

MULTIPLE OWNERSHIP NARRATIVE

The Station KLDC city of license is situated within the Denver-Boulder, Colorado, Arbitron Metro Market which encompasses Adams, Arapahoe, Boulder, Bloomfield, Denver, Douglas and Jefferson counties. The following 49 commercial and non-commercial stations are licensed to these counties:

Adams

KLTT(AM), KKZN(AM), KLDC(AM), KDDZ(AM), KSIR-FM

Arapahoe

KMXA(AM), KNRC(AM), KEZW(AM), KCUV(AM),

Boulder

KRCN(AM), KVCU(AM), KCFC(AM), KRKS-FM, KBCO-FM, KJCD(FM) , KGNU-FM*, KGUD(FM)*

Broomfield

KDJM(FM)

Denver

KLZ(AM), KHOW(AM), KNUS(AM), KOA(AM), KPOF(AM), KKFN(AM), KRKS(AM), KLVB(AM), KBNO(AM), KCFR(AM), KGNU(AM), KBJD(AM), KFMD(FM), KYGO-FM, KQMT(FM), KIMN(FM), KOSI(FM), KRFX(FM), KXKL-FM, KALX(FM), KBPI(FM) , KUVO(FM)*, KVOD(FM)*

Douglas

KJMN(FM), KAVD(FM)

Jefferson

KCKK(AM), KTCL(FM), KXPK(FM), KQKS(FM) , KFDN(FM)*, KLDV(FM)*

KLZ Radio, Inc., owns 4 AM stations licensed to this Arbitron defined market. This is a longstanding combination approved by the Commission:

KLZ(AM) Denver, Colorado (FAC No. 35088)
KLDC(AM) Brighton, Colorado (FAC No. 35089)
KLTT(AM) Commerce City, Colorado (FAC No. 35191)
KLVB(AM) Denver, Colorado (FAC No. 12364)

KLZ Radio, Inc., also owns the following two stations:

KCMN(AM) Colorado Springs, Colorado (FAC No. 33731)
KCBR(AM) Monument, Colorado (FAC No. 10846)

However, these two stations are not licensed to any of the Boulder/Denver metro counties and they have insignificant service and listenership in that metro. Given the strong competitive radio forces at play in the metro, it is believed that these two stations are “below the line” in the metro

and are disregarded for purposes of this study.

Section 73.3555 of the Commission's rules provides that in a metro market having more than 45 commercial and noncommercial stations, a party may have a cognizable interest in up to 8 full power commercial radio stations, not more than 5 of which are in the same service.

As there are at least 45 stations serving market area, the continued ownership of proposed minor modification for facilities for station KLDC would create no undue concentration of ownership and is permissible under Section 73.3555 of the rules.