

**Simmons Media Group, LLC**  
**Compliance with FCC Local Radio Ownership Requirements**  
**August 2, 2006**

By this amendment, the applicant, Simmons-SLC, LS, LLC, updates the instant major change application for KOVO(AM) to reflect call sign, facilities, and attribution changes that have occurred since its most recent ownership submission for this application. SMG submits that the instant application continues to comply with the local radio ownership limits set forth in Section 73.3555(a) of the Commission's rules, as determined under both the Arbitron Metro methodology and the "interim contour overlap methodology." For the Commission's convenience, we begin with a listing of all attributable media ownership interests held by Simmons Media Group, LLC (collectively with all other parties to this application, "SMG").

**Media Interests.** SMG owns the majority of the outstanding membership interests in Simmons-SLC, LLC, which in turn owns all of the outstanding membership interests in Simmons-SLC, LS, LLC, which is the licensee of the following radio stations:

<u>Call Letters</u>	<u>Community</u>	<u>FIN</u>
KOVO(AM)	Provo, UT	65665
KZNS(AM)	Salt Lake City, UT	60458
KXOL(AM)	Brigham City, UT	87107
KXRK(FM)	Provo, UT	406
KEGH(FM)	Brigham City, UT	81867
KRAR(FM)	Brigham City, UT	21607
KEGA(FM)	Oakley, UT	89255
KJQN(FM)	Coalville, UT	88483
KMER(AM)	Kemmerer, WY	10335
KAOX(FM)	Kemmerer, WY	31169
KDWY(FM)	Diamondville, WY	77947

SMG also owns the majority of the outstanding membership interests in Simmons-Austin, LLC, which in turn owns all of the outstanding membership interests in Simmons-Austin, LS, LLC, which is the licensee of the following radio stations:

<u>Call Letters</u>	<u>Community</u>	<u>FIN</u>
KDXE(AM)	North Little Rock, AR	665
KQPN(AM)	West Memphis, AR	48749
KSLG(AM)	St. Louis, MO	74579
WESL(AM)	East St. Louis, IL	72815
KRZI(AM)	Waco, TX	87179
KLRK(FM)	Marlin, TX	35581
KZNX(AM)	Creedmoor, TX	38906
KWNX(AM)	Taylor, TX	35647
KKNS(AM)	Corrales, NM	7050
KRQX (AM)	Mexia, TX	21493
KWGW(FM)	Mexia, TX	21494

SMG, through its affiliates or subsidiaries, currently provides more than 15% of the broadcast program time on KZHK(FM), St. George, UT (FIN 40519). This local marketing

agreement is not attributable to SMG at this time. In addition, SMG, through its affiliates or subsidiaries, currently provides more than 15% of the broadcast program time on the following radio stations through attributable local marketing agreements:

Call Letters	Community	FIN
KFMS(FM)	Coalville, UT	87974
KDTR(FM)	Florence, MT	162324
KKVU(FM)	Stevensville, MT	162327
KYJK(FM)	Missoula, MT	162326

Western Broadcasting, LLC, an affiliate of SMG, is the approved assignee of the licenses for new, unbuilt FM radio stations in Hurricane, Utah (FIN 164147) and Mesquite, Nevada (FIN 164142). See FCC File Nos. BAPH-20051101AAG and BAPH -20060104ABC, respectively.

**Arbitron Metro Methodology.** For purposes of the instant application, the relevant Arbitron Metro radio market includes (i) all commercial and noncommercial radio stations that are listed in the BIA Investing in Radio Market Report as “home” to the Salt Lake City-Ogden-Provo Metro market and (ii) any other licensed full power commercial or noncommercial radio station whose community of license is located within the Metro’s geographic boundary. According to BIA’s *Investing in Radio 2006* (Metro Rank: 31, June 28, 2006), the Salt Lake City-Ogden-Provo Metro market includes 49 full-power commercial radio stations. According to the Commission’s CDBS, an additional number of full-power non-commercial radio stations are also licensed to communities located within the Metro market.

As detailed above, SMG currently holds attributable interests in the following radio stations that are listed as “home” to the Salt Lake City-Ogden-Provo Metro market or are licensed to communities located within the Metro’s geographic boundary:

Call Letters	Community	FIN
KOVO(AM)	Provo, Utah	65665
KZNS(AM)	Salt Lake City, Utah	60458
KXRK(FM)	Provo, Utah	406
KEGH(FM)	Brigham City, UT	81867
KRAR(FM)	Brigham City, UT	21607
KEGA(FM)	Oakley, Utah	89255
KJQN(FM)	Coalville, UT	88483

Upon grant and implementation of the facilities proposed herein, SMG would hold attributable interests in five full-power FM radio stations and two full-power AM radio stations in the Salt Lake City-Ogden-Provo Metro market. As noted, this Arbitron Metro market includes 45 or more full-power, commercial and noncommercial radio stations. Consequently, SMG’s attributable interest in seven radio stations, including five FM radio stations and two AM radio stations in the Arbitron Salt Lake City-Ogden-Provo Metro market, would comply with Section 73.3555(a) under the Arbitron Metro methodology.

**Interim Contour Overlap Methodology.** The facilities proposed for KOVO(AM) in the instant application, in combination with SMG’s attributable interests, would create four separate radio markets under the Commission’s interim contour overlap methodology, as shown in Attachment A hereto and the additional enclosed material, and as summarized below:

Market Number	Market Boundary	Total Radio Stations in Market <sup>1</sup>	Maximum Attributable Radio Stations in Market	SMG Attributable Radio Stations in Market
1	KOVO(AM), KZNS-C(AM), KXOL(AM), KRAR(FM), KXRK(FM), KEGH-L(FM)	52	8 (no more than 5 in the same service)	3 AM (KOVO(AM), KZNS-C(AM), KXOL(AM))  3 FM (KRAR(FM), KXRK(FM), KEGH-L(FM))
2	KOVO(AM), KZNS-L(AM), KXOL(AM), KRAR(FM), KXRK(FM), KEGH-L(FM)	52	8 (no more than 5 in the same service)	3 AM (KOVO(AM), KZNS-L(AM), KXOL(AM))  3 FM (KRAR(FM), KXRK(FM), KEGH-L(FM))
3	KOVO(AM), KZNS-C(AM), KJQN(FM), KFMS(FM), KEGA(FM), KXRK(FM), KEGH-C(FM)	46	8 (no more than 5 in the same service)	2 AM (KOVO(AM), KZNS-L(AM))  5 FM (KJQN(FM), KFMS(FM), KEGA(FM), KXRK(FM), KEGH-C(FM))
4	KOVO(AM), KZNS-L(AM), KJQN(FM), KFMS(FM), KEGA(FM), KXRK(FM), KEGH-C(FM)	46	8 (no more than 5 in the same service)	2 AM (KOVO(AM), KZNS-L(AM))  5 FM (KJQN(FM), KFMS(FM), KEGA(FM), KXRK(FM), KEGH-C(FM))

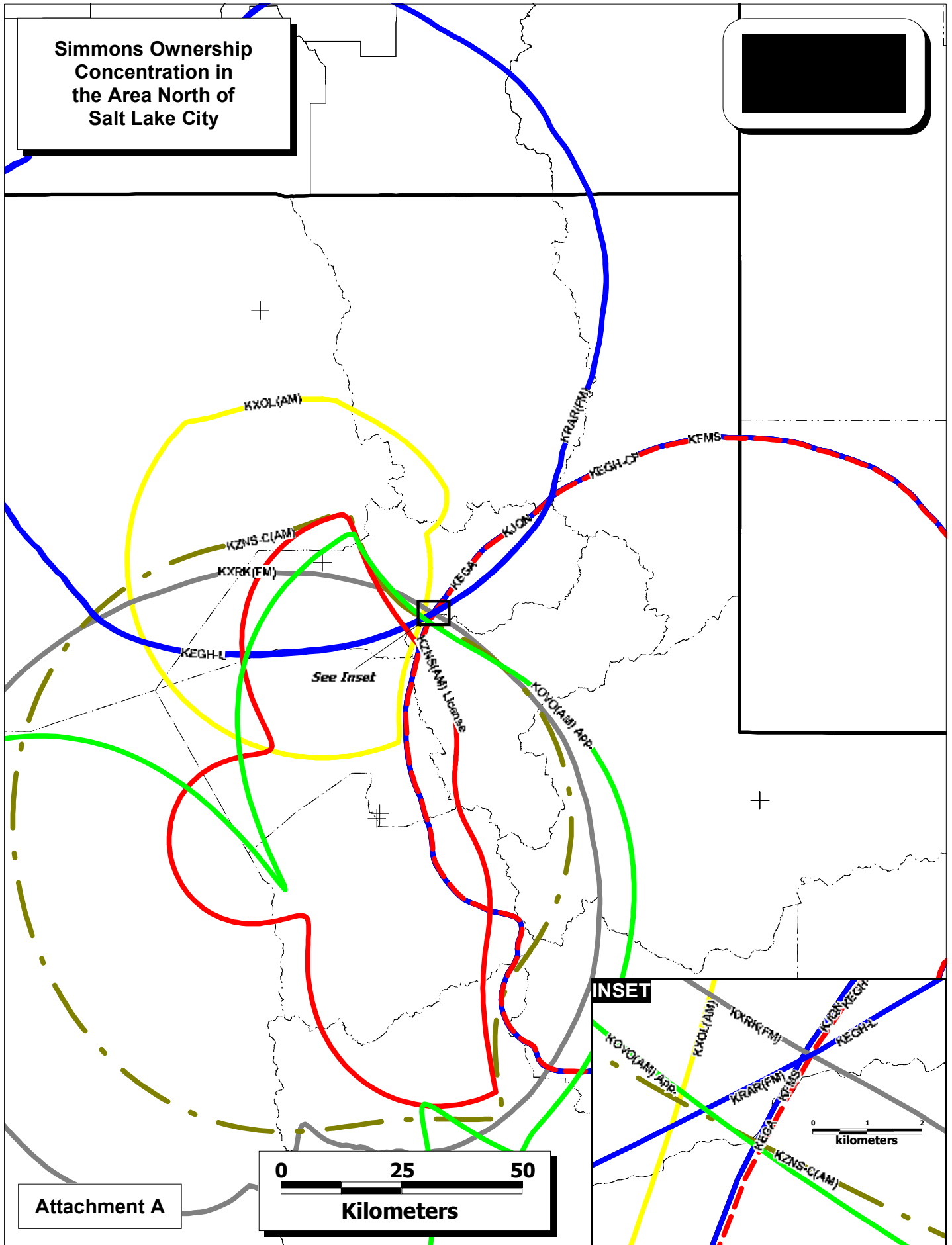
Each such market includes 45 or more full-power, commercial and noncommercial radio stations (excluding stations in which SMG holds an attributable interest and distant radio stations). Upon grant and implementation of the facilities proposed herein, SMG would hold attributable interests in no more than five full-power FM radio stations and no more than three full-power AM radio stations in any of the four radio markets. Consequently, SMG's attributable interest in up to five FM radio stations and up to three AM radio stations in each of the four contour overlap markets would comply with Section 73.3555(a) under the Arbitron Metro methodology.

**Conclusion.** As demonstrated herein, grant and implementation of the instant application would comply with Section 73.3555(a) of the Commission's rules under both the Arbitron Metro market methodology and the interim contour overlap methodology.

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<sup>1</sup> The number of radio stations in the market excludes radio stations in which SMG holds an attributable interest as well as radio stations whose transmitter site is more than 92 kilometers (58 miles) from the perimeter of the mutual overlap area.

**Simmons Ownership  
Concentration in  
the Area North of  
Salt Lake City**

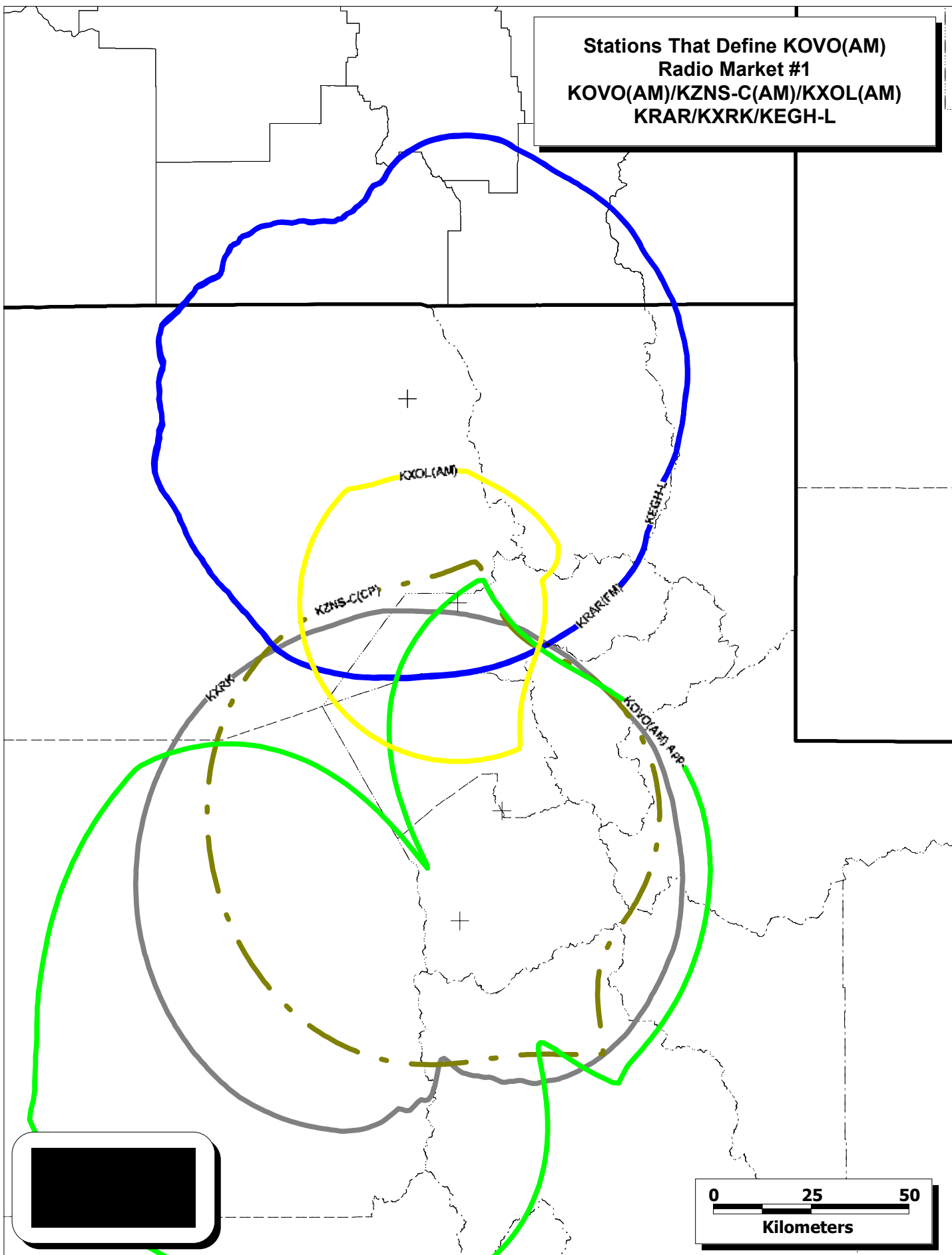


Attachment A

## Stations in the KOVO(AM) Radio Markets

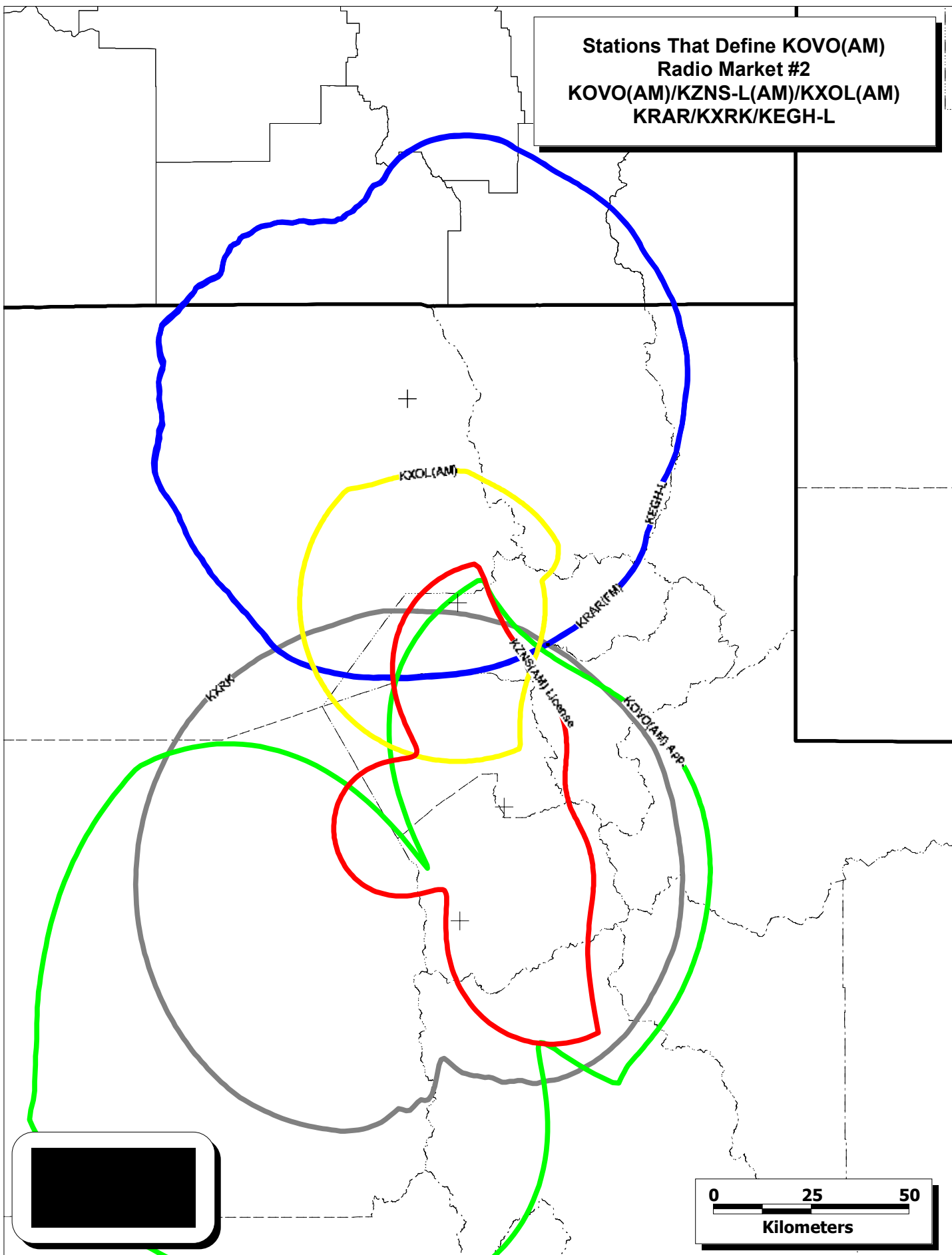
<u>Markets #1 and #2</u>		<u>Markets #3 and #4</u>	
<u>Call Letters</u>	<u>File Number</u>	<u>Call Letters</u>	<u>File Number</u>
1. KACH(AM)	BL--	KALL(AM)	BL19831116AA
2. KALL(AM)	BL19831116AA	KANN(AM)	BML19991112ACR
3. KANN(AM)	BML19991112ACR	KBEE(AM)	BL19891129AA
4. KBEE(AM)	BL19891129AA	KBEEFM	BLH19880104KB
5. KBEEFM	BLH19880104KB	KBER	BMLH20021203ACC
6. KBER	BMLH20021203ACC	KBZN	BLH19781208AG
7. KBLQFM	BLH20040129AJH	KCPX	BLH20021125AAS
8. KBZN	BLH19781208AG	KCWW	BLED20050810AAK
9. KCPX	BLH20021125AAS	KDUT	BLH20030729AEW
10. KDUT	BLH20030729AEW	KENZ	BLH19850517KF
11. KENZ	BLH19850517KF	KEYY(AM)	BL--
12. KEYY(AM)	BL--	KFNZ(AM)	BL--
13. KFNZ(AM)	BL--	KHQN(AM)	BL--
14. KGNT	BLH19830311AK	KIQN(AM)	BML20030610AEA
15. KHQN(AM)	BL--	KISNFM	BLH19960826KF
16. KIQN(AM)	BML20030610AEA	KJQS(AM)	BL--
17. KISNFM	BLH19960826KF	KKAT	BLED19930817KB
18. KJQS(AM)	BL--	KLLB(AM)	BL19830208AE
19. KKAT	BLED19930817KB	KLO(AM)	BL20001221ABT
20. KKEX	BLH19960213KC	KMRI(AM)	BL19970213AC
21. KLGN(AM)	BL--	KMTI(AM)	BL19900814AC
22. KLLB(AM)	BL19830208AE	KNRS(AM)	BL19910522AB
23. KLO(AM)	BL20001221ABT	KODJ	BLH7863
24. KLZX	BLH20001031ACK	KOHS	BLED19920102KA
25. KMRI(AM)	BL19970213AC	KOSYFM	BLH20021125AAT
26. KMTI(AM)	BL19900814AC	KPCW	BMLH20031201AOA
27. KNRS(AM)	BL19910522AB	KQMB	BLH20021113AAL
28. KODJ	BLH7863	KRSPFM	BLH20021113AAM
29. KOHS	BLED19920102KA	KSFI	BMLH20021113AAK
30. KOSYFM	BLH20021125AAT	KSGO(AM)	BL19851009AG
31. KPCW	BMLH20031201AOA	KSL(AM)	BL--
32. KQMB	BLH20021113AAL	KSOP(AM)	BL19811229AB
33. KRSPFM	BLH20021113AAM	KSOPFM	BLH20040205AAJ
34. KSFI	BMLH20021113AAK	KSRR(AM)	BL19940421AA
35. KSGO(AM)	BL19851009AG	KSVN(AM)	BL19890814AE
36. KSL(AM)	BL--	KTCE	BLH19931126KE
37. KSOP(AM)	BL19811229AB	KTKK(AM)	BL19800129AB
38. KSOPFM	BLH20040205AAJ	KTPM	BLH20030806ABN
39. KSRR(AM)	BL19940421AA	KUBLFM	BLH20021203ACG
40. KSVN(AM)	BL19890814AE	KUDE	BLH20011213ABC
41. KTKK(AM)	BL19800129AB	KURR	BLH19880311KC
42. KTCE	BLH20050118ALE	KUUU	BLH19990511KC
43. KTPM	BLH20030806ABN	KWDZ(AM)	BL19861229AK
44. KUBLFM	BLH20021203ACG	KYFO(AM)	BML20020710ABK
45. KUDE	BLH20011213ABC	KYFOFM	BLED19981125KD
46. KURR	BLH19880311KC	KZHT	BMLH19890328KA
47. KUUU	BLH19990511KC		
48. KVFX	BLH19971113KA		
49. KWDZ(AM)	BL19861229AK		
50. KYFO(AM)	BML20020710ABK		
51. KYFOFM	BLED19981125KD		
52. KZHT	BMLH19890328KA		

**Stations That Define KOVO(AM)  
Radio Market #1  
KOVO(AM)/KZNS-C(AM)/KXOL(AM)  
KRAR/KXRK/KEGH-L**



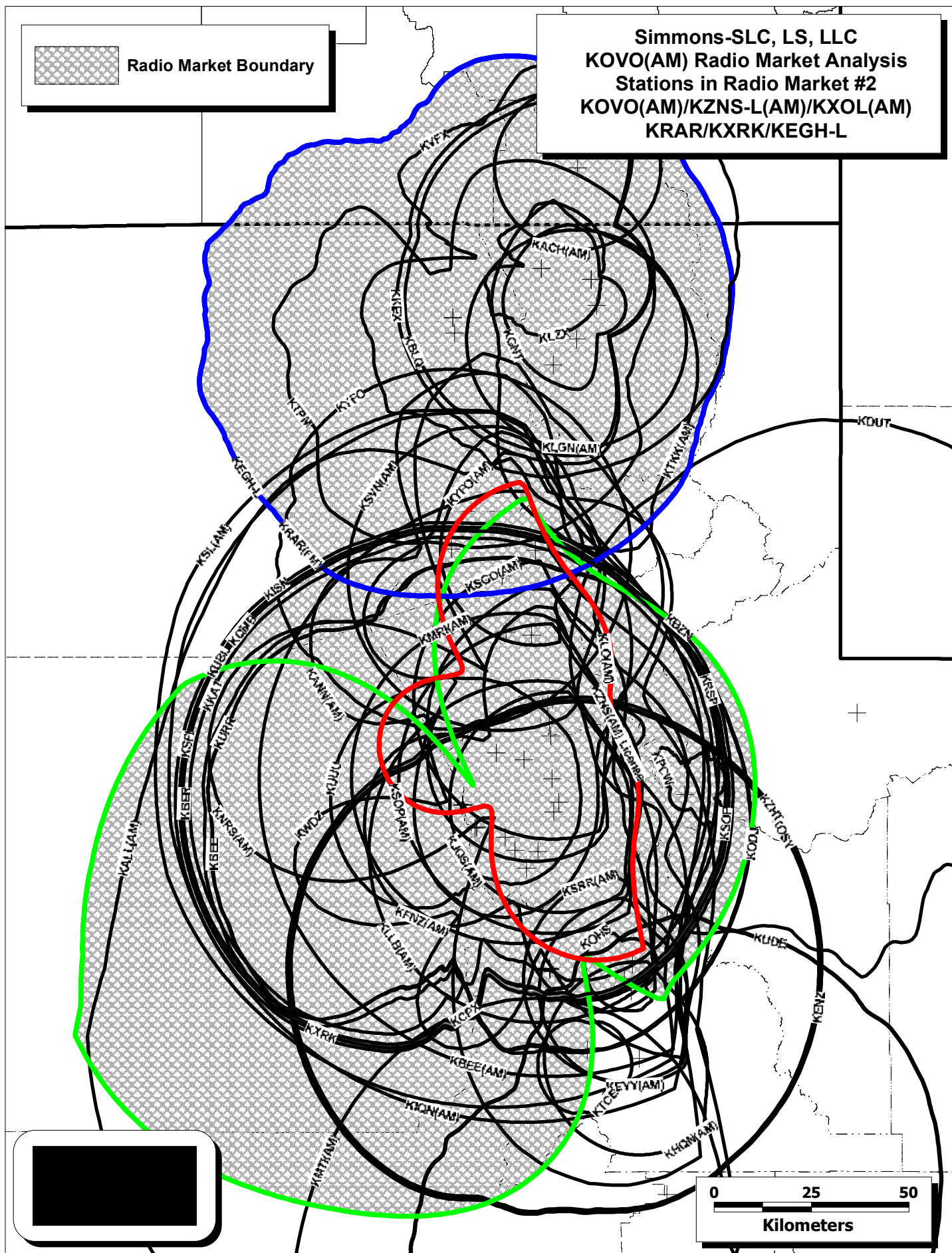


**Stations That Define KOVO(AM)  
Radio Market #2  
KOVO(AM)/KZNS-L(AM)/KXOL(AM)  
KRAR/KXRK/KEGH-L**

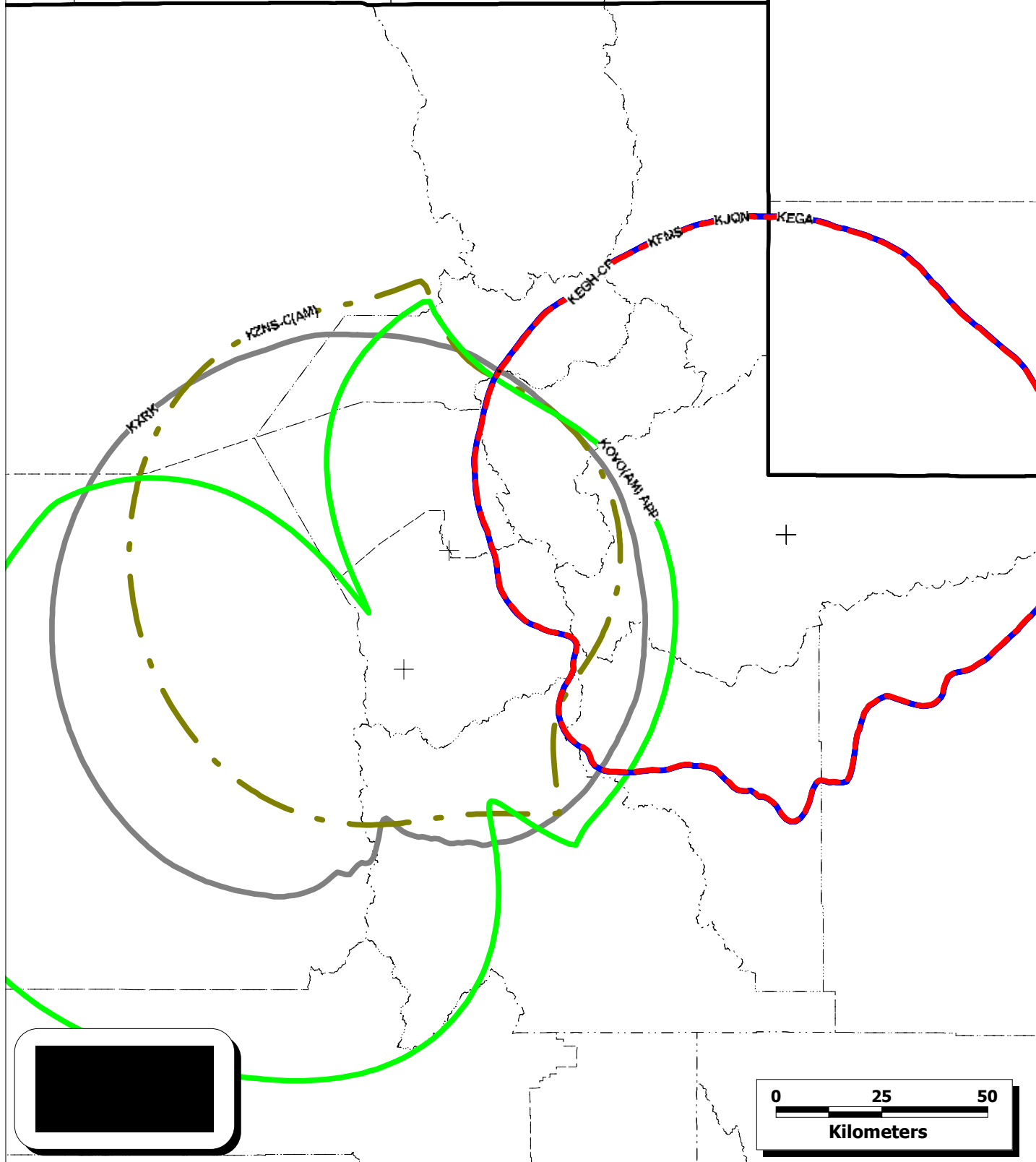




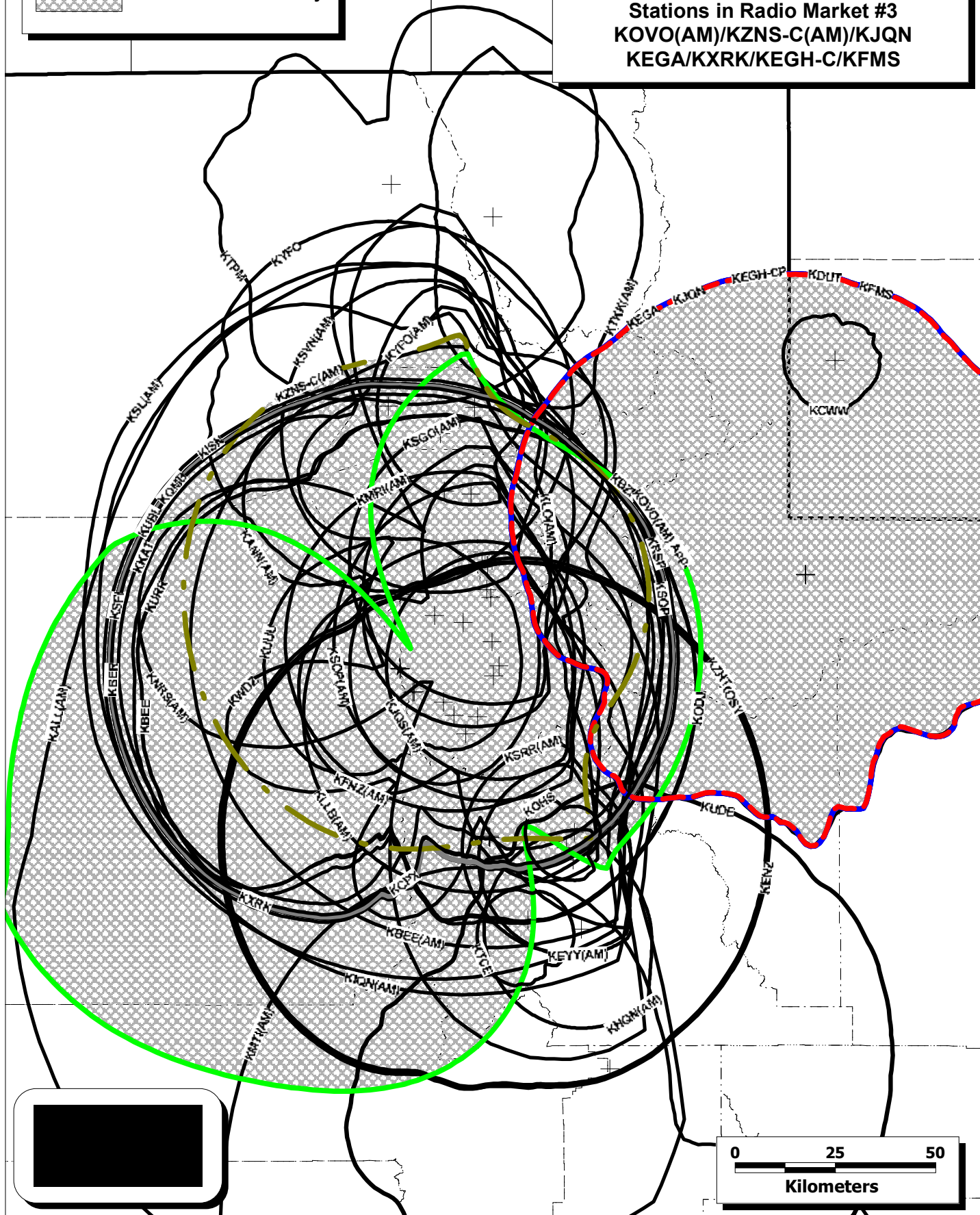
**Simmons-SLC, LS, LLC  
KOVO(AM) Radio Market Analysis  
Stations in Radio Market #2  
KOVO(AM)/KZNS-L(AM)/KXOL(AM)  
KRAR/KXRK/KEGH-L**



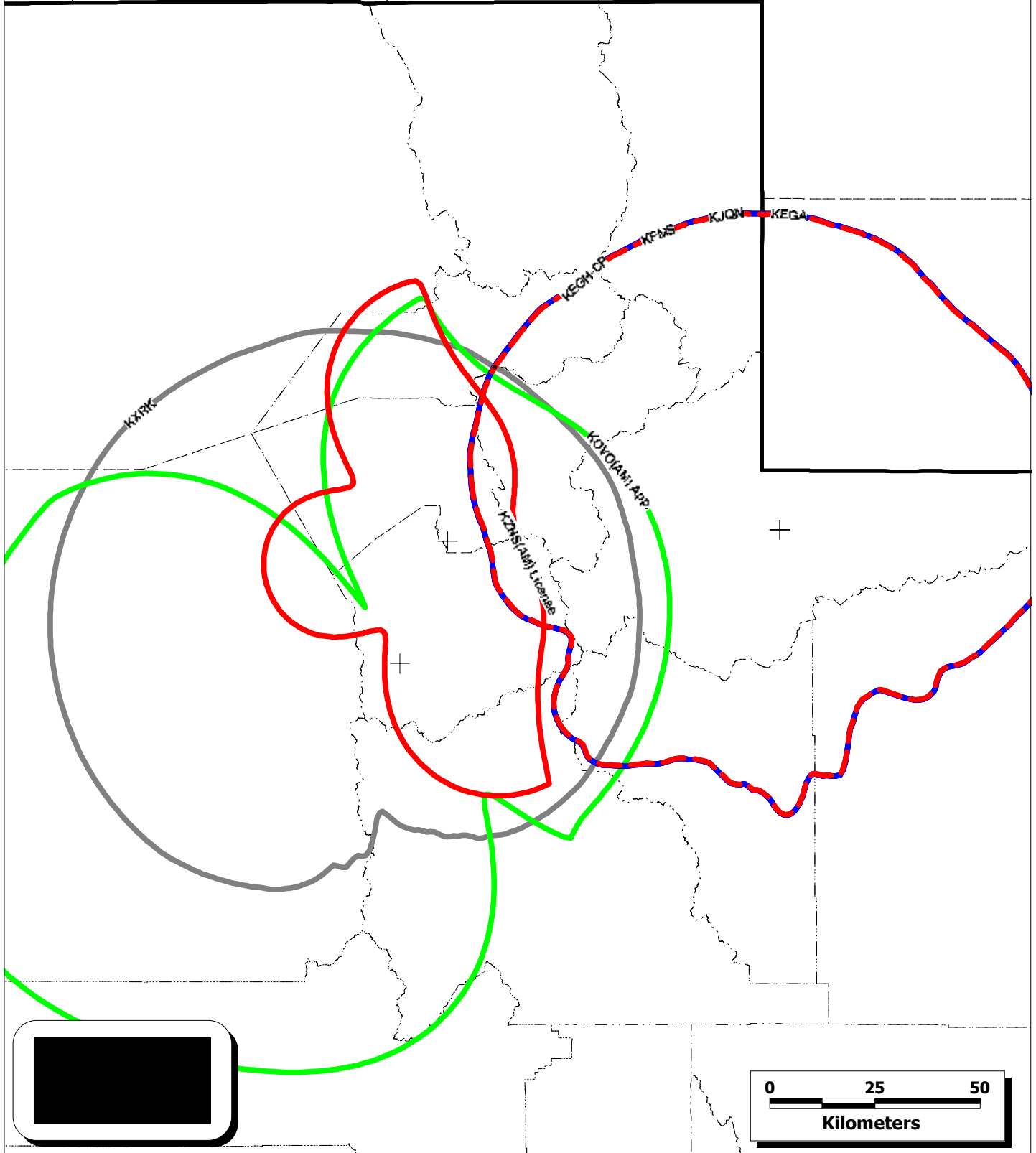
**Stations That Define KOVO(AM)  
Radio Market #3  
KOVO(AM)/KZNS-C(AM)/KJQN  
KFMS/KEGA/KXRK/KEGH-C**



**Simmons-SLC, LS, LLC  
KOVO(AM) Radio Market Analysis  
Stations in Radio Market #3  
KOVO(AM)/KZNS-C(AM)/KJQN  
KEGA/KXRK/KEGH-C/KFMS**



**Stations That Define KOVO(AM)  
Radio Market #4  
KOVO(AM)/KZNS-L(AM)/KJQN  
KFMS/KEGA/KXRK/KEGH-C**



**Simmons-SLC, LS, LLC  
KOVO(AM) Radio Market Analysis  
Stations in Radio Market #4  
KOVO(AM)/KZNS-L(AM)/KJQN  
KEGA/KXRK/KEGH-C/KFMS**

