

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
SUPERIOR BROADCASTING OF DENVER

This statement and the attached figures were prepared on behalf of Superior Broadcasting of Denver ("Superior"). Superior proposes the common ownership of radio stations KBLJ(AM), KLMR(AM), KTHN(FM), KFVR-FM and KSNZ(FM). Therefore, a multiple ownership analysis was prepared considering the following radio stations under proposed common ownership or control:

Call Sign	Location	Facilities
KBLJ(AM)	La Junta, Colorado	1400 kHz 1 kW-U ND-1
KLMR(AM)	Lamar, Colorado	920 kHz 5 kW-U DA-N
KTHN(FM)	La Junta, Colorado	CH 221A 3 kW 91 M
KFVR-FM	La Junta, Colorado	CH 293C1 100 kW 156 M
KSNZ(FM)	Lamar, Colorado	CH 227C1 100 kW 146 M

Since some of these stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations), an ownership study has been prepared in accordance with the Federal Communications Commission multiple ownership rules (See Section 73.3555 of the FCC Rules).

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.* The predicted principal contours are shown on Figure 1. There are three new "radio markets" defined for analysis under the Commission's Rules by the acquisition of the proposed stations. The table below lists the defined markets:

Defined Radio Market	Stations that Define Radio Market	
	AM Station(s)	FM Stations
Market 1	KBLJ	KFVR-FM/KTHN
Market 2	KBLJ/KLMR	KFVR-FM
Market 3	KLMR	KSZN

Count of Stations in Defined Market

The number of radio stations in a "radio market" is determined by counting the operating, commercial stations having principal community contours which overlap the principal community contours which define the radio market, plus the subject stations to be co-owned.

Radio Market	Number of Stations in Radio Market
Market 1	2 - AM; 4 - FM; Total of 6
Market 2	2 - AM; 5 - FM; Total of 7
Market 3	2 - AM; 4 - FM; Total of 6

A tabulation of the stations contained within the radio markets is provided in Figure 2.

* See Order in Implementation of Section 202(a) and 202(b)(1) of the Telecommunications Act of 1996 (Broadcast Radio Ownership) FCC 96-90, released March 8, 1996 and Memorandum Opinion and Order in Revision of Radio Rules and Policies 7 FCC Rcd 6387, 6395 para. 39 (1992).

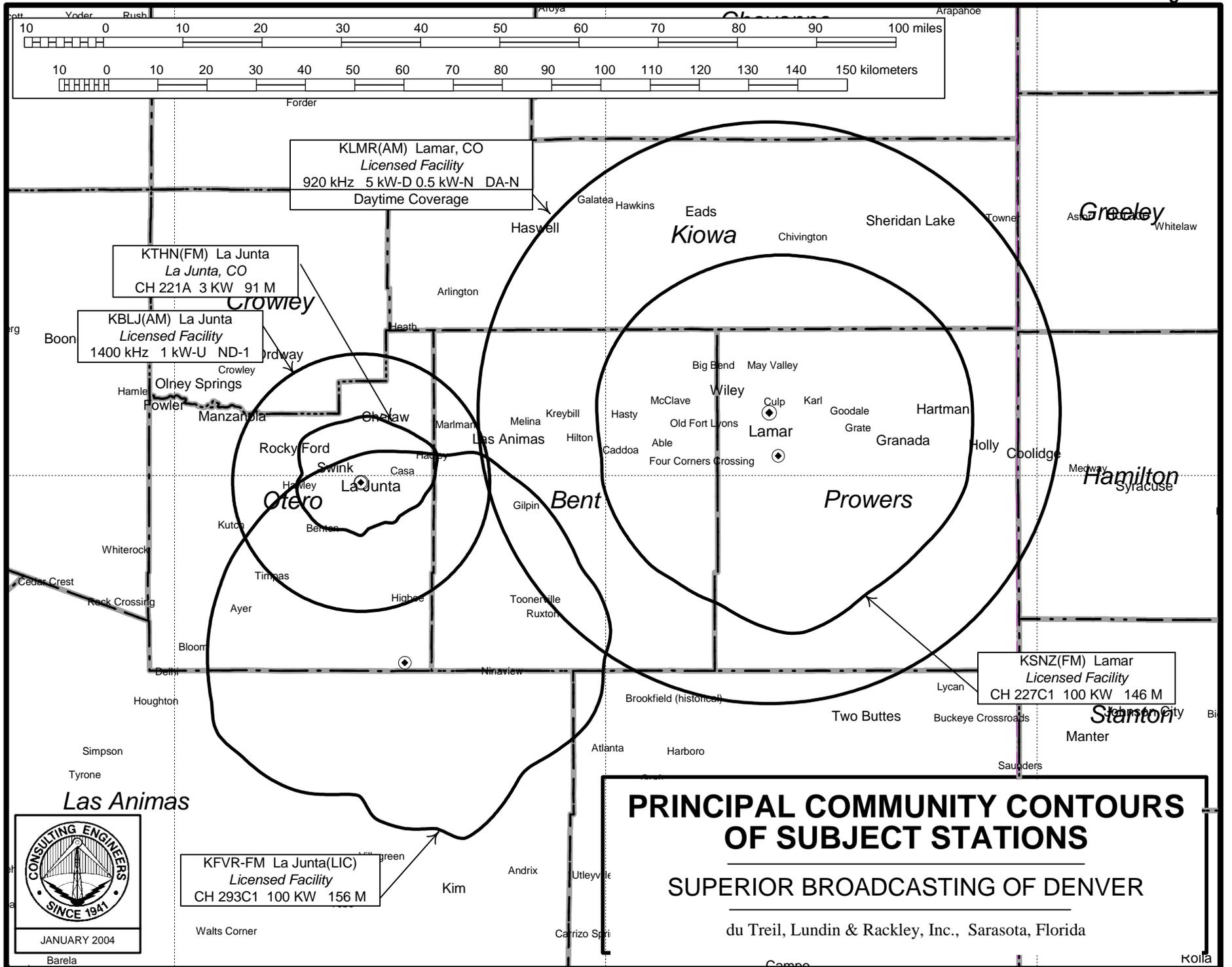
In Radio Markets 1 and 2, the market is created by three proposed commonly-owned stations, so at least three other stations are required in these markets in order to be in compliance with the Commission's multiple ownership rule. However, only two of those other stations would not be commonly owned. In Radio Market 3, the market is created by two proposed commonly-owned stations, so at least two other stations are required in these markets in order to be in compliance with the Commission's multiple ownership rule. Of the stations within the radio market, there are two other stations that would not be commonly owned.

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Figure 1



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Tabulation of Stations Within Radio Market 1

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KBLJ(AM)	La Junta	CO	1400
KLMR(AM)	Lamar	CO	920
KTHN(FM)	La Junta	CO	92.1
KFVR-FM	La Junta	CO	106.5
KVAY(FM)	Lamar	CO	105.7
KJQY(FM)	Rocky Ford	CO	95.5

Tabulation of Stations Within Radio Market 2

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KBLJ(AM)	La Junta	CO	1400
KLMR(AM)	Lamar	CO	920
KTHN(FM)	La Junta	CO	92.1
KSNZ(FM)	Lamar	CO	93.3
KFVR-FM	La Junta	CO	106.5
KVAY(FM)	Lamar	CO	105.7
KJQY(FM)	Rocky Ford	CO	95.5

Tabulation of Stations Within Radio Market 3

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KBLJ(AM)	La Junta	CO	1400
KLMR(AM)	Lamar	CO	920
KSNZ(FM)	Lamar	CO	93.3
KFVR-FM	La Junta	CO	106.5
KVAY(FM)	Lamar	CO	105.7
KJQY(FM)	Rocky Ford	CO	95.5