

Exhibit 5

Local Radio Ownership

The instant application requests Commission consent for Festus/Farmington License Co, LLC (“GoodRadio”) to increase antenna height for KTJJ(FM), Farmington, Missouri. The instant application implicates the Commission’s local radio ownership rule because GoodRadio or its affiliate is the licensee of the following stations whose principal community contours overlap KTJJ(FM):

Station	Arbitron Market of Community of License	“Home” Arbitron Market
KTJJ(FM), Farmington, MO	None	None
KJFF(AM), Festus, MO	None	None
KREI(AM), Farmington, MO	None	None

Under Section 73.3555(a)(1) of the Commission’s rules, the FCC uses a tiered approach, as described below, to determine whether a combination of commonly-owned radio stations complies with the local radio ownership limits for any particular market.¹

Full-Power Commercial and Noncommercial Stations in the Market	Maximum Number of Stations in Which a Single Entity May Have an Attributable Interest	Maximum Number of Stations in the Same Service
45 or More Stations	8 Radio Stations	5
Between 30 and 44 Stations	7 Radio Stations	4
Between 15 and 29 Stations	6 Radio Stations	4
14 or Fewer Stations	5 Radio Stations (Provided that no entity may have an interest in more than 50% of the stations in the market)	3

None of the above stations are licensed to communities within an Arbitron Metro Market or “home” to an Arbitron Metro Market. Accordingly, the Commission defines the market as the area where the principal community contours for the commonly-owned stations overlap. To determine the number of stations in that market, the Commission counts all stations whose principal community contours overlap that of at least one of the commonly-owned stations. The Commission, however, excludes all stations whose transmitters are greater than 92 kilometers from the mutual overlap area and any commonly owned stations that are not included already in the market (the “Contour Methodology”).²

¹ See 47 C.F.R. 73.3555(a)(1).

² See 2002 Biennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, *Report & Order & Notice of Proposed Rulemaking*, 18 FCC Rcd 13,620, ¶ 285 (2003).

Exhibit 5
FCC Form 301, Section II, Item 4(b)
March 2008

As the attached engineering statement from du Treil, Lundin & Rackley demonstrates, common ownership of these stations complies with the Commission's local ownership rule. Under the Contour Methodology, at least seven stations serve the relevant market. As a result, GoodRadio's ownership of one FM station and two AM station complies with the local radio ownership rule.

ATTACHMENT 1

Engineering Statement of du Treil, Lundin & Rackley

ENGINEERING STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS

This radio multiple ownership analysis was prepared to consider potential common ownership of the stations tabulated below under the FCC “Interim” contour analysis method, as the stations are located outside of any Arbitron Market.¹ Festus / Farmington License Co, LLC, has attributable interest in the stations tabulated below

Call Sign / Facility ID	Location	Facilities
KJFF (AM) / 35532 Licensed	Festus, MO	1400 kHz 1 kW-D ND-1
KREI (AM) / 35531 Licensed	Farmington, MO	800 kHz 1 kW-D ND-2
KTJJ(FM) / 35533 Application	Farmington, MO	Channel 253C 100 kW 600 m

The principal community contours (3.16 mV/m for FM stations, 5 mV/m for AM stations) for these stations are depicted on a map included herein as Figure 1. As there is common contour overlap between the above mentioned stations, an ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555(a).

Radio Markets

The “radio markets” applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. There is one “radio market” to consider based on the contours for KTJJ(FM), KREI(AM) and KJFF(AM).

Count of Stations in Defined Market

The number of radio stations in a “radio market” is determined by counting the operating stations having principal community contours that overlap or intersect the principal community contours that define the radio market, plus the subject stations that are co-owned. Only those stations located within 92 km of the perimeter of the mutual overlap area of the

defined market area were employed in the count of stations. Commonly owned stations were not considered in the count of stations in the defined markets. The results of the analysis are tabulated below:

Defined Radio Market	Number of Other Stations in the Radio Market
Market 1	6 FM, 1 AM

Figure 2 is a tabulation of the radio stations identified in the defined radio market. It is noted that the tabulation is not a complete list of all of the other stations in the market, but rather enough stations to show compliance with the FCC's radio multiple ownership rules. Only known licensed, operating stations were employed for the study.

Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's AM database and the appropriate Ground Wave Field Strength versus Distance Graph of Section 73.184. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of Section 73.313. Terrain data was derived from the N.G.D.C. 30-second computer database for each of the FM stations using radials evenly-spaced every 5 degrees of azimuth.

Based on the above, it is concluded that the proposed combination of the stations to be owned will comply with Section 73.3555(a) of the FCC Rules.



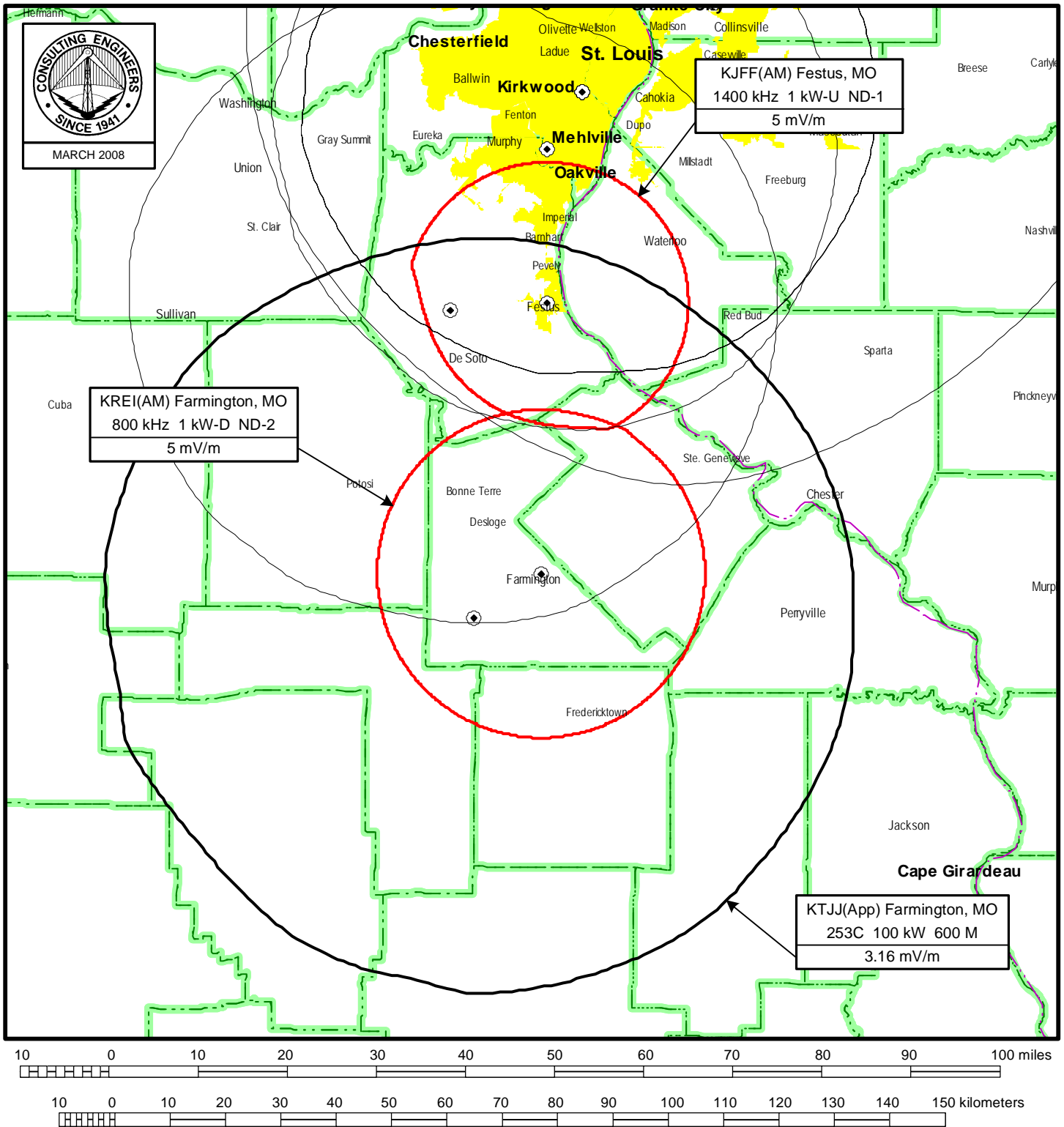
Jonathan N. Edwards

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 34237
941.329.6000

March 20, 2008

¹ See Report and Order and Notice of Proposed Rulemaking, MB Docket 02-277, FCC 03-127, Released July 2, 2003.

Figure 1



PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

du Treil, Lundin & Rackley, Inc Sarasota, Florida

ENGINEERING STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS

Tabulation of Other Stations in Radio Market 1

<u>Call Sign</u>	<u>City of License</u>	<u>State</u>	<u>Freq/Ch.</u>
KMOX(AM)	St. Louis	MO	1120
KPNT(FM)	St. Genevieve	MO	289
KSLZ(FM)	St. Louis	MO	299
KFUO-FM	Clayton	MO	256
KEZK-FM	St. Louis	MO	273
KSHE(FM)	Crestwood	MO	234
WIL-FM	St. Louis	MO	222