

**MULTIPLE OWNERSHIP**

In the instant application, Encore Broadcasting, LLC (“Encore”) proposes to acquire KCSE(FM), Sterling City, TX and KKC�(FM), Ballinger, TX. Encore has also signed a separate asset purchase agreement to acquire stations KGKL(AM), San Angelo, TX, KGKL-FM, San Angelo, TX, and KELI(FM), San Angelo, TX and an application on FCC Form 314 seeking consent to the assignment of licenses for these stations to Encore will be filed imminently. An engineering analysis demonstrating that the common ownership of these five stations in the San Antonio, TX area complies with Section 73.3555 of the Commission’s rules is attached.

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
ENCORE BROADCASTING LLC

This radio multiple ownership analysis was prepared on behalf of Encore Broadcasting LLC (“Encore”), in connection with applications to acquire stations in the San Angelo, Texas area. The following radio stations are to have a common attributable interest by the principals of Encore:

Call Sign	City of License	Facilities
KGKL(AM)	San Angelo, TX	960 kHz, 1 kW-N, 5 kW-D, U, DA-N
KCSE(FM)	Sterling City, TX	Channel 243C2, 40 kW, 166 m
KGKL-FM	San Angelo, TX	Channel 248C1, 100 kW, 125 m
KELI(FM)	San Angelo, TX	Channel 254C, 100 kW, 393 m
KKCN(FM)	Ballinger, TX	Channel 276C1, 100 kW, 139 m

The principal community contours of all of these stations are depicted on a map included herein as Figure 1. The radio multiple ownership analysis considers only those stations with 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 Markets

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. As listed in the table below, there are two defined “radio markets” formed by the subject stations:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	KGKL	KCSE, KGKL, KELI
Market 2	KGKL	KGKL, KELI, KKCNC

#### Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating stations that have principal community contours that intersect the principal community contours that define the radio market. Only operating, licensed commercial stations were counted. Commonly owned stations that are not considered in the numerator of owned stations are also not counted as part of the count of stations in the defined markets. The results of the analysis are tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	4 AM; 12 FM; 16 Total
Market 2	4 AM; 16 FM; 20 Total

Figure 2 is a tabulation of the radio stations identified in the defined radio markets. 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 described in Section 73.184 of the FCC Rules. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method outlined in Section 73.313 of the FCC Rules. Terrain data were derived from the U.S.G.S. 3-second computer database for each of the FM stations using radials evenly-spaced every 2 degrees of azimuth.

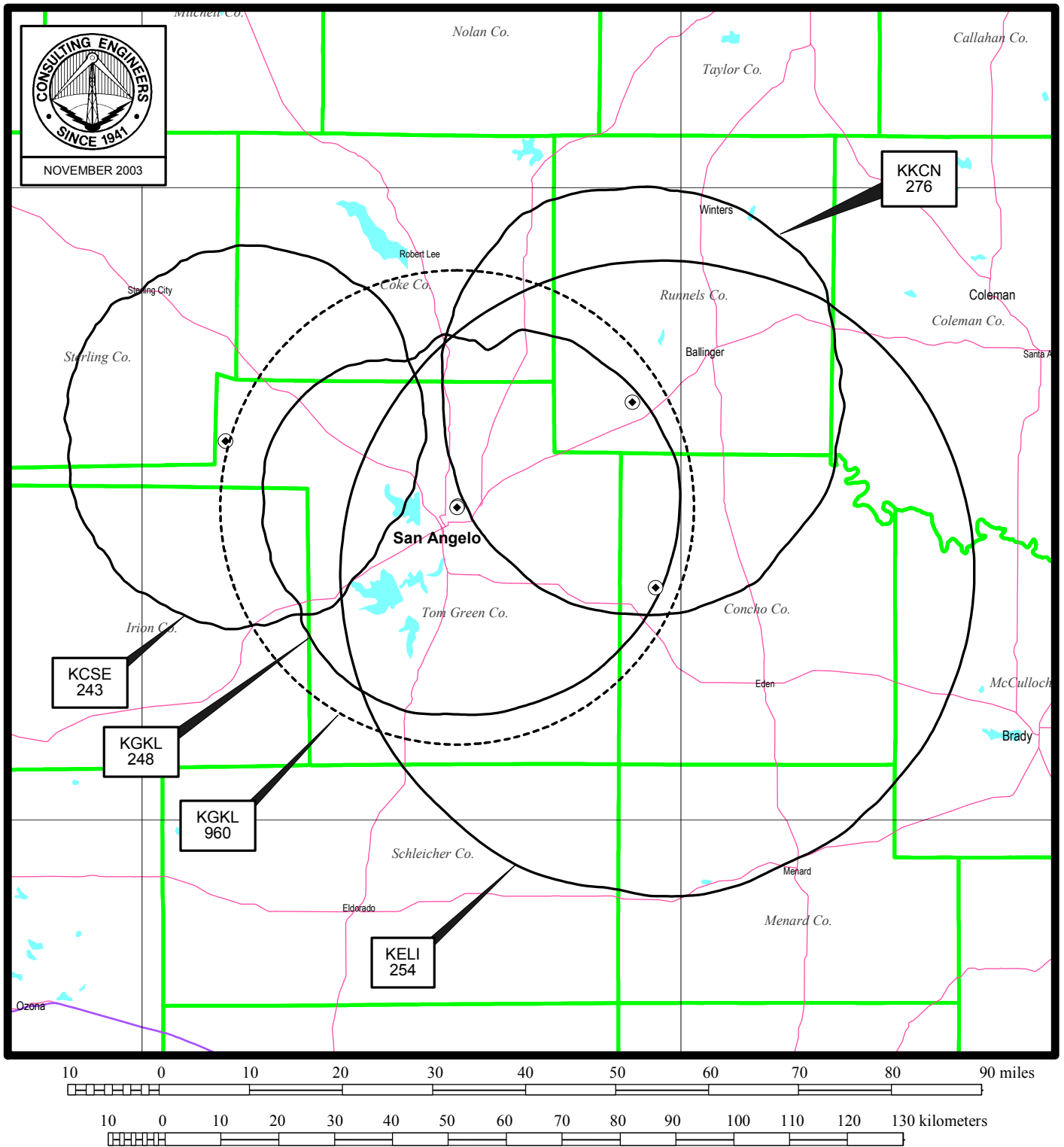
Based on the above, it is concluded that the proposed combination of the stations to be owned complies with Section 73.3555(a) of the FCC Rules.

Louis Robert du Treil, Jr.

du Treil, Lundin & Rackley, Inc.  
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November 10, 2003

Figure 1



## PREDICTED PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

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

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
ENCORE BROADCASTING LLC

Tabulation of Stations in Radio Markets

<b>Market 1</b>	
Number	Station
<b>AM Stations</b>	
1	KGKL, SAN ANGELO, TX, 960 kHz
2	KKSA, SAN ANGELO, TX, 1260 kHz
3	KCRN, SAN ANGELO, TX, 1340 kHz
4	KRUN, BALLINGER, TX, 1400 kHz
<b>FM Stations</b>	
1	KDCD, SAN ANGELO, TX, Channel 225
2	KCRN-F, SAN ANGELO, TX, Channel 230
3	KIXY-F, SAN ANGELO, TX, Channel 234
4	KCSE, STERLING CITY, TX, Channel 243
5	KXYL-F, BROWNWOOD, TX, Channel 245
6	KGKL-F, SAN ANGELO, TX, Channel 248
7	KELI, SAN ANGELO, TX, Channel 254
8	KYZZ, SAN ANGELO, TX, Channel 261
9	KWFR, SAN ANGELO, TX, Channel 270
10	KXCT, COLEMAN, TX, Channel 272
11	KMDX, SAN ANGELO, TX, Channel 291
12	KSJT-F, SAN ANGELO, TX, Channel 298

Market 2	
Number	Station
AM Stations	
1	KGKL, SAN ANGELO, TX, 960 kHz
2	KKSA, SAN ANGELO, TX, 1260 kHz
3	KCRN, SAN ANGELO, TX, 1340 kHz
4	KRUN, BALLINGER, TX, 1400 kHz
FM Stations	
1	KDCD, SAN ANGELO, TX, Channel 225
2	KCRN-F, SAN ANGELO, TX, Channel 230
3	KIXY-F, SAN ANGELO, TX, Channel 234
4	KNCE, BAIRD, TX, Channel 236
5	KORQ, WINTERS, TX, Channel 241
6	KXYL-F, BROWNWOOD, TX, Channel 245
7	KGKL-F, SAN ANGELO, TX, Channel 248
8	KELI, SAN ANGELO, TX, Channel 254
9	KYZZ, SAN ANGELO, TX, Channel 261
10	KWFR, SAN ANGELO, TX, Channel 270
11	KXCT, COLEMAN, TX, Channel 272
12	KKCN, BALLINGER, TX, Channel 276
13	KEAN-F, ABILENE, TX, Channel 286
14	KMDX, SAN ANGELO, TX, Channel 291
15	KSJT-F, SAN ANGELO, TX, Channel 298
16	KEYJ-F, ABILENE, TX, Channel 300