

**ENGINEERING STATEMENT COVERING  
BROADCAST MULTIPLE OWNERSHIP STUDY  
CCR-ST. GEORGE IV, LLC  
BRIAN HEAD, CEDAR CITY, ST. GEORGE, WASHINGTON, UTAH &  
COLORADO CITY, ARIZONA**

**AUGUST 2006**

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This engineering statement is submitted for the purpose of reflecting a change in KXFF facilities associated with a 301 Application for Modification of CP filed which this statement accompanies. This statement, supporting tabulations and figures have been prepared on behalf of **CCR-St. George IV, LLC** (“CCR”). This statement demonstrates CCR compliance with *Section 73.3555* of the Commission’s Rules with respect to multiple ownership of AM and FM broadcast facilities.

CCR proposes common ownership in the following eight stations:

KREC (FM)	Brian Head, UT	98.1 MHz	54 kW	BLH 19881123KC
KSUB (AM)	Cedar City, UT	590 kHz	5 kW DAN	BL 20060501AOZ
KXFF (FM)	Cedar City, UT	92.1 MHz	100 kW	See Table I
KXBN (FM)	Cedar City, UT	94.9 MHz	55 kW	BLH 19890717KF
KMXM (FM)	Colorado City, AZ	107.3 MHz	35 kW	BLH 20030313AXW
KSNN (FM)	St. George, UT	106.1 MHz	2 kW	See Table I <sup>1</sup>
KDXU (AM)	St. George, UT	890 kHz	10 kW DA-2	BL 20060216AMX
KUNF (AM)	Washington, UT	1210 kHz	10 kW ND	BL 19820816AK <sup>2</sup>

These eight stations are considered as three separate markets since the principal community contours for KXBN (FM), KMXM (FM) and KSNN (FM) do not overlap.

- Market 1: KSUB (AM), KDXU (AM), KUNF (AM), KXBN(FM), KXFF (FM) and KREC (FM)  
2: KSUB (AM), KDXU (AM), KUNF (AM), KMXM (FM), KXFF (FM) and KREC (FM)  
3: KSUB (AM), KDXU (AM), KUNF (AM), KSNN (FM), KMXM (FM) & KREC (FM)

In each market there are three AM and three FM stations.

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<sup>1</sup>An application for modification of license will be filed for KSNN to reduce ERP from 2.4 kW to 2 kW to prevent overlap between the KXFF CP Mod and KSNN 70 dBu contours simultaneously with the filing of the KXFF 302-FM license application.

<sup>2</sup>It is noted that KUNF has an application for construction permit pending, BP-20050506ABL. This facility is evaluated on page 3 of this statement and on Map *Figure 7*.

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 is defined as the area encompassed by the principal community contours (predicted or measured 5 mV/m groundwave contour for AM; predicted 3.16 mV/m contour for FM) of the stations that are both mutually overlapping and proposed to be “commonly attributable” post-transaction. The number of radio stations in this defined radio market (i.e., the numerator) will not exceed the limits set forth in *Section 73.3555(a)*. A commonly attributable station whose contour overlaps the contour of some but not all of the contours of the stations that define the radio market was not counted toward the local radio ownership limits (i.e., is not counted in the numerator). Counties in the market are Beaver, Piute, Garfield, Iron, Kane, and Washington, Utah, Mohave, Arizona and Lincoln and Clark, Nevada. Clark County is located in an Arbitron defined survey area. However, since the stations are in counties which are not Arbitron Metro counties, stations counted as part of the market are determined on the basis of contour overlap. *Figure 1* depicts the principal community contours for all eight stations for which common ownership is proposed. *Figure 2* depicts only the stations in Market #1, while *Figure 3* depicts the stations in Market #2 and *Figure 4* depicts the stations in Market #3.

*Table I* lists all AM stations whose 5 mV/m daytime contour duplicates some portion of the market. The contours for these stations are plotted on *Figure 5* in gray along with the market as depicted on *Figure 1*.

*Table I* also lists all FM stations whose 70 dBu contour duplicates some portion of the market. The contours for these stations are plotted on *Figure 6* in green along with the market.

Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission’s CDBS database using 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.

### **KUNF APPLICATION FOR CP**

KUNF has a pending application for construction permit, FCC file BP-20050506ABL. The application 5 mV/m contour is plotted on map *Figure 7* in orange. The application contour has no impact on the market analysis as the application 5 mV/m contour shares a large common area with the KSUB and KDXU 5 mV/m contours as does the licensed KUNF 5 mV/m contour.

### **CONCLUSION**

Based on the above analysis, it is believed that the proposed common ownership of stations complies with *Section 73.3555(a)(1)(iii)* of the Commission's Rules. There are 16 FM and 6 AM stations considered in this study which have principal community contours that overlap some portion of the attributable stations principal community contours. AM stations KSUB and KDXU are a part of each of the three markets and their contours represent the boundary of the market for all practical purposes. Stations in each market are listed as follows:

#### **Market 1: Attributable Stations - 6 Stations (3 AM & 3 FM)**

KSUB (AM), KDXU (AM), KUNF (AM), KXBN (FM), KXFF (FM) and KREC (FM)

#### **Non Attributable Stations in Market = 16**

KSNM (FM), KMXM (FM), KENT (AM), KNNZ (AM), KZNU (AM), KAER (FM), KAIZ (FM), KBZB (FM), KCYQ (FM), KJUL (FM), KONY (FM), KPLD (FM), KSGU (FM), KSUU (FM), KVEG (FM) and KZHK (FM)

#### **Market 2: Attributable Stations - 6 Stations (3 AM & 3 FM)**

KSUB (AM), KDXU (AM), KUNF (AM), KMXM (FM), KXFF (FM) and KREC (FM)

Non Attributable Stations in Market = 16

KSNM (FM), KXBN (FM), KENT (AM), KNNZ (AM), KZNU (AM), KAER (FM), KAIZ (FM), KBZB (FM), KCYQ (FM), KJUL (FM), KONY (FM), KPLD (FM), KSGU (FM), KSUU (FM), KVEG (FM) and KZHK (FM)

Market 3: Attributable Stations - 6 Stations (3 AM & 3 FM)

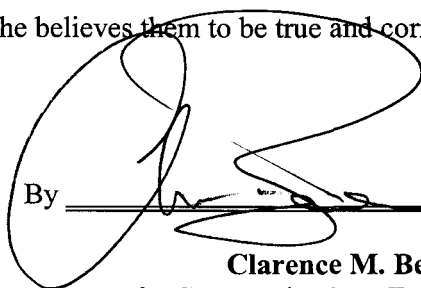
KSUB (AM), KDXU (AM), KUNF (AM), KSSN (FM), KMXM (FM), and KREC (FM)

Non Attributable Stations in Market = 16

KXFF (FM), KXBN (FM), KENT (AM), KNNZ (AM), KZNU (AM), KAER (FM), KAIZ (FM), KBZB (FM), KCYQ (FM), KJUL (FM), KONY (FM), KPLD (FM), KSGU (FM), KSUU (FM), KVEG (FM) and KZHK (FM)

The foregoing was prepared on behalf of **CCR-St. George IV, 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 undersigned certifies, under penalty of perjury, that 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

August 17, 2006

# TABLE I

## AM STATIONS IN THE CCR-ST.GEORGE IV, LLC MARKET ANALYSIS

AUGUST, 2006

CALL ARN LATITUDE	ST CITY OWNER LONGITUDE	FREQ	PAT	AG	PWR	DESC
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KSUB	UT CEDAR CITY	590.00000	CD		5.000	DAN
BL20060501AOZ	CCR-ST. GEORGE IV, LLC					
37-41-49.6 N	113-10-58.9 W					
KDXU	UT ST. GEORGE	890.00000	CD		10.000	DAN
BL20060216AMX	CCR-ST. GEORGE IV, LLC					
37-04-05.0 N	113-31-08.0 W					
KUNF	UT WASHINGTON	1210.00000	LD		10.000	ND1
BL19820816AK	CCR-ST. GEORGE IV, LLC					
37-08-38.0 N	113-30-03.0 W					
KNNZ	UT CEDAR CITY	940.00000	LD		10.000	ND1
BL	PRC ST. GEORGE I, LLC					
37-45-51.0 N	113-06-15.0 W					
KZNU	UT ST. GEORGE	1450.00000	LD		1.000	ND2
BL20050414ACX	CANYON MEDIA CORPORATION					
37-02-17.0 N	113-38-12.0 W					
KENT	UT PAROWAN	1400.00000	LD		0.800	ND1
BL20040621ADA	AM RADIO 1400, INC.					
37-48-22.0 N	112-56-40.0 W					

NOTE: KUNF BP-20050506ABL 1210 kHz daytime application for site change evaluated on Figure 7.  
The facilities are N.L. 37° 04' 05", 113° 31' 08" 1210 kHz 10 kW ND.

**TABLE I, PAGE 2****FM STATIONS IN THE CCR-ST. GEORGE IV, LLC MARKET STUDY ANALYSIS****AUGUST, 2006**

CALL	ST	TY	FREQ	CHN	CL	ERP	STAT
ARN	OWNER						
LATITUDE	LONGITUDE		HAAT:m	AMSL:m			

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KREC UT BRIAN HEAD 98.10000 C 54000.00 LIC  
BLH19881123KC CCR-ST. GEORGE IV, LLC  
37-32-32.0 N 113-04-05.0 W 759.111 3078.000

KXFF UT CEDAR CITY 92.10000 C 100000.00 CP MOD  
BPH20040409AAX CCR-ST. GEORGE IV, LLC  
37-38-43.0 N 113-22-22.0 W 532.0 2432.00

KXBN UT CEDAR CITY 94.90000 C1 55000.00 LIC  
BLH19890717KF CCR-ST. GEORGE IV, LLC  
37-45-51.0 N 113-06-15.0 W -33.458 1733.000

KMXM AZ COLORADO CITY 107.30000 C1 35000.00 LIC  
BLH20030313AXW CCR-ST. GEORGE IV, LLC  
37-05-41.0 N 113-11-06.0 W 343.556 1728.000

KSNN UT ST. GEORGE 106.10000 C2 2000.00 LIC MOD - TO BE FILED  
BLH20050621AAL CCR-ST. GEORGE IV, LLC  
36-50-49.0 N 113-29-28.0 W 571.0 1939.000

KEKL NV MESQUITE 88.50000 C2 20500.00 LIC  
BLED20050824ADM SOUTHERN NEVADA EDUCATIONAL BROADCASTERS  
36-41-00.0 N 114-30-48.0 W 151.042 740.000

KVEG NV MESQUITE 97.50000 C 100000.00 LIC  
BLH20010711AAI KEMP BROADCASTING, INC.  
36-35-06.0 N 114-36-01.0 W 600.431 1203.000

KAIZ NV MESQUITE 91.10000 A 400.00 LIC  
BLED20050630AGN EDUCATIONAL MEDIA FOUNDATION  
36-53-51.0 N 114-17-10.0 W 248.611 1145.000

KJUL NV MOAPA VALLEY 104.70000 C1 100000.00 LIC  
BLH20041115ACG SUMMIT AMERICAN, INC.  
36-41-00.0 N 114-30-48.0 W 186.042 775.000

**TABLE I, PAGE 3**

**FM STATIONS IN THE CCR-ST. GEORGE IV, LLC MARKET STUDY ANALYSIS**

**AUGUST 2006**

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

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KBZB NV PIOCHE 98.90000 C 5000.00 LIC  
BLH20000317ABQ GLA-MAR BROADCASTING, LLC  
37-53-44.0 N 114-34-41.0 W 1034.722 2870.000

KSGU UT ST. GEORGE 90.30000 C2 2000.00 LIC  
BLED20051107AED NEVADA PUBLIC RADIO  
36-50-49.0 N 113-29-28.0 W 553.153 1921.000

KONY UT ST. GEORGE 99.90000 C 89000.00 LIC  
BMLH20020215ABJ CANYON MEDIA CORPORATION  
36-50-49.0 N 113-29-28.0 W 623.153 1991.000

KAER UT ST. GEORGE 89.50000 C1 7000.00 LIC  
BLED20060301ADG EDUCATIONAL MEDIA FOUNDATION  
36-50-49.0 N 113-29-28.0 W 553.153 1921.000

KZHK UT ST. GEORGE 95.90000 C 100000.00 LIC  
BLH19970130KB MARVIN KENT FRANSEN  
36-50-49.0 N 113-29-28.0 W 595.153 1963.000

KSUU UT CEDAR CITY 91.10000 C3 10000.00 LIC  
BLED19850219KK SOUTH STATE UNIVERSITY  
37-38-55.0 N 113-05-32.0 W -140.500 1892.000

KPLD UT KANAB 101.10000 C 100000.00 LIC  
BLH20000809AAL MARATHON MEDIA GROUP, L.L.C.  
37-17-45.0 N 112-50-34.0 W 595.236 2536.000

KCYQ UT ELSINORE 97.70000 C 43000.00 LIC  
BLH20050811ACJ MID-UTAH RADIO, INC.  
38-32-30.0 N 112-03-31.0 W 873.556 3353.000



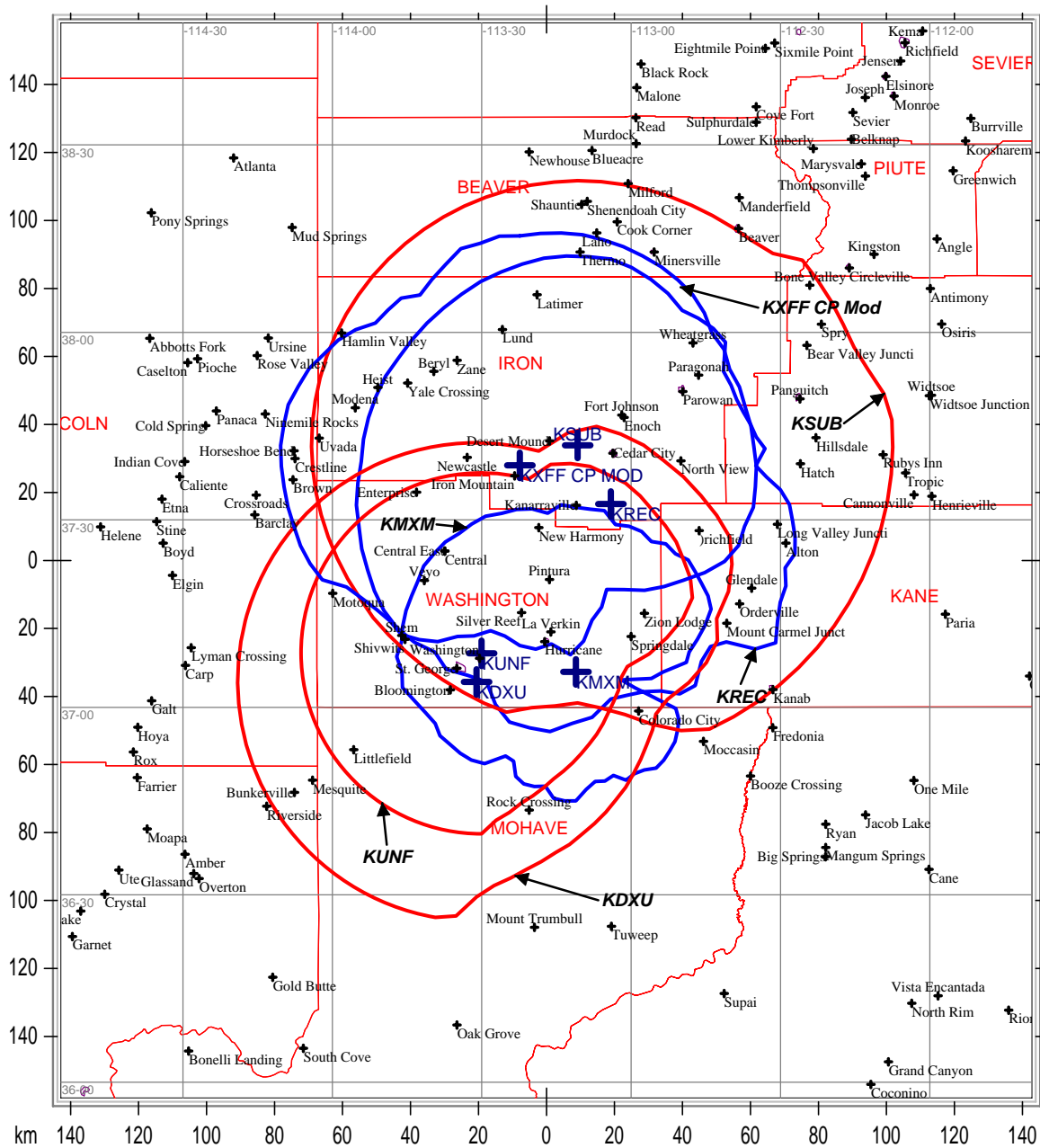
[illegible]

 County Borders
  City Borders
  Lat/Lon Grid

The map displays the Colorado Plateau region, including parts of Utah, Arizona, and New Mexico. County boundaries are shown in red, and major cities are marked with black dots. The map includes labels for counties such as SEVIER, PIUTE, BEAVER, KANE, WASHINGTON, MOHAVE, and GARFIELD. Major cities like Salt Lake City, Denver, and Phoenix are marked. The map also shows the location of the KREC radio station and its signal coverage area, indicated by concentric circles.

 County Borders
  City Borders
  Lat/Lon Grid

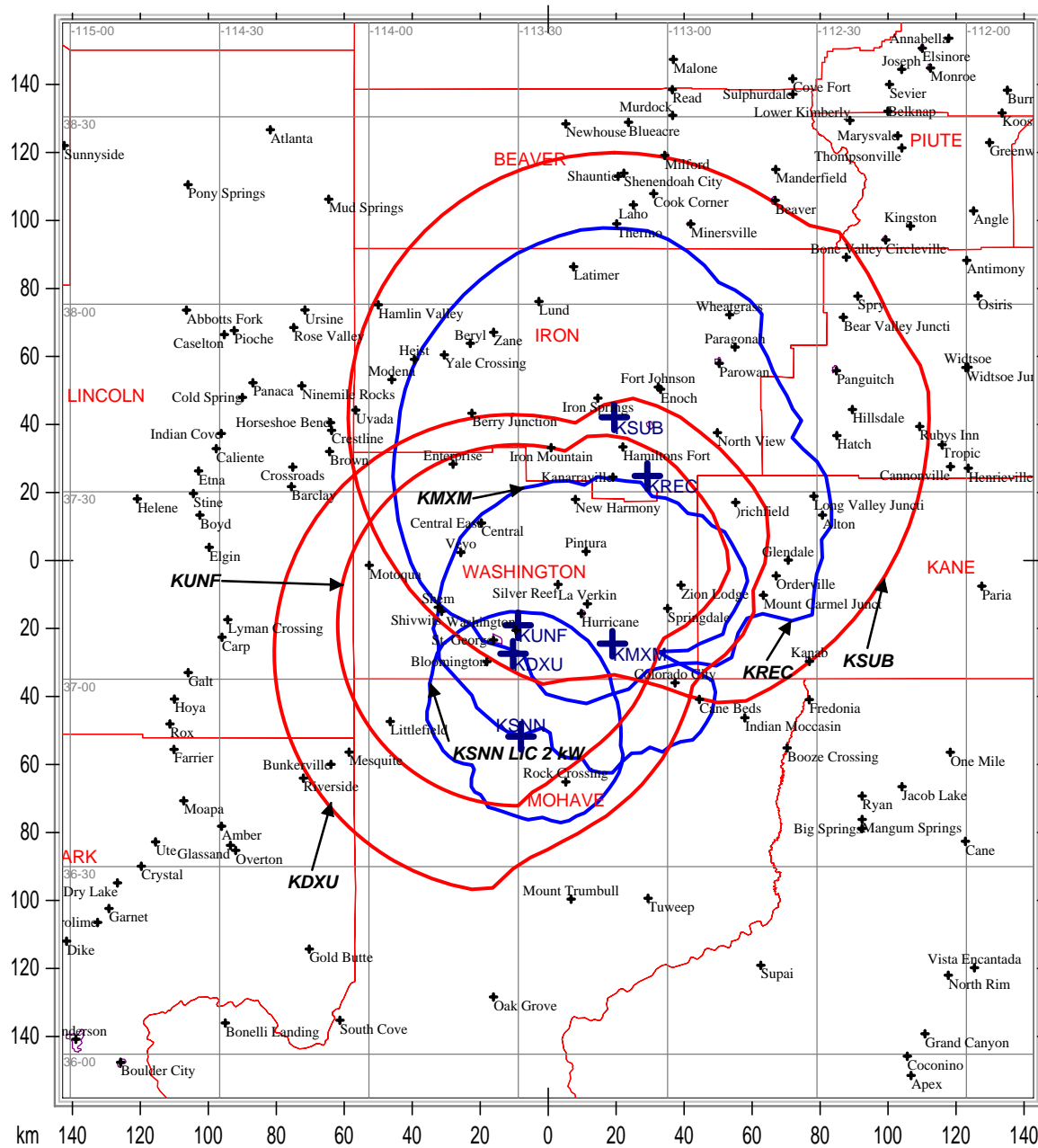
## MARKET 2 AM STATIONS KSUB, KDXU &amp; KUNF FM STATIONS KMXM, KXFF &amp; KREC



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— County Borders   
 — City Borders   
 — Lat/Lon Grid

MARKET 3 AM STATIONS KSUB, KDXU & KUNF FM STATIONS KMXM, KSNN & KREC



Communications Technologies, Inc. Marlton, New Jersey 08053

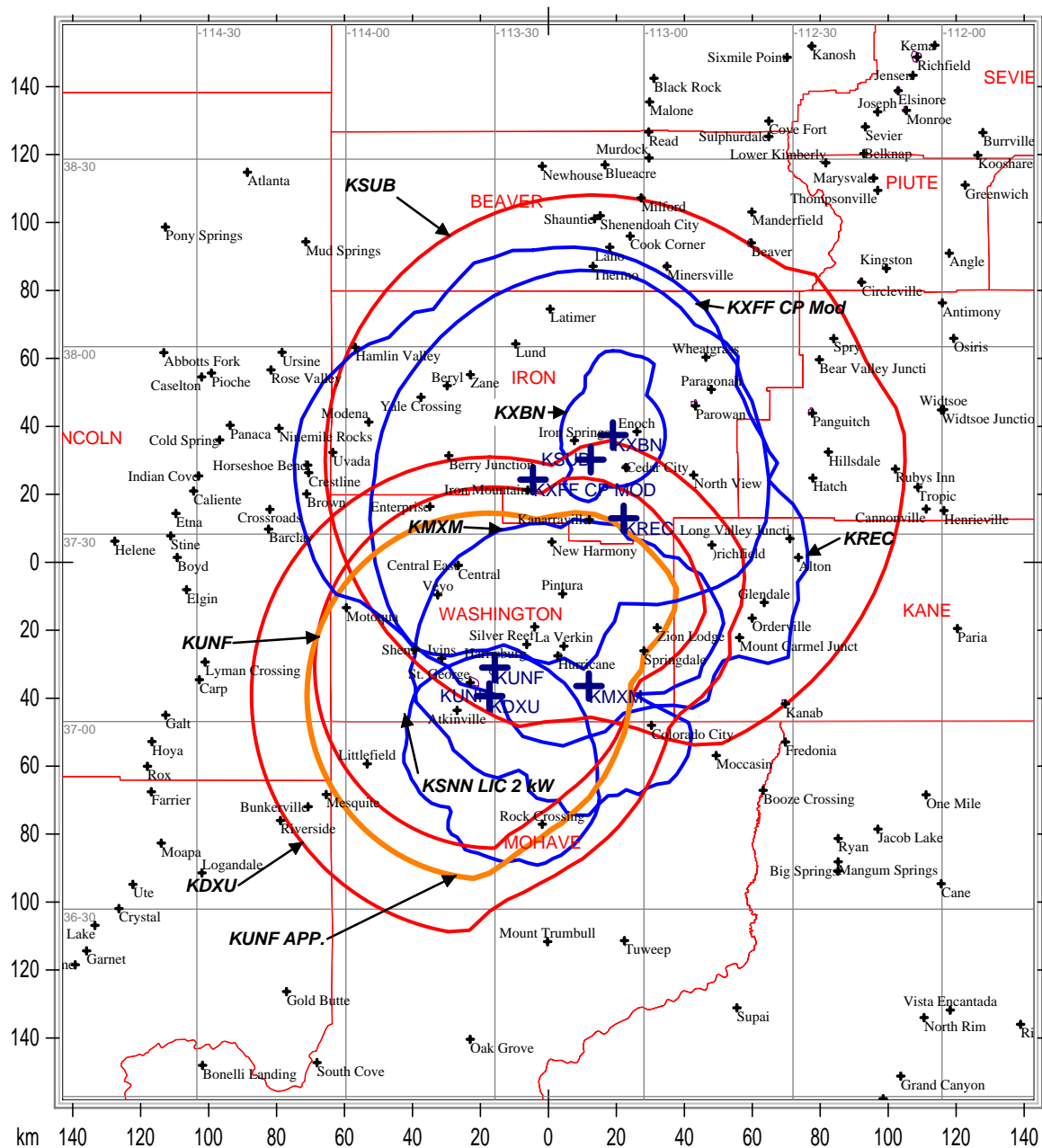
 County Borders
  City Borders
  Lat/Lon Grid

[illegible]

 County Borders
  City Borders
  Lat/Lon Grid

 County Borders
  City Borders
  Lat/Lon Grid

## AM STATIONS KSUB, KDXU &amp; KUNF FM STATIONS KMXM, KXBN, KXFF, KSNN &amp; KREC



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— County Borders   
 — City Borders   
 — Lat/Lon Grid