

**ENGINEERING STATEMENT COVERING
BROADCAST MULTIPLE OWNERSHIP STUDY**

MICHAEL RADIO GROUP, LLC

VICTOR, IDAHO, NEWCASTLE, WYOMING & BELLE FOURCHE, SOUTH DAKOTA

NOVEMBER 2004

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This engineering statement and supporting tabulations and figures has been prepared on behalf of **Michael Radio Group, LLC (“MRG”)**. The purpose of the statement is to demonstrate **MRG** compliance with *Section 73.3555* of the Commission’s Rules with respect to multiple ownership of FM broadcast facilities.

MRG proposes common ownership¹ in the following four stations:

KMQS (FM) Victor, ID	CH 222C3	BMPH 20041013AAG
KKTN (FM) Victor, ID	CH 279C#	BMPH 20041013AAF
KRKI (FM) New Castle, WY	CH 258CO	BPH 20030919AAU
KFMH (FM) Belle Fourche, SD	CH 27OC	BPH 20040713AAE

These four stations are considered as two markets since the principal community contours for the Victor, Idaho stations do not overlap the principal community contours of the Wyoming and South Dakota stations.

A multiple ownership analysis was prepared considering the above described radio stations under proposed common ownership or control, which stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) in accordance with *Section 73.3555* of the FCC Rules.

RADIO MARKETS & METHODOLOGY

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. In this case, Market No. 1 is made up of KMQS(FM) and KKTN(FM) while Market No. 2 is made up of KRKI(FM) and KFMH(FM). The predicted principal community contours for all four stations are shown on *Figure 1*, attached. It is noted that the KMQS and KKTN contour locations are indistinguishable from each other. Counties in the markets include:

¹ Victor A. Michael, Jr., member of Laramie Mountain Broadcasting, LLC, owner of KFMH, is also a member of Michael Radio Group, LLC.

Market 1 (KMOS & KKTN)

Teton, ID
Bonneville, ID
Teton, WY

Market 2 (KRKI & KFMH)

Weston, WY
Crook, WY
Niobrara, WY
Fall River, SD
Custer, SD
Pennington, SD
Lawrence, SD
Meade, SD
Butte, SD

Victor, Idaho is located in Teton County, Idaho which is not part of any Arbitron metro. Based on the Arbitron Market Definition for Rapid City, South Dakota, Fall 2004, Meade and Pennington Counties in South Dakota are the metro counties. New Castle is located in Weston County, Wyoming and not part of the metro. Belle Fourche is located in Butte County and also not part of the metro. Since the communities all lie outside of an Arbitron metro, the markets are determined by contour overlap.

Table 1 lists all AM stations whose 5 mV/m daytime contour duplicates some portion of Market 1. The contours for these stations are plotted on Figure 2 in red along with the market. Table 1 also lists all FM stations whose 70 dBu contour duplicates some portion of Market 1. The contours for these stations are plotted on Figure 2 in green along with the market.

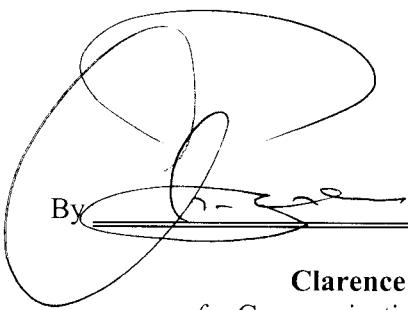
Table 2 lists all AM stations whose 5 mV/m daytime contour duplicates some portion of Market 2. The contours for these stations are plotted on Figure 3 in red along with the market. Table 2 also lists all FM stations whose 70 dBu contour duplicates some portion of Market 2. The contours for these stations are plotted on Figure 3 in green along with the market.

Only known CP or licensed operating full service commercial stations were employed in 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 47 CFR 73.184. Ground conductivities were obtained from FCC Figure M3. Distances to the FM contours were determined based on the methodology of 47 CFR 73.313. Terrain data was derived from the

N.G.D.C. 30-second computer database for each of the FM stations, using radials spaced every 5 degrees of azimuth.

Based on the above analysis, it is believed that the proposed common ownership of stations complies with *Section 73.3555* of the Commission's Rules as there are a total of 9 FM and 2 AM stations in Market No. 1 and 23 FM and 10 AM stations in Market No. 2. **MRG** will own one two FM stations in Market No. 1 (KMQS(FM) and KKTN(FM)) and two FM stations in Market No. 2 (KRKI(FM) and KFMH(FM)).

The foregoing was prepared on behalf of **Michael Radio Group, LLC** by Clarence M. Beverage of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.

By  _____
Clarence M. Beverage
for Communications Technologies, Inc.
Marlton, New Jersey

SUBSCRIBED AND SWORN TO before me,

this 18th day of November, 2004,

Esther G. Sperbeck, NOTARY PUBLIC

ESTHER G. SPERBECK
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES OCT 15, 2007

TABLE 1

**MICHAEL RADIO GROUP, LLC MARKET NO. 1
VICTOR, IDAHO**

NOVEMBER 2004

CALL	ST	CITY ARN	FREQ OWNER	PAT	AG	PWR	DESC
LATITUDE		LONGITUDE					
KID	ID	IDAHO FALLS BL	590.00000 LD CITICASTERS LICENSES, L.P.			5.000	DAN
43-33-35.0 N		111-55-15.0 W					
KSGT	WY	JACKSON BL	1340.00000 LD CHAPARRAL BROADCASTING, INC.			1.000	ND1
43-30-22.0 N		110-45-16.0 W					
CALL	ST	CITY ARN	FREQ OWNER	CHN	CL	ERP	STAT
LATITUDE		LONGITUDE	HAAT:m AMSL:m				
KCHQ	ID	DRIGGS BLH20040226AAC TED W. AUSTIN, JR.	102.10000 577.688 2684.000		C1	4000.00	LIC
43-42-42.0 N		111-20-56.0 W					
KZJH	WY	JACKSON BLH19890714KA CHAPARRAL BROADCASTING COMPANY	95.30000 315.625 2474.000		C	100000.00	LIC
43-27-40.0 N		110-45-09.0 W					
KJHR-LP	WY	TETON VILLAGE BMPL20040930BTK TETON VILLAGE ASSOCIATION	100.10000 -373.375 1965.000		LP100	100.00	CP MOD
43-35-28.0 N		110-49-38.0 W					
KJHB-LP	WY	JACKSON BLL20020926ADQ TETON COUNTY SCHOOL DISTRICT #1	97.70000 -263.125 1875.000		LP100	100.00	LIC
43-27-25.0 N		110-48-04.0 W					
KJAX	WY	JACKSON BLH19991103ABW CATHEDRAL COMMUNICATIONS INC	93.30000 320.625 2479.000		C	100000.00	LIC
43-27-40.0 N		110-45-09.0 W					
KUWJ	WY	JACKSON BLED19921207KC UNIVERSITY OF WYOMING	90.30000 330.625 2489.000		C2	3000.00	LIC
43-27-40.0 N		110-45-09.0 W					
KMTN	WY	JACKSON BLH19850617KC CHAPARRAL BROADCASTING, INC.	96.90000 317.812 2473.000		C1	50000.00	LIC
43-27-42.0 N		110-45-10.0 W					
KMQS	ID	VICTOR BMPH20041013AAG MICHAEL RADIO GROUP, LLC	92.30000 339.438 2644.000		C3	800.00	APP
43-29-27.0 N		110-57-16.0 W					
KKTN	ID	VICTOR BMPH20041013AAF MICHAEL RADIO GROUP, LLC	103.70000 339.438 2644.000		C3	800.00	APP
43-29-27.0 N		110-57-16.0 W					

TABLE 2

**MICHAEL RADIO GROUP, LLC MARKET NO. 2
NEW CASTLE, WY AND BELLE FOURCHE, SD**

NOVEMBER 2004

CALL	ST	CITY ARN	FREQ OWNER	PAT	AG	PWR	DESC
LATITUDE		LONGITUDE					
KASL	WY	NEWCASTLE BL	1240.00000	LU		1.000	ND1
43-50-47.0 N		104-12-45.0 W	KASL, LLC				
KZMX	SD	HOT SPRINGS BL19880531AH	580.00000	LD		2.300	ND1
43-27-24.0 N		103-28-34.0 W	MT RUSHMORE BROADCASTING, INC				
KFCR	SD	CUSTER BL19880602AH	1490.00000	LU		0.830	ND1
43-43-03.0 N		103-35-00.0 W	MOUNT RUSHMORE BROADCASTING, INC.				
KOTA	SD	RAPID CITY BL20011026ABG	1380.00000	LD		5.000	DAN
44-02-00.0 N		103-11-15.0 W	DUHAMEL BROADCASTING ENTERPRISES				
KTOQ	SD	RAPID CITY BL	1340.00000	LU		1.000	ND1
44-04-06.0 N		103-10-11.0 W	HAUGO BROADCASTING, INC				
KIMM	SD	RAPID CITY BL20000623AFV	1150.00000	LD		5.000	DAN
44-04-37.0 N		103-08-49.0 W	KIMM RADIO, INC.				
KBHB	SD	STURGIS BL20010214ABF	810.00000	LD		25.000	ND2
44-25-24.0 N		103-25-37.0 W	MONTEREY LICENSES, LLC				
KDSJ	SD	DEADWOOD BL19800128AJ	980.00000	LD		5.000	DAN
44-22-57.0 N		103-39-44.0 W	GOLDRUSH BROADCASTING, INC.				
KKLS	SD	RAPID CITY BL19990729DE	920.00000	LD		5.000	DA2
44-03-43.0 N		103-10-32.0 W	MONTEREY LICENSES, LLC				
KBFS	SD	BELLE FOURCHE BL	1450.00000	LU		1.000	ND1
44-40-02.0 N		103-51-22.0 W	ULTIMATE CAPS, INC.				

TABLE 2
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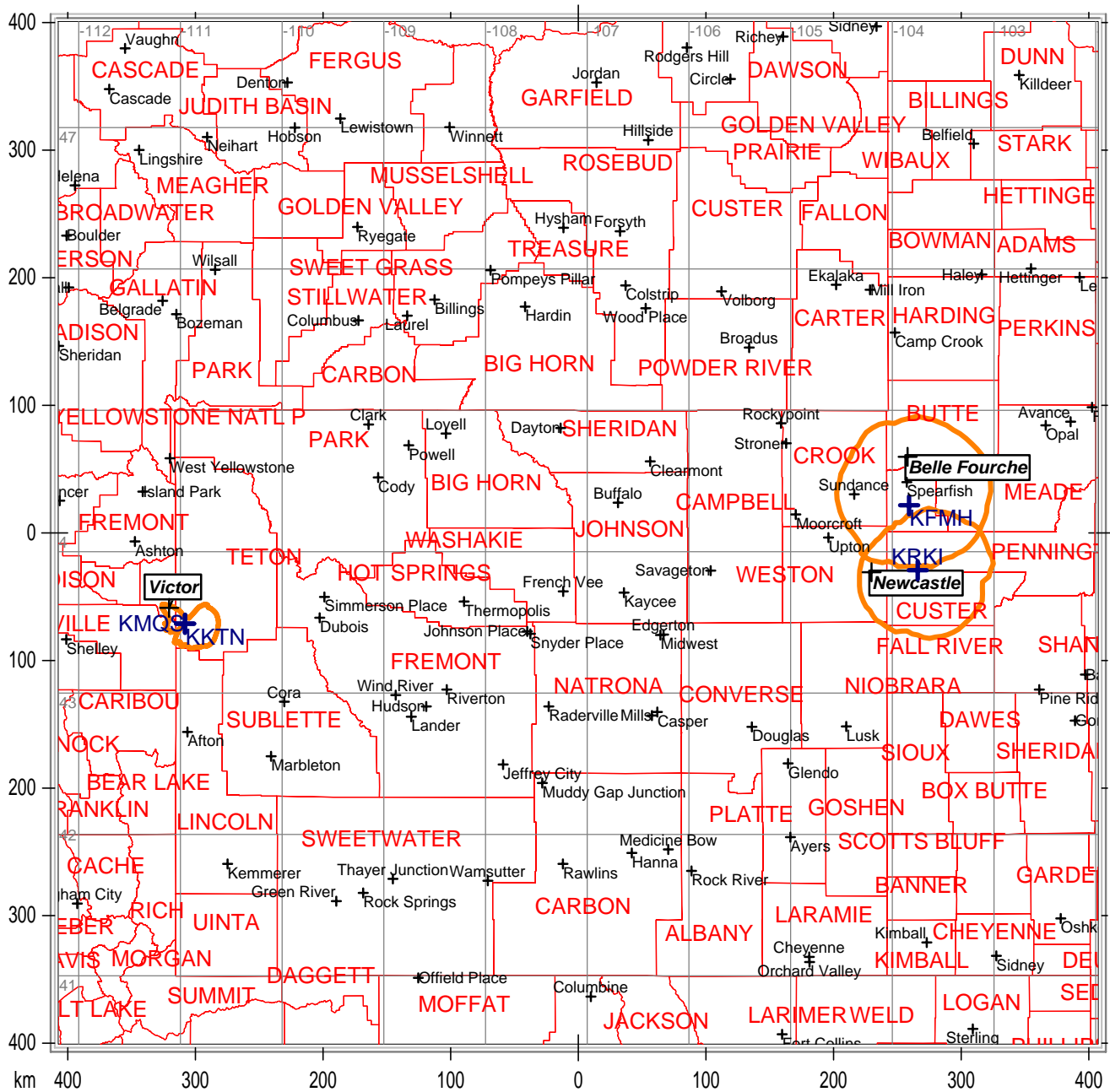
CALL	ST	CITY	FREQ	CHN	CL	ERP	STAT
		ARN	OWNER				
LATITUDE		LONGITUDE	HAAT:m AMSL:m				

KUWN	WY	NEWCASTLE	90.50000		A	400.00	LIC
		BLD19971201KA	UNIVERSITY OF WYOMING				
43-49-57.0 N		104-13-08.0 W	60.875 1406.000				
KUWD	WY	SUNDANCE	91.50000		C3	430.00	LIC
		BLD20000830AFK	UNIVERSITY OF WYOMING				
44-28-35.0 N		104-26-54.0 W	483.625 2042.000				
KYDT	WY	SUNDANCE	103.10000		C1	25000.00	LIC
		BLH19971223KE	ULTIMATE CAPS, INC.				
44-28-35.0 N		104-26-54.0 W	502.625 2061.000				
KAWK	SD	CUSTER	105.10000		C1	7000.00	LIC
		BLH19970925KD	MOUNT RUSHMORE BROADCASTING, INC.				
43-44-41.0 N		103-28-52.0 W	400.438 1920.000				
KZMX-FM	SD	HOT SPRINGS	96.70000		C2	38000.00	CP MOD
		BMPH19960823ID	MT RUSHMORE BROADCASTING, INC				
43-26-34.0 N		103-27-27.0 W	139.125 1283.000				
KFXS	SD	RAPID CITY	100.30000		C1	100000.00	LIC
		BLH19990625KE	MONTEREY LICENSES, LLC				
44-04-13.0 N		103-15-01.0 W	137.250 1248.000				
KOUT	SD	RAPID CITY	98.70000		C1	100000.00	LIC
		BLH19990625KF	MONTEREY LICENSES, LLC				
44-04-13.0 N		103-15-01.0 W	137.250 1248.000				
KDDX	SD	SPEARFISH	101.10000		C	100000.00	LIC
		BLH20000112ABW	DUHAMEL BROADCASTING ENTERPRISES				
44-19-35.0 N		103-50-06.0 W	540.438 2259.000				
KKMK	SD	RAPID CITY	93.90000		C1	100000.00	LIC
		Unknown or New CP BLH19990709KB	MONTEREY LICENSES, LLC				
44-02-49.0 N		103-14-45.0 W	207.688 1310.000				
KIQK	SD	RAPID CITY	104.10000		C1	100000.00	LIC
		BLH19940826KA	HAUGO BROADCASTING, INC				
44-01-19.0 N		103-15-33.0 W	164.750 1292.000				
KSQY	SD	DEADWOOD	95.10000		C	100000.00	LIC
		BLH19820910AM	HAUGO BROADCASTING, INC				
44-19-49.0 N		103-50-10.0 W	531.625 2238.000				
KZLK	SD	RAPID CITY	106.30000		C1	92000.00	LIC
		BLH20010925AAW	STEVEN E.DUFFY				
44-04-07.0 N		103-15-02.0 W	209.812 1321.000				
KZZI	SD	BELLE FOURCHE	95.90000		C	100000.00	LIC
		BLH20000112ABG	WESTERN SOUTH DAKOTA BROADCASTING, LLC				
44-19-35.0 N		103-50-06.0 W	543.438 2262.000				

TABLE 2
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CALL	ST	CITY	FREQ	CHN	CL	ERP	STAT
LATITUDE	LONGITUDE	HAAT:m AMSL:m	OWNER				
KSLT	SD	SPEARFISH	107.30000		C	100000.00	LIC
BLH20000609ABG		BETHESDA	CHRISTIAN BROADCASTING, INC				
44-19-42.0 N	103-50-03.0 W	574.688	2290.000				
KLMP	SD	RAPID CITY	97.90000		C	100000.00	LIC
BLH20021106ABV		BETHESDA	CHRISTIAN BROADCASTING, INC				
44-19-42.0 N	103-50-03.0 W	574.688	2290.000				
KLGH	SD	RAPID CITY	88.30000		C	63000.00	CP MOD
BMPED20020321ABT		BETHESDA	CHRISTIAN BROADCASTING, INC				
44-19-42.0 N	103-50-03.0 W	516.688	2232.000				
KRCS	SD	STURGIS	93.10000		C	100000.00	LIC
BLH19790904AA		MONTEREY	LICENSES, LLC				
44-19-58.0 N	103-32-20.0 W	321.562	1661.000				
KFMH	SD	BELLE FOURCHE	101.90000		C	95000.00	CP
BPH20040713AAE		LARAMIE MOUNTAIN	BROADCASTING, LLC				
44-19-44.0 N	103-50-07.0 W	454.625	2169.000				
KBHE-FM	SD	RAPID CITY	89.30000		C3	9800.00	LIC
BLD19840416CB		SOUTH DAKOTA BOARD OF DIRECTORS	FOR ED. TELECOMMUNICATIONS				
44-03-09.0 N	103-14-38.0 W	130.375	1228.000				
KBHU-FM	SD	SPEARFISH	89.10000		A	100.00	LIC
BLD19940930KD		BLACK HILLS STATE UNIVERSITY					
44-29-48.0 N	103-52-13.0 W	-130.125	1128.000				
KQFR	SD	RAPID CITY	89.90000		C2	2300.00	CP
BPED19980420MG		FAMILY STATIONS, INC.					
44-19-42.0 N	103-50-03.0 W	557.688	2273.000				
KQRQ	SD	RAPID CITY	92.30000		C1	86000.00	LIC
BLH20021028ABX		NEW GENERATION BROADCASTING, LLC					
44-04-07.0 N	103-15-02.0 W	174.812	1286.000				
KRKIAPP	WY	NEWCASTLE	99.50000		C0	100000.00	APP
BPH20030919AAU		MICHAEL RADIO GROUP					
43-52-10.0 N	103-45-00.0 W	300.250	2192.000				

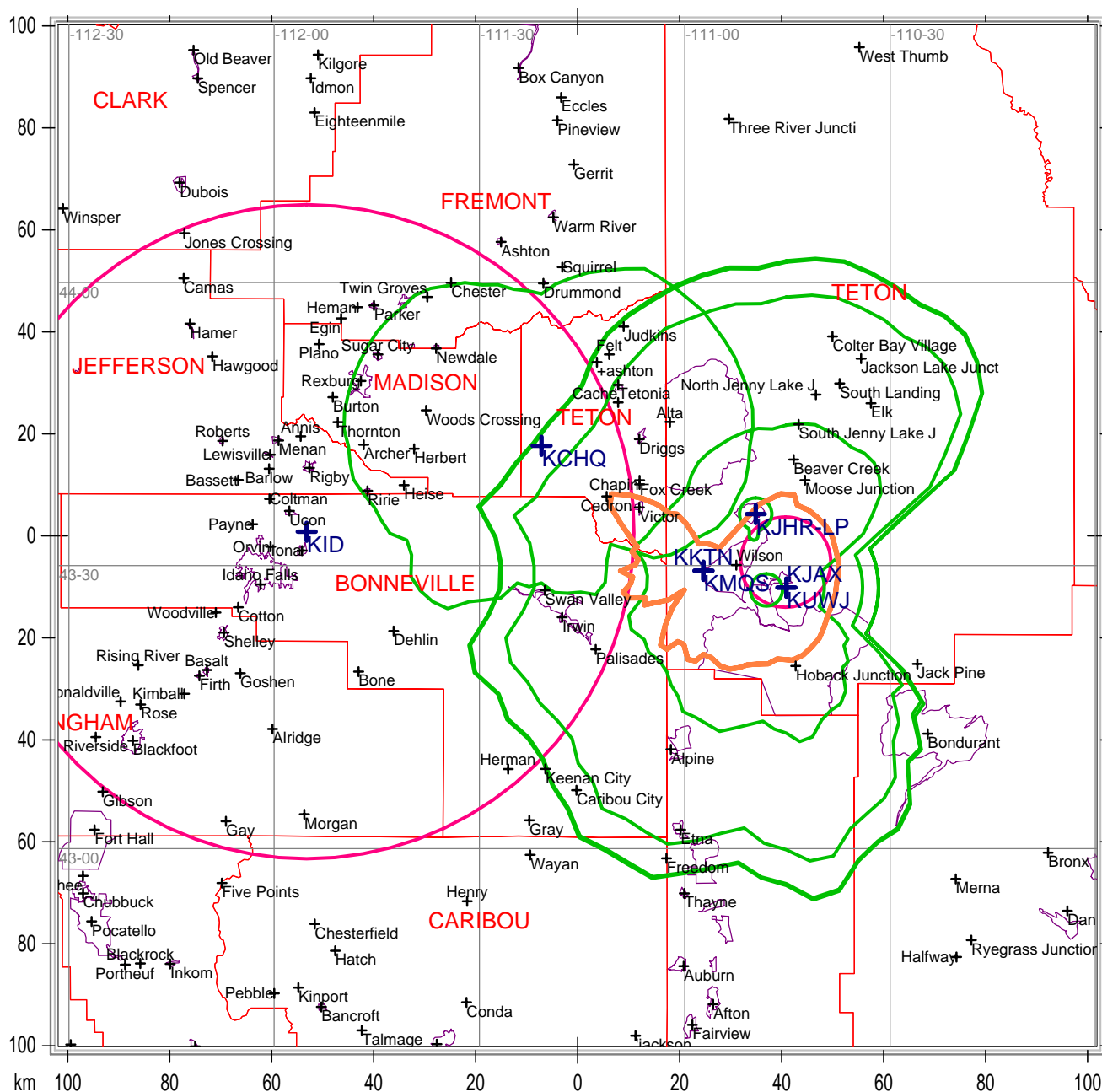
MICHAEL RADIO GROUP, LLC VICTOR, IDAHO NEWCASTLE, WY & BELLE FOURCHE, SD



Communications Technologies, Inc. Marlton, New Jersey

County Borders Lat/Lon Grid

MICHAEL RADIO GROUP, LLC VICTOR IDAHO



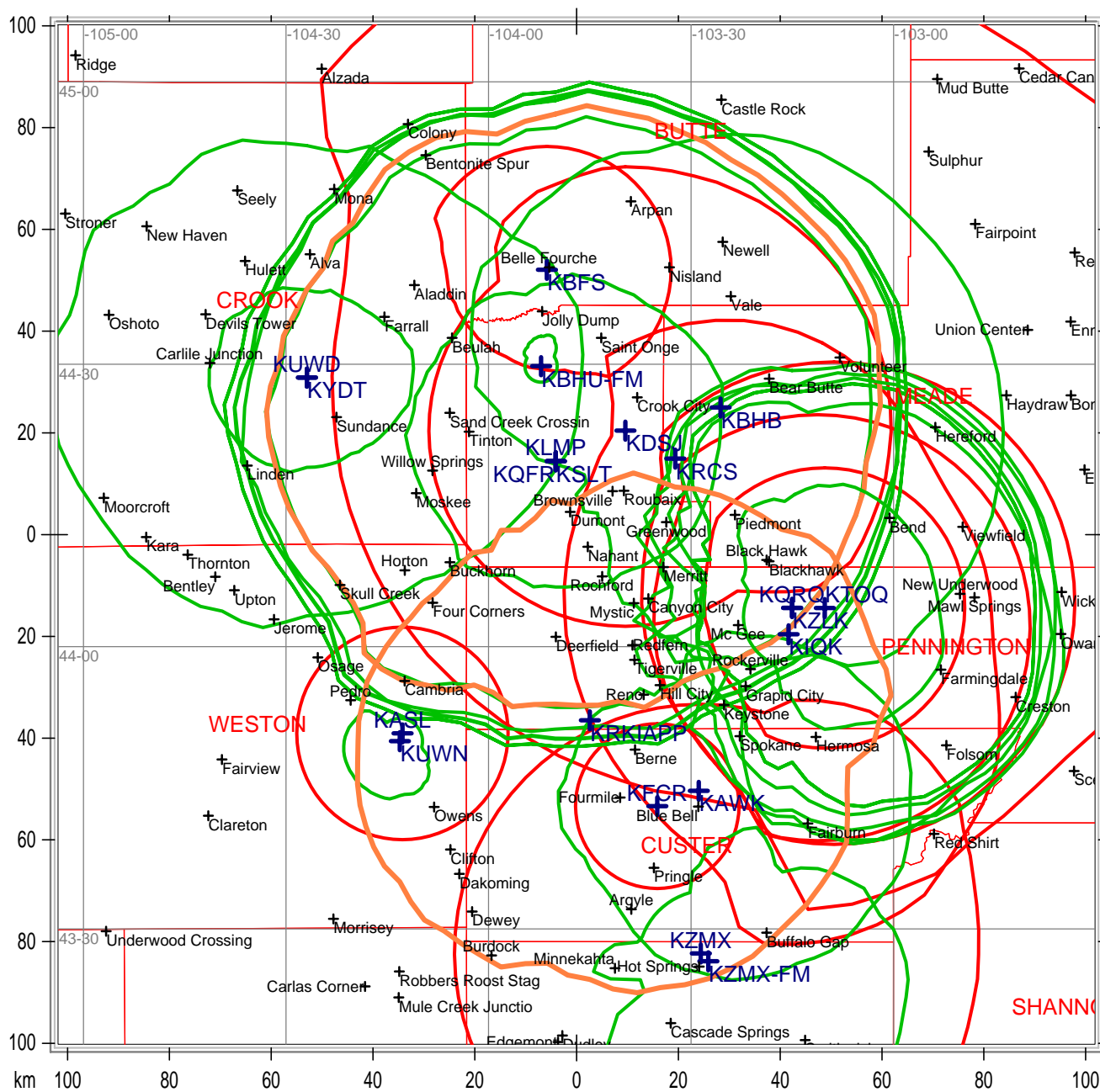
Communications Technologies, Inc. Marlton, New Jersey

County Borders City Borders Lat/Lon Grid

Map Scale: 1:1249972 1 cm = 12.50 km V/H Size: 200.37 x 203.73 km

Figure 2

MICHAEL RADIO GROUP, LLC NEWCASTLE, WY & BELLE FOURCHE, SD



Communications Technologies, Inc. Marlton, New Jersey

County Borders Lat/Lon Grid