

### **Multiple Ownership Study**

The following engineering statement and attached exhibits have been prepared for Waitt Radio, Inc., and contain a multiple ownership showing relative to the acquisition of KQNS(FM) at Lindsborg, Kansas.

The applicant currently has an LMA with the licensee of KQNS(FM), however, it is proposed that the license for this facility be assigned to Waitt. This study demonstrates that the assignment of this license would be consistent with the provisions of Section 73.3555 of the Commission's Rules. The first map in this study depicts the predicted 70 dBu service contour of KQNS(FM) relative to other facilities in which the applicant has an attributable interest.

As this map demonstrates, there are two other facilities in the vicinity in which Waitt would have an attributable interest. These two facilities are KILS(FM) at Minneapolis, KS and KZLS(FM) at Great Bend, KS. As the map indicates the predicted 70 dBu service contour of KZLS(FM) would not overlap that of KQNS(FM), however, there would be overlap between KILS(FM) and KQNS(FM). As a result of this common overlap, a two station market would therefore be defined.

This market, which is defined by the common overlap between KILS(FM) and KQNS(FM) would lie within an area that is not an Arbitron rated market. In

addition, neither facility comprising the overlap would be located in an area which is part of an Arbitron rated market. As a result, it is necessary and sufficient to demonstrate that the proponent would not control greater than fifty percent of the stations serving the market, the transmitter sites of which would be located less than 92 kilometers from the perimeter of the common overlap.

The second map in this study, which analyses the market, indicates that there are at least three other full power facilities whose principal community coverage contour would overlap with one or both of the stations comprising the market. Of these four facilities, three are commercial FM stations with the fourth being a non-commercial FM station. Since a sufficient number of other stations serving the market have been identified, it is respectfully submitted that the proposed acquisition of KQNS(FM) by the applicant would be consistent with Section 73.3555 of the Commission's Rules.

The preceding statement and attached exhibits have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.

1-10-2005  
Date

  
Jeremy D. Ruck, Consulting Engineer

**Index to Facilities Depicted on Maps****Facilities with Attributable Interest:**

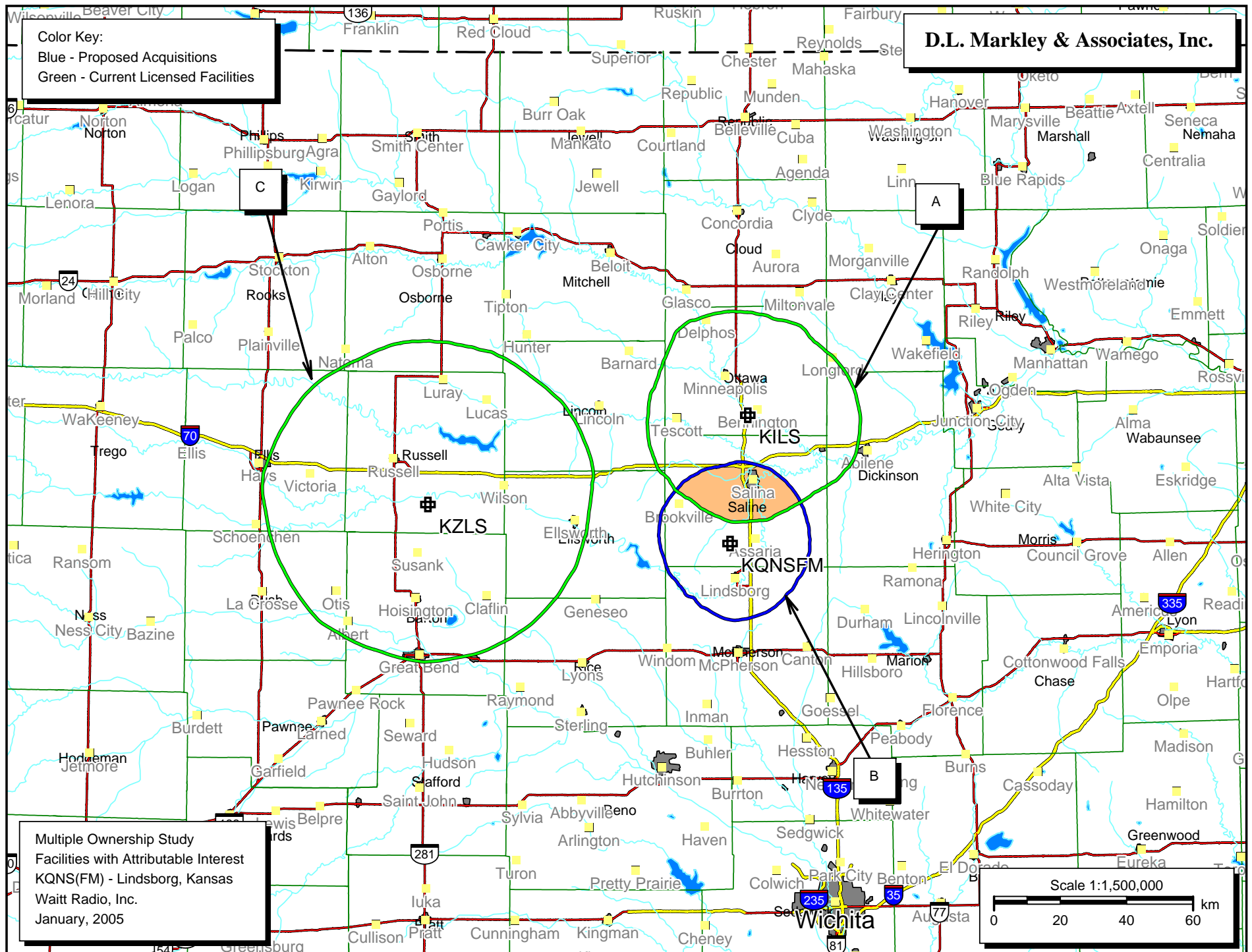
<b>A-</b>	<b>KILS(FM)</b>	<b>Minneapolis, Kansas</b>
<b>B-</b>	<b>KQNS(FM)</b>	<b>Lindsborg, Kansas</b>
<b>C-</b>	<b>KZLS(FM)</b>	<b>Great Bend, Kansas</b>

**Analysis of Non-Rated Market:**

<b>A-</b>	<b>KILS(FM)</b>	<b>Minneapolis, Kansas</b>
<b>B-</b>	<b>KQNS(FM)</b>	<b>Lindsborg, Kansas</b>
<b>C-</b>	<b>KYEZ(FM)</b>	<b>Salina, Kansas</b>
<b>D-</b>	<b>KZBZ(FM)</b>	<b>Salina, Kansas</b>
<b>E-</b>	<b>KSKG(FM)</b>	<b>Salina, Kansas</b>
<b>F-</b>	<b>KCVS(FM)</b>	<b>Salina, Kansas</b>

**D.L. Markley & Associates, Inc.**

Color Key:  
Blue - Proposed Acquisitions  
Green - Current Licensed Facilities



Multiple Ownership Study  
Facilities with Attributable Interest  
KQNS(FM) - Lindsborg, Kansas  
Waitt Radio, Inc.  
January, 2005

Scale 1:1,500,000

0 20 40 60 km

