

**Visionary Related Entertainment, LLC
KNUQ
Paauilo, Hawaii
Ch 280 C
Application for Minor Change to
KNUQ
FCC File BLH- 19900425KB
Facility ID 15969**

**Duopoly Study
and
Demonstration of Compliance with Local Ownership Rules**

Attached are a table and maps demonstrating Visionary Related Entertainment LLC ("VRE") compliance with the Commission's multiple ownership rules.

The submitted application for the proposed minor change to KNUQ is permissible under the Commission's multiple ownership rules because of the following:

- 1) KNUQ is located in a non-Arbitron, unrated market (Maui) and is not a part of any other market in the Hawaiian Islands. The Island of Maui is geographically isolated from the other Hawaiian Islands. There are a total of Nineteen FM stations and Six AM stations in the Maui market, for a total of 25 stations in the market. Four VRE-owned primary signals (two AM and four FM) overlap the 70 dbu coverage area of this proposal. VRE is entitled to six stations, only four of which may be in one class, AM or FM.
- 2) None of the existing VRE operating stations in adjacent markets or Islands have an FM 70 dBu contour that overlap the 70 dBu contour of the proposed KNUQ facility on Ch. 280. This proposal has no VRE station overlap with adjacent markets, and is within the current limits set forth by the Commission's rules.
- 3) The modification of the KNUQ facility will not exceed the Commission's limit of four FM stations because it is the fourth FM VRE station in the Maui market.
- 4) VRE has two currently operating AM stations in the Maui market, and they do overlap the proposed KNUQ 70 dBu contour. Therefore, VRE submits that there is overlap with four operating FM VRE facilities and two AM VRE facilities, but the number does not exceed the FCC limits on cross-ownership in an unrated market with at least 15 but not more than 29 stations (commercial and non-commercial), and is therefore in compliance with FCC duopoly rules.
- 5) Only those stations within 92 kilometers of the common overlap area will be considered as contributors to the market.

6) All data and information contained herein is true and accurate to our belief and knowledge. All data related to AM and FM facilities was derived from the FCC CDBS system.

**KNUQ
Paauilo, Hawaii**

**Maui Market
Duopoly Study – AM Stations of Interest**

***AM Broadcast Stations
(5 mV/m Overlap)***

<u>Facility ID</u>	<u>Call Sign</u>	<u>Location</u>	<u>Freq</u>	<u>Power</u>	<u>Coordinates</u>
*70381	KAOI-AM	Kihei	1110	5kw	20-49-21/156-27-15
*161045	KEWE	Kahului	1240	5kw	20-49-21/156-27-15
9678	KMVI	Wailuku	550	5kw	20-47-30/156-28-21
49956	KNUI	Kahului	900	5kw	20-53-29/156-29-23
36687	KUAU	Haiku	1570	5kw	20-53-29/156-29-23
161239	KCIK	Kihei	740	5kw	20-53-29/156-29-23

*Denotes facility owned and operated by VRE

KNUQ
Paauilo, Hawaii

Maui Market
Duopoly Study – FM Stations of Interest

FM Broadcast Stations
(70 dbu overlap)

<u>Facility ID</u>	<u>Call Sign</u>	<u>Location</u>	<u>Ch</u>	<u>Power</u>	<u>HAAT</u>	<u>Coordinates</u>
170177	KHEI-FM*	Kihei	298	.75kw	955m	20-46-31/156-14-49
164100	KUHI (CP)	Haiku	293	69kw	696m	20-39-36/156-21-50
166083	KLHI-FM	Kahului	223	1.7kw	674m	20-39-36/156-21-50
26437	KKUA**	Wailuku	214	14.5kw	1752m	20-42-34/156-15-49
172438	KIPM**	Waikapu	209	14.5kw	1752m	20-42-34/156-15-49
172436	KIPH**	Hana	202	.25kw	-41.7m	20-45-03.5/156-00-17.1
174896	KMNO**	Wailuku	219	1.2kw	935m	20-46-31/156-14-49
70375	KAOI-FM*	Wailuku	236	3.5kw	933.1m	20-46-31/156-14-49
14699	KDLX*	Makawao	232	2 kw	933.1m	20-46-31/156-14-49
170964	KRKH	Wailea-Makena	247	1.2kw	696m	20-39-36/156-21-50
9674	KJKS	Kahului	260	69kw	696m	20-39-36/156-21-50
49958	KJMD	Pukalani	252	50kw	31m	20-42-19/156-21-54
15969	KNUQ*	Paauilo	280	100 kw	369m	20-38-18/156-23-01
17023	KONI	Lanai City	284	69kw	696m	20-39-36/156-21-50
56069	KPMW	Haliimaile	288	21kw	165m	20-44-40/156-18-39
35490	KPOA	Lahina	228	69kw	696m	20-39-36/156-21-50
198744	KFNZ	Kualapuu	276	3.4kw	511m	20-50-41/156-54-04
189544	KMKV	Kihei	264	2.25kw	1755m	20-42-34/156-15-49
164133	KQMY	Paia	271	.33kw	1796m	20-42-34/156-15-49

* Denotes facility owned and operated by VRE

** Denotes non-commercial station