

Exhibit E-5

The proposed facility would comply with the provisions of Section 73.3555 of the Commission's Rules. The applicant has three facilities in the vicinity which would all share common overlap with each other. Specifically these stations are the proposed KISD(FM) facilities, KJOE(FM) at Slayton, Minnesota, and KLOH(AM) at Pipestone, Minnesota.

As a result of this grouping, it is necessary and sufficient for the proponent to demonstrate that they would not have an attributable interest in greater than fifty percent of the stations serving the market. The attached analysis map demonstrates that there are at least four other facilities in the vicinity whose principal community coverage contour would overlap with one or more of the commonly controlled stations. Each of these four facilities complies with the interim methodology in that the transmitter site of each is located less than 92 kilometers from the perimeter of the common overlap defining the market.

It is therefore respectfully submitted that the proposed facility would comply with the provisions of Section 73.3555 of the Commission's Rules. None of the stations under common control are located within the boundaries of an Arbitron rated market, and therefore the contour method of determining compliance is valid.

Index to Facilities Depicted on Analysis Map

A-	KISD(FM)	Pipestone, Minnesota
B-	KJOE(FM)	Slayton, Minnesota
C-	KLOH(AM)	Pipestone, Minnesota
D-	KARL(FM)	Tracy, Minnesota
E-	KKCK(FM)	Marshall, Minnesota
F-	KELO-FM	Sioux Falls, South Dakota
G-	KNWC-FM	Sioux Falls, South Dakota

Bold faced facilities indicate those in which the applicant has attributable interest.

