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ENGINEERING STATEMENT:

**MULTIPLE OWNERSHIP STUDY FOR
AMIGO RADIO, LTD.**

AUGUST 2003

Radio Multiple Ownership Analysis

Prepared For
Amigo Radio, Ltd.

The attached analysis of compliance with the radio multiple ownership rules was prepared in accordance with the Rules and Regulations of the Federal Communications Commission.

Arbitron Rated Markets

In each case where stations in an Arbitron rated market would be commonly-owned, a list of stations providing service to that market has been provided. This list includes non-commercial and commercial stations which are licensed to communities within the Arbitron market, as well as other stations which are considered to be "home" to the market. This exhibit evidences at least the minimum number of stations necessary to demonstrate compliance with the rules concerning radio multiple ownership in rated markets.

Unrated Markets

In the case of markets which are not rated by Arbitron, analysis has been made consistent with the Commission's interim rules for unrated markets. The 70 dBu contours of FM stations were determined from the technical data contained in the most recent edition of the FCC FM Database. The listed antenna height above average terrain was used together with topographic data obtained from the digitized 30 second or 3 second database. The 5 mV/m daytime contours of AM stations were determined from the technical data contained in the most recent edition of the FCC AM Database. The listed antenna parameter information was used together with a digitized version of the FCC M-3 or Region II ground conductivity database.

The service contours were plotted using correct map projection mathematics. Those stations whose transmitter sites are within the respective principal community service contours of the stations proposed to be commonly owned have only the sites rather than their contours shown. All contours and enclosed transmitter site locations have been labeled. A list of all stations considered is included with this statement.

In counting stations providing service to the "market" defined by each of the discrete clusters formed in unrated markets, stations whose transmitter sites are located in excess of 92 km from the perimeter of the common overlap area have been excluded, as have other stations to be commonly-owned but which do not have overlap with the discrete cluster being studied. This exhibit evidences at least the minimum number of stations necessary to demonstrate compliance with the rules concerning radio multiple ownership in unrated markets.

August 21, 2003



Benjamin F. Dawson III, P.E.

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Amarillo Market

The Arbitron Amarillo market is comprised of the following counties:

Potter County, Texas
Randall County, Texas

The following stations would be commonly-owned in the Arbitron Amarillo market:

| Call Sign | Channel/Frequency | Community of Lic | County |
|-----------|-------------------|------------------|----------------|
| KQFX-FM | 282C1 | Borger | Hutchinson |
| KBZD-FM | 259C3 | Amarillo | Potter/Randall |
| KTNZ-AM | 1010 kHz | Amarillo | Potter/Randall |
| KZIP-AM | 1310 kHz | Amarillo | Potter/Randall |

The following AM and FM stations are licensed to communities located within the Arbitron Amarillo market, and/or are considered to be "home" to the market:

| Call Sign | Channel/Frequency | Community of Lic | County |
|-----------|-------------------|------------------|----------------|
| KJRT-FM | 202C3 | Amarillo | Potter/Randall |
| KXLV-FM | 206C3 | Amarillo | Potter/Randall |
| KACV-FM | 210C | Amarillo | Potter/Randall |
| KAVW-FM | 214A | Amarillo | Potter/Randall |
| KWTS-FM | 216A | Canyon | Randall |
| KXRI-FM | 220C3 | Amarillo | Potter/Randall |
| KQIZ-FM | 226C1 | Amarillo | Potter/Randall |
| KMXJ-FM | 231C | Amarillo | Potter/Randall |
| KARX-FM | 239C1 | Claude | Armstrong |
| KMML-FM | 245C1 | Amarillo | Potter/Randall |
| KGNC-FM | 250C | Amarillo | Potter/Randall |
| KPRF-FM | 254C1 | Amarillo | Potter/Randall |
| KBZD-FM | 259C3 | Amarillo | Potter/Randall |
| KXGL-FM | 265C0 | Amarillo | Potter/Randall |
| KATP-FM | 270C1 | Amarillo | Potter/Randall |

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|---------|----------|----------|----------------|
| KRGN-FM | 276A/C1 | Amarillo | Potter/Randall |
| KQFX-FM | 282C1 | Borger | Hutchinson |
| KAEZ-FM | 289C2 | Amarillo | Potter/Randall |
| KPUR-FM | 296A | Canyon | Randall |
| KZRK-FM | 300C1 | Canyon | Randall |
| KGNC-AM | 710 kHz | Amarillo | Potter/Randall |
| KIXZ-AM | 940 kHz | Amarillo | Potter/Randall |
| KTNZ-AM | 1010 kHz | Amarillo | Potter/Randall |
| KZIP-AM | 1310 kHz | Amarillo | Potter/Randall |
| KDJW-AM | 1360 kHz | Amarillo | Potter/Randall |
| KPUR-AM | 1440 kHz | Amarillo | Potter/Randall |
| KZRK-AM | 1550 kHz | Canyon | Randall |

(Note that there may be additional stations which are considered to be "home" to the market, which were not identified in the course of this study.)

In order to qualify the common ownership of a 2FM / 2AM cluster in this market, there must be at least 8 radio stations in the market. This study demonstrates that there are at least 27 stations in this market, thereby satisfying the Commission's Rules for radio station multiple ownership.

It should be noted that Amigo also owns KGRW-FM Channel 234C2 Friona, Texas, in the near vicinity of the Amarillo market. Friona is located in Parmer County, outside the Amarillo market, and KGRW-FM is not believed to be considered "home" to the Amarillo market. However, even if KGRW-FM were considered to be "home" to the Amarillo market, there are sufficient stations in the market to qualify a 3FM / 2AM cluster. KGRW-FM does not have principal community contour overlap with any of Amigo's Amarillo market stations, or with any other Amigo stations.

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Corpus Christi Market

The Arbitron Corpus Christi market is comprised of the following counties:

Nueces County, Texas
San Patricio County, Texas

The following stations would be commonly-owned in the Arbitron Corpus Christi market:

| Call Sign | Channel/Frequency | Community of Lic | County |
|-----------|-------------------|------------------|--------------|
| KOUL-FM | 279C1 | Sinton | San Patricio |
| KMJR-FM | 288A | Portland | San Patricio |
| KLTG-FM | 243C1 | Corpus Christi | Nueces |
| KLHB-FM | 252C2 | Odem | San Patricio |

The following AM and FM stations are licensed to communities located within the Arbitron Corpus Christi market, and/or are considered to be "home" to the market:

| Call Sign | Channel/Frequency | Community of Lic | County |
|-----------|-------------------|------------------|--------------|
| KKLM-FM | 204C2 | Corpus Christi | Nueces |
| KEDT-FM | 212C1 | Corpus Christi | Nueces |
| KBNJ-FM | 219C3 | Corpus Christi | Nueces |
| KMXR-FM | 230C1 | Corpus Christi | Nueces |
| KBSO-FM | 234C3 | Corpus Christi | Nueces |
| KZFM-FM | 238C | Corpus Christi | Nueces |
| KLTG-FM | 243C1 | Corpus Christi | Nueces |
| KRYS-FM | 256C1 | Corpus Christi | Nueces |
| KLUX-FM | 208C1 | Robstown | Nueces |
| KSGR-FM | 216C3 | Portland | San Patricio |
| KKBA-FM | 224C2 | Kingsville | Kleberg |
| KFTX-FM | 248C1 | Kingsville | Kleberg |
| KLHB-FM | 252C3 | Odem | Nueces |
| KSAB-FM | 260C1 | Robstown | San Patricio |
| KNCN-FM | 267C1 | Sinton | Nueces |

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|---------|----------|----------------|--------------|
| KKPN-FM | 272C2 | Rockport | Aransas |
| KOUL-FM | 279C1 | Sinton | Nueces |
| KPUS-FM | 283C3 | Gregory | Nueces |
| KMJR-FM | 288A | Portland | Nueces |
| KCCG-FM | 297C3 | Ingleside | Nueces |
| KCTA-AM | 1030 kHz | Corpus Christi | Nueces |
| KCCT-AM | 1150 kHz | Corpus Christi | Nueces |
| KSIX-AM | 1230 kHz | Corpus Christi | Nueces |
| KKTX-AM | 1360 kHz | Corpus Christi | Nueces |
| KUNO-AM | 1400 kHz | Corpus Christi | Nueces |
| KEYS-AM | 1440 kHz | Corpus Christi | Nueces |
| KROB-AM | 1510 kHz | Robstown | San Patricio |
| KDAE-AM | 1590 kHz | Sinton | Nueces |

(Note that there may be additional stations which are considered to be "home" to the market, which were not identified in the course of this study.)

In order to qualify the common ownership of a 4FM / 0AM cluster in this market, there must be at least 15 radio stations in the market. This study demonstrates that there are at least 28 stations in this market, thereby satisfying the Commission's Rules for radio station multiple ownership.

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Unrated Markets

Amigo owns KGRW-FM Channel 234C2 Friona, Texas, in the near vicinity of the Amarillo market. Friona is located in Parmer County, outside the Amarillo market, and KGRW-FM is not believed to be considered "home" to the Amarillo market. However, even if KGRW-FM were considered to be "home" to the Amarillo market, there are sufficient stations in the market to qualify a 3FM / 2AM cluster. KGRW-FM does not have principal community contour overlap with any of Amigo's Amarillo market stations, or with any other Amigo stations.

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