

**RADIO MARKET ANALYSIS**  
**CUMULUS LICENSING LLC**  
**KBKL (FM) RADIO STATION**  
**GRAND JUNCTION, COLORADO**  
**November 2010**

**TECHNICAL STATEMENT**

1. This Technical Statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC, licensee of KBKL, Channel 300C, Grand Junction, Colorado. Cumulus is submitting an application to make minor changes in the KBKL facilities by correcting the elevation data, as such, a Radio Market Analysis is needed. Cumulus is also the licensee of stations KEKB, Channel 260C, Fruita, Colorado; KEXO, 1230 kHz, and KMXV, Channel 282C0, Grand Junction, Colorado; KKNN, Channel 236C0, Delta, Colorado; KDBN, Channel 266A, Parachute, Colorado; and an applicant for a new FM station on Channel 262C0 at Dinosaur, Colorado ("Dinosaur").

2. KBKL is licensed to a metro county in the Grand Junction Arbitron Market (Market #264). KEKB, KEXO and KMXV are also licensed to metro counties in the Grand Junction Arbitron Market. KKNN is not licensed to a metro county in the Grand Junction Market, but is considered "home" to that market. Neither KDBN or Dinosaur is located in a metro county within any rated market nor considered home to any rated market. Therefore, an analysis for both a rated market and non-rated market is necessary.

### **ARBITRON MARKET REVIEW**

3. As shown on Exhibit #1, there are twenty-two AM and FM (commercial and non-commercial ) stations listed in the Grand Junction, Colorado Market. Cumulus would be in control of four FM stations and one AM station in the market. The number of stations depicted falls in the fifteen to twenty nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules. At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service is permissible. Based on Cumulus's interests in KBKL, KMXV, KEKB, KKNN and KEXO, the rated market is in compliance.

### **REVISED CONTOUR OVERLAP ANALYSIS**

4. Since the proposed KBKL will have contour overlap with Dinosaur, KDBN and KKNN, a study has been conducted to verify that the proposed application for KBKL is also in compliance with the Commission's revised contour overlap rules. The city grade contours of the stations are shown on Exhibit #2. As noted, because of locations of the overlap of the city grade contours, three distinct radio markets are created. Market #1 consists of FM stations KBKL, KMXV and Dinosaur; Market #2 consists of FM stations KBKL, KMXV KEKB an KDBN; and Market #3 consists of FM stations KBKL, KMXV, KEKB, KKNN and AM station KEXO.

5. A study, therefore, has been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission's rules. Since KBKL is a subject station in each market, its contour will be used to define the market boundary, hereinafter referred to as the



“Radio Market”. This boundary will be used to determine the number of other commercial and non-commercial AM and FM stations that either have transmitter sites within or provide coverage to the radio market. These stations will then be added to the relevant subject stations in the three markets under review. Only those stations with transmitter sites within 92.0 kilometers will be considered as contributors to the market. No other stations in which Cumulus has interests will be considered, unless it was a subject station in the market under review.

6. Exhibit #3 is a depiction of the stations within, or providing service, to the KBKL/Radio Market boundary. A total of eleven stations are depicted.<sup>1</sup> Exhibit #4 is a tabulation of the stations in Radio Market #1, which totals fourteen when the three subject stations are included. The number of stations depicted falls in the fourteen or more stations tier of §73.3555(a)(1)(iv) of the Commission's rules. At the fourteen or more stations level, common ownership or control of up to five stations, with no more three in the same service, is permissible provided the number of stations to be commonly held does not exceed 50% of the stations in the market. As such, Market #1 is in compliance with the rules.

7. Exhibit #5 is a tabulation of the stations in Radio Market #2, which totals fifteen when the four subject stations are included.<sup>2</sup> The number of stations depicted falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules. At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more four in the same service, is permissible. As such, Market #2 is in compliance with the rules.

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1) There are additional stations, however they were no considered as the number of station shown were sufficient to demonstrate to compliance, based on the number of station to be commonly held.

2) See Footnote 3, *supra*.

8. Exhibit #6 is a tabulation of the stations in Radio Market #3, which totals sixteen when the five subject stations are included.<sup>3</sup> The number of stations depicted also falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules. At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more four in the same service, is permissible. As such, Market #3 is in compliance with the rules.

9. Cumulus's interests in the above referenced stations, in three distinct contour overlap markets and one rated market, have been shown to be in compliance. Therefore, the application for KBKL is in compliance with §73.3555.

10. The foregoing technical statement was prepared on behalf of Cumulus Licensing LLC by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.5 . BIA database. Technical data related to AM and FM facilities was extracted from the Commission's CDBS database. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.

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3) See Footnote 3, supra.





## FCC Geographic Market Definition for Grand Junction, CO

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KAAI	FM	98.5	NC	Chrst/Altve	Grand Junction, CO		252	Educational Media Foundation	Palisade, CO	Mesa
KAFM	FM	88.1	NC	Variety	Grand Junction, CO	07/02/2003	252	Grand Valley Public Radio Company	Grand Junction, CO	Mesa
KBKL	FM	107.9	C	Oldies	Grand Junction, CO	07/02/2003	252	Cumulus Broadcasting Inc	Grand Junction, CO	Mesa
KCIC	FM	88.5	NC	Educa/Relg	Grand Junction, CO	07/02/2003	252	Pear Park Baptist Schools	Grand Junction, CO	Mesa
KDVC	FM	102.5	C	DARK	Grand Junction, CO	04/07/2009	252	Cochise Broadcasting LLC	Dove Creek, CO	Dolores
KEKB	FM	99.9	C	Country	Grand Junction, CO	07/02/2003	252	Cumulus Broadcasting Inc	Fruita, CO	Mesa
KEXO	AM	1230	C	Talk	Grand Junction, CO	07/02/2003	252	Cumulus Broadcasting Inc	Grand Junction, CO	Mesa
KJOL	AM	620	NC	ChrsContem	Grand Junction, CO	07/02/2003	252	United Ministries	Grand Junction, CO	Mesa
KJYE	FM	92.3	C	Cisc Hits	Grand Junction, CO	07/02/2003	252	MBC Grand Broadcasting Inc	Grand Junction, CO	Mesa
KKNN	FM	95.1	C	Rock	Grand Junction, CO	07/02/2003	252	Cumulus Broadcasting Inc	Delta, CO	Delta
KLFV	FM	90.3	NC	ChrsContem	Grand Junction, CO	07/02/2003	252	Educational Media Foundation	Grand Junction, CO	Mesa
KMGJ	FM	93.1	C	Top 40	Grand Junction, CO	07/02/2003	252	MBC Grand Broadcasting Inc	Grand Junction, CO	Mesa
KMOZ	FM	100.7	C	Country	Grand Junction, CO	07/02/2003	252	MBC Grand Broadcasting Inc	Grand Junction, CO	Mesa
KMSA	FM	91.3	NC	Ecltc/Altve	Grand Junction, CO	07/02/2003	252	Mesa State College	Grand Junction, CO	Mesa
KMXV	FM	104.3	C	Hot AC	Grand Junction, CO	07/02/2003	252	Cumulus Broadcasting Inc	Grand Junction, CO	Mesa
KNZZ	AM	1100	C	News/Talk	Grand Junction, CO	07/02/2003	252	MBC Grand Broadcasting Inc	Grand Junction, CO	Mesa
KPRN	FM	89.5	NC	News/Info	Grand Junction, CO	07/02/2003	252	Colorado Public Radio	Grand Junction, CO	Mesa
KRZX	FM	106.1	C	DARK	Grand Junction, CO	03/24/2010	252	Cochise Broadcasting LLC	Redlands, CO	Mesa
KSTR	FM	96.1	C	Rock	Grand Junction, CO	07/02/2003	252	MBC Grand Broadcasting Inc	Montrose, CO	Montrose
KTMM	AM	1340	C	Sports	Grand Junction, CO	07/02/2003	252	MBC Grand Broadcasting Inc	Grand Junction, CO	Mesa
KWGL	FM	105.7	C	Country	Grand Junction, CO	07/02/2003	252	Western Slope Communications	Ouray, CO	Ouray
KZKS	FM	105.3	C	Adult Hits	Grand Junction, CO	01/24/2008	252	Western Slope Communications	Rifle, CO	Garfield

Number of Stations in Geographic Market 22

### Previous Stations in Geographic Market

KAYW	FM	98.1	C	Adult Hits		08/03/2006	0	Western Slope Communications	Meeker, CO	Rio Blanco
KDTA	AM	1400	NC	ChrsContem		02/08/2005	0	United Ministries	Delta, CO	Delta

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

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**EXHIBIT #1**



# Graham Brock, Inc. - Broadcast Technical Consultants

**KBKL**  
Latitude: 39-03-56 N  
Longitude: 108-44-52 W  
ERP: 100.00 kW  
Channel: 300C  
AMSL Height: 2245.464 m

**KMXV**  
BLH-19960402KD  
Latitude: 39-03-56 N  
Longitude: 108-44-52 W  
ERP: 100.00 kW  
Channel: 282C0  
AMSL Height: 2244.0 m

**KEKB**  
BMLH-20070420AAR  
Latitude: 39-03-56 N  
Longitude: 108-44-52 W  
ERP: 79.00 kW  
Channel: 260C  
AMSL Height: 2269.0 m

Dinosaur 3.16 mV/m

KMXV/KBKL 3.16 mV/m

KEKB 3.16 mV/m

KDBN 3.16 mV/m

**KEXO**  
Latitude: 39-05-41 N  
Longitude: 108-34-41 W  
ERP: 1.0 kW  
Frequency: 1230 kHz

**KDBN**  
BLH-20080328AGR  
Latitude: 39-26-31 N  
Longitude: 108-01-15 W  
ERP: 0.20 kW  
Channel: 266C0  
AMSL Height: 1705.0 m

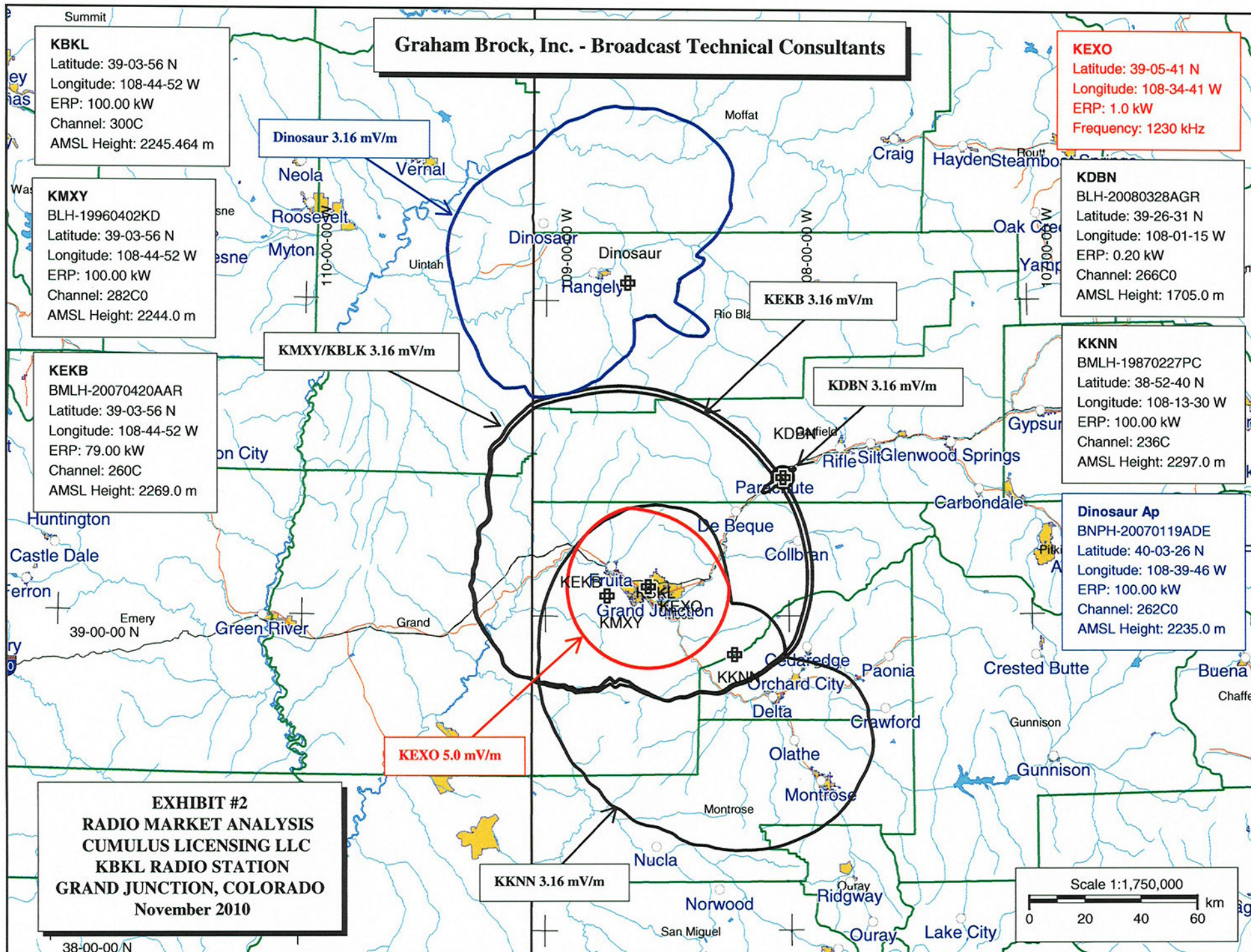
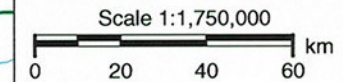
**KKNN**  
BMLH-19870227PC  
Latitude: 38-52-40 N  
Longitude: 108-13-30 W  
ERP: 100.00 kW  
Channel: 236C  
AMSL Height: 2297.0 m

**Dinosaur Ap**  
BNPH-20070119ADE  
Latitude: 40-03-26 N  
Longitude: 108-39-46 W  
ERP: 100.00 kW  
Channel: 262C0  
AMSL Height: 2235.0 m

KEXO 5.0 mV/m

KKNN 3.16 mV/m

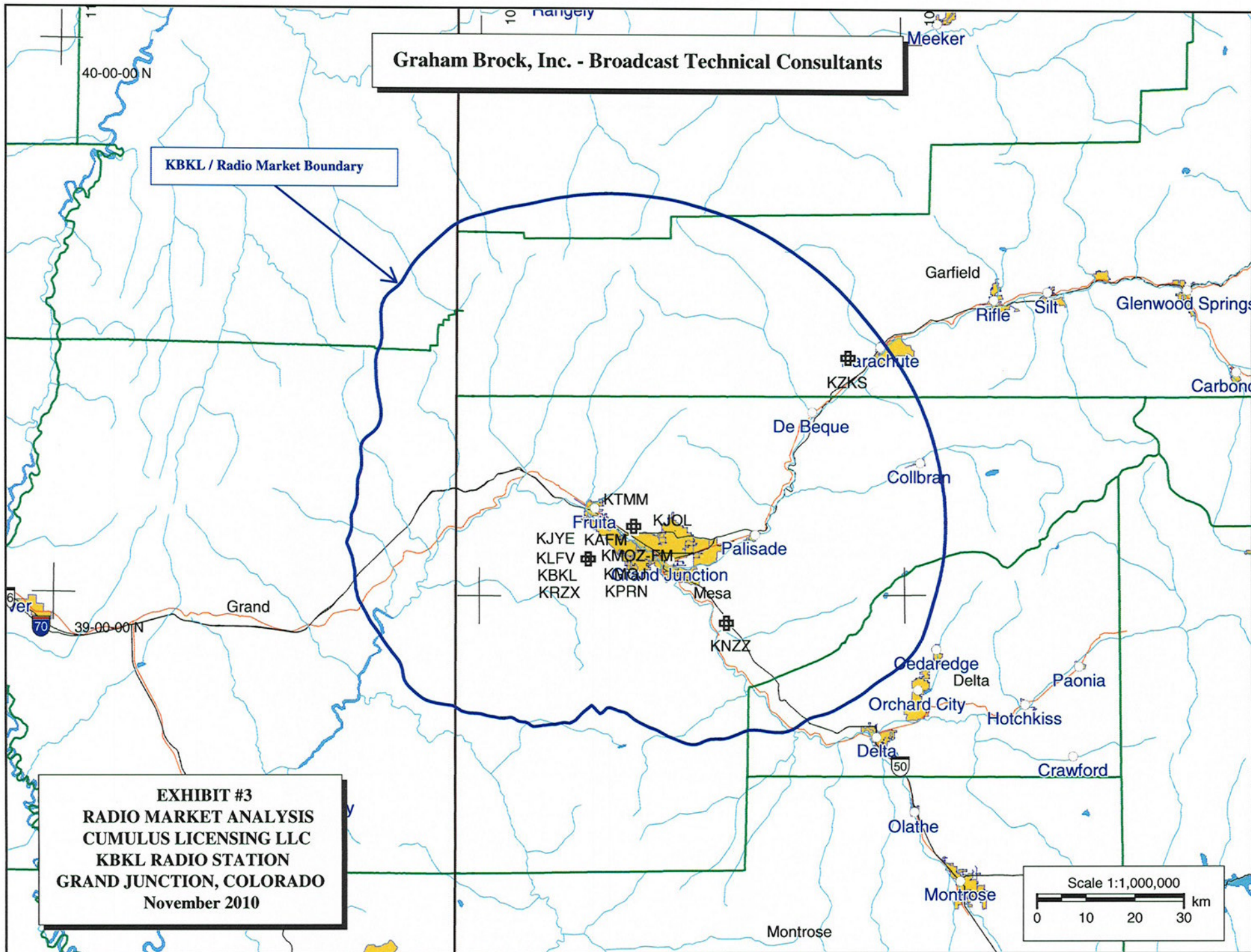
**EXHIBIT #2**  
**RADIO MARKET ANALYSIS**  
**CUMULUS LICENSING LLC**  
**KBKL RADIO STATION**  
**GRAND JUNCTION, COLORADO**  
**November 2010**





**Graham Brock, Inc. - Broadcast Technical Consultants**

**KBKL / Radio Market Boundary**



**EXHIBIT #3**  
**RADIO MARKET ANALYSIS**  
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**KBKL RADIO STATION**  
**GRAND JUNCTION, COLORADO**  
**November 2010**

**RADIO MARKET ANALYSIS**  
**CUMULUS LICENSING LLC**  
**KBKL (FM) RADIO STATION**  
**GRAND JUNCTIONS, COLORADO**  
**November 2010**

**EXHIBIT #4**

**Tabulation of Stations in Radio Market #1**

**AM Stations**

KJOL	620 kHz	Grand Junction, Colorado
KNZZ	1100 kHz	Grand Junction, Colorado
KTMM	1340 kHz	Grand Junction, Colorado

Total AM Stations - 3

**FM Stations**

KAFM	Ch 201A	Grand Junction, Colorado
KPRN	Ch 208C1	Grand Junction, Colorado
KLFV	Ch212C2	Grand Junction, Colorado
KJYE	Ch 222C	Grand Junction, Colorado
KMGJ	Ch 226C0	Grand Junction, Colorado
KMOZ-FM	Ch 264C1	Grand Junction, Colorado
* New FM CP	Ch 266C0	Dinosaur, Colorado
KPRU	Ch 277C2	Delta, Colorado
* KMXV	Ch 282C0	Grand Junction, Colorado
KZKS	Ch 287C	Rifle, Colorado
* KBKL	Ch 300C	Grand Junction, Colorado

Total FM Stations - 11

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 14**

\* Subject station.



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**EXHIBIT #5**

**Tabulation of Stations in Radio Market #2**

**AM Stations**

KJOL	620 kHz	Grand Junction, Colorado
KNZZ	1100 kHz	Grand Junction, Colorado
KTMM	1340 kHz	Grand Junction, Colorado

Total AM Stations - 3

**FM Stations**

KAFM	Ch 201A	Grand Junction, Colorado
KPRN	Ch 208C1	Grand Junction, Colorado
KLFV	Ch212C2	Grand Junction, Colorado
KMSA	Ch 217C2	Grand Junction, Colorado
KJYE	Ch 222C	Grand Junction, Colorado
KMGJ	Ch 226C0	Grand Junction, Colorado
* KEKB	Ch 260C	Fruita, Colorado
KMOZ-FM	Ch 264C1	Grand Junction, Colorado
* KDBN	Ch 266A	Parachute, Colorado
* KMXY	Ch 282C0	Grand Junction, Colorado
KZKS	Ch 287C	Rifle, Colorado
* KBKL	Ch 300C	Grand Junction, Colorado

Total FM Stations - 12

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 15**

\* Subject station.



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**EXHIBIT #6**

**Tabulation of Stations in Radio Market #3**

**AM Stations**

KJOL	620 kHz	Grand Junction, Colorado
KNZZ	1100 kHz	Grand Junction, Colorado
* KEXO	1320 kHz	Grand Junction, Colorado
KTMM	1340 kHz	Grand Junction, Colorado

Total AM Stations - 4

**FM Stations**

KAFM	Ch 201A	Grand Junction, Colorado
KPRN	Ch 208C1	Grand Junction, Colorado
KLFV	Ch212C2	Grand Junction, Colorado
KMSA	Ch 217C2	Grand Junction, Colorado
KJYE	Ch 222C	Grand Junction, Colorado
KMGJ	Ch 226C0	Grand Junction, Colorado
* KKNN	Ch 236C	Delta, Colorado
* KEKB	Ch 260C	Fruita, Colorado
KMOZ-FM	Ch 264C1	Grand Junction, Colorado
* KMXY	Ch 282C0	Grand Junction, Colorado
KZKS	Ch 287C	Rifle, Colorado
* KBKL	Ch 300C	Grand Junction, Colorado

Total FM Stations - 12

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 16**

\* Subject station.



**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

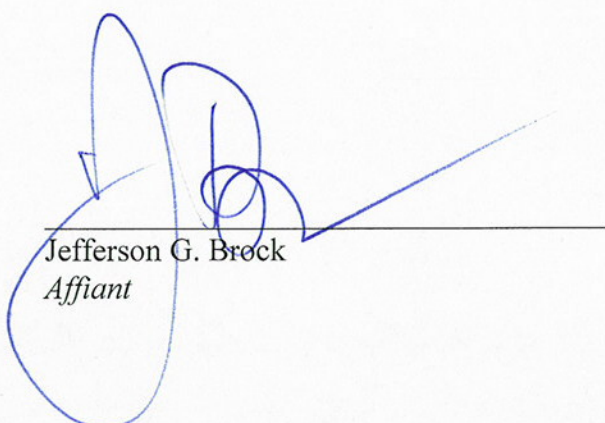
*State of Georgia    )*  
*St. Simons Island    ) ss:*  
*County of Glynn    )*

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Cumulus Licensing LLC to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 19th day of November 2010.*



\_\_\_\_\_  
Jefferson G. Brock  
*Affiant*

*Sworn to and subscribed before me  
this the 19th day of November 2010*



\_\_\_\_\_  
Notary Public, State of Georgia  
My Commission Expires: June 16, 2012