

RADIO MARKET ANALYSIS
PETRACOM OF HOLBROOK, LLC
KZUA (FM) RADIO STATION
HOLBROOK, ARIZONA
January 2008

TECHNICAL STATEMENT

1. This Technical Statement and attached exhibits were prepared on behalf of Petracom of Holbrook, LLC ("Petracom"), licensee of a KZUA, Channel 221C1, Holbrook, Arizona. Petracom is proposing to modify its outstanding permit for KZUA on Channel 253C1 by relocating to another site. As such, Petracom is providing an updated Radio Market Analysis. Petracom also has interests in stations KDJI, 1270 kHz, Holbrook, Arizona; KRFM, Channel 243C, KSNX, Channel 228C3, KVSL, 1450 kHz, and KVWM, 970 kHz, Show Low, Arizona. None of these stations are licensed to, or are considered "home", to any Arbitron Market. Therefore, a revised contour overlap analysis was undertaken to demonstrate compliance with the Commission's ownership rules. Exhibit #1 is a map depicting the subject stations. Due to the contour overlap of city grade signals, two radio markets are created. Market #1 consists of FM stations KZUA and KRFM and AM station KDJI. Market #2 consists of FM stations KZUA, KRFM and KSNX and AM stations KVSL and KVWM.

2. A study, therefore, has been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission's rules. As KZUA and KRFM are subject stations in both markets, their contours will be used to determine the number of contributing stations in each market, to which will be added the relevant subject stations. This ownership study will determine the number of other commercial AM and FM stations that either

have transmitter sites within or provide coverage to the subject radio market. Only those stations with transmitter sites within 92.0 kilometers will be considered as contributors to the market. No other station in which Petracom has interests will be considered, unless it is a subject station in the market under review.

3. Exhibit #2 is a depiction of the existing AM and FM stations (commercial and non-commercial) providing service to the Radio Market, as defined by KZUA and KRFM. A total of six stations are shown. Exhibit #3 is a tabulation of the stations in the Radio Market #1, which totals nine stations, including the three subject stations. The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules. At the fourteen or fewer stations level, common ownership or control of up to five stations, with no more than three in the same service, is permissible provided the number of stations to be commonly held does not exceed 50% of the stations in the subject market. As such, Radio Market #1 is in compliance with the rules.

4. Exhibit #4 is a tabulation of the stations in the Radio Market #2, which totals eleven, including the five subject stations. The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules. At the fourteen or fewer stations level, common ownership or control of up to five stations, with no more than three in the same service, is permissible provided the number of stations to be commonly held does not exceed 50% of the stations in the subject market. As such, Radio Market #2 is in compliance with the rules.

5. Therefore, based on Petracom's interests in the above referenced stations, in two separate markets, it has been demonstrated herein that the modification of the KZUA permit is in compliance with the Commission's multiple ownership rules, as detailed in §73.3555 of the rules.

6. The foregoing technical statement was prepared on behalf of Petracom of Holbrook, LLC by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities was extracted from the CDBS database. All data relating to AM and FM facilities in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.2 BIA database. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.

Graham Brock, Inc. - Broadcast Technical Consultants

KZUA

Latitude: 34-34-28 N
Longitude: 110-05-57 W
ERP: 100.00 kW
Channel: 253C1
Frequency: 98.5 MHz

KZUA 3.16 mV/m

KRFM

BLH-19850325KT
Latitude: 34-12-20 N
Longitude: 109-56-26 W
ERP: 100.00 kW
Channel: 243C
Frequency: 96.5 MHz

KRFM 3.16 mV/m

KDJI

Latitude: 34-53-55 N
Longitude: 110-11-30 W
ERP: 5.00 kW
Frequency: 1270.0 kHz

KDJI 5.0 mV/m

KSNX

BLH-19950905KE
Latitude: 34-13-14 N
Longitude: 110-01-49 W
ERP: 25.00 kW
Channel: 228C3
Frequency: 93.5 MHz

KSNX 3.16 mV/m

KVSL

Latitude: 34-12-40 N
Longitude: 110-00-20 W
ERP: 1.00 kW
Frequency: 1450.0 kHz

KVWM

Latitude: 34-12-40 N
Longitude: 110-00-20 W
ERP: 5.00 kW
Frequency: 970.0 kHz

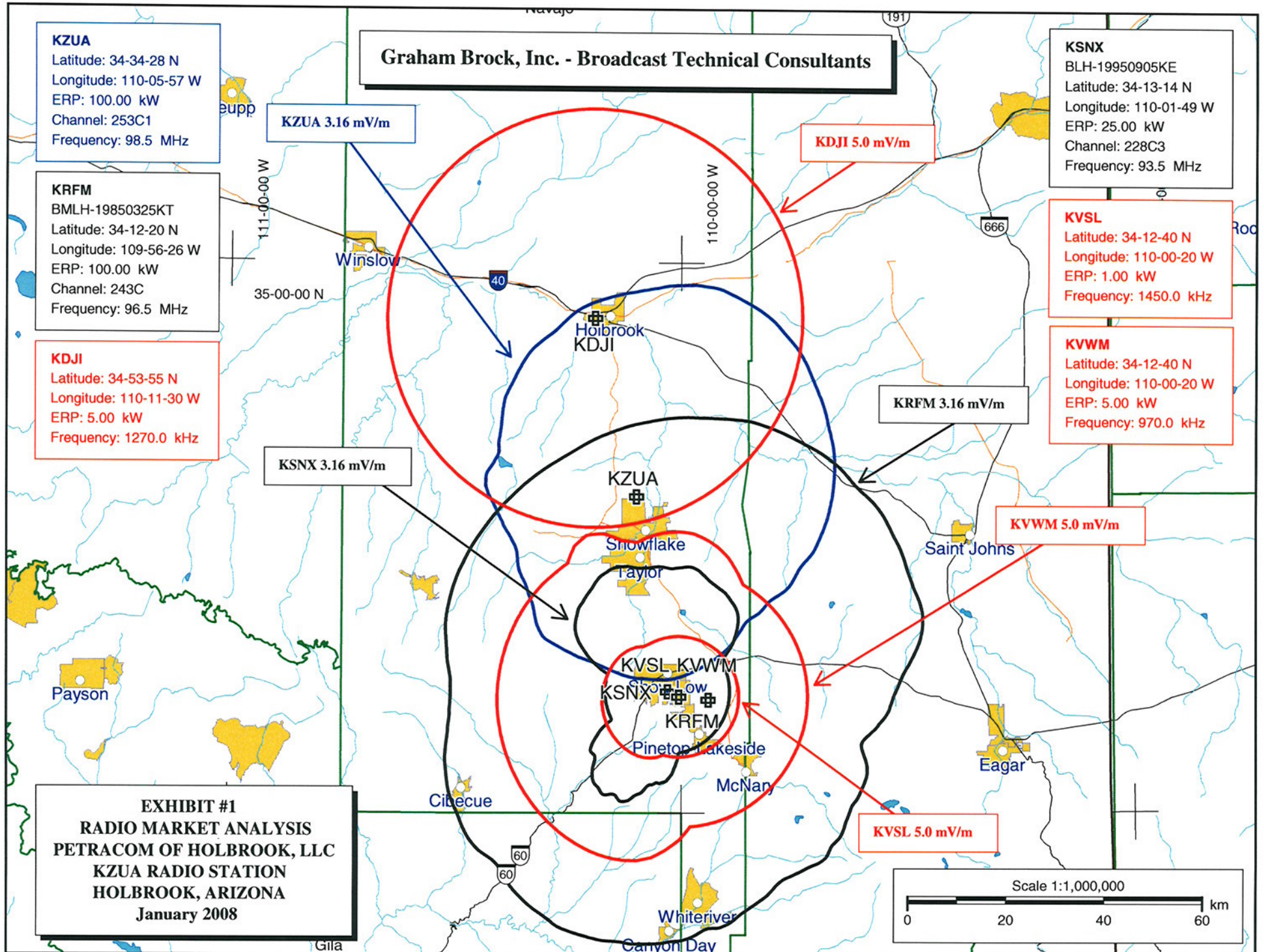
KVWM 5.0 mV/m

KVSL 5.0 mV/m

EXHIBIT #1
RADIO MARKET ANALYSIS
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Scale 1:1,000,000

0 20 40 60 km



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EXHIBIT #3

Tabulation of Stations in Radio Market #1

AM Stations

*	KDJJ	1270 kHz	Holbrook, Arizona
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Total AM Stations - 1

FM Stations

+	KNNB	Ch 201A	Whiteriver, Arizona
	KBMH	Ch 212A	Holbrook, Arizona
	KNAA	Ch 214C3	Show Low, Arizona
	KTHQ	Ch 223C1	Eagar, Arizona
	KWKM	Ch 239C	St. John, Arizona
*	KRFM	Ch 243C	Show Low, Arizona
*	KZUA	Ch 253C1	Holbrook, Arizona
	KQAZ	Ch 269C1	Springerville, Arizona

Total FM Stations - 8

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 9

- * Subject station.
- + Station provides city grade coverage to market.

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EXHIBIT #4

Tabulation of Stations in Radio Market #2

AM Stations

* KVWM	970 kHz	Show Low, Arizona
* KVSL	1450 kHz	Show Low, Arizona

Total AM Stations - 2

FM Stations

+ KNNB	Ch 201A	Whiteriver, Arizona
KBMH	Ch 212A	Holbrook, Arizona
KNAA	Ch 214C3	Show Low, Arizona
KTHQ	Ch 223C1	Eagar, Arizona
* KSNX	Ch 228C3	Show Low, Arizona
KWKM	Ch 239C	St. John, Arizona
* KRFM	Ch 243C	Show Low, Arizona
* KZUA	Ch 253C1	Holbrook, Arizona
KQA	Ch 269C1	Springerville, Arizona

Total FM Stations - 9

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 11

- * Subject station.
- + Station provides city grade coverage to market.

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

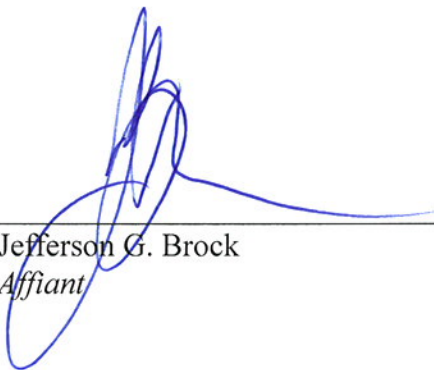
State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Petracom of Holbrook, LLC to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

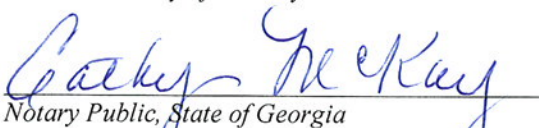
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 17th day of January 2008.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 17th day of January 2008*



Notary Public, State of Georgia
My Commission Expires: March 18, 2011