

Exhibit 15 - Idaho Falls-Pocatello-Blackfoot Market

This exhibit is being submitted in accordance with the Commission's interim processing guidelines to demonstrate that the acquisition proposed in the instant application complies with the new local radio ownership limits.

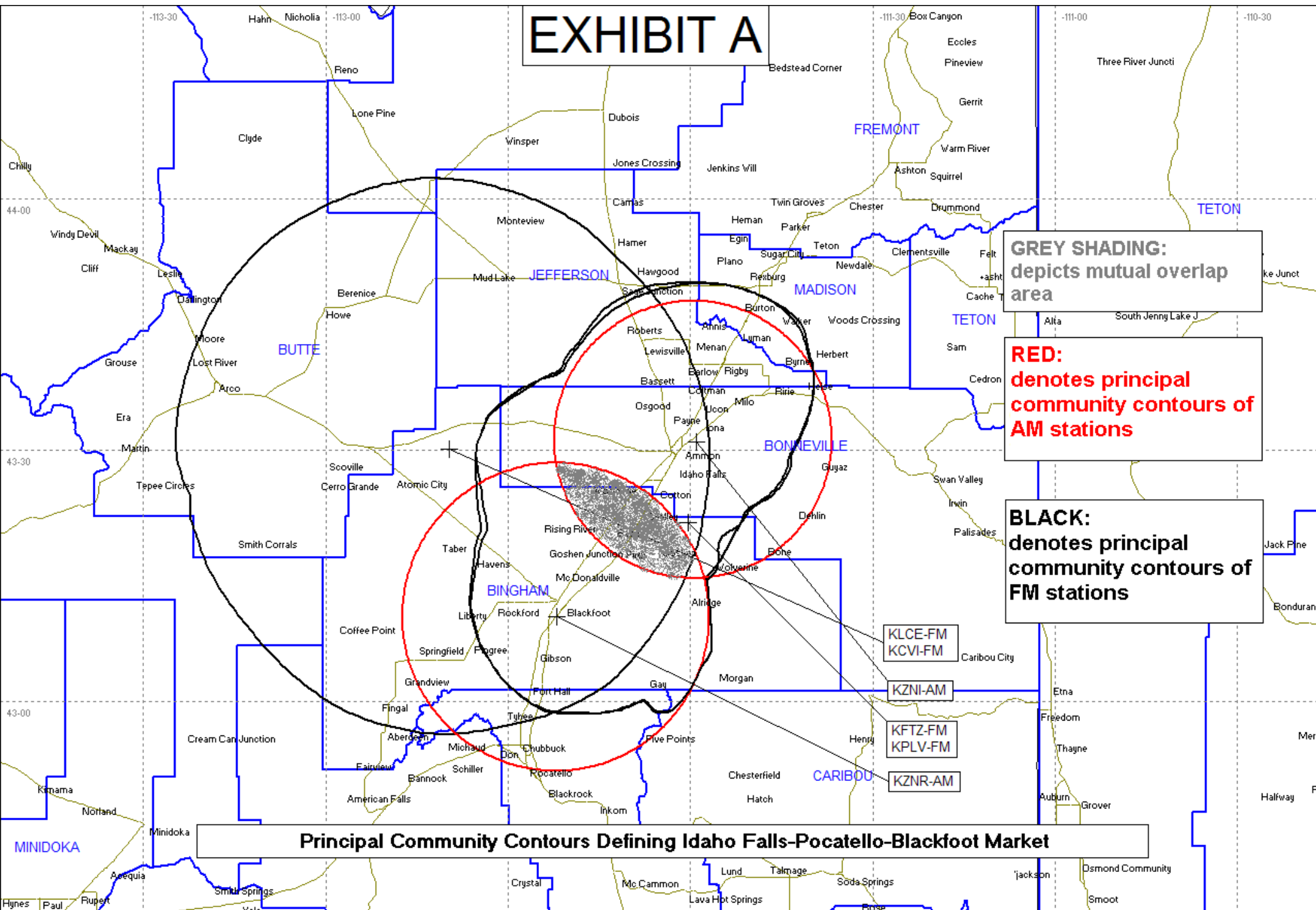
In this application, and a related application filed concurrently herewith, assignee Bonneville Holding Company ("BHC") proposes, as a result of the instant transaction to hold the licenses of Stations KCVI(FM), Blackfoot, Idaho, KLCE(FM) Blackfoot, Idaho, KZNR(AM), Blackfoot, Idaho, KZNI(AM), Idaho Falls, Idaho, KPLV(FM), Idaho Falls, Idaho, and KFTZ(FM), Idaho Falls, Idaho.<sup>1</sup> These stations are not located within an Arbitron market. Accordingly, this exhibit and the attached maps demonstrate compliance with the Commission's new local radio ownership rule utilizing the modified contour method.

The principal community contours of the six stations contemplated by the instant application mutually overlap with one another (See attached map at Exhibit A). Section 73.3555(a) of the Commission's rules provides that in a radio market with between 15 and 29 radio stations, a party may own, operate or control up to six commercial radio stations, no more than four of which are in the same service. There are more than 15 radio stations whose principal community contours overlap the relevant area and whose transmitter sites are no more than 92 kilometers from the perimeter of the mutual overlap area (See Exhibits B and C). Thus, BHC can hold the licenses for KCVI(FM), KLCE(FM), KZNR(AM), KZNI(AM), KPLV(FM), KFTZ(FM) under the Commission's new local radio ownership rule.

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<sup>1</sup> KZNR(AM) has an associated expanded band AM station, call sign KBLI(AM), Blackfoot, Idaho, which Applicant would also acquire. This station has not been included in the instant analysis. Consistent with Commission policy, expanded band stations are not considered in a local radio ownership analysis. See 47 C.F.R. § 73.3555 Notes 9 & 10; *Entercom Kansas City License, LLC Request for Waiver of Section 73.3555 Note 10*, FCC 02-313, *Memorandum Opinion and Order* (rel. Nov. 20, 2002). As in the *Entercom* case, herein the applicant seeks a limited waiver of Section 73.3555 Note 10 to afford the expanded band station consistent treatment in calculating the ownership exemption and the operating period. Such action eliminates application of a rule that "would disserve the public interest" by "significantly erod[ing]" the licensee's "ability to evaluate its expanded band operation." *Entercom*, FCC 02-131, ¶ 6.

# EXHIBIT A



## EXHIBIT B

**Radio stations in the Idaho Falls-Blackfoot market whose principal community contours overlap the relevant area and whose transmitter sites are no more than 92 Km from the perimeter of the mutual overlap area.\***

<b>Station #</b>	<b>Call Sign</b>	<b>City, State</b>	<b>Frequency</b>	<b>Class</b>	<b>Power</b>
1	KBJX-FM	Shelly, Idaho	106.3 mHz	C1	100,000.00
2	KCVI-FM **	Blackfoot, Idaho	101.5 mHz	C	100,000.00
3	KFTZ-FM **	Idaho Falls, Idaho	103.3 mHz	C1	100,000.00
4	KID-AM	Idaho Falls, Idaho	590 kHz	B	5,000.00
5	KID-FM	Idaho Falls, Idaho	96.1 mHz	C	100,000.00
6	KLCE-FM **	Blackfoot, Idaho	97.3 mHz	C	100,000.00
7	KLLP-FM	Chubbuck, Idaho	98.5 mHz	C2	6,200.00
8	KMGI-FM	Pocatello, Idaho	102.5 mHz	C	100,000.00
9	KORR-FM	American Falls, Idaho	104.1 mHz	C1	56,000.00
10	KOUU-AM	Pocatello, Idaho	1290 kHz	D	1,000.00
11	KPKY-FM	Pocatello, Idaho	94.9 mHz	C	100,000.00
12	KPLV-FM **	Idaho Falls, Idaho	105.5 mHz	C1	100,000.00
13	KRTK-AM	Chubbuck, Idaho	1490 kHz	C	1,000.00
14	KRXK-AM	Rexburg, Idaho	1230 kHz	C	1,000.00
15	KSEI-AM	Pocatello, Idaho	930 kHz	B	5,000.00
16	KUPI-AM	Ammon, Idaho	980 kHz	B	5,000.00
17	KUPI-FM	Idaho Falls, Idaho	99.1 mHz	C1	100,000.00
18	KWIK-AM	Pocatello, Idaho	1240 kHz	C	1,000.00
19	KZBQ-FM	Pocatello, Idaho	93.7 mHz	C	98,000.00
20	KZNI-AM **	Idaho Falls, Idaho	1260 kHz	D	5,000.00
21	KZNR-AM **	Blackfoot, Idaho	690 kHz	D	1,000.00
22	KDAQ-FM	Rexburg, Idaho	94.3 mHz	A	43,000.00
23	KGTM-FM	Rexburg, Idaho	98.1 mHz	C1	100,000.00

**\*\* stations involved in the proposed acquisition**

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\* There are also noncommercial radio stations that have not been included in this showing. Their inclusion is unnecessary to demonstrate compliance with the Commission's new local radio ownership rule.

# EXHIBIT C

**GREY SHADING:**  
depicts mutual overlap  
area

**RED:**  
denotes principal  
community contours  
of AM stations

**GREEN:**  
denotes principal  
community contours of  
FM stations

**BLACK :**  
denotes principal  
community contours of  
stations defining the  
market

\*\*\* stations involved in  
proposed acquisition

Transmitter sites of the stations  
depicted are not more than 92 km  
from the perimeter of the mutual  
overlap area.

**Principal Community Contours Involved in Idaho Falls-Pocatello-Blackfoot Market Study**

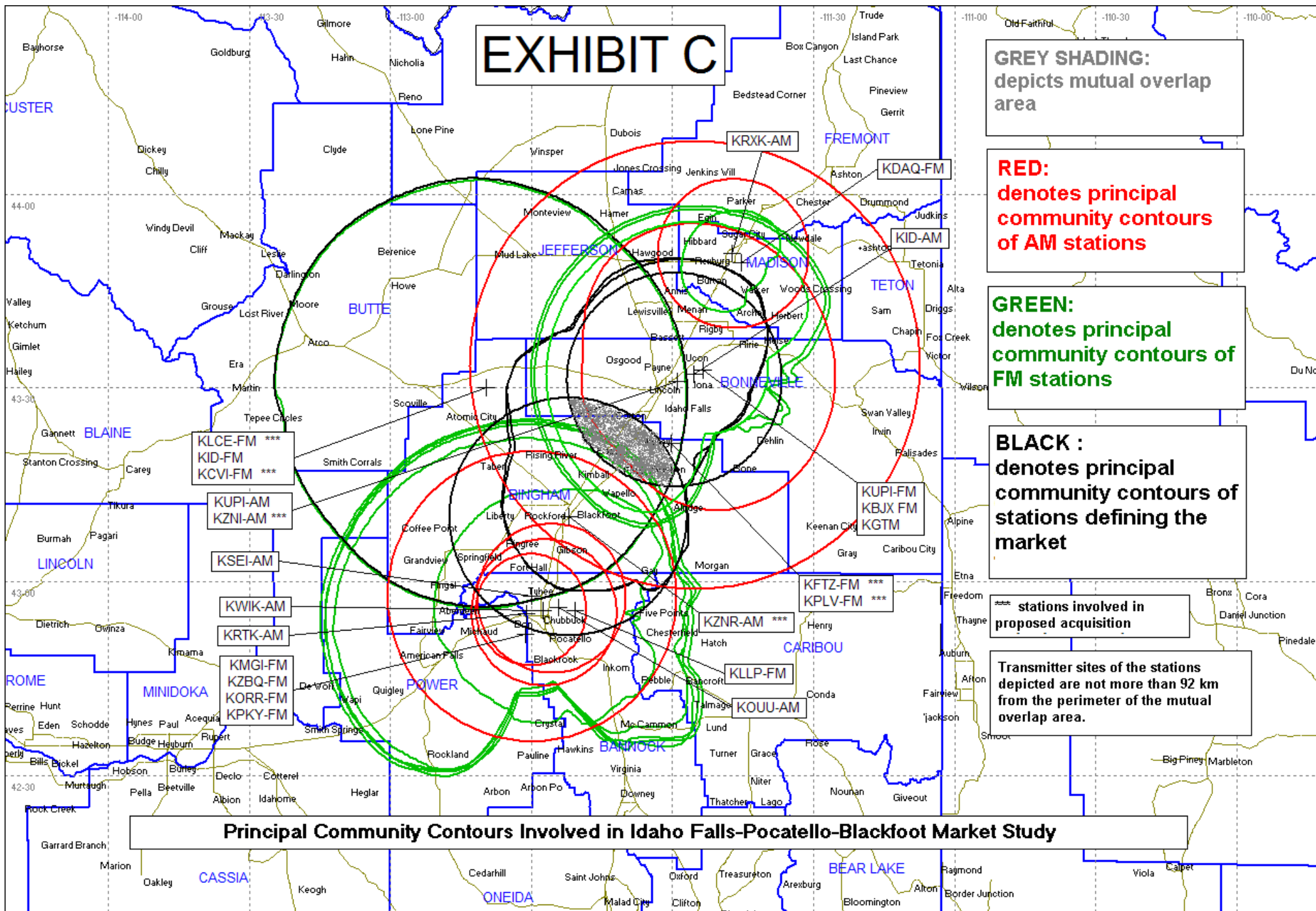


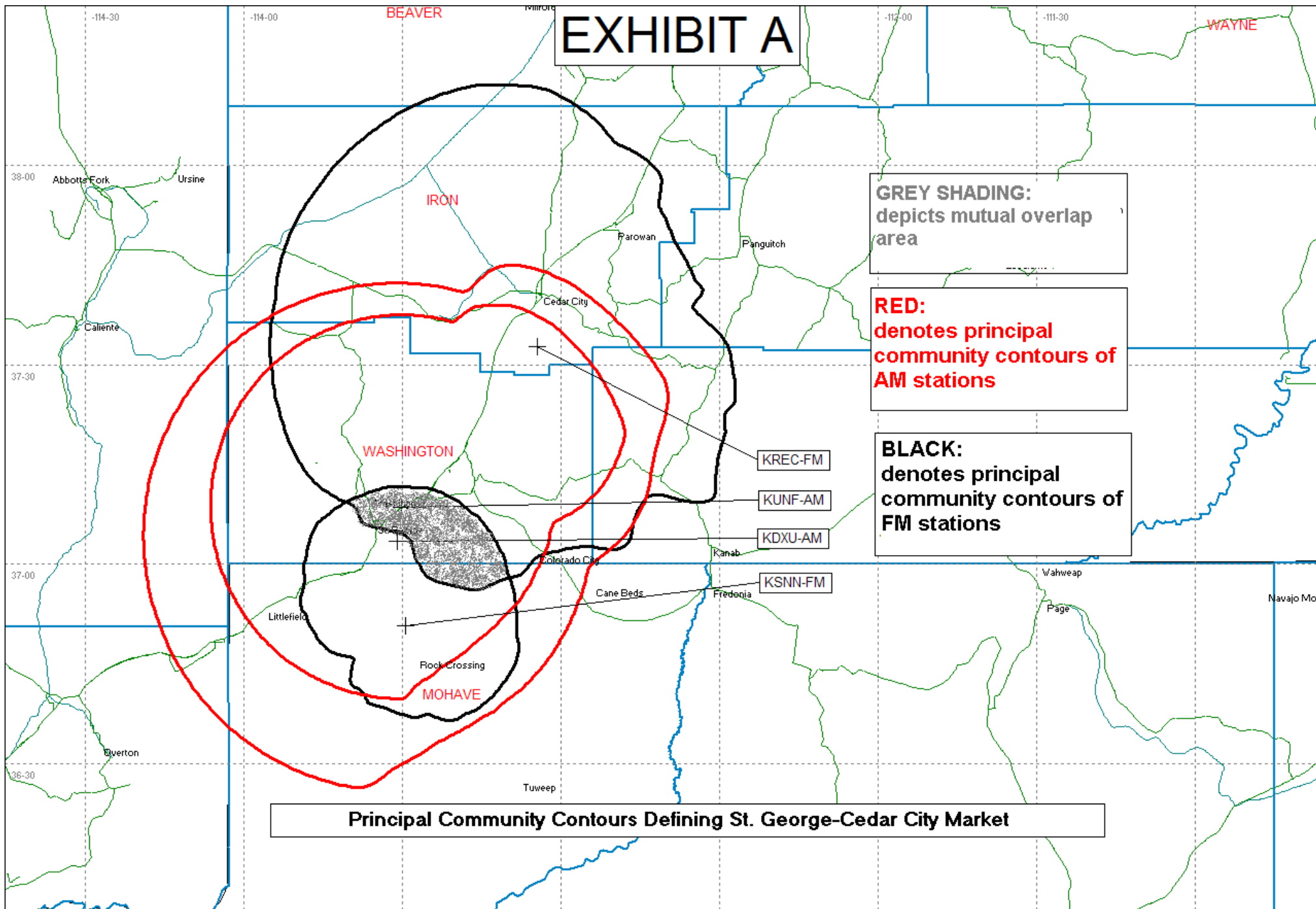
Exhibit 15 - St. George-Cedar City, Utah

This exhibit is being submitted in accordance with the Commission's interim processing guidelines to demonstrate that the acquisition proposed in the instant application complies with the new local radio ownership limits.

In this application, and a related application filed concurrently herewith, assignee Bonneville Holding Company ("BHC") proposes, as a result of the instant transaction to hold the licenses of Stations KDXU(AM), St. George, Utah, KSNN(FM), St. George, Utah, KUNF(AM) Washington, Utah, and KREC(FM) Brian Head, Utah. These stations are not located within an Arbitron market. Accordingly, this exhibit and the attached maps demonstrate compliance with the Commission's new local radio ownership rule utilizing the modified contour method.

The principal community contours of the four stations contemplated by the instant application mutually overlap with one another (See attached map at Exhibit A). Section 73.3555(a) of the Commission's rules provides that in a radio market with 14 or fewer radio stations, a party may own, operate, or control up to five commercial radio stations, not more than three of which are in the same service, except that a company may not own, operate, or control more than 50 percent of the stations in such market. There are more than eight radio stations whose principal community contours overlap the relevant area and whose transmitter sites are no more than 92 kilometers from the perimeter of the mutual overlap area (See Exhibits B and C). Thus, BHC can hold the licenses for KDXU(AM), KSNN(FM), KUNF(AM), and KREC(FM) under the Commission's new local radio ownership rule.

# EXHIBIT A



## EXHIBIT B

**Radio stations in the St. George-Cedar City market whose principal community contours overlap the relevant area and whose transmitter sites are no more than 92 Km from the perimeter of the mutual overlap area.\***

<b>Station #</b>	<b>Call Sign</b>	<b>City, State</b>	<b>Frequency</b>	<b>Class</b>	<b>Power</b>
1	KITT-AM	Parowan, Utah	1400 kHz	C	800.00
2	KDXU-AM **	St. George, Utah	890 kHz	B	10,000.00
3	KPLD-FM	Kanab, Utah	101.1 mHz	C	100,000.00
4	KNNZ-AM	Cedar City, Utah	940 kHz	D	10,000.00
5	KONY-FM	St. George, Utah	99.9 mHz	C	89,000.00
6	KREC-FM **	Brian Head, Utah	98.1 mHz	C	54,000.00
7	KSNN-FM **	St. George, Utah	93.5 mHz	C2	2,400.00
8	KSUB-AM	Cedar City, Utah	590 kHz	B	5,000.00
9	KUNF-AM **	Washington, Utah	1210 kHz	B	10,000.00
10	KXBN-FM	Cedar City, Utah	94.9 mHz	C1	55,000.00
11	KXFF-FM	Cedar City, Utah	92.5 mHz	C	41,000.00
12	KZHK-FM	St. George, Utah	95.9 mHz	C	100,000.00
13	KZNU-AM	St. George, Utah	1450 kHz	B	1,000.00
14	KMXM-FM	Colorado City, Arizona	101.7 mHz	C1	6,100.00

**\*\*stations involved in the proposed acquisition**

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\* There are also noncommercial radio stations that have not been included in this showing. Their inclusion is unnecessary to demonstrate compliance with the Commission's new local radio ownership rule.

# EXHIBIT C

**GREY SHADING:**  
depicts mutual overlap area

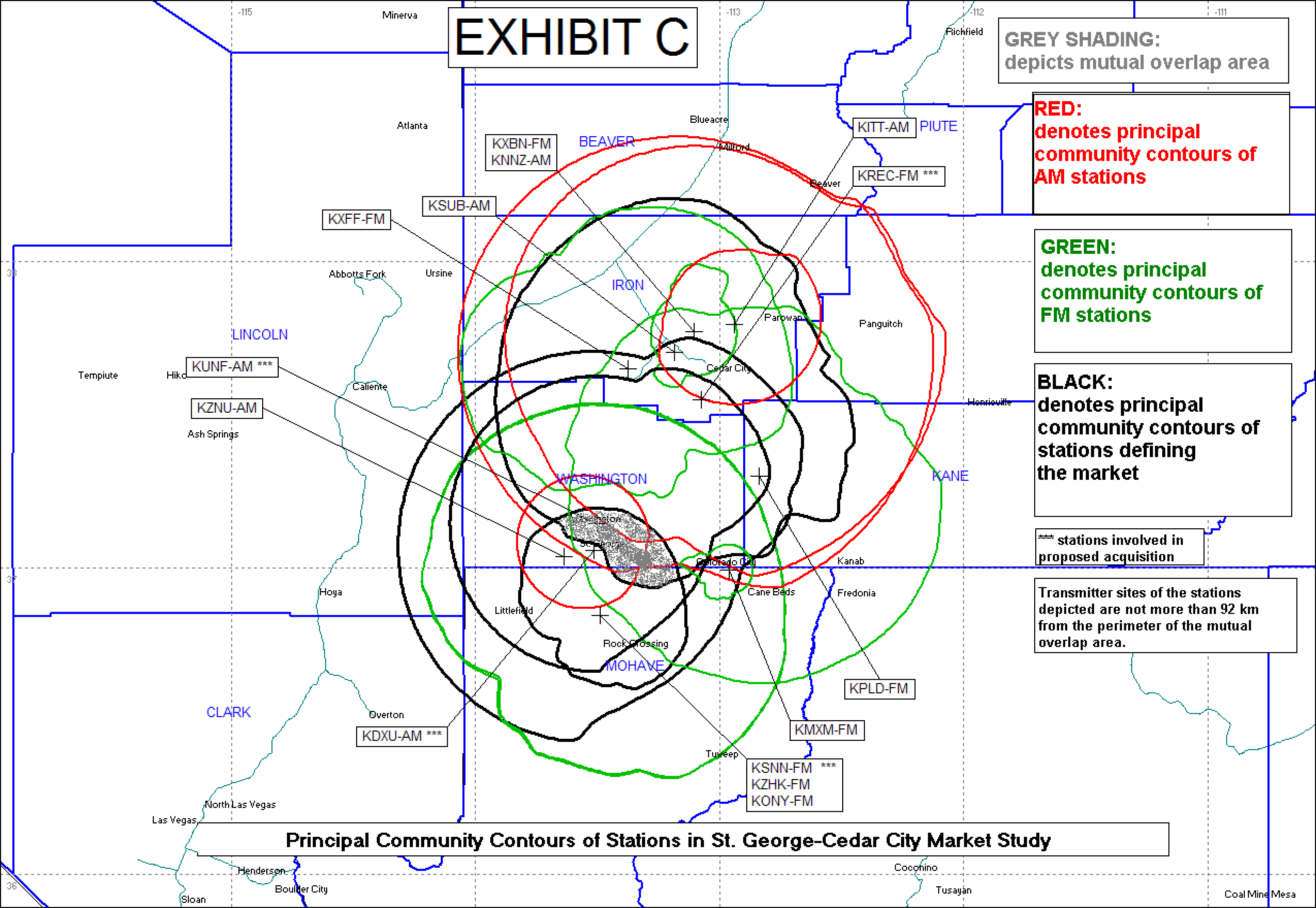
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stations defining  
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\*\*\* stations involved in  
proposed acquisition

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**Principal Community Contours of Stations in St. George-Cedar City Market Study**