

**ENGINEERING EXHIBIT
IN SUPPORT OF AN APPLICATION
FOR ASSIGNMENT OF LICENSE
KXPK, EVERGREEN, COLORADO
PREPARED ON BEHALF OF
ENTRAVISION HOLDINGS, LLC**

ENGINEERING STATEMENT

INTRODUCTION

The Engineering Exhibit of which this statement is part has been prepared on behalf of Entravision Holdings, LLC (hereinafter Entravision), licensee of UHF commercial television (TV) station KCEC, Denver, Colorado, commercial AM station KMXA, Aurora, Colorado, and commercial FM station KJMN, Castle Rock, Colorado. Entravision is the proposed assignee in an application for consent to the assignment of the license of commercial FM station KXPK, Evergreen, Colorado.

The purpose of the instant Engineering Exhibit is to present data showing compliance of the proposed Entravision ownership of one television station and three radio stations with the requirements of Section 73.3555 of the Federal Communications Commission (FCC) Rules governing multiple ownership of radio and TV stations serving the same geographic area.

STATION FACILITIES

KCEC(TV) (FCC Facility Number 24514) is licensed (FCC File Number BLCT-19901025KE) to operate on UHF TV channel 50 (686-692 megahertz (MHz)), at Denver, Colorado, at a transmitter site located at geographic coordinates 39° 43' 59" North Latitude, 105° 14' 12" West Longitude (referenced to the 1927 North American Datum (NAD 27)), using zero frequency offset, a horizontally polarized, directional antenna, 2,510 kilowatts (kW) maximum peak visual effective radiated power (ERP), and 233 meters antenna radiation center height above average terrain (HAAT).

KMXA(AM) is a fulltime Class B AM Station (FCC Facility Number 10057) licensed (FCC File Number BL-19850710AD) to operate on 1090 kHz at Aurora, Colorado, at a transmitter site located at geographic coordinates 39° 39' 53" North Latitude, 104° 39' 24" West Longitude (referenced to NAD 27), using 50 kW power during daytime hours, 0.5 kW power during nighttime hours, and different directional antenna systems for daytime and nighttime operations.

KJMN(FM) (FCC Facility Number 10056) is licensed (FCC File Number BLH-19950929KE) to operate on FM channel 221C2 (92.1 MHz), at Castle Rock,

DENNY & ASSOCIATES, P.C.
CONSULTING ENGINEERS
OXON HILL, MARYLAND

Engineering Statement
Entravision Holdings, LLC
Denver, Colorado

Page 3

Colorado, at a transmitter site located at geographic coordinates 39° 25' 15" North Latitude, 104° 39' 15" West Longitude (referenced to NAD 27), using 33 kW ERP, circularly polarized, and 183 meters antenna radiation center HAAT.

KXPK(FM) (FCC Facility Number 20300) is licensed (FCC File Number BLH-19940701KC) to operate on FM channel 243C (96.5 MHz), at Evergreen, Colorado, at a transmitter site located at geographic coordinates 39° 40' 35" North Latitude, 105° 29' 09" West Longitude (referenced to NAD 27), using 100 kW ERP, circularly polarized, and 530 meters antenna radiation center HAAT.

COMPLIANCE WITH RADIO MULTIPLE OWNERSHIP RULES

The predicted principal community contours, as defined in the FCC Rules¹, for the licensed KMXA(AM), KJMN(FM) and KXPK(FM) facilities overlap. Exhibit 1 of this Engineering Exhibit is a map on which the locations of the predicted principal community contours for KMXA(AM), KJMN(FM) and

¹ The principal community contour for AM stations is the predicted or measured 5-millivolt-per-meter groundwave contour computed in accordance with Section 73.183 or Section 73.186 of the FCC Rules. The principal community contour for FM stations is the predicted 3.16-millivolt-per-meter (70 dBuV/m) contour computed in accordance with Section 73.313 of the FCC Rules.

Engineering Statement
Entravision Holdings, LLC
Denver, Colorado

Page 4

KXPK(FM) are plotted. The composite principal community contour of the three stations, defines the radio market.

Entravision proposes common ownership of three commercial radio stations (one AM station and two FM stations) in a single radio market. Section 73.3555 of the FCC Rules allows a single entity to own, operate, or control up to eight commercial radio stations in a single radio market depending on the number of other commercial radio stations in the radio market. In the most restrictive radio market defined in Section 73.3555(a)(1)(iv) of the FCC Rules where there are 14 or fewer commercial radio stations, a single entity may own, operate, or control up to five commercial radio stations provided that no more than three of the commonly owned, operated, or controlled stations are in the same radio service (AM or FM) and that the total number of commercial radio stations owned, operated, or controlled does not constitute more than half of the total number of commercial radio stations in the radio market.

To demonstrate the compliance of Entravision's proposal with the requirements of Section 73.3555 of the FCC Rules in the most restrictive case of

DENNY & ASSOCIATES, P.C.
CONSULTING ENGINEERS
OXON HILL, MARYLAND

Engineering Statement
Entravision Holdings, LLC
Denver, Colorado

Page 5

14 or fewer stations in the radio market, the transmitter sites for four additional licensed, operating commercial radio stations were plotted on the map of Exhibit 1 of this Engineering Exhibit. Since the transmitter sites for the four additional stations are contained within the boundary of the KMXA(AM)/KJMN(FM)/KXPK(FM) radio market their principal community contours by definition overlap the aforementioned radio market. The following table lists the facilities of the four additional stations shown on Exhibit 1.

<u>Call Sign</u>	<u>City, State</u>	<u>Facilities</u>	<u>Geographic Coordinates</u>
KFMD(FM)	Denver, CO	Ch 239C, 100 kW-H 64 kW-V (Max-DA) 490 m	39° 43' 59" NL 105° 14' 10" WL
KYGO-FM	Denver, CO	Ch 253C, 100 kW (H&V) 555 m	39° 40' 35" NL 105° 29' 09" WL
KIMN(FM)	Denver, CO	Ch 262C, 100 kW (Max-DA, BT) 345 m	39° 40' 18" NL 105° 13' 12" WL
KBCO-FM	Boulder, CO	Ch 247C, 100 kW-H 85 kW-V (Max-DA) 469 m	39° 54' 48" NL 105° 17' 32" WL

As Exhibit 1 shows, there are at least 7 operating stations in the KMXA(AM)/KJMN(FM)/KXPK(FM) radio market, and Entravision proposes

common ownership of three of the stations in the radio market, two of which are in the same service. Accordingly, the Entravision proposal for common ownership of KMXA(AM), KJMN(FM) and KXPK(FM) complies with section 73.3555(a)(1)(iv) of the FCC Rules.

COMPLIANCE WITH RADIO-TV CROSS OWNERSHIP RULES

The calculated 1 millivolt per meter (mV/m) contours of KJMN(FM) and KXPK(FM), predicted in accordance with Section 73.313 of the FCC Rules, and the calculated KMXA(AM) 2 mV/m contour, predicted in accordance with Section 73.183 of the FCC Rules, each encompasses 100 percent of Denver, Colorado, the community of license of Entravision's TV station KCEC(TV). Pursuant to Section 73.3555(c)(2)(i) of the FCC Rules, an entity may directly or indirectly own, operate, or control one commercial TV station and up to seven commercial radio stations in a market, provided that at least 20 other independently owned media voices exist in the market following the requested assignment.

Engineering Statement
Entravision Holdings, LLC
Denver, Colorado

Page 7

TV Voices in Market Post-Merger

According to the *Broadcasting and Cable Yearbook 2001*, KCEC(TV) is in the Denver Nielsen Designated Market Area (DMA). The Denver DMA, number 18 of the 210 2001 Nielsen DMAs, is comprised of 58 counties. There are 1,312,300 TV households in the Denver DMA. *Broadcasting and Cable Yearbook 2001* reports that in addition to KCEC(TV), there are 18 operating full-service TV stations (14 commercial and 4 noncommercial) in the Denver DMA. As shown in the tabulation of Exhibit 2 of this Engineering Exhibit, these 18 operating TV stations count as 16 independently owned TV voices in the market post-merger. Therefore, the number of independently owned TV voices remaining in the market post-merger merger and the four additional radio stations identified herein equals the minimum of 20 independently owned, post-media voices required to permit the proposed Entravision ownership of KCEC(TV), KMXA(AM), KJMN(FM), and KXPB(FM). Hence, it is unnecessary to count the number of other radio, cable and newspaper voices in the post-merger market.

Engineering Statement
Entravision Holdings, LLC
Denver, Colorado

Page 8

CONCLUSIONS

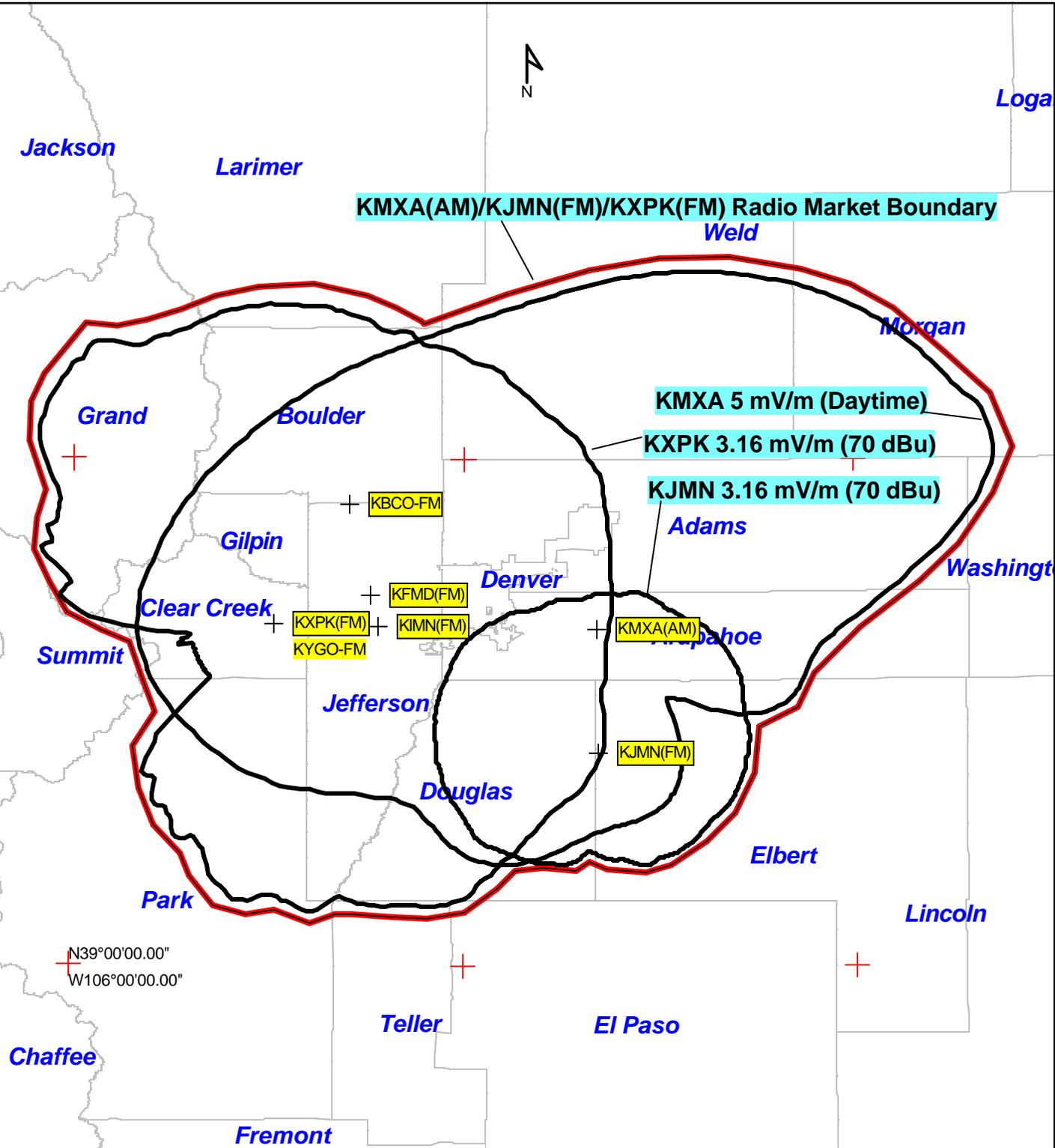
Based on the studies reported herein, the proposed Entravision ownership of one television station, KCEC(TV), and three radio stations, KMXA(AM), KJMN(FM) and KXPK(FM), comports with radio multiple ownership requirements of Section 73.3555(a) of the FCC Rules and the radio-television cross ownership requirements of Section 73.3555(c)(2) of the FCC Rules.

CERTIFICATION

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on February 21, 2002.


Alan R. Rosner, P.E.





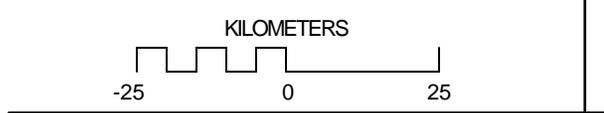
SIGNAL™: KXPK-Entravision.map

Notes

KMXA(AM) Aurora, CO
1090 kHz 50 kW-LS, 0.5 kW-N, DA-2

KJMN(FM) Castle Rock, CO
CH 221C2 33 kW(H&V) 183 Meters

KXPK(FM) Evergreen, CO
CH 243C 100 kW(H&V) 530 Meters



KMXA(AM)/KJMN(FM)/KXPK(FM)
Radio Market

Exhibit 1 February 2002

**ENGINEERING EXHIBIT
IN SUPPORT OF AN APPLICATION
FOR ASSIGNMENT OF LICENSE
KXPK, EVERGREEN, COLORADO
PREPARED ON BEHALF OF
ENTRAVISION HOLDINGS, LLC**

RADIO-TV CROSS OWNERSHIP STUDY

OTHER POST-MERGER TV VOICES IN THE DENVER, COLORADO, DMA¹

<u>Licensee</u>	<u>Call Sign</u>	<u>Community of License</u>	<u>FCC Facility Number</u>
1. First National Broadcasting Corp.	KFNR(TV)	Rawlins, WY	21612
2. Fox Television Stations, Inc.	KDVR(TV)	Denver, CO	126
	KFCT(TV)	Fort Collins, CO	125
3. Front Range Educational Media Corp.	KBDI-TV ²	Broomfield, CO	22685
4. Telemundo Of Steamboat Springs	KMAS-TV	Steamboat Springs, CO	20373
5. Group W Television Stations, Inc.	KCNC-TV	Denver, CO	47903
6. KWGN Inc.	KWGN-TV	Denver, CO	35883
7. LeSea Broadcasting Corporation	KWHD(TV)	Castle Rock, CO	37101
8. Longmont Channel 25, Inc.	KDEN(TV)	Longmont, CO	38375
9. McGraw-Hill Broadcasting Co., Inc.	KMGH-TV	Denver, CO	40875
10. Multimedia Holdings Corporation	KUSA-TV	Denver, CO	23074
11. Paxson Denver License, Inc.	KPXC-TV	Denver, CO	68695
12. Nebraska Educational Telecom. Comm.	KTNE-TV ²	Alliance, NE	47996
13. Rocky Mountain Public Broadcasting Network	KRMA-TV ²	Denver, CO	14040
14. Twenver Broadcast, Inc	KTVD(TV)	Denver, CO	68581
Channel 20 TV Company	KUPN(TV) ³	Sterling, CO	63158
15. Word of God Fellowship, Inc.	KRMT(TV) ²	Denver, CO	20476
16. W. Russell Withers, Jr.	KREG-TV	Glenwood Springs, CO	70578

¹ All station data reported herein were extracted from the FCC CDBS database.

² Noncommercial educational station.

³ Satellite of KTVD(TV)