

KLZVZ(AM) Brighton, Colorado
Form 301

EXHIBIT 5
MULTIPLE OWNERSHIP NARRATIVE

KLZ Radio, Inc. is the licensee of radio stations:

KLZ(AM) Denver, CO
KLZVZ(AM) Brighton, CO
KLTT(AM) Commerce City, CO
KLDC(AM) Denver, CO

The Market Study Map submitted herewith depicts the 5 mV/m contours of these four AM stations. The Commission approved common ownership of these stations in File Nos. BAL-19981201HF and BAL-19990713AI. The contour study also depicts the 5 mV/m (city-grade) contour proposed for KLZVZ in the instant minor change application.

Section 73.3555 of the rules provides that in a radio market with between 15 and 29 commercial radio stations a party may own or control up to six commercial stations, not more than four of which are in the same service.

The Market Study Map lists more than 15 radio stations with a licensed tower site situated within the Denver market study area. Given the location of the tower site coordinates at the Lookout Mountain antenna farm as well as the other two depicted mountaintop sites where stations have collocated, each station serves the study area with a city-grade contour. There are many more stations serving the Denver area with a city-grade signal than are identified in this study. The applicant will identify these additional stations if so requested by the Commission's staff.

As there are at least 15 stations serving the Denver market, the proposed power increase for station KLZVZ would create no undue concentration of ownership and is permissible under Section 73.5555 of the rules.

The city-grade contours of the stations at issue do not overlap the city-grade contours of any other stations commonly owned by the principals of KLZ Radio, Inc., therefore no other stations are implicated under the Commission's multiple ownership rules with regard to the proposed minor change of KLZVZ, nor required to be included in this market study.

