

### **Multiple Ownership Study**

The following engineering statement and attached exhibits have been prepared for Three Eagles Communications, Inc., licensee of several commercial broadcast facilities in the Watertown, South Dakota, and Brookings, South Dakota areas, and are in support of their multiple ownership showing for the acquisition of additional facilities.

This particular study seeks to amend the study currently on file with the Commission, by changing the facilities that would be acquired. In addition, at the request of the Commission's Staff, additional information concerning the multiple ownership situation has been included.

Three Eagles currently has an attributable interest in KBRK-FM and KBRK(AM) at Brookings, South Dakota, KJAM(AM) and KJAM-FM in Madison, South Dakota, and KSDR(AM) and KSDR-FM in Watertown, South Dakota. It is proposed that Three Eagles acquire KKSD(FM) at Milbank, South Dakota, KKQQ(FM) and KJJQ(AM) at Volga, South Dakota, and KIXX(FM), KDLO-FM, and KWAT(AM) of Watertown, South Dakota. Under the original study, it was proposed that Three Eagles would acquire KDBX(FM) at Clear Lake, South Dakota. Since it has been determined that Three Eagles will not now acquire KDBX(FM), that facility has been excluded from the listing of facilities to be acquired and studied under this report.

The first map in this study depicts the markets that would arise from the multiple ownership situation described above. In order to avoid confusion with the previous study, the designations of the markets have been changed from numerical labels to alphabetic labels. Each of these markets is indicated by orange shading on this particular map. As this map indicates, there are four markets that would arise from the multiple ownership situation as described. Under the original study there were six markets, plus two additional markets identified by the Commission's Staff. With the exclusion of KDBX(FM), however, the number of markets is reduced to four. It should be noted that while technically other markets could be created, those indicated on the map are the result of the combinations of the maximum number of stations in a particular area, and if compliance with the Commission's Rules can be demonstrated with these groupings, then a grouping of one or two fewer commonly controlled stations would also clearly be in compliance with the Commissions' Rules.

The market designated as "A" is defined by the common overlap between KKSD(FM), KSDR-FM, KIXX(FM), KDLO-FM, KSDR(AM), and KWAT(AM). In the case of this market, there are six total facilities involved, four of which are FM stations. As a result, it is necessary and sufficient to demonstrate that there are at least 15 stations serving this particular market. The map depicting the analysis of Market "A" illustrates the principal community coverage contour of ten

additional stations, therefore, there are at least sixteen facilities serving the market. It is respectfully submitted that this market would be in compliance with the provisions of Section 73.3555 of the Commission's Rules.

The second market under consideration, that designated as "B" is comprised of the common overlap between KBRK-FM, KDLO-FM, and KWAT(AM). In this market, there are a total of three stations involved, two of which are FM stations. As a result of this grouping, it is necessary and sufficient to demonstrate that the proponent would not control greater than fifty percent of the stations serving the market. To that end, the principal community coverage contour of five additional stations has been illustrated on the map depicting the analysis of this market. Since there are at least five other facilities serving the market, it is respectfully submitted that this market would be in compliance with the provisions of Section 73.3555 of the Commission's Rules.

The market designated as "C", which is the third market under consideration, is defined by the common overlap between KBRK-FM, KBRK(AM), KJJQ(AM), KKQQ(FM), and KJAM-FM. In the case of this market, there are five defining stations, three of which are FM facilities. As a result of this grouping, it is necessary and sufficient to demonstrate that the proponent would not control greater than fifty percent of the stations serving the market. As the map analyzing this particular market demonstrates, there are at least six other

facilities whose principal community coverage contour overlaps the market. It is therefore respectfully submitted that this market would be in compliance with the provisions of Section 73.3555 of the Commission's Rules.

The final market to be studied, which has been designated as "D" is defined by the common overlap between KBRK-FM, KJAM-FM, KKQQ(FM), KJJQ(AM), and KJAM(AM). In this market, there are five stations that define the market, three of which are FM facilities. As with the previous market, it is necessary and sufficient to demonstrate that the proponent would not control greater than fifty percent of the stations serving the market. On the map analyzing this market, there have been an additional six stations depicted. Since it is clear that at least six other facilities would serve the market, it is respectfully submitted that the proponent would not control greater than fifty percent of the stations serving the market, and that market "D" would be in compliance with the provisions of Section 73.3555 of the Commission's Rules.

Since all four markets under consideration would be in compliance with the Commission's Rules, it is respectfully submitted that the proposed acquisition of the facilities listed in this study would be in compliance with the Commission's Rules.

At the request of the Commission's Staff two additional maps have been included in this study. It was specifically requested of the proponent to provide a map showing all facilities that overlapped the stations that are or would be under common control. Due to the density of stations in the region, and the fact that a single map would be almost unreadable due to clutter, this request has been complied with by providing two different maps. The first of these two maps depicts the facilities that are or would be under common control and the markets they define, with the contours of other commercial AM facilities overlaid. The second map has the other FM facilities indicated. A tabulation of the facilities included on these maps follows them. It should be noted that in addition to the commercial facilities depicted, there are several non-commercial educational facilities that serve the markets. Since multiple ownership situations at present only involve commercial facilities, the NCE stations have been excluded from these maps and tabulations.

The preceding statement and attached exhibits have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.

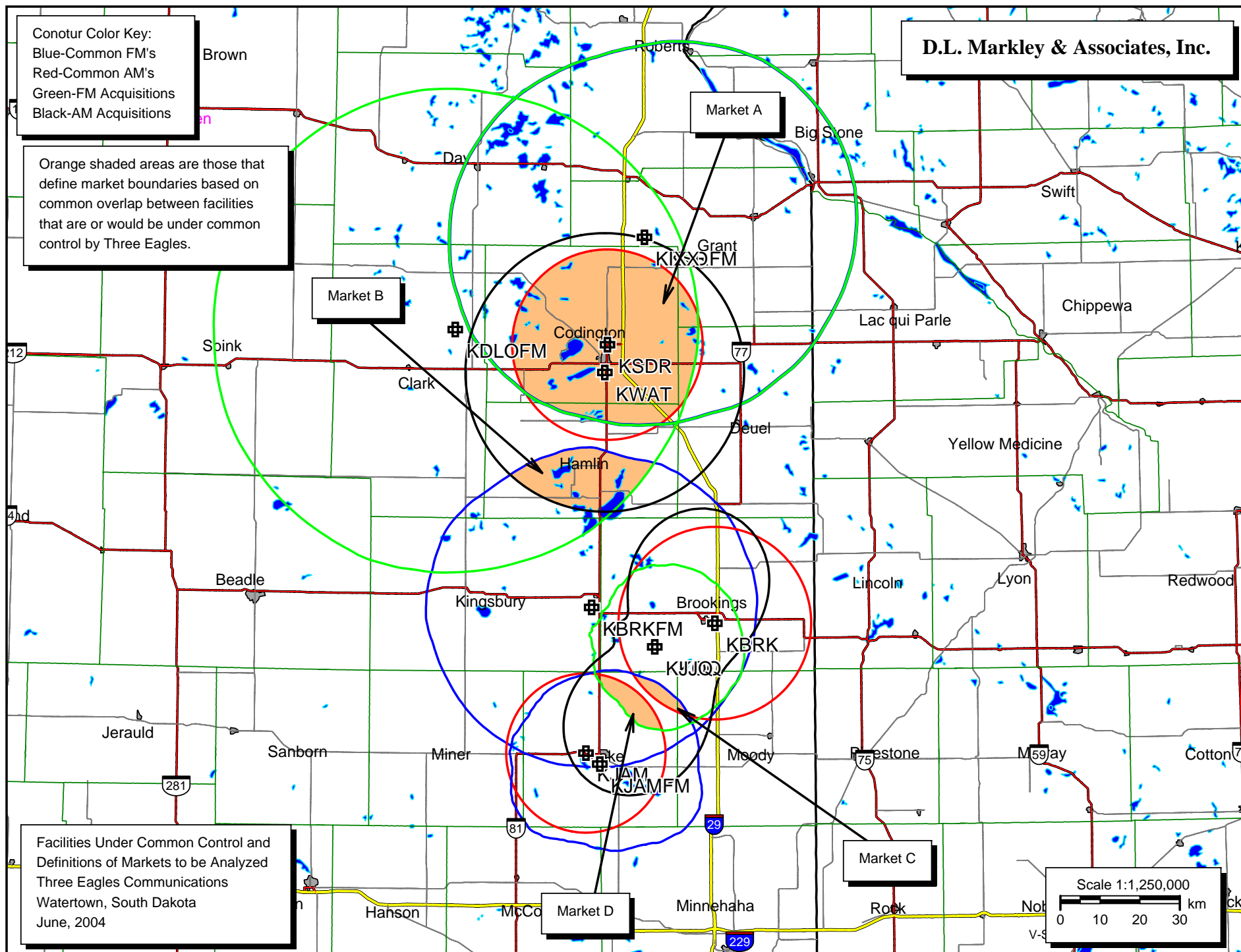
6-04-2004  
Date

  
Jeremy D. Ruck, Consulting Engineer

Conotur Color Key:  
Blue-Common FM's  
Red-Common AM's  
Green-FM Acquisitions  
Black-AM Acquisitions

Orange shaded areas are those that define market boundaries based on common overlap between facilities that are or would be under common control by Three Eagles.

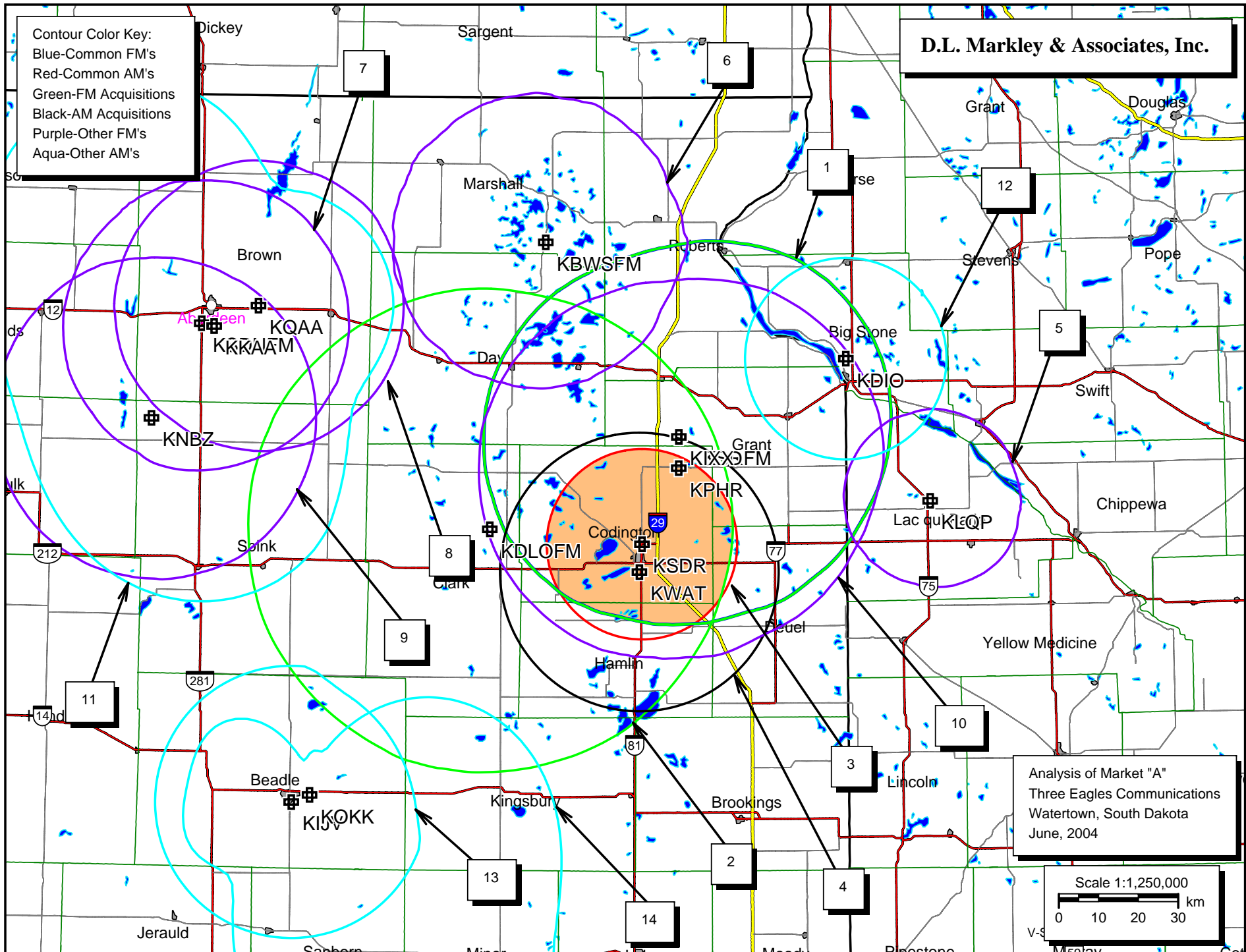
D.L. Markley & Associates, Inc.

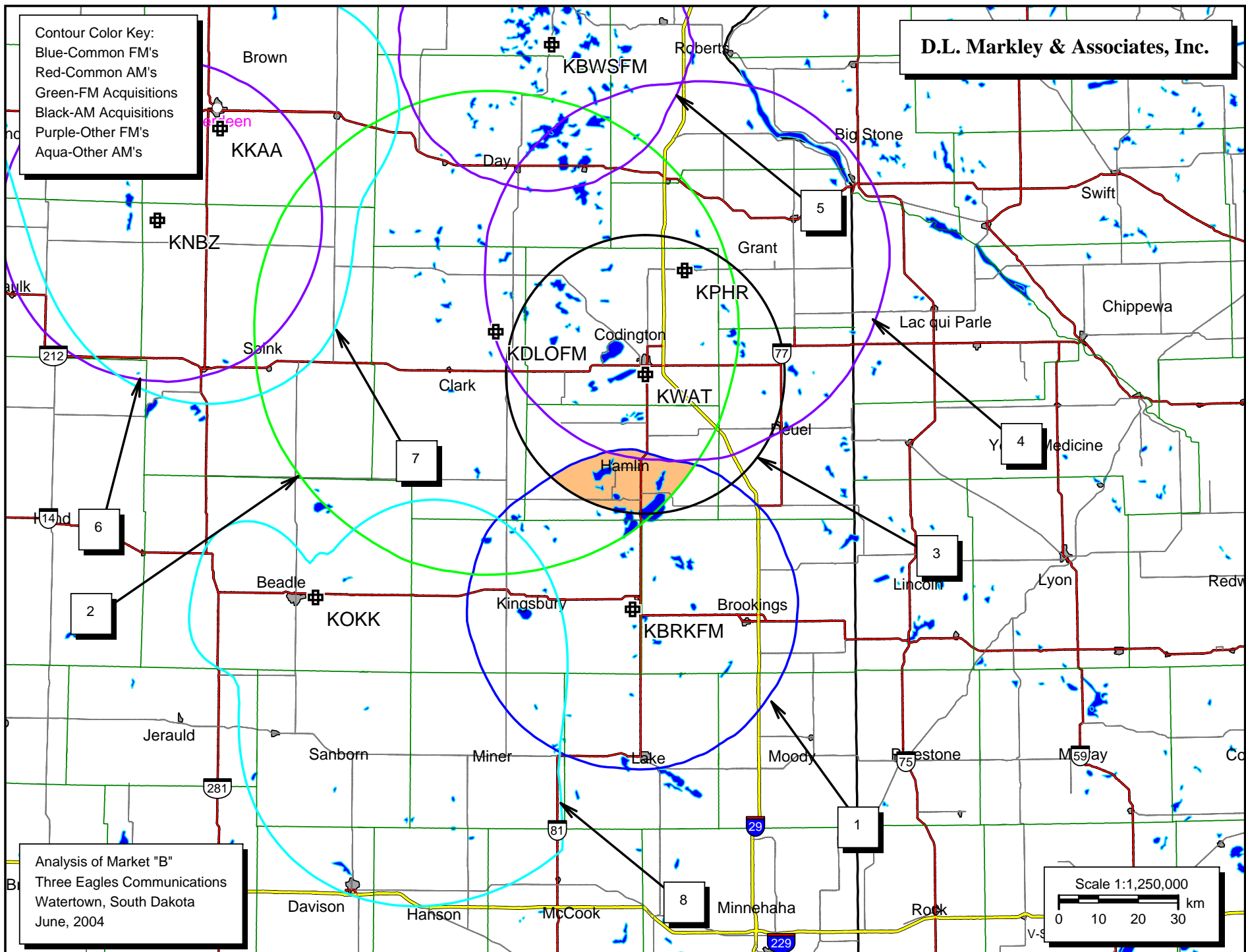


Facilities Under Common Control and  
Definitions of Markets to be Analyzed  
Three Eagles Communications  
Watertown, South Dakota  
June, 2004

Scale 1:1,250,000

0 10 20 30 km

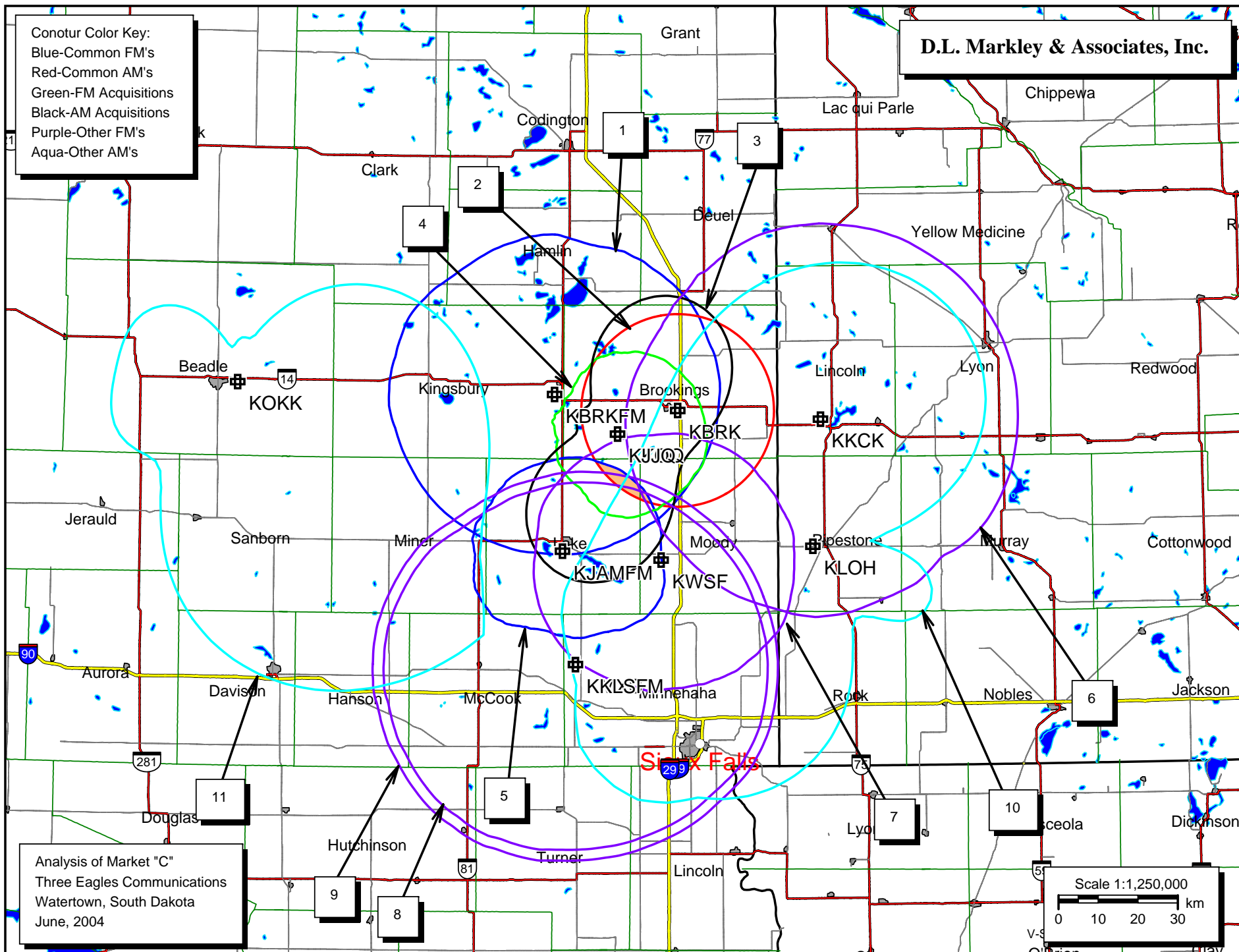






Conotur Color Key:  
Blue-Common FM's  
Red-Common AM's  
Green-FM Acquisitions  
Black-AM Acquisitions  
Purple-Other FM's  
Aqua-Other AM's

D.L. Markley & Associates, Inc.



Analysis of Market "C"  
Three Eagles Communications  
Watertown, South Dakota  
June, 2004

Scale 1:1,250,000  
0 10 20 30 km

[illegible]

**D.L. Markley & Associates, Inc.**

**Conotur Color Key:**  
 Blue-Common FM's  
 Red-Common AM's  
 Green-FM Acquisitions  
 Black-AM Acquisitions  
 Purple-Other FM's  
 Aqua-Other AM's

**Analysis of Market "D"**  
 Three Eagles Communications  
 Watertown, South Dakota  
 June, 2004

**Scale 1:1,250,000**  
 0 10 20 30 km

[illegible]

A map of Market "D" in Watertown, South Dakota, showing radio station coverage areas. The map includes county names like Grant, Spink, Clark, Hamlin, Deuel, Lincoln, and others. It features various radio stations such as KOKK, KBRKFM, KJJOQ, KAM, KJAMFM, KWSF, KMXC-FM, KLOH, and KKCK. Coverage areas are indicated by colored circles and lines, corresponding to the Conotur Color Key. Numbered callouts (1-11) point to specific locations or features. A scale bar at the bottom right indicates a scale of 1:1,250,000. The map is titled "Analysis of Market 'D' Three Eagles Communications Watertown, South Dakota June, 2004".

**Multiple Ownership Study**  
*Index to Facilities Depicted on Maps*

Market "A" Analysis:

- 1- **KKSD(FM)** **Milbank, South Dakota**
- 1- **KSDR-FM** **Watertown, South Dakota**
- 1- **KIXX(FM)** **Watertown, South Dakota**
- 2- **KDLO-FM** **Watertown, South Dakota**
- 3- **KSDR(AM)** **Watertown, South Dakota**
- 4- **KWAT(AM)** **Watertown, South Dakota**
- 5- **KLQP(FM)** **Madison, Minnesota**
- 6- **KBWS-FM** **Sisseton, South Dakota**
- 7- **KSDN-FM** **Aberdeen, South Dakota**
- 8- **KQAA(FM)** **Aberdeen, South Dakota**
- 9- **KNBZ(FM)** **Redfield, South Dakota**
- 10- **KPHR(FM)** **Ortonville, Minnesota**
- 11- **KKAA(AM)** **Aberdeen, South Dakota**
- 12- **KDIO(AM)** **Ortonville, Minnesota**
- 13- **KIJV(AM)** **Huron, South Dakota**
- 14- **KOKK(AM)** **Huron, South Dakota**

Market "B" Analysis:

- 1- **KBRK-FM** **Brookings, South Dakota**
- 2- **KDLO-FM** **Watertown, South Dakota**
- 3- **KWAT(AM)** **Watertown, South Dakota**
- 4- **KPHR(FM)** **Ortonville, Minnesota**
- 5- **KBWS-FM** **Sisseton, South Dakota**
- 6- **KNBZ(FM)** **Redfield, South Dakota**
- 7- **KKAA(AM)** **Aberdeen, South Dakota**
- 8- **KOKK(AM)** **Huron, South Dakota**

Market "C" Analysis:

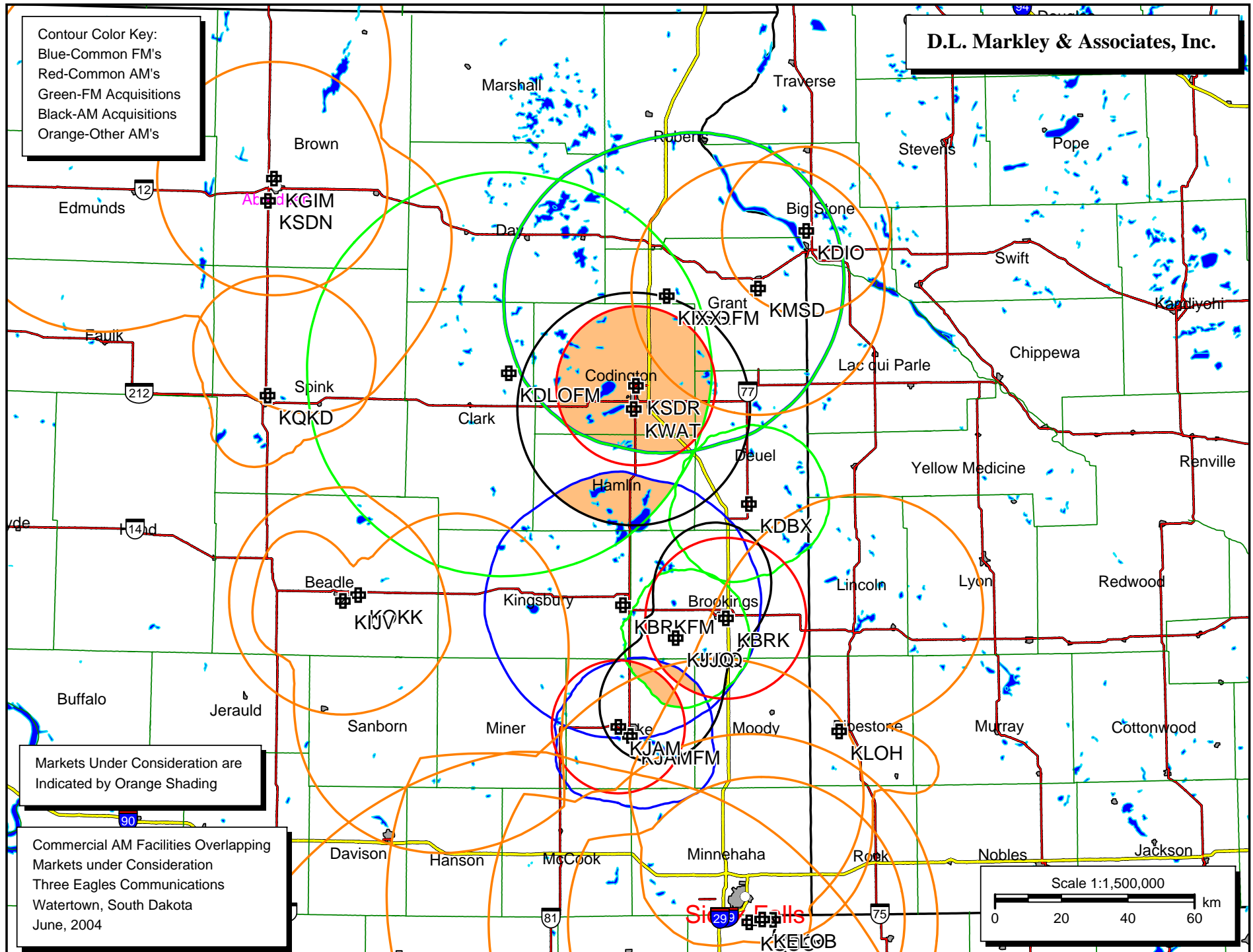
- 1- **KBRK-FM** **Brookings, South Dakota**
- 2- **KBRK(AM)** **Brookings, South Dakota**
- 3- **KJJQ(AM)** **Volga, South Dakota**
- 4- **KKQQ(FM)** **Volga, South Dakota**
- 5- **KJAM-FM** **Madison, South Dakota**
- 6- **KKCK(FM)** **Marshall, Minnesota**
- 7- **KWSF(FM)** **Flandreau, South Dakota**
- 8- **KMXC(FM)** **Sioux Falls, South Dakota**
- 9- **KKLS-FM** **Sioux Falls, South Dakota**
- 10- **KLOH(AM)** **Pipestone, Minnesota**
- 11- **KOKK(AM)** **Huron, South Dakota**

Market "D" Analysis

- 1- **KBRK-FM** **Brookings, South Dakota**
- 2- **KJAM-FM** **Madison, South Dakota**
- 3- **KKQQ(FM)** **Volga, South Dakota**
- 4- **KJJQ(AM)** **Volga, South Dakota**
- 5- **KJAM(AM)** **Madison, South Dakota**
- 6- **KKCK(FM)** **Marshall, Minnesota**
- 7- **KWSF(FM)** **Flandreau, South Dakota**
- 8- **KKLS-FM** **Sioux Falls, South Dakota**
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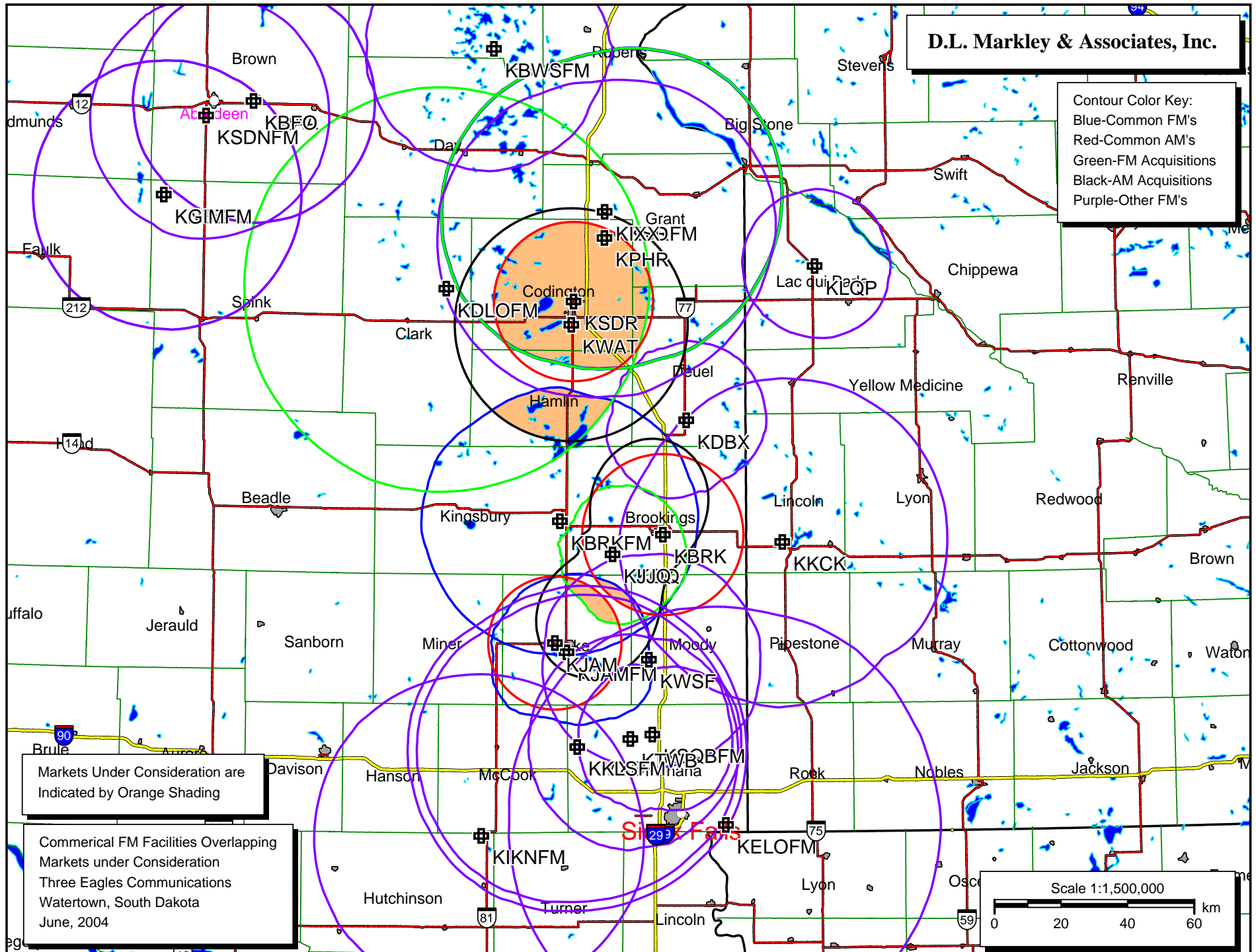
**Bold faced facilities are those that are or would be under common control.**

Contour Color Key:  
Blue-Common FM's  
Red-Common AM's  
Green-FM Acquisitions  
Black-AM Acquisitions  
Orange-Other AM's



# D.L. Markley & Associates, Inc.

Contour Color Key:  
 Blue-Common FM's  
 Red-Common AM's  
 Green-FM Acquisitions  
 Black-AM Acquisitions  
 Purple-Other FM's



Markets Under Consideration are Indicated by Orange Shading

Commerical FM Facilities Overlapping Markets under Consideration  
 Three Eagles Communications  
 Watertown, South Dakota  
 June, 2004

Scale 1:1,500,000





**Multiple Ownership Study***Listing of Other AM Facilities Overlapping Markets under Consideration*

WNAX(AM) Yankton, South Dakota  
KSDN(AM) Aberdeen, South Dakota  
KLOH(AM) Pipestone, Minnesota  
KXRB(AM) Sioux Falls, South Dakota  
KSOO(AM) Sioux Falls, South Dakota  
KOKK(AM) Huron, South Dakota  
KELO(AM) Sioux Falls, South Dakota  
KIJV(AM) Huron, South Dakota  
KDIO(AM) Ortonville, Minnesota  
KQKD(AM) Redfield, South Dakota  
KGIM(AM) Aberdeen, South Dakota  
KMSD(AM) Milbank, South Dakota

*Listing of Other FM Facilities Overlapping Markets under Consideration*

KLQP(FM) Madison, Minnesota  
KELO-FM Sioux Falls, South Dakota  
KSDN-FM Aberdeen, South Dakota  
KQAA(FM) Aberdeen, South Dakota  
KSQB-FM Dell Rapids, South Dakota  
KMXC(FM) Sioux Falls, South Dakota  
KNBZ(FM) Redfield, South Dakota  
KKCK(FM) Marshall, Minnesota  
KIKN-FM Salem, South Dakota  
KTWB(FM) Sioux Falls, South Dakota  
KBWS-FM Sisseton, South Dakota  
KGIM-FM Redfield, South Dakota  
KKLS-FM Sioux Falls, South Dakota  
KPHR(FM) Ortonville, Minnesota  
KBFO(FM) Aberdeen, South Dakota  
KWSF(FM) Flandreau, South Dakota  
KDBX(FM) Clear Lake, South Dakota