

ENGINEERING STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS

This radio multiple ownership analysis was prepared to consider potential common ownership of the stations tabulated below under the FCC “Interim” contour analysis method.¹

Call Sign / Facility ID	Location	Facilities
KRES(FM) / 35890 Licensed	Moberly, MO	Channel 284C 100 kW 311 m
KIRK-FM / 78275 Licensed	Macon, MO	Channel 260C3 12.5 kW 141 m
NEW(FM) / 171017 Application	Madison, MO	Channel 247C3 25 kW 100 m
KWIX (AM) / 35889 Licensed	Moberly, MO	1230 kHz 0.49 kW-D, 1 kW-N ND

The principal community contours (3.16 mV/m for FM stations, 5 mV/m for AM stations) of these stations are depicted on a map included herein as Figure 1. As there is common contour overlap between the above mentioned stations, an ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555(a).

Radio Market

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. There is one “radio market” to consider based on the map in Figure 1.

Count of Stations in Defined Market

The number of radio stations in a “radio market” is determined by counting the operating stations having principal community contours that overlap or intersect the principal community contours that define the radio market, plus the subject stations that are co-owned. Only those stations located within 92 km of the perimeter of the mutual overlap area of the

¹ See *Report and Order and Notice of Proposed Rulemaking*, MB Docket 02-277, FCC 03-127, Released July 2, 2003.

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 Market	Number of Other Stations in the Radio Market
Market 1	5 FM

Figure 2 is a tabulation of the radio stations identified in the defined radio market. It is noted that there may be other stations that are considered in the market, however the stations tabulated are enough to show compliance with the FCC's radio multiple ownership rules. 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 Section 73.184. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of Section 73.313. Terrain data was derived from the U.S.G.S. 3-second computer database for each of the FM stations using radials evenly-spaced every 10 degrees of azimuth.

Therefore, the proposed common ownership of stations KRES(FM), KIRK-FM, NEW(FM) {at Madison, MO} and KWIX(AM) will not make up more than half of the stations in the defined radio market. Based on the above, it is concluded that the proposed combination of the stations to be owned will comply with Section 73.3555(a) of the FCC Rules.

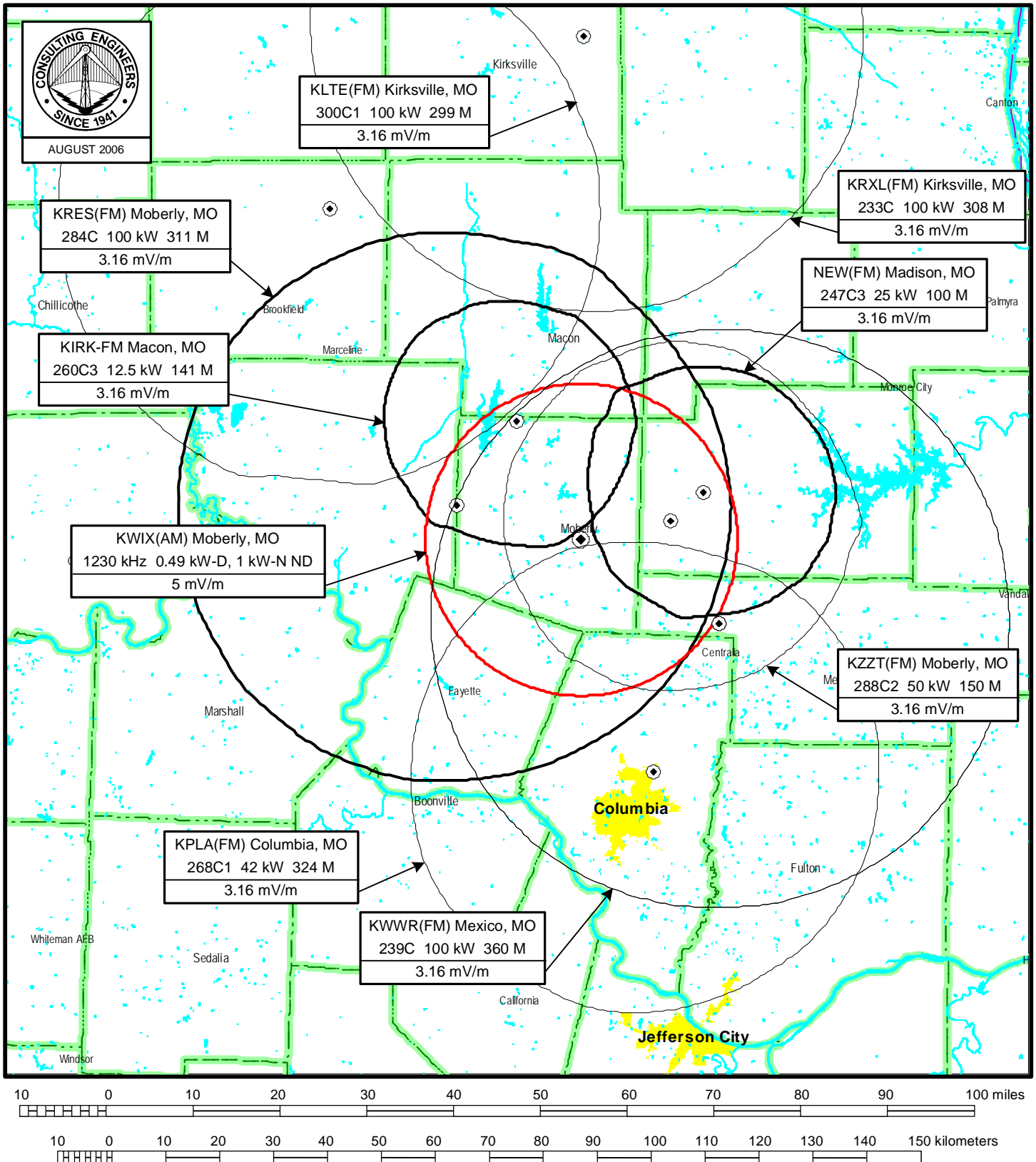


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Figure 1



PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

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Tabulation of Other Stations in Radio Market

<u>Call Sign</u>	<u>City of License</u>	<u>State</u>	<u>Freq/Ch.</u>
KRXL(FM)	Kirksville	MO	233
KLTE(FM)	Kirksville	MO	300
KWWR(FM)	Mexico	MO	239
KPLA(FM)	Columbia	MO	268
KZZT(FM)	Moberly	MO	288