

**RADIO MARKET ANALYSIS**  
**ENCORE BROADCASTING**  
**OF SAN ANGELO I LIMITED PARTNERSHIP**  
**KKCN RADIO STATION**  
**BALLINGER, TEXAS**  
**March 2006**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits were prepared on behalf of Encore Broadcasting of San Angelo I Limited Partnership (“Encore”), licensee of station KKCN, Channel 276C1, Ballinger, Texas. Encore is filing an application to correct the geographic coordinates and other technical data to update the license for the KKCN facility. Encore is also the licensee of stations KGKL, 960 kHz, KGKL-FM, Channel 248C1, and KELI, Channel 254C0, San Angelo, Texas and KNRX, Channel 243C2, Sterling City, Texas.<sup>1</sup> KKCN and KNRX are considered “home” to the San Angelo, Texas market, but are licensed to communities in a non-metro county. KGKL, KGKL-FM and KELI are all licensed to communities within metro counties in the San Angelo, Texas Arbitron Market (Market #283). As a result, a hybrid ownership analysis was conducted. The review will verify compliance of common ownership of metro stations in the same market under the Arbitron/BIA rated market rules, as well as a revised contour overlap study involving the non-metro stations.

**ARBITRON/BIA MARKET REVIEW**

2. As shown on Exhibit #1, there are eighteen AM and FM (commercial and non-commercial) stations listed in the San Angelo Arbitron Market. Encore would be in control of

---

1) The Commission has approved an assignment of these stations to Double O Texas Corporation. As of this writing the consummation of the assignment has not yet occurred.

four FM stations and one AM station in the market. The number of stations indicated falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules. At this level, common ownership or control of up to six stations, with no more than four in the same service, is permissible. Therefore, control of KGKL, KGKL-FM, KELI, KNRX and KKCEN in the San Angelo, Texas market is believed to be in compliance with the Commission's radio ownership rules for rated markets.

### **REVISED CONTOUR OVERLAP ANALYSIS**

3. Since KNRX and KKCEN are non-metro stations, a study has been conducted to verify that the proposed ownership of these facilities, in conjunction with those in the nearby San Angelo, Texas Arbitron market (KGKL, KGKL-FM and KELI) is also in compliance with the Commission's multiple ownership rules. The city grade contours of these five stations are shown on Exhibit #2. As noted, the locations of the city grade contours of the stations create two distinct radio markets requiring review. Market #1 consists of AM station KGKL and FM stations KGKL-FM, KELI and KNRX.<sup>2</sup> Market #2 consists of AM station KGKL and FM stations KGKL-FM, KELI and KKCEN.

4. Since the contour of AM station KGKL is a subject station in each Market, its contour will be used to determine the number of other stations in each market to which the subject stations in that market will be added. No stations with transmitters located more than 92.0

---

2) While KKCEN is not a contributor in this market, the market will be reviewed for compliance.

kilometers from the boundary of the common overlap of subject stations will be considered. Further, no other facility controlled by Encore will be considered as a market contributor, unless it is a subject station in the radio market under study.

5. Exhibit #3 is a depiction of the AM and FM stations (commercial and non-commercial) providing service to the KGKL Radio Market boundary, a total of seven stations are shown, excluding any subject stations. Exhibit #4 is a tabulation of the stations in Radio Market #1 (KGKL/KGKL-FM/KELI/KNRX). A total of eleven stations are shown, including the four subject stations.<sup>3</sup> 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 this 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 market. Based on this number of facilities, it has been herein demonstrated that Market #1 is in compliance with the Commission's rules.

6. Exhibit #5 is a tabulation of the stations in Radio Market #2 (KGKL/KGKL-FM/KELI/KKCN); a total of eleven is shown, including the four subject stations.<sup>4</sup> The number of stations in Market #2 also falls in the fourteen or fewer stations tier of 73.3555(a)(1)(iv) of the Commission's rules. At this 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

---

3) While there many are other stations contributing service to the market, they are not considered as there are sufficient stations based on the number of facilities to be commonly held.

4) See Footnote 2, supra.

exceed 50% of the stations in the market. Based on this number of facilities, it has been herein demonstrated that Market #2 is in compliance with the Commission's rules.

7. Based on the individual compliance shown in the rated and non-rated markets, the control of stations KGKL, KGKL-FM, KELI, KNRX and KKCX by Encore is in compliance with the Commission's rules. Therefore, the minor change/correction of coordinates application for KKCX is in compliance with the ownership rules.

8. The foregoing technical statement was prepared on behalf of Encore Broadcasting of San Angelo I Limited Partnership 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 in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.0. BIA database. Technical data related to AM and FM facilities was extracted from the Commission's CDBS database. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.



## FCC Geographic Market Definition for San Angelo, TX

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KCLL	FM	100.1	C	Oldies	San Angelo, TX	07/02/2003	283	Foster Communications	San Angelo, TX	Tom Green
KCRN	AM	1340	NC	Inspiration	San Angelo, TX	07/02/2003	283	Criswell College	San Angelo, TX	Tom Green
KCRN	FM	93.9	NC	Inspiration	San Angelo, TX	07/02/2003	283	Criswell College	San Angelo, TX	Tom Green
KDCD	FM	92.9	C	Country	San Angelo, TX	07/02/2003	283	Regency Broadcasting Inc	San Angelo, TX	Tom Green
KELI	FM	98.7	C	Oldies	San Angelo, TX	07/02/2003	283	Double O Radio LLC	San Angelo, TX	Tom Green
KGKL	AM	960	C	Talk	San Angelo, TX	07/02/2003	283	Double O Radio LLC	San Angelo, TX	Tom Green
KGKL	FM	97.5	C	Country	San Angelo, TX	07/02/2003	283	Double O Radio LLC	San Angelo, TX	Tom Green
KIXY	FM	94.7	C	CHR	San Angelo, TX	07/02/2003	283	Foster Communications	San Angelo, TX	Tom Green
KKCN	FM	103.1	C	Country	San Angelo, TX	07/02/2003	283	Double O Radio LLC	Ballinger, TX	Runnels
KKSA	AM	1260	C	Nws/Tlk/Spt	San Angelo, TX	07/02/2003	283	Foster Communications	San Angelo, TX	Tom Green
KLRW	FM	88.5	NC	ChrsContem	San Angelo, TX	09/14/2004	283	Educational Media Foundation	Byrne, TX	Tom Green
KMDX	FM	106.1	C	Adult Rock	San Angelo, TX	07/02/2003	283	Regency Broadcasting Inc	San Angelo, TX	Tom Green
KMEO	FM	91.9	NC	CP - NOA	San Angelo, TX	06/06/2005	283	American Family Association Incorporated	Mertzon, TX	Irion
KNAR	FM	89.3	NC	CP - NOA	San Angelo, TX	05/25/2005	283	Educational Media Foundation	San Angelo, TX	Tom Green
KNRX	FM	96.5	C	Hot AC	San Angelo, TX	07/02/2003	283	Double O Radio LLC	Sterling City, TX	Sterling
KSJT	FM	107.5	C	Varty/News	San Angelo, TX	07/02/2003	283	La Unica Broadcasting Company	San Angelo, TX	Tom Green
KUTX	FM	90.1	NC	Variety	San Angelo, TX	07/02/2003	283	University of Texas	San Angelo, TX	Tom Green
KWFR	FM	101.9	C	Clsc Rock	San Angelo, TX	07/02/2003	283	Foster Communications	San Angelo, TX	Tom Green

**Number of Stations in Geographic Market 18**

"C" - Commercial Station; "NC" - Non Commercial Station.

"p" indicates pending sale to owner listed

**Graham Brock, Inc. - Broadcast Technical Consultants**

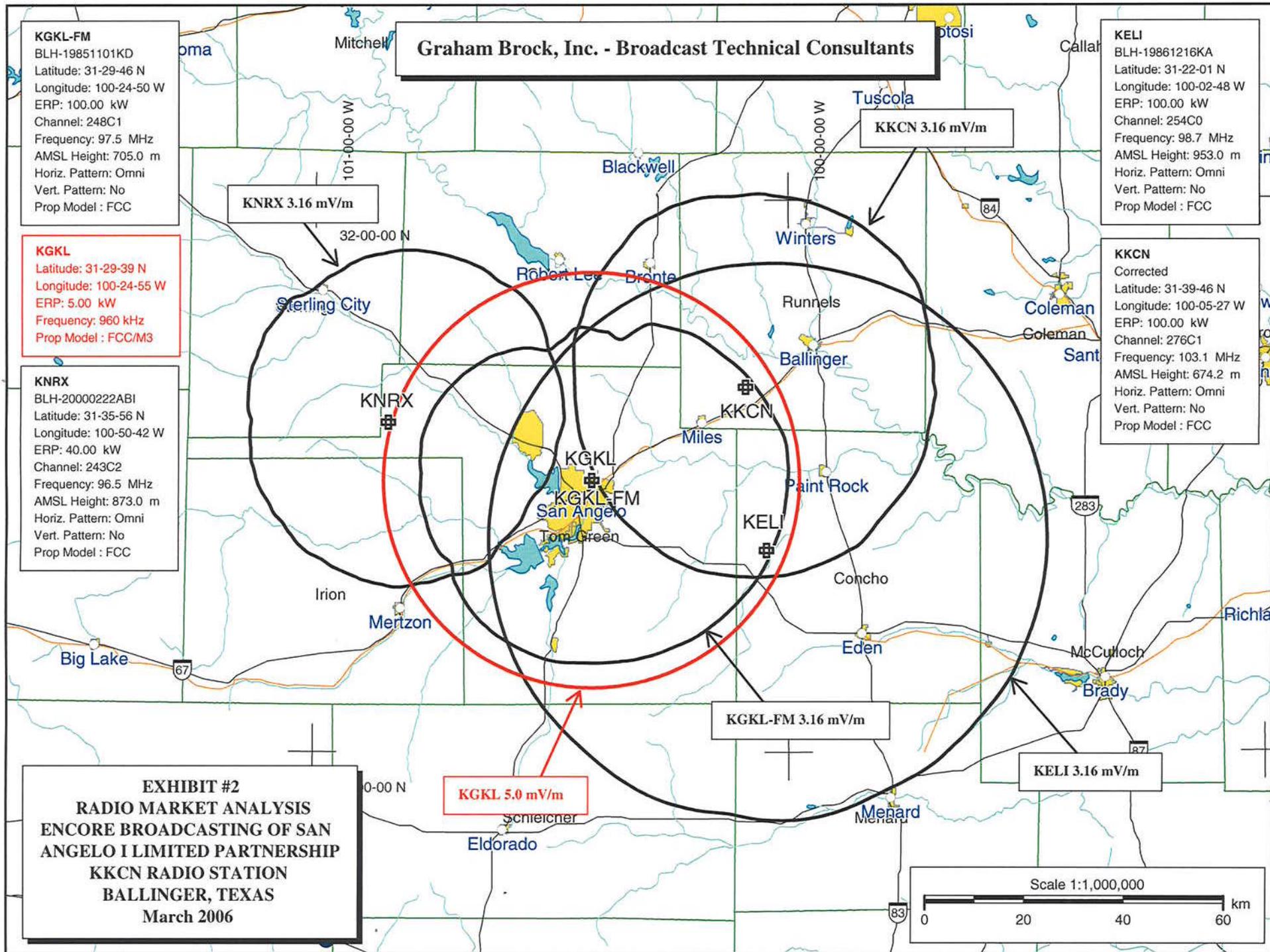
**KGKL-FM**  
 BLH-19851101KD  
 Latitude: 31-29-46 N  
 Longitude: 100-24-50 W  
 ERP: 100.00 kW  
 Channel: 248C1  
 Frequency: 97.5 MHz  
 AMSL Height: 705.0 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model : FCC

**KGKL**  
 Latitude: 31-29-39 N  
 Longitude: 100-24-55 W  
 ERP: 5.00 kW  
 Frequency: 960 kHz  
 Prop Model : FCC/M3

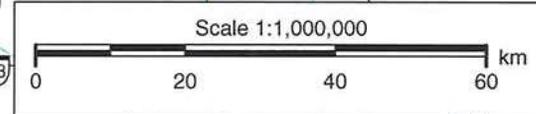
**KNRX**  
 BLH-20000222ABI  
 Latitude: 31-35-56 N  
 Longitude: 100-50-42 W  
 ERP: 40.00 kW  
 Channel: 243C2  
 Frequency: 96.5 MHz  
 AMSL Height: 873.0 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model : FCC

**KELI**  
 BLH-19861216KA  
 Latitude: 31-22-01 N  
 Longitude: 100-02-48 W  
 ERP: 100.00 kW  
 Channel: 254C0  
 Frequency: 98.7 MHz  
 AMSL Height: 953.0 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model : FCC

**KKCN**  
 Corrected  
 Latitude: 31-39-46 N  
 Longitude: 100-05-27 W  
 ERP: 100.00 kW  
 Channel: 276C1  
 Frequency: 103.1 MHz  
 AMSL Height: 674.2 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: No  
 Prop Model : FCC

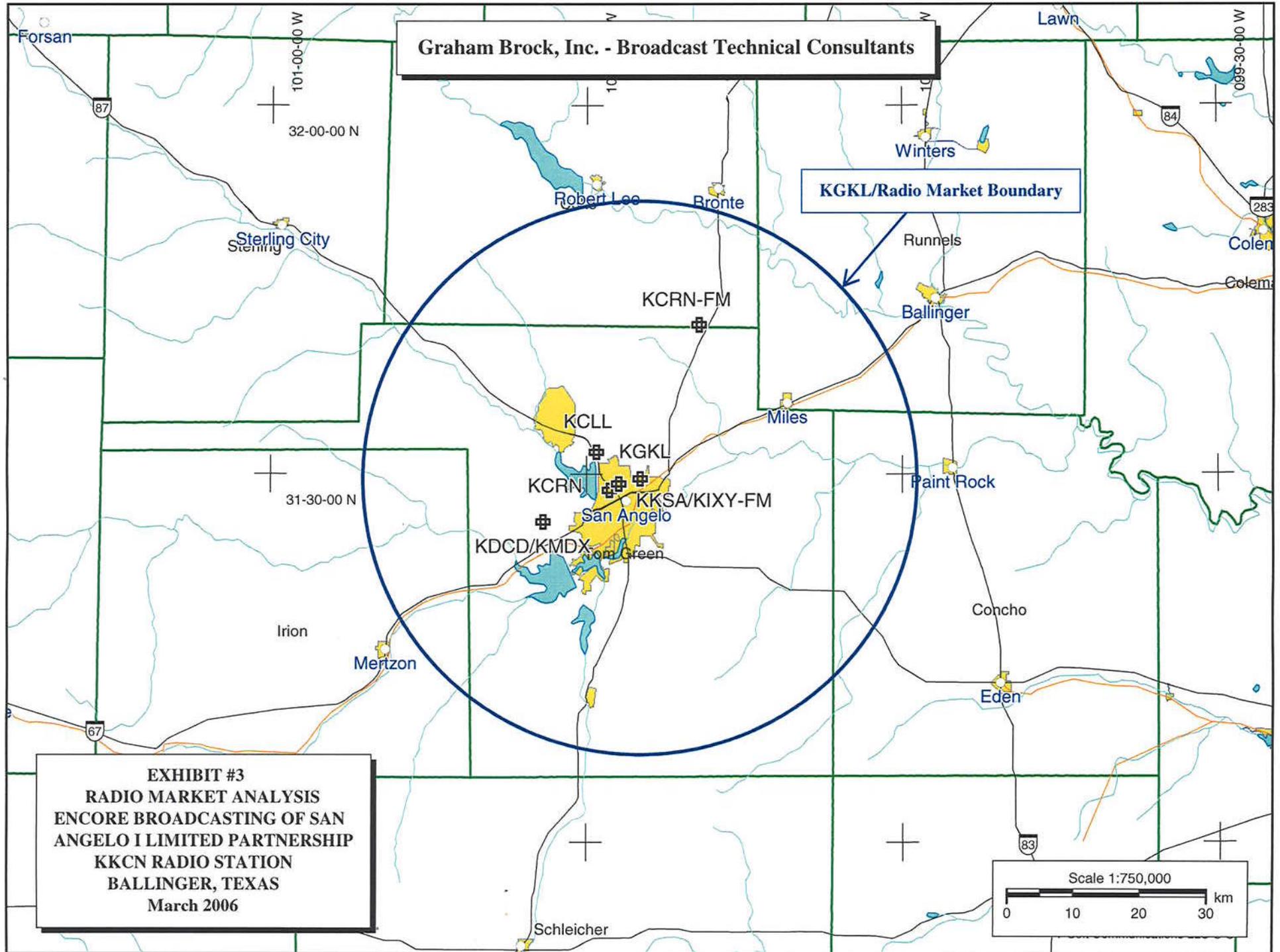


**EXHIBIT #2**  
**RADIO MARKET ANALYSIS**  
**ENCORE BROADCASTING OF SAN**  
**ANGELO I LIMITED PARTNERSHIP**  
**KKCEN RADIO STATION**  
**BALLINGER, TEXAS**  
**March 2006**



Graham Brock, Inc. - Broadcast Technical Consultants

KGKL/Radio Market Boundary



**EXHIBIT #3**  
**RADIO MARKET ANALYSIS**  
**ENCORE BROADCASTING OF SAN**  
**ANGELO I LIMITED PARTNERSHIP**  
**KKCN RADIO STATION**  
**BALLINGER, TEXAS**  
**March 2006**

**RADIO MARKET ANALYSIS**  
**ENCORE BROADCASTING**  
**OF SAN ANGELO I LIMITED PARTNERSHIP**  
**KKCN RADIO STATION**  
**BALLINGER, TEXAS**  
**March 2006**

**EXHIBIT #4**

**Tabulation of Stations in Radio Market #1**

**AM Stations**

* KGKL	960 kHz	San Angelo, Texas
KKSA	1260 kHz	San Angelo, Texas
KCRN	1340 kHz	San Angelo, Texas

Total AM Stations - 3

**FM Stations**

KDCD	Ch 225C1	San Angelo, Texas
KCRN-FM	Ch 230C1	San Angelo, Texas
KIXY-FM	Ch 234C	San Angelo, Texas
* KNRX	Ch 243C2	Sterling City, Texas
* KGKL-FM	Ch 248C1	San Angelo, Texas
* KELI	Ch 254C0	San Angelo, Texas
KCLL	Ch 261C2	San Angelo, Texas
KMDX	Ch 291C2	San Angelo, Texas

Total FM Stations - 8

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 11**

\* Subject station.

**RADIO MARKET ANALYSIS**  
**ENCORE BROADCASTING**  
**OF SAN ANGELO I LIMITED PARTNERSHIP**  
**KKCN RADIO STATION**  
**BALLINGER, TEXAS**  
**March 2006**

**EXHIBIT #5**

**Tabulation of Stations in Radio Market #2**

**AM Stations**

* KGKL	960 kHz	San Angelo, Texas
KKSA	1260 kHz	San Angelo, Texas
KCRN	1340 kHz	San Angelo, Texas

Total AM Stations - 3

**FM Stations**

KDCD	Ch 225C1	San Angelo, Texas
KCRN-FM	Ch 230C1	San Angelo, Texas
KIXY-FM	Ch 234C	San Angelo, Texas
* KGKL-FM	Ch 248C1	San Angelo, Texas
* KELI	Ch 254C0	San Angelo, Texas
KCLL	Ch 261C2	San Angelo, Texas
* KKCX	Ch 276C1	Ballinger, Texas
KMDX	Ch 291C2	San Angelo, Texas

Total FM Stations - 8

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 11**

\* Subject station.

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

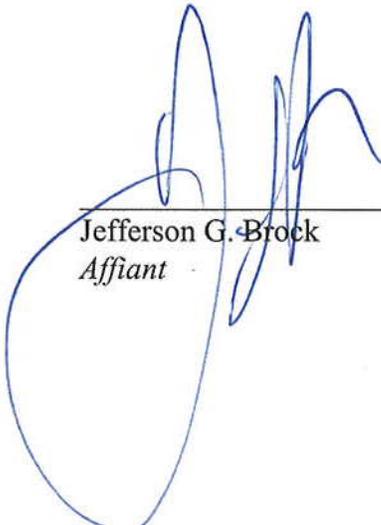
*State of Georgia )*  
*St. Simons Island ) ss:*  
*County of Glynn )*

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Encore Broadcasting of San Angelo I Limited Partnership 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 12th day of March 2006.*



---

Jefferson G. Brock  
Affiant

*Sworn to and subscribed before me  
this the 12th day of March 2006*



---

*Notary Public, State of Georgia  
My Commission Expires September 3, 2007*