

ENGINEERING STATEMENT WITH
REGARD TO NUMBER OF
STATIONS IN MARKET
Family Radio, Inc.

May 25, 2001

Prepared For: Mr. John Bauer
Family Radio, Inc.
P.O. Box 2058
Madison, WI 53701

CARL E. SMITH CONSULTING ENGINEERS

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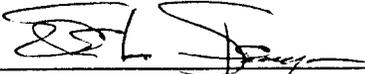
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ENGINEERING AFFIDAVIT

State of Ohio)
) ss:
County of Summit)

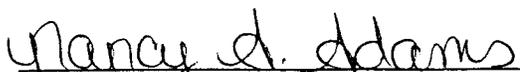
Elmer L. Steingass, being duly sworn, deposes and states that he is a qualified and experienced Communications Consulting Engineer whose works are a matter of record with the Federal Communications Commission and that he is a member of the Firm of "Carl E. Smith Consulting Engineers" located at 2324 North Cleveland-Massillon Road in the Township of Bath, County of Summit, State of Ohio, and that the Firm has been retained by Family Radio, Inc. to prepare the attached "Engineering Statement With Regard to Number of Stations In Market."

The deponent states that the Exhibit was prepared by him or under his direction and is true of his own knowledge, except as to statements made on information and belief and as to such statements, he believes them to be true.



Elmer L. Steingass

Subscribed and sworn to before me on **May 25, 2001**.



Notary Public

NANCY A. ADAMS, Notary Public
Residence - Cuyahoga County
State Wide Jurisdiction, Ohio
My Commission Expires Sept. 5, 2005

/SEAL/

ENGINEERING STATEMENT

This engineering statement is prepared on behalf of Family Radio, Inc., proposed assignee of Radio Stations KSFF(FM) - Caledonia, Minnesota; KQYB(FM) - Spring Grove, Minnesota; and KHME(FM) - Winona, Minnesota. It documents that the common ownership of these three stations with WKTY(AM) - La Crosse, Wisconsin; WIZM(AM) - La Crosse, Wisconsin; WRQT(FM) - La Crosse, Wisconsin; and WIZM-FM - La Crosse, Wisconsin complies with the multiple ownership restrictions outlined in Section 73.3555 of the FCC Rules.

Figure 1.0 is a map exhibit depicting the principal community contours for these seven stations. The 5 mV/m daytime contours for WKTY and WIZM were projected using the notified facilities for each station from the FCC's Consolidated Database System ("CDBS") and conductivity data extracted from FCC Figure M3. The 3.16 mV/m contours for WIZM-FM, KSFF, WRQT, KQYB, and KHME were projected using the notified facilities for each station from the CDBS and terrain data extracted from the NGDC 30 second terrain database. As shown by this figure, the common ownership of these seven stations forms two different markets which must be examined for compliance with the FCC's multiple ownership rules.

The first market (Market #1) which must be examined is based upon the common area of principal community contour overlap between WIZM-FM, KSFF, WRQT, and KQYB. Since the principal community contours of AM stations WKTY and WIZM overlap the area of common overlap between these four FM stations, they are considered to also be in this market and must be considered in determining the composite principal community contour for this market. It should be noted, however, that the principal community contour of KHME does not overlap this area of common FM con-

tour overlap and therefore is not considered to be a commonly owned station in this market. Thus, this market contains of six commonly owned stations, two AM and four FM.

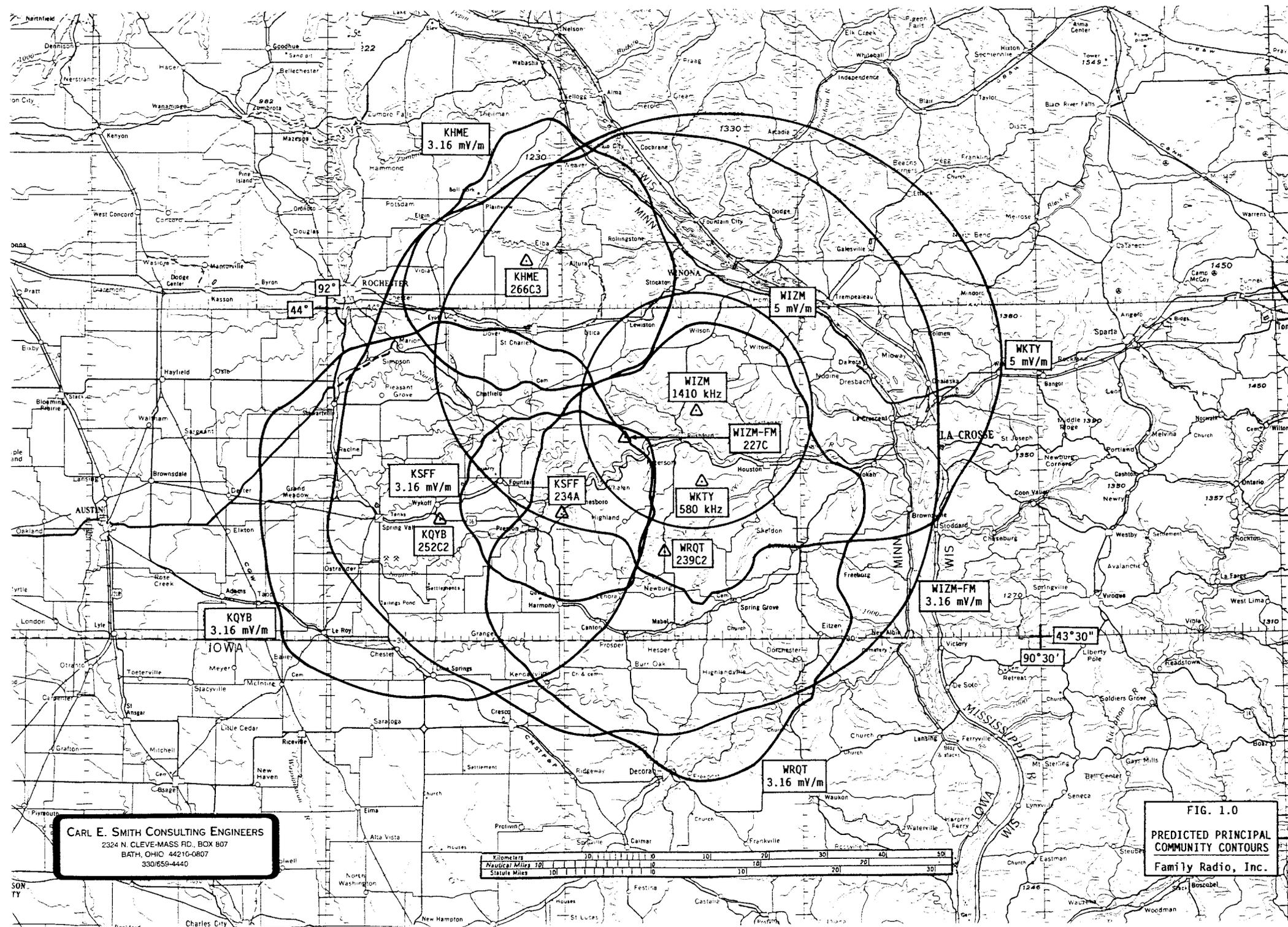
Figure 1.1 depicts the composite principal community contour for Market #1. Also shown in this figure are the transmitter sites of all operating commercial stations that are located within this composite contour. Table 1.1 is a tabulation of the stations depicted in this figure. As shown by this table, there are 25 stations, including WKTY, WIZM, WIZM-FM, KSFF, WRQT, and KQYB whose transmitter sites lie within this composite contour. Since it is obvious that the principal community contour of any station whose site is located within this composite contour will overlap this contour, it can be safely said that there are at least 25 stations in Market #1. In fact, this number would be even higher if stations whose transmitter sites are located outside this contour but whose principal community contours overlap this contour were included. No such further analysis is necessary in this case, however, since, in markets containing 15 to 29 stations, Section 73.3555(a)(1)(iii) of the FCC Rules permits the common ownership of up to six stations, not more than four of which are in the same service. Since, as outlined above, this market will contain six commonly owned stations, two AM and four FM, the common ownership of these six stations will comply with the FCC's multiple ownership rules with regard to Market #1.

Market #2 is defined by the area of common overlap between WIZM-FM, KQYB, and KHME. Since the principal community contours of WKTY and WIZM overlap this area of common FM overlap, these two AM stations are also considered to be in Market #2 and must be included in the determination of the composite contour for this market. It should be noted, however, that the principal community contours of KSFF and WRQT

do not overlap this area of common FM contour overlap and are therefore not considered to be commonly owned stations in this market. Thus, Market #2 contains five commonly owned stations, two AM and three FM.

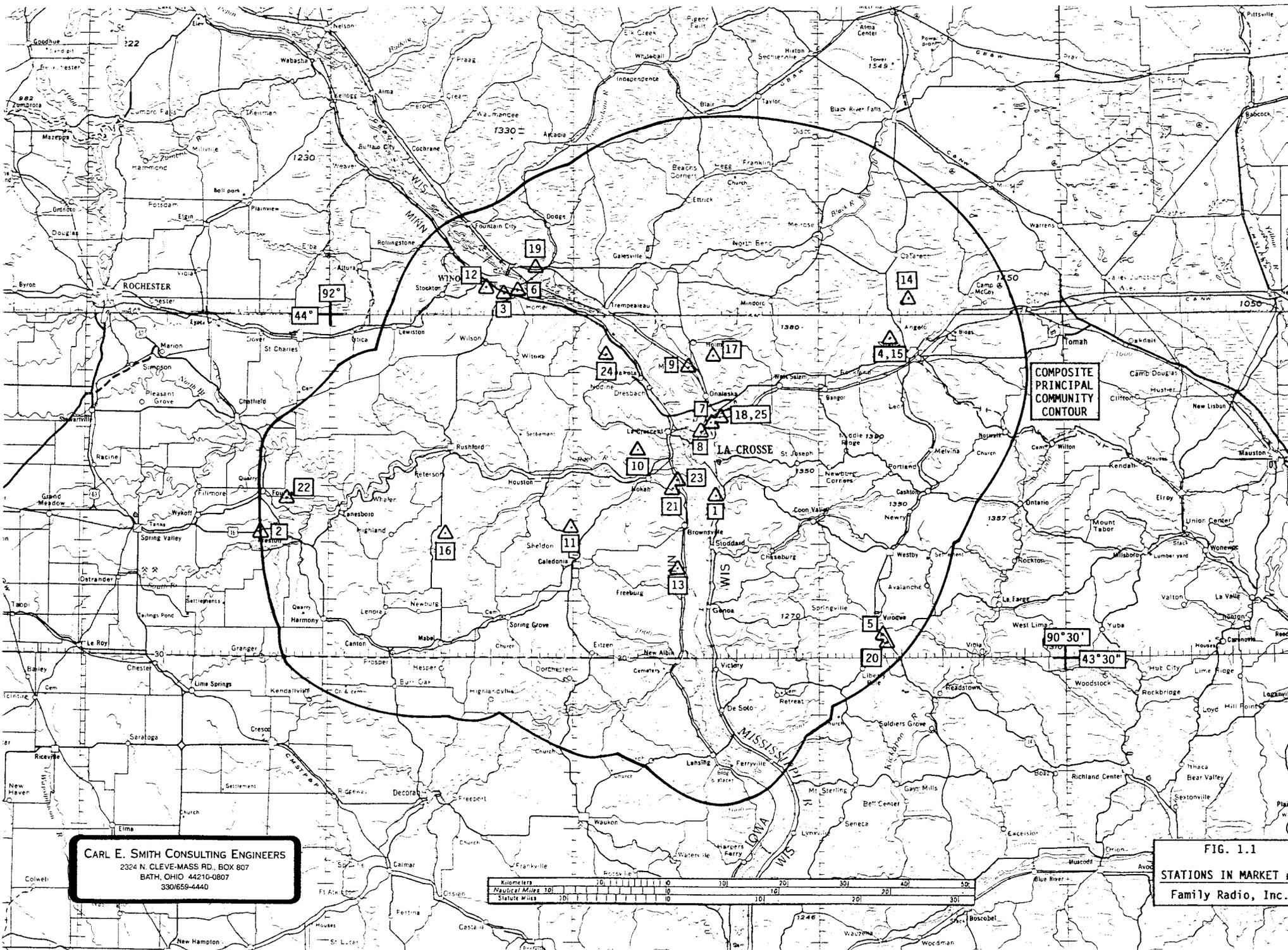
Figure 1.2 depicts the composite principal community contour for Market #2. Also shown in this figure are the transmitter sites of all operating commercial stations that are located within this composite contour. Table 1.2 is a tabulation of the stations depicted in this figure. As shown by this data, there are 25 stations, including WKTY, WIZM, WIZM-FM, KQYB, and KHME whose transmitter sites lie within this composite contour. Since it is obvious that the principal community contour of any station whose site is located within this contour will overlap this contour, it can be safely said that there are at least 25 stations in Market #2. In fact, this number would be even higher if stations whose transmitter sites are located outside this contour but whose principal community contours overlap this contour were included. No such further analysis is necessary in this case, however, since, in markets containing 15 to 29 stations, Section 73.3555(a)(1)(iii) of the FCC Rules permits the common ownership of up to six stations, not more than four of which are in the same service. Since, as outlined above, this market will contain five commonly owned stations, two AM and three FM, the common ownership of these five stations will comply with the FCC's multiple ownership rules with regard to Market #2

Based on the above information, the proposed acquisition of KSFF, KQYB and KHME will fully comply with the multiple ownership restrictions outlined in Section 73.3555 of the FCC Rules.



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FIG. 1.0
PREDICTED PRINCIPAL COMMUNITY CONTOURS
 Family Radio, Inc.



COMPOSITE
PRINCIPAL
COMMUNITY
CONTOUR

LA CROSSE

90°30'
43°30'

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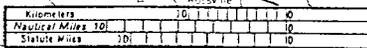


FIG. 1.1
STATIONS IN MARKET #1
Family Radio, Inc.

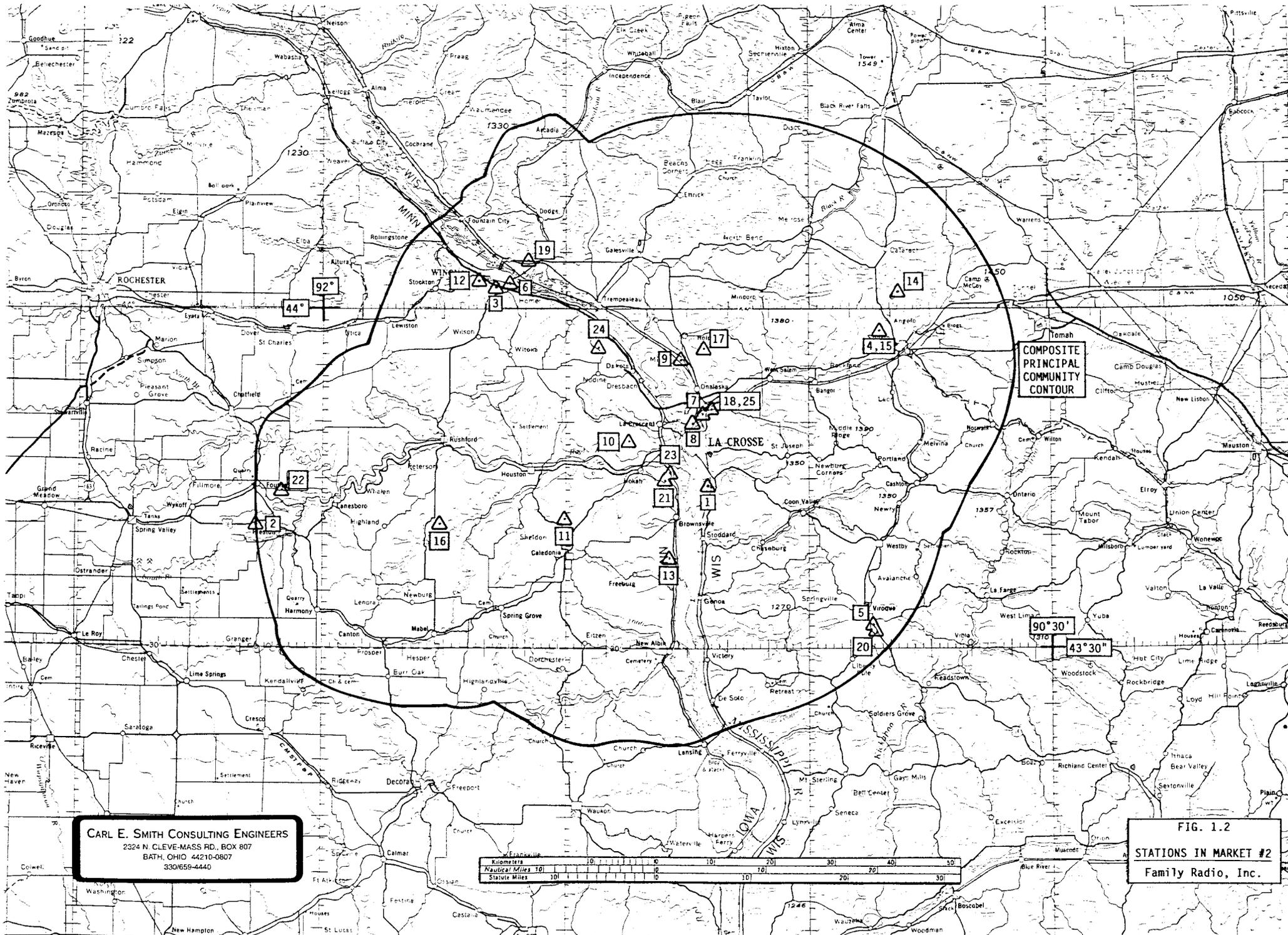
TABLE 1.1

STATIONS IN MARKET #1
Family Radio, Inc.

<u>Station</u>	<u>Call</u>	<u>Frequency/ Channel</u>	<u>Location</u>
1	WKTY	580	La Crosse, WI
2	KFIL	1060	Preston, MN
3	KWNO	1230	Winona, MN
4	WKLJ	1290	Sparta, WI
5	WVRQ	1360	Viroqua, WI
6	KAGE	1380	Winona, MI
7	WIZM	1410	La Crosse, WI
8	WLFN	1490	La Crosse, WI
9	WKBH	1570	Holmen, MN
10	WIZM-FM	227C	La Crosse, WI
11	KSFF	234A	Caledonia, MN
12	KAGE-FM	237C3	Winona, MN
13	WRQT	239C2	La Crosse, WI
14	WXYM	241C2	Tomah, WI
15	WCOW-FM	246C1	Sparta, WI
16	KQYB	252C2	Spring Grove, MN
17	KWNO-FM	257C3	Rushford, MN
18	WKBH-FM	261A	West Salem, WI
19	KHME	266C3	Winona, MN
20	WVRQ-FM	272A	Viroqua, WI
21	KQEG	274C3	La Crescent, MN
22	KFIL-FM	276C3	Preston, MN

TABLE 1.1 (cont'd)

<u>Station</u>	<u>Call</u>	<u>Frequency/ Channel</u>	<u>Location</u>
23	WLXR-FM	285A	La Crosse, WI
24	WFBZ	288A	Trempealeau, WI
25	WQCC	292C3	La Crosse, WI



COMPOSITE
PRINCIPAL
COMMUNITY
CONTOUR

LA CROSSE

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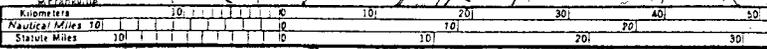


FIG. 1.2
STATIONS IN MARKET #2
Family Radio, Inc.

TABLE 1.2
STATIONS IN MARKET #2
 Family Radio, Inc.

<u>Station</u>	<u>Call</u>	<u>Frequency/ Channel</u>	<u>Location</u>
1	WKTY	580	La Crosse, WI
2	KFIL	1060	Preston, MN
3	KWNO	1230	Winona, MN
4	WKLJ	1290	Sparta, WI
5	WVRQ	1360	Viroqua, WI
6	KAGE	1380	Winona, MI
7	WIZM	1410	La Crosse, WI
8	WLFN	1490	La Crosse, WI
9	WKBH	1570	Holmen, MN
10	WIZM-FM	227C	La Crosse, WI
11	KSFF	234A	Caledonia, MN
12	KAGE-FM	237C3	Winona, MN
13	WRQT	239C2	La Crosse, WI
14	WXYM	241C2	Tomah, WI
15	WCOW-FM	246C1	Sparta, WI
16	KQYB	252C2	Spring Grove, MN
17	KWNO-FM	257C3	Rushford, MN
18	WKBH-FM	261A	West Salem, WI
19	KHME	266C3	Winona, MN
20	WVRQ-FM	272A	Viroqua, WI
21	KQEG	274C3	La Crescent, MN
22	KFIL-FM	276C3	Preston, MN

TABLE 1.2 (cont'd)

<u>Station</u>	<u>Call</u>	<u>Frequency/ Channel</u>	<u>Location</u>
23	WLXR-FM	285A	La Crosse, WI
24	WFBZ	288A	Trempealeau, WI
25	WQCC	292C3	La Crosse, WI