations
Market 1	KZNS/KOVO	KXRK/KYMV/KJQN/KEGA
Market 2	KMER	KAOX

Count of Stations in the Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating stations having principal community contours which overlap or intersect the principal community contours which define the radio market. Only those stations located within 92 km of the perimeter of the mutual overlap area of the defined market area were employed in the count of stations. Commonly owned stations were not considered in the count of stations in the defined markets. The results of the analysis are tabulated below:

Defined Radio Markets	Minimum Number of Other Stations in the Radio Market
Market 1	23 AM, 34 FM; 57 Total
Market 2	No Justification Necessary - Inherently Permitted by Rules

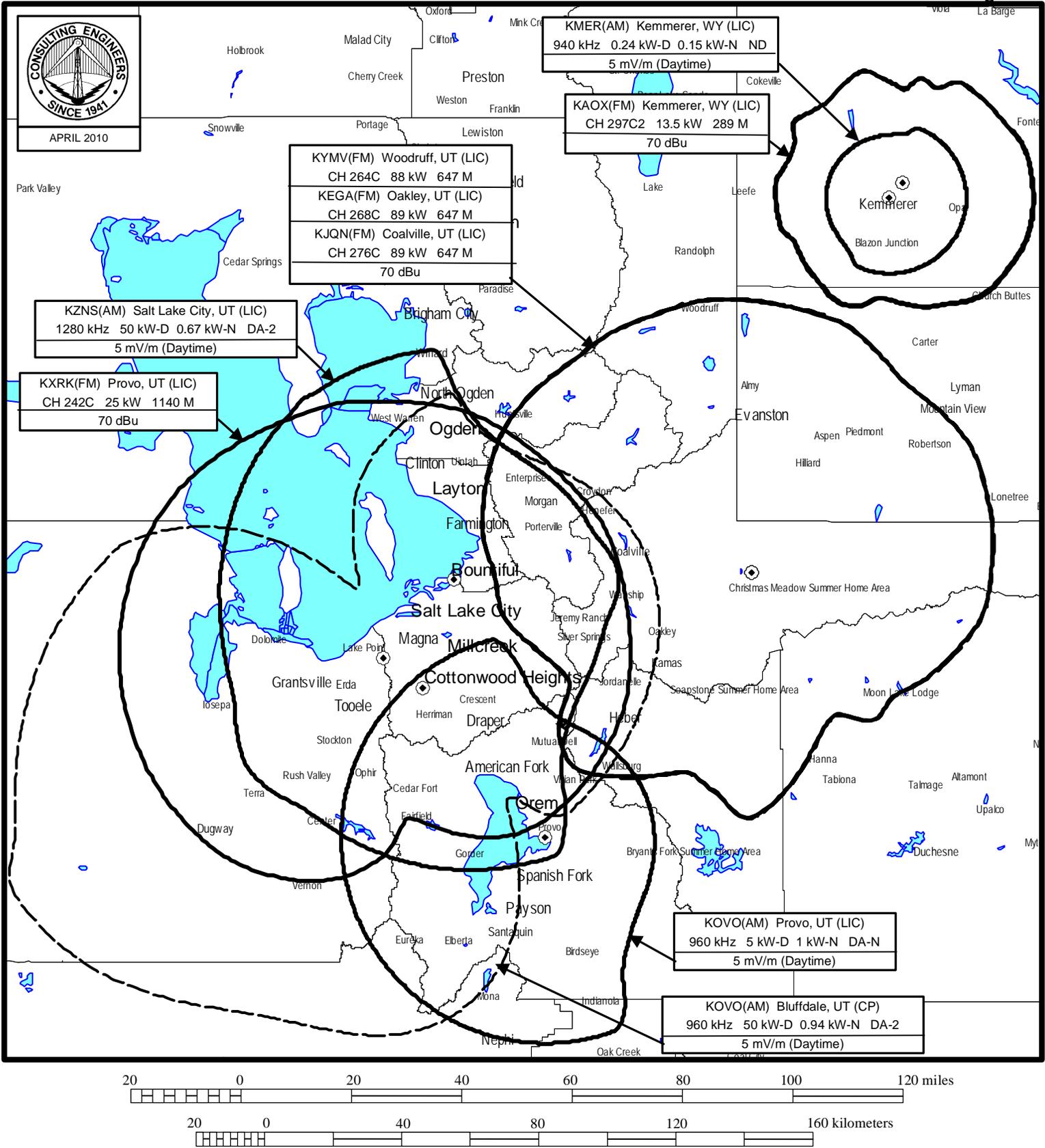
Figure 2 are tabulations of the radio stations identified in the defined radio market. Only known licensed, operating stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's AM database and the appropriate 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.

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Figure 1



RADIO MULTIPLE-OWNERSHIP SUBJECT STATIONS

SIMMONS-SLC, LS, LLC

du Treil, Lundin & Rackley, Inc Sarasota, Florida

ENGINEERING STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
SIMMONS-SLC, LS, LLC

Tabulation of Other Stations Defined in the Radio Market #1

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Channel</u>
KACP	Salt Lake City	UT	570
KTKK	Sandy	UT	630
KALL	North Salt Lake City	UT	700
KSVN	Ogden	UT	730
KUTR	Taylorsville	UT	820
KKAT	Salt Lake City	UT	860
KWDZ	Salt Lake City	UT	910
KIHU	Tooele	UT	1010
KDYL	South Salt Lake	UT	1060
KANN	Roy	UT	1120
KSL	Salt Lake City	UT	1160
KJQS	Murray	UT	1230
KFNZ	Salt Lake City	UT	1320
KTMP	Heber City	UT	1340
KSOP	South Salt Lake	UT	1370
KSRR	Provo	UT	1400
KLO	Ogden	UT	1430
KEYY	Provo	UT	1450
KHQN	Spanish Fork	UT	1480
KOGN	Ogden	UT	1490
KLLB	West Jordan	UT	1510
KMRI	West Valley City	UT	1550
KTUB	Centerville	UT	1600
KPGR	Pleasant Grove	UT	88.1
KWCR-FM	Ogden	UT	88.1
KCPW-FM	Salt Lake City	UT	88.3
KBYU-FM	Provo	UT	89.1
KUER-FM	Salt Lake City	UT	90.1
KRCL	Salt Lake City	UT	90.9
KUFR	Salt Lake City	UT	91.7
KOHS	Orem	UT	91.7
KPCW	Park City	UT	91.9
KTCE	Payson	UT	92.1
KUUU	South Jordan	UT	92.5
KUBL-F	Salt Lake City	UT	93.3
KODJ	Salt Lake City	UT	94.1
KHTB	Provo	UT	94.9
KMGR	Delta	UT	95.9
KZHT	Salt Lake City	UT	97.1
KZZQ	Coalville	UT	97.5
KBZN	Ogden	UT	97.9
KBEE	Salt Lake City	UT	98.7
KJMY	Bountiful	UT	99.5
KSFI	Salt Lake City	UT	100.3
KBER	Ogden	UT	101.1
KENZ	Ogden	UT	101.9
KDUT	Randolph	UT	102.3

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Channel</u>
KSL-FM	Midvale	UT	102.7
KRSP-FM	Salt Lake City	UT	103.5
KUDE	Nephi	UT	103.9
KSOP-FM	Salt Lake City	UT	104.3
KYLZ	Lyman	WY	104.7
KAUU	Manti	UT	105.1
KNRS-FM	Centerville	UT	105.7
KBMG	Evanston	WY	106.1
KOSY-FM	Spanish Fork	UT	106.5
KKAT-FM	Orem	UT	107.5