

**Exhibit 5**

Local Radio Ownership

The instant application requests Commission consent for Christine CP Co., LLC (“GoodRadio”) to relocate KCDG(FM), Madison, Missouri, to a new tower site. 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 KCDG(FM):

Station	Licensee	Arbitron Market of Community of License	“Home” Arbitron Market
KCDG(FM), Madison, MO	Christine CP Co., LLC	None	None
KRES(FM), Moberly, MO	Moberly/Macon License Co, LLC	None	None
KIRK(FM), Macon, MO	Moberly/Macon License Co, LLC	None	None
KWIX(AM), Moberly, MO	Moberly/Macon License Co, LLC	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.<sup>1</sup>

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

<sup>1</sup> See 47 C.F.R. 73.3555(a)(1).

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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”).<sup>2</sup>

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, thirty three stations serve the relevant market. As a result, GoodRadio’s ownership of three FM stations and one AM station complies with the local radio ownership rule.

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<sup>2</sup> 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).

## **ATTACHMENT 1**

Engineering Statement of du Treil, Lundin & Rackley

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
MOBERLY, MISSOURI MARKET

This radio multiple ownership analysis was prepared on behalf of radio station KCDG(FM), Madison, MO concerning its application for modification of construction permit. This analysis was prepared under the FCC interim contour analysis method.\* Considering the KCDG(FM) proposed facility and all other attributable radio stations in the region, the following stations were analyzed:

Call Sign	City of License	Facilities
KRES(FM)	Moberly, MO	Ch. 284C, 100 kW, 311 m
KIRK-FM	Macon, MO	Ch. 260C3, 12.5 kW, 141 m
KCDG(FM)	Madison, MO	Ch. 247C3, 11 kW, 152 m (instant application)
KWIX(AM)	Moberly, MO	1230 kHz, 0.49 kW-D, 1 kW-N

The principal community contours of all of these stations are depicted on a map included herein as Figure 1. The radio multiple ownership analysis considers only those stations with overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations). An ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

Radio Markets

The “radio market” 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. As listed in the table below, there is one defined “radio market” formed by the subject stations:

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

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	KWIX	KRES, KIRK, KCDG

Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating stations that have principal community contours that intersect the principal community contours that define the radio market. 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, other than those that form the market in question were not considered in the count of stations in the defined market. The results of the analysis are tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	9 AM; 24 FM; 33 Total

Figure 2 is a tabulation of the radio stations identified in the defined radio market. 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 described in Section 73.184 of the FCC Rules. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method outlined in Section 73.313 of the FCC Rules. Terrain data were derived from the U.S.G.S. 3-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 complies with Section 73.3555(a) of the FCC Rules.



Louis Robert du Treil, Jr.

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

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TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
MOBERLY, MISSOURI MARKET

Tabulation of Stations in Radio Markets

<b>Market 1</b>	
Number	Station
<b>AM Stations</b>	
1	WTAD, QUINCY, IL, 930 kHz
2	KWIX, MOBERLY, MO, 1230 kHz
3	KMMO, MARSHALL, MO, 1300 kHz
4	KXEO, MEXICO, MO, 1340 kHz
5	KWRT, BOONVILLE, MO, 1370 kHz
6	KFRU, COLUMBIA, MO, 1400 kHz
7	KFMZ, BROOKFIELD, MO, 1470 kHz
8	KLTI, MACON, MO, 1560 kHz
9	KTGR, COLUMBIA, MO, 1580 kHz
<b>FM Stations</b>	
1	KOPN, COLUMBIA, MO, Channel 208
2	KBKC, MOBERLY, MO, Channel 211
3	KBIA, COLUMBIA, MO, Channel 217
4	KMFC, CENTRALIA, MO, Channel 221
5	KWJK, BOONVILLE, MO, Channel 226
6	KSSZ, FAYETTE, MO, Channel 230
7	KRXL, KIRKSVILLE, MO, Channel 233
8	KWWR, MEXICO, MO, Channel 239
9	KZBK, BROOKFIELD, MO, Channel 245
10	KCDG, MADISON, MO, Channel 247
11	KPOW-FM, LA MONTE, MO, Channel 249
12	KCLR-FM, BOONVILLE, MO, Channel 257
13	KIRK, MACON, MO, Channel 260
14	KMZU, CARROLLTON, MO, Channel 264
15	KPLA, COLUMBIA, MO, Channel 268
16	KBXR, COLUMBIA, MO, Channel 272
17	KMMO-FM, MARSHALL, MO, Channel 275
18	KRLI, MALTA BEND, MO, Channel 280
19	KRES, MOBERLY, MO, Channel 284
20	KZZT, MOBERLY, MO, Channel 288
21	KOQL, ASHLAND, MO, Channel 291
22	KTXY, JEFFERSON CITY, MO, Channel 295
23	KWBZ, MONROE CITY, MO, Channel 298
24	KLTE, KIRKSVILLE, MO, Channel 300