

KUDE Multiple Ownership Study

Pursuant to the Commission’s ownership rules in Section 73.3555, the following Multiple Ownership Study was conducted to determine if a grant of the instant application for KUDE will comply with the Rules. Radio station KUDE is owned by Millcreek Broadcasting, LLC. The principals of Millcreek Broadcasting, LLC, have an attributable interest in the following radio stations in the Salt Lake City, UT area:

Station	Channel/Class/Status	City of License	Overlap with KUDE
KBNZ	285C2 Lic, 284C App	Lyman, WY ¹	YES (App Only)
KHTB	235C Lic.	Provo, UT ²	YES
KCUA	223C3 Lic.	Coalville, UT ³	NO
KKAT	270C Lic.	Ogden, UT ⁴	YES
KOTB	291C Lic	Evanston, WY ⁵	YES
KRAR	295C Lic	Brigham City, UT ⁶	NO
KUDD	300C Lic.	Roy, UT ⁷	NO
KUDE	280C Lic.	Nephi, UT ⁷	n/a
KDUT	272C Lic.	Randolph, UT ⁷	YES
KOVO	960 kHz Lic.	Provo, UT ⁷	YES
KUUU	221C3 Lic, 223C2 App	South Jordan, UT ⁷	NO
KNJQ	286C Lic.	Manti, UT ⁷	YES
KMGR	240C1 CP, 239C1 Lic.	Delta, UT ⁸	YES (App only)
KTCE	222A Lic, 221A App.	Payson, UT ⁹	YES
KTPM	248C App	Coalville, UT ¹⁰	YES (App Only)

¹ 3 Point Media – Utah, LLC, owns KBNZ and shares common principals with Millcreek Broadcasting, LLC.

² 3 Point Media – Salt Lake City, LLC, owns KKAT and shares common principals with Millcreek Broadcasting, LLC.

³ 3 Point Media – Coalville, LLC, owns KCUA and shares common principals with Millcreek Broadcasting, LLC.

⁴ 3 Point Media – Ogden, LLC, owns KKAT and shares common principals with Millcreek Broadcasting, LLC.

⁵ Rocky Mountain Radio Network, Inc., owns KOTB and shares common principals with Millcreek Broadcasting, LLC.

⁶ 3 Point Media – Brigham, LLC, owns KRAR and shares common principals with Millcreek Broadcasting, LLC

⁷ Millcreek Broadcasting, LLC, also owns KUDD, KDUT, KOVO, KUUU, and KNJQ..

⁸ 3 Point Media – Delta, LLC, owns KRAR and shares common principals with Millcreek Broadcasting, LLC

⁹ KTCE is owned by Moenkopi Communications, Inc. and is operating pursuant to an LMA agreement with Millcreek Broadcasting, LLC.

¹⁰ 3 Point Media – Franklin, LLC, owns KTPM and shares common principals with Millcreek Broadcasting, LLC.

It should be noted that four of the stations listed (which KUDE's principals commonly control) have filed various applications which, upon FCC approval and/or consummation, will significantly decrease the number of stations that will share a mutual overlap area with KUDE. Each of these four stations is discussed below:

KKAT (FM) Ogden, UT

On June 1, 2004, 3 Point Media – Ogden, LLC, filed BALH 20040601BEP to assign the license of KKAT (FM) Ogden, UT to Citadel Broadcasting Company. The Commission has not yet granted this application for Assignment of License. Currently, KKAT is operating pursuant to an LMA agreement between 3 Point and Citadel. Upon approval and consummation of the assignment to Citadel, KKAT will no longer be attributable to the principals of KUDE.

KDUT (FM) Randolph, UT

On March 16, 2004, Millcreek Broadcasting, LLC filed BALH-20040316ACS to assign the license of KDUT to Bustos Media Holdings of Utah, LLC. The Commission has not yet granted this application for Assignment of License. However, upon approval and consummation of the assignment of license to Bustos, KDUT will no longer be attributable to the principals of KUDE.

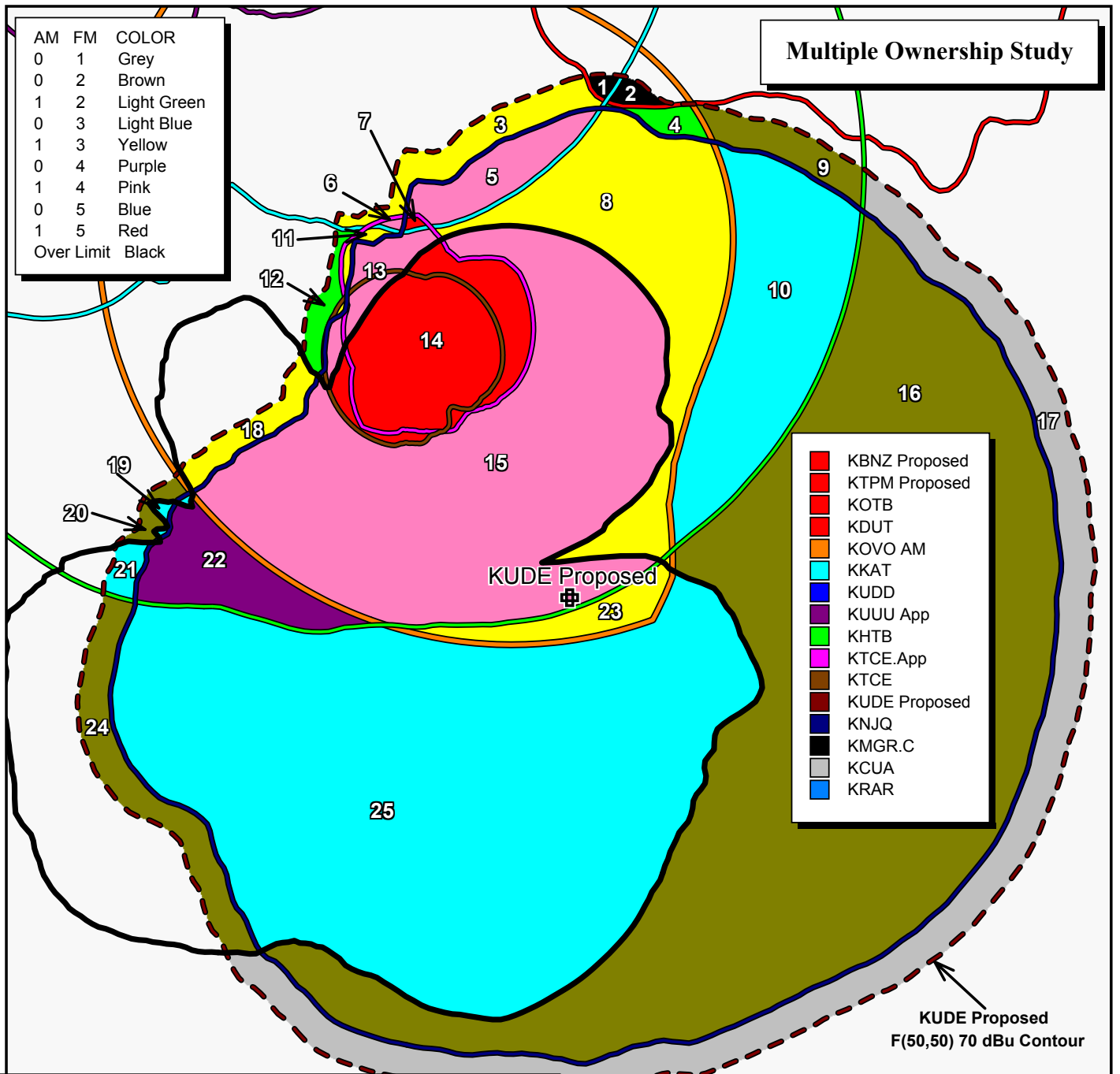
KOTB (FM) Evanston, WY

Also on March 16, 2004, Rocky Mountain Radio Network, Inc., filed BTCH-20040316AFQ to Transfer Control of Rocky Mountain and KOTB thereby replacing its current principals (associated with KUDE) with new principals which are affiliated with Bustos Media Holdings of Utah, LLC. The Commission has not yet granted this application for Transfer of Control. However, upon approval and consummation of the transfer of control to Bustos, KOTB will no longer be attributable to the principals of KUDE.

KOVO (AM) Provo, UT

On April 19, 2004, Millcreek Broadcasting, LLC received a Commission grant on BALH-20040204ACU to assign the license of KOVO to Simmons-SLC, LS, LLC. The Assignment of KOVO has not yet been consummated. However, upon consummation of the assignment of license to Simmons, KOVO will no longer be attributable to the principals of KUDE.

Of the fifteen nearby stations which share a common attributable interest with KUDE, only the facilities of KBNZ (App only), KDUT, KTPM (App Only), KOTB, KMGR (App only), KTCE, KNJQ, KOVO, KHTB, and KKAT share a mutual overlap area with the proposed facilities of the KUDE instant application. The accompanying map illustrates the predicted 5 mV/m groundwave AM contours and the predicted 3.16 mV/m FM contours of these eleven stations.



MKT	FM STATIONS	AM STATIONS	MKT	FM STATIONS	AM STATIONS
1	KUDE, KTPM, KBNZ, KOTB, KDUT, KKAT, KHTB	KOVO**	12	KUDE, KHTB	KOVO
2	KUDE, KTPM, KBNZ, KOTB, KDUT, KHTB	KOVO**	13	KUDE, KHTB, KTCE, KNJQ	KOVO
3	KUDE, KKAT, KHTB	KOVO	14	KUDE, KHTB, KTCE, KNJQ, KMGR	KOVO
4	KUDE, KHTB	KOVO	15	KUDE, KNJQ, KMGR, KHTB	KOVO
5	KUDE, KNJQ, KKAT, KHTB	KOVO	16	KUDE, KNJQ	
6	KUDE, KKAT, KHTB, KTCE	KOVO	17	KUDE	
7	KUDE, KKAT, KHTB, KTCE, KNJQ	KOVO	18	KUDE, KMGR, KHTB	KOVO
8	KUDE, KNJQ, KHTB	KOVO	19	KUDE, KMGR, KHTB	
9	KUDE, KHTB		20	KUDE, KHTB	
10	KUDE, KNJQ, KHTB		21	KUDE, KMGR, KHTB	
11	KUDE, KHTB, KTCE,	KOVO	22	KUDE, KMGR, KNJQ, KHTB	
** Market is Over Limit for Ownership Pending Consumption of Assignment of License of KKAT and KDUT and Transfer of Control of KOTB			23	KUDE, KNJQ, KMGR	KOVO
			24	KUDE, KMGR	
			25	KUDE, KMGR, KNJQ	

As can be shown on the map, the proposed KUDE facilities have sixteen “mutual overlap” Radio Markets with the following stations under common control. The stations that will no longer share a mutual overlap area with KUDE upon grant of various FCC applications are *italicized* below. The stations that will continue to share a mutual overlap area with KUDE upon grant of various FCC applications are shown in **bold** below.

TABLE 2

	<u>FM Stations</u>	<u>AM Stations</u>
Radio Market #1:	KUDE, KTPM, KBNZ, KHTB, <i>KDUT</i>¹, <i>KOTB</i>², <i>KKAT</i>³	<i>KOVO</i> ⁴
Radio Market #2:	KUDE, KTPM, KBNZ, KHTB, <i>KDUT</i>¹, <i>KOTB</i>²	<i>KOVO</i> ⁴
Radio Market #3:	KUDE, KHTB, <i>KKAT</i>³	<i>KOVO</i> ⁴
Radio Market #4:	KUDE, KHTB	<i>KOVO</i> ⁴
Radio Market #5:	KUDE, KNJQ, <i>KKAT</i>³, KHTB	<i>KOVO</i> ⁴
Radio Market #6:	KUDE, KKAT, KHTB, KTCE	<i>KOVO</i> ⁴
Radio Market #7:	KUDE, KKAT, KHTB, KTCE, KNJQ	<i>KOVO</i> ⁴
Radio Market #8:	KUDE, KNJQ, KHTB	<i>KOVO</i> ⁴
Radio Market #9:	KUDE, KHTB	
Radio Market #10:	KUDE, KNJQ, KHTB	
Radio Market #11:	KUDE, KHTB, KTCE	<i>KOVO</i> ⁴
Radio Market #12:	KUDE, KHTB	<i>KOVO</i> ⁴
Radio Market #13:	KUDE, KHTB, KTCE, KNJQ	<i>KOVO</i> ⁴
Radio Market #14:	KUDE, KHTB, KTCE, KNJQ, KMGR	<i>KOVO</i> ⁴
Radio Market #15:	KUDE, KNJQ, KMGR, KHTB	<i>KOVO</i> ⁴
Radio Market #16:	KUDE, KNJQ	
Radio Market #17:	KUDE	
Radio Market #18:	KUDE, KMGR, KHTB	<i>KOVO</i> ⁴
Radio Market #19:	KUDE, KMGR, KHTB	
Radio Market #20:	KUDE, KHTB	
Radio Market #21:	KUDE, KMGR, KHTB	
Radio Market #22:	KUDE, KMGR, KNJQ, KHTB	
Radio Market #23:	KUDE, KNJQ, KMGR	<i>KOVO</i> ⁴
Radio Market #24:	KUDE, KMGR	
Radio Market #25:	KUDE, KMGR, KNJQ	

¹ KDUT will not be attributable to KUDE upon consummation of assignment of license to Bustos Media Holdings of Utah, LLC.

² KOTB will not be attributable to KUDE upon consummation of transfer of control to the principals of Bustos Media Holdings of Utah, LLC.

³ KKAT will not be attributable to KUDE upon consummation of assignment of license to Citadel Broadcasting Company.

⁴ KOVO will not be attributable to KUDE upon consummation of assignment of license to Simmons-SLC, LS, LLC.

Radio Market Denominator for ALL markets:

The “numerator” of each Radio Market will be the stations listed in the table above for the particular radio market. The “denominator” of each radio market will include only those commercial stations that have contours which overlap with the proposed KUDE instant application. Granted, this method is more conservative than the usual practice. In most ownership studies, the denominator of each radio market would include those commercial stations that have contours which overlap with the proposed KUDE instant application PLUS any other stations that have contours which overlap the remaining stations in the numerator, other than those under common control with KUDE. However, since there are more than 45 stations in the denominator using this conservative practice and the group of stations below would be included in the denominator of all of the individual radio markets, the undersigned believes that the conservative practice is a much easier method for determining ownership compliance in this particular application. With this in mind, the following stations will be included in the “denominator” for each of the radio markets:

<u>NO.</u>	<u>CC</u>	<u>CALL LETTERS</u>	<u>CHANNEL</u>	<u>POWER (KW)</u>	<u>CITY OF LICENSE</u>
1	*	>*KUDE	256C	83	Nephi UT
2		KALL.L	700	50	NORTH SALT LA UT
3		KARB.L	252A	3	Price UT
4		KBEE.L	860	10	SALT LAKE CIT UT
5		KBEEFM.L	254C	40	Salt Lake Cit UT
6		KBER.L	266C	25	Ogden UT
7	*	KBNZ.Application	284C	89	Lyman WY
8		KBZN.L	250C	26	Ogden UT
9		KCFM.L	244C	67	Levan UT
10		KCPX.L	289C	25	Centerville UT
11	*	KDUT.L	272C	89	Randolph UT
12		KDYL.L	1060	10	SOUTH SALT LA UT
13		KEGA.L	268C	89	Oakley UT
14		KENZ.L	298C	45	Orem UT
15		KEYY.L	1450	1	PROVO UT
16		KFNZ.L	1320	5	SALT LAKE CIT UT
17		KHQN.L	1480	1	SPANISH FORK UT
18	*	KHTB.L	235C	48	Provo UT
19		KIQN.L	1010	50	TOOELE UT
20	*	KKAT.L	270C	26	Ogden UT
21		KLGL.L	248C	66	Richfield UT
22		KLLB.L	1510	10	WEST JORDAN UT
23		KMTI.L	650	10	MANTI UT
24		KNAK.L	540	1	DELTA UT
25	*	KNJQ.L	286C	48	Manti UT
26		KNRS.L	570	5	SALT LAKE CIT UT
27		KOAL.L	750	10	PRICE UT
28		KODJ.L	231C	40	Salt Lake Cit UT
29		KOSYFM.L	293C	25	Spanish Fork UT
30	*	KOTB.L	291C	89	Evanston WY
31	*	KOVO.L	960	5	PROVO UT
32		KPEB.CP (under PTA)	276C	89	Coalville UT
33		KQMB.L	274C	25	Midvale UT
34		KRSPFM.L	278C	25	Salt Lake Cit UT
35		KSFI.L	262C	25	Salt Lake Cit UT
36		KSL.L	1160	50	SALT LAKE CIT UT
37		KSL.L	1080	10	PRICE UT
38		KSOPFM.L	282C	25	Salt Lake Cit UT
39		KSRR.L	1400	1	PROVO UT
40	*	KTCE.L or A	222A (221A App)	0.058 (0.128 App)	Payson UT
41		KTKK.L	630	1	SANDY UT
42	*	KTPM.Application	248C	89	Coalville UT
43		KUBLFM.L	227C	25	Salt Lake Cit UT
44		KURR.L	258C	40	Bountiful UT
45		KWDZ.L	910	5	SALT LAKE CIT UT

46	KWSA.L	265A	3	Price UT
47	KXRK.L	242C	25	Provo UT
48	KZHT.L	246C	30	Salt Lake Cit UT
49	KZNS.L	1280	10	SALT LAKE CIT UT
50	* KMGR.CP	240C1	100	Delta, UT

* These stations are under Common Control of the principals of KUDE.

In a radio market with 45 or more commercial radio stations, Section 73.3555 of the Commission's rules allows a party to own, operate, or control up to eight (8) commercial radio stations, not more than five (5) of which are in the same service (AM or FM). Again, each of the sixteen radio markets listed in Table 2 of this exhibit includes 45 or more stations in the denominator.

In the case of each Radio Market, upon the consummation of Assignment of License of KDUT to Bustos Media Holdings of Utah, LLC, and the consummation of Transfer of Control of KOTB's licensee, Rocky Mountain Radio Network, Inc., the principals for KUDE will have common control over not more than five (5) stations in the FM service and one (1) station in the AM service in each of the 25 Radio Markets. In some markets, the principals for KUDE will have common control of fewer than five FM stations and one AM station.

Therefore, the instant application for KUDE appears to comply with Section 73.3555 of the Commission's Rules with regard to each Radio Market.

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