

**Multiple Ownership Study**

The following engineering statement and attached exhibits have been prepared for Three Eagles Communications, Inc., licensee of several commercial broadcast facilities in the Watertown, South Dakota, and Brookings, South Dakota areas, and are in support of their multiple ownership study for the acquisition of additional facilities.

Three Eagles currently has an attributable interest in KBRK-FM and KBRK(AM) in Brookings, South Dakota, KJAM(AM) and KJAM-FM in Madison, South Dakota, and KSDR(AM) and KSDR-FM at Watertown, South Dakota. It is proposed that Three Eagles acquire KDBX(FM) at Clear Lake, South Dakota, KKSD(FM) at Milbank, South Dakota, KKQQ(FM) and KJJQ(AM) at Volga, South Dakota, and KIXX(FM), KDLO-FM, and KWAT(AM) all of Watertown, South Dakota. The first map in this study depicts the principal community coverage contours of these facilities, and depicts the markets that would result from the common overlap between these facilities.

Because of the relative location of each of these facilities, the groupings of stations would result in the creation of six different markets for analysis.

Although other groupings would be created, these six markets are those that include the maximum number of stations for a particular area of common overlap.

Specifically the markets are created by the common overlap between facilities as subsequently described. Market #1 is defined by the common overlap between KKSD(FM), KSDR-FM, KIXX(FM), KDLO-FM, KSDR(AM), and KWAT(AM). The second market is created by the common overlap between KSDR-FM, KIXX(FM), KKSD(FM), KDBX(FM), and KWAT(AM). Market #3 arose as a result of the common overlap between KDBX(FM), KWAT(AM), and KDLO-FM. The fourth market is defined by the common overlap between KDBX(FM), KBRK-FM, KJJQ(AM), and KBRK(AM). The next to last market, Market #5, is a consequence of the common overlap between KJJQ(AM), KBRK(AM), KJAM-FM, KBRK-FM, and KKQQ(FM). The final market, Market #6, is defined by the common overlap between KJJQ(AM), KJAM(AM), KJAM-FM, KBRK-FM, and KKQQ(FM). Each of these markets is illustrated on its appropriate map, and each will be analyzed in turn to demonstrate compliance with Section 73.3555 of the Commission's Rules.

In the case of the first market, the definition is due to the common overlap between 6 facilities, 4 of which are FM's. As a result of this grouping, it is necessary and sufficient to demonstrate that there are at least 15 facilities serving that market. The Market #1 analysis map depicts the facilities comprising the market as well as the other facilities considered. The area that is orange shaded illustrates that area where the facilities that would be under common control have common overlap. As this map indicates, there are at least 16

facilities serving this market. It should be noted that FM station KDBX(FM) was included as a station attributable to the total number of stations in the market, but not attributable toward the number of stations under common control, since it does not overlap the market under consideration. Since at least 16 facilities have been indicated on this map as serving the market, it is respectfully submitted that this market, Market #1, would be in compliance with the provisions of Section 73.3555 of the Commission's Rules.

Market #2 is defined by the common overlap between 5 facilities, 4 of which are in the same service (FM stations). As a result of this combination, it is necessary and sufficient to demonstrate that there are at least 15 stations serving this market. As the map analyzing this market indicates, there are at least 15 facilities serving the market. Of these 15 facilities, two have been included that are under common control, however do not overlap the market, and therefore may be included for market size, but do not count against the proponent in the number of stations they have in the market. As a result, it is respectfully submitted that this market would comply with the provisions of Section 73.3555 of the Commission's Rules.

In the case of the third market, there are three facilities under common control, two of which are in the same service. For this market, it is necessary and sufficient to demonstrate that the proponent would not have greater than 50

percent of the stations in the market under common control. As the map indicates, there are at least 7 additional stations serving the market, one of which is under common control, but does not overlap with the market. It is therefore respectfully submitted that this third market would be in compliance with the provisions of Section 73.3555 of the Commission's Rules.

Market #4 is defined by the common overlap between 4 stations, equally divided between AM and FM facilities. As a result of this grouping, it is necessary and sufficient for the proponent to demonstrate that they would not control greater than 50 percent of the stations serving the market. The map for market #4 demonstrates that there are at least 10 facilities serving the market, or 6 more in addition to those under common control. As a result, it is respectfully submitted that the proponent would not control greater than 50 percent of the stations in the market, and this market would be in compliance with the provisions of Section 73.3555 of the Commission's Rules.

The fifth market is comprised of the common overlap between 5 stations, three of which are FM facilities, and 2 are AM stations. Due to the market size in this case, it is also necessary and sufficient to demonstrate that the proponent would not control greater than 50 percent of the stations in the market. The map for this particular market demonstrates that there are at least 11 stations serving

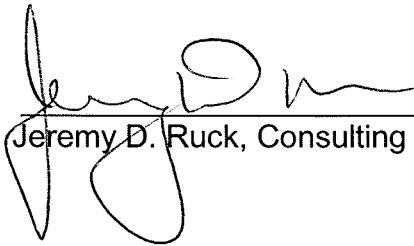
the market. It is therefore respectfully submitted that Market #5 would be in compliance with the provisions of Section 73.3555 of the Commission's Rules.

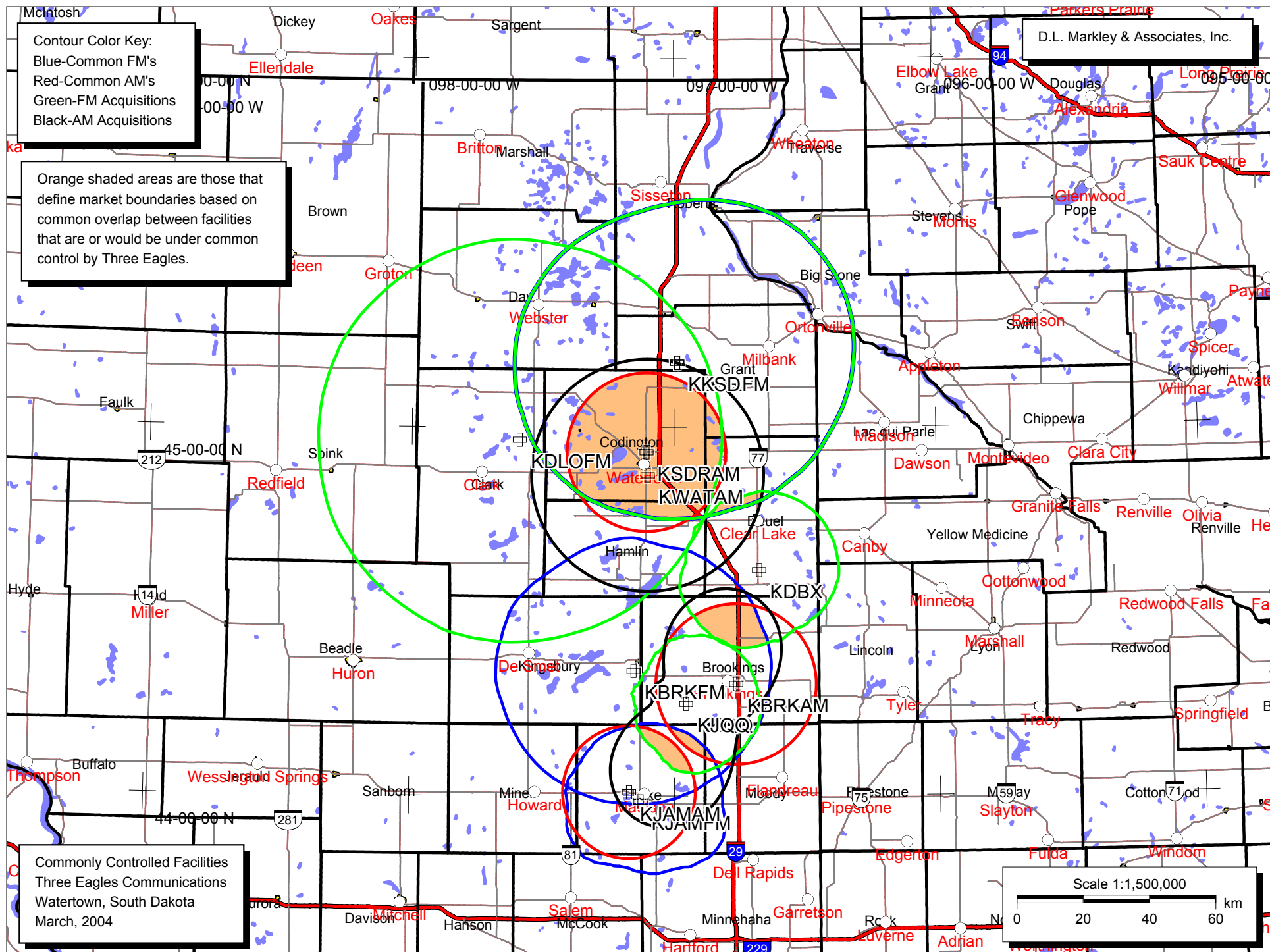
The sixth and final market is also defined by the common overlap between five facilities, three of which are FM stations, with the other two being AM stations. Because of the number of facilities involved in this grouping, it is once again necessary and sufficient to demonstrate in the case of this market that Three Eagles would not control greater than 50 percent of the stations. The map for Market #6 illustrates that there are at least 11 stations serving the market, therefore, it is respectfully submitted that Three Eagles would not control greater than fifty percent of said stations, and that this market would comply with the provisions of Section 73.3555 of the Commission's Rules.

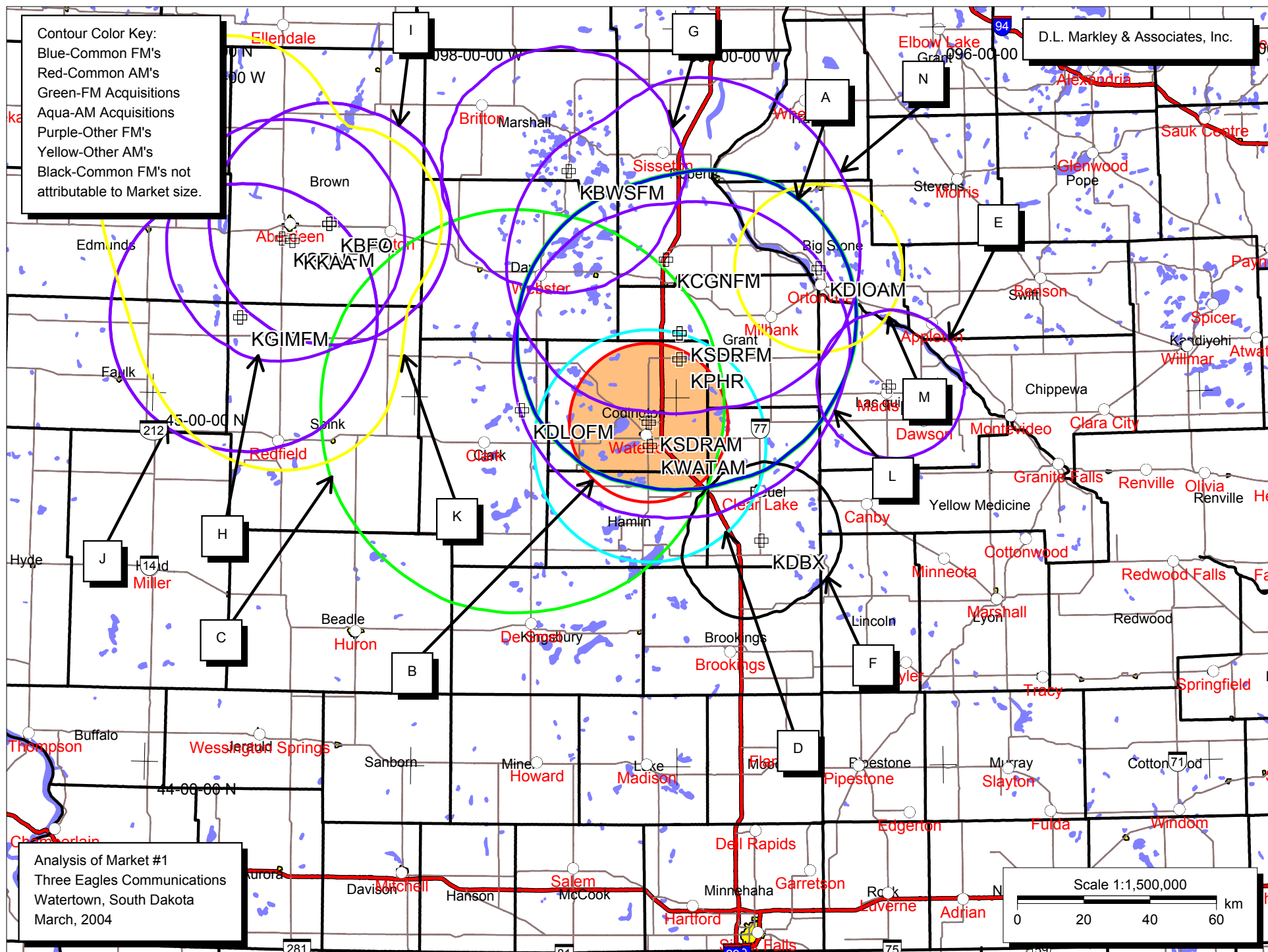
Since all six market groupings would be in compliance with the provisions of Section 73.3555 of the Commission's Rules, it is therefore respectfully submitted that the acquisition of the above listed facilities would comply with the provisions of the Commission's Rules. It should be noted that each of the maps was computer generated using a commercially available software package, and as a result, the maps are believed to be considerably more accurate than similar maps generated by hand. The summary pages following the maps list each of the stations considered.

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.

3/29/2007  
Date

  
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Jeremy D. Ruck, Consulting Engineer



















**Multiple Ownership Study**  
*Index to Facilities Depicted on Maps*

Market #1 Analysis:

A-	<b>KKSD(FM)</b>	<b>Milbank, South Dakota</b>
A-	<b>KSDR-FM</b>	<b>Watertown, South Dakota</b>
A-	<b>KIXX(FM)</b>	<b>Watertown, South Dakota</b>
B-	<b>KSDR(AM)</b>	<b>Watertown, South Dakota</b>
C-	<b>KDLO-FM</b>	<b>Watertown, South Dakota</b>
D-	<b>KWAT(AM)</b>	<b>Watertown, South Dakota</b>
E-	KLQP(FM)	Lac Qui Prairie, Minnesota
F-	<b>KDBX(FM)</b>	<b>Clear Lake, South Dakota</b>
G-	KBWS-FM	Sisseton, South Dakota
H-	KSDN-FM	Aberdeen, South Dakota
I-	KQAA(FM)	Aberdeen, South Dakota
J-	KNBZ(FM)	Redfield, South Dakota
K-	KKAA(AM)	Aberdeen, South Dakota
L-	KPHR(FM)	Ortonville, Minnesota
M-	KDIO(AM)	Ortonville, Minnesota
N-	KCGN-FM	Ortonville, Minnesota

Market #2 Analysis:

A-	<b>KSDR-FM</b>	<b>Watertown, South Dakota</b>
A-	<b>KIXX(FM)</b>	<b>Watertown, South Dakota</b>
A-	<b>KKSD(FM)</b>	<b>Milbank, South Dakota</b>
B-	<b>KDBX(FM)</b>	<b>Clear Lake, South Dakota</b>
C-	<b>KWAT(AM)</b>	<b>Watertown, South Dakota</b>
D-	KPHR(FM)	Ortonville, Minnesota
E-	KDIO(AM)	Ortonville, Minnesota
F-	KLOH(AM)	Pipestone, Minnesota
G-	KBWS-FM	Sisseton, South Dakota
H-	KLQP(FM)	Lac Qui Prairie, Minnesota
I-	<b>KSDR(AM)</b>	<b>Watertown, South Dakota</b>
J-	<b>KDLO-FM</b>	<b>Watertown, South Dakota</b>
K-	KCGN-FM	Ortonville, Minnesota
L-	KMSD(AM)	Milbank, South Dakota
M-	KKCK(FM)	Marshall, Minnesota

Market #3 Analysis:

<b>A-</b>	<b>KDBX(FM)</b>	<b>Clear Lake, South Dakota</b>
<b>B-</b>	<b>KWAT(AM)</b>	<b>Watertown, South Dakota</b>
<b>C-</b>	<b>KDLO-FM</b>	<b>Watertown, South Dakota</b>
<b>D-</b>	<b>KKCK(FM)</b>	<b>Marshall, Minnesota</b>
<b>E-</b>	<b>KPHR(FM)</b>	<b>Ortonville, Minnesota</b>
<b>F-</b>	<b>KCGN-FM</b>	<b>Ortonville, Minnesota</b>
<b>G-</b>	<b>KBWS-FM</b>	<b>Sisseton, South Dakota</b>
<b>H-</b>	<b>KIXX(FM)</b>	<b>Watertown, South Dakota</b>
<b>H-</b>	<b>KKSD(FM)</b>	<b>Milbank, South Dakota</b>
<b>H-</b>	<b>KSDR-FM</b>	<b>Watertown, South Dakota</b>

Market #4 Analysis:

<b>A-</b>	<b>KDBX(FM)</b>	<b>Clear Lake, South Dakota</b>
<b>B-</b>	<b>KBRK-FM</b>	<b>Brookings, South Dakota</b>
<b>C-</b>	<b>KBRK(AM)</b>	<b>Brookings, South Dakota</b>
<b>D-</b>	<b>KJJQ(AM)</b>	<b>Volga, South Dakota</b>
<b>E-</b>	<b>KKCK(FM)</b>	<b>Marshall, Minnesota</b>
<b>F-</b>	<b>KMXC(FM)</b>	<b>Sioux Falls, South Dakota</b>
<b>G-</b>	<b>KPHR(FM)</b>	<b>Ortonville, Minnesota</b>
<b>H-</b>	<b>KLOH(AM)</b>	<b>Pipestone, Minnesota</b>
<b>I-</b>	<b>KKLS-FM</b>	<b>Sioux Falls, South Dakota</b>
<b>J-</b>	<b>KKHG(FM)</b>	<b>Flandreau, South Dakota</b>

Market #5 Analysis:

<b>A-</b>	<b>KJJQ(AM)</b>	<b>Volga, South Dakota</b>
<b>B-</b>	<b>KBRK(AM)</b>	<b>Brookings, South Dakota</b>
<b>C-</b>	<b>KJAM-FM</b>	<b>Madison, South Dakota</b>
<b>D-</b>	<b>KBRK-FM</b>	<b>Brookings, South Dakota</b>
<b>E-</b>	<b>KKQQ(FM)</b>	<b>Volga, South Dakota</b>
<b>F-</b>	<b>KPHR(FM)</b>	<b>Ortonville, Minnesota</b>
<b>G-</b>	<b>KKCK(FM)</b>	<b>Marshall, Minnesota</b>
<b>H-</b>	<b>KLOH(AM)</b>	<b>Pipestone, Minnesota</b>
<b>I-</b>	<b>KMXC(FM)</b>	<b>Sioux Falls, South Dakota</b>
<b>J-</b>	<b>KKLS-FM</b>	<b>Sioux Falls, South Dakota</b>
<b>K-</b>	<b>KKHG(FM)</b>	<b>Flandreau, South Dakota</b>

Market #6 Analysis:

<b>A-</b>	<b>KJJQ(AM)</b>	<b>Volga, South Dakota</b>
<b>B-</b>	<b>KJAM(AM)</b>	<b>Madison, South Dakota</b>
<b>C-</b>	<b>KJAM-FM</b>	<b>Madison, South Dakota</b>
<b>D-</b>	<b>KBRK-FM</b>	<b>Brookings, South Dakota</b>
<b>E-</b>	<b>KKQQ(FM)</b>	<b>Volga, South Dakota</b>
F-	KPHR(FM)	Ortonville, Minnesota
G-	KKLS-FM	Sioux Falls, South Dakota
H-	KKCK(FM)	Marshall, Minnesota
I-	KLOH(AM)	Pipestone, Minnesota
J-	KMXC(FM)	Sioux Falls, South Dakota
K-	KKHG(FM)	Flandreau, South Dakota

**Bold faced facilities are those currently under common control by Three Eagles, or proposed acquisitions by Three Eagles.**