

**MULTIPLE SERVICES STUDY**

for

**Saga Communications  
of South Dakota, LLC.**

Associated with the Modification of Station

KUQL(FM) – Ethan, SD

“Market 1”

**September 2008**

COPYRIGHT 2008

**MUNN-REESE, INC.**  
Broadcast Engineering Consultants  
Coldwater, MI 49036

## **ENGINEERING STATEMENT**

---

This firm was retained to determine the minimum number of principal community radio contours available from stations authorized for commercial and non-commercial service associated with the modification of KUQL(FM), Ethan, SD by Saga Communications of South Dakota, LLC. The existing transmitter site and new community of license do not reside within any Arbitron Metro Market as reported by BIA, therefore this study has been conducted under the *Interim Contour-overlap Methodology*. Saga Communications of South Dakota, LLC, currently owns or holds interest in three (3) other radio stations which are relevant for this modification, however only two (2) other stations are technically affected. One separate and distinct market will result from this modification. "Market 1" is comprised of KUQL(FM) - Mitchell, SD, KMIT(FM) - Mitchell, SD and WNAX(AM) - Yankton, SD. Commonly held station WNAX-FM - Yankton, SD enters, but does not define the market, therefore this facility may be ignored.

The existing facilities of the stations included in this report were determined by the use of currently updated copies of the FCC computer databases of AM and FM stations. The listed facilities served as the basis for the computation of the respective principal community contours. The accuracy of the results of this study is understood to be limited to the accuracy of these databases. The FCC databases give no indication of licensed facilities that may be inoperative, construction permit facilities that may now be operating under program test authority (but have not yet been issued a license) or facilities which may have been licensed since the last update. Therefore, some stations may have been included or excluded erroneously. However, unless otherwise indicated, all licensed facilities known to be inoperative and all known applications and construction permit facilities, have been eliminated from consideration in this study.

For AM stations, Map M-3 soil conductivity values and the authorized licensed transmitting facilities served as the basis for the computation of the predicted 5.0 mV/m groundwave contour in accordance with §73.183 of the FCC Rules. The distance to the contour was computed for seventy-two (72) equally spaced azimuths beginning with 0° True. For FM stations, the authorized Center of Radiation and ERP values were utilized to compute the predicted 3.16 mV/m (70 dBu) contour as provided in §73.313 of the Rules. The predicted FM contours shown in this report are based on the use of 72 equally spaced terrain radials beginning with 0° True.

As stated before, there will be one unique and distinct market associated with this modification. The market has been defined, in accordance with §73.3555 of the FCC Rules, as the area within the total perimeter formed by the combined principal community contours of KUQL(FM), KMIT(FM) and WNAX(AM).

**Exhibit 1.1** shows the four (4) stations under common control which are relevant for this modification. To aid in identifying the respective contours, currently owned AM contours have been shown with solid red lines, and currently owned FM contours have been shown with solid blue lines. The station to be modified has been shown with a dotted line. The "Market 1" common overlap areas have been designated as well.

## **ENGINEERING STATEMENT (continued)**

For "Market 1", the market defining contours have been shown in **Exhibit 2.1** of this report along with a minimum number of principal community contours entering the market. The defining contours have been shown with green lines on this map. Contours entering the market have been denoted in purple lines. As stated before, the contours shown only represent enough stations to satisfy the minimum requirement of the Rules. Co-owned stations entering the market, but not defining the market have been omitted. A complete tabulation of stations entering the market will be supplied upon request.

Under the current rules, the market falls at least within the minimum limitations set forth in §73.3555 (a)(1)(iv): ***In a radio market with 14 or fewer full-power, commercial and noncommercial radio stations, not more than 5 commercial radio stations in total and not more than 3 commercial stations in the same service (AM or FM); provided, however, that no person or single entity (or entities under common control) may have a cognizable interest in more than 50% of the full-power, commercial and noncommercial radio stations in such market unless the combination of stations comprises not more than one AM and one FM station.*** The principal community contours of at least eight (8) other stations entering the market are shown in **Exhibit 2.1**. Including the two (2) FM and one (1) AM stations which define the market there are at least eleven (11) aural services in this market. This represents no more than 27.3% of the market as shown. **Exhibit 3.1** lists the facilities of the individual stations used in this report.

## **CERTIFICATION**

I hereby certify, subject to penalties for perjury, that the contents of this Engineering Statement are true and accurate to the best of my knowledge and belief.

September, 18, 2008

**MUNN-REESE, INC.**

By Justin W. Asher  
Justin W. Asher, Project Engineer

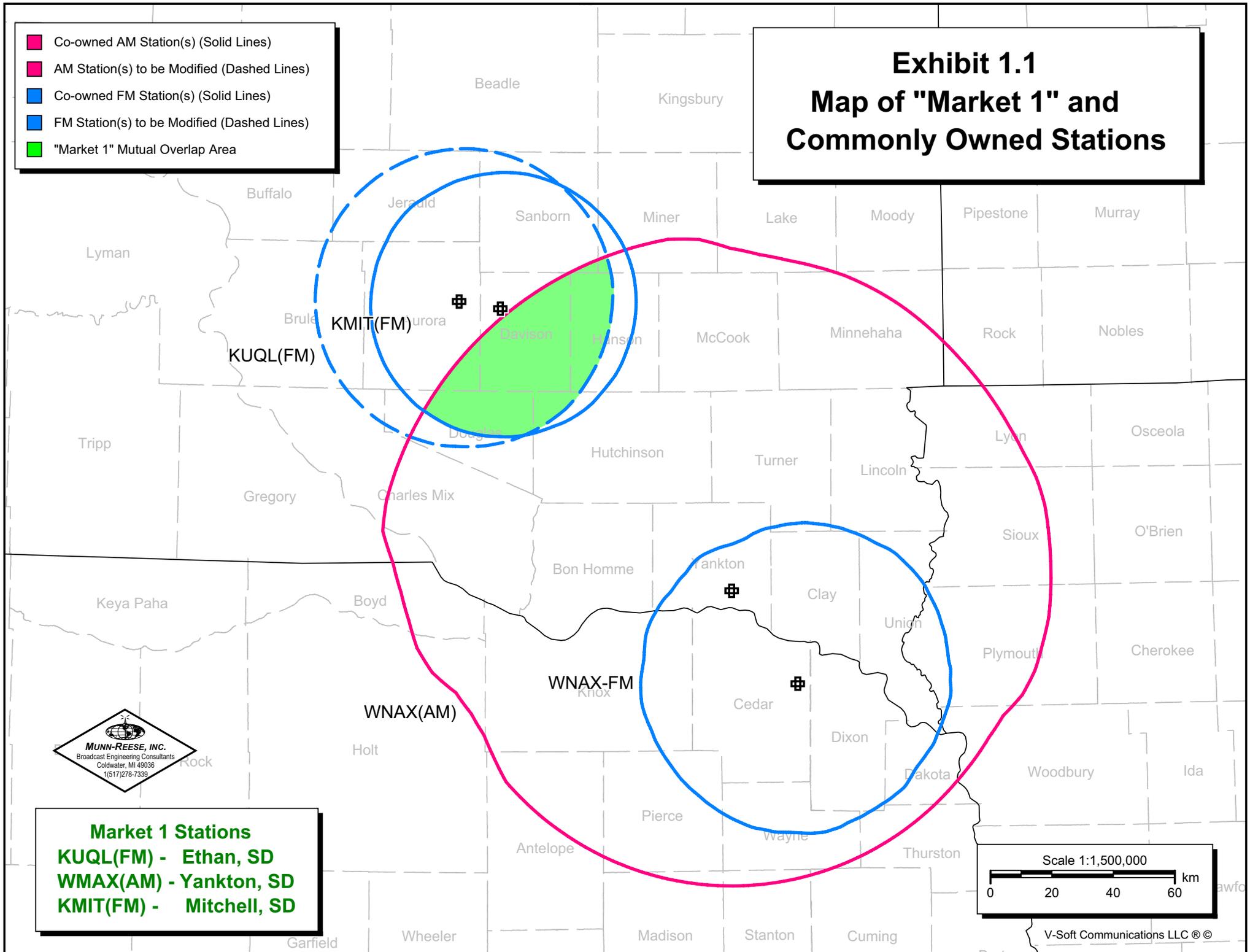
By Wayne S. Reese  
Wayne S. Reese, President

P.O. Box 220  
Coldwater, MI 49036  
517-278-7339

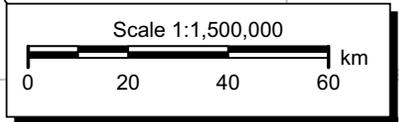
**MUNN-REESE, INC.**  
Broadcast Engineering Consultants  
Coldwater, MI 49036

# Exhibit 1.1 Map of "Market 1" and Commonly Owned Stations

- Co-owned AM Station(s) (Solid Lines)
- AM Station(s) to be Modified (Dashed Lines)
- Co-owned FM Station(s) (Solid Lines)
- FM Station(s) to be Modified (Dashed Lines)
- "Market 1" Mutual Overlap Area

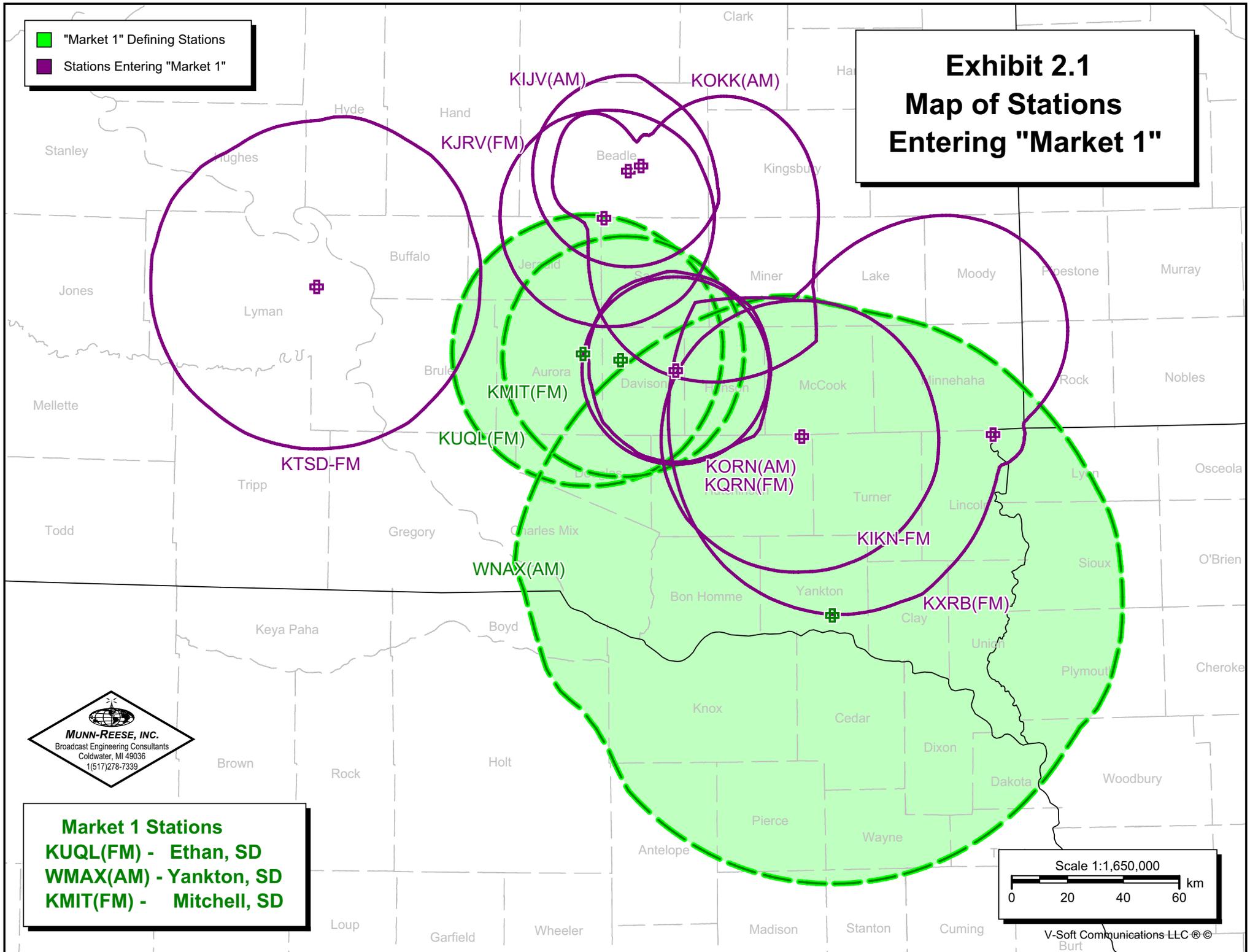


**Market 1 Stations**  
**KUQL(FM) - Ethan, SD**  
**WNAX(AM) - Yankton, SD**  
**KMIT(FM) - Mitchell, SD**

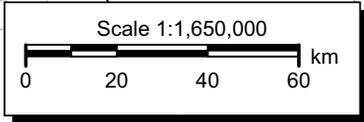


■ "Market 1" Defining Stations  
■ Stations Entering "Market 1"

## Exhibit 2.1 Map of Stations Entering "Market 1"



**Market 1 Stations**  
**KUQL(FM) - Ethan, SD**  
**WMAX(AM) - Yankton, SD**  
**KMIT(FM) - Mitchell, SD**



# Exhibit 3.1

## Tabulation of Select Stations Entering “Market 1”

---

### Stations Entering Market 1: (No Less than 8)

Duopoly Study Center = 46 26 58 N, 85 06 04 W

Call	Coordinates	Chan	Pwr(kW)	City	State	File #
<i>KUQL.L*</i>	<i>434528N 982439W</i>	<i>252C1</i>	<i>100</i>	<i>Ethan</i>	<i>SD</i>	<i>PROPOSED</i>
<i>WNAX.L*</i>	<i>425447N 971858W</i>	<i>570</i>	<i>5</i>	<i>YANKTON</i>	<i>SD</i>	<i>BL19860411AI</i>
<i>KMIT.L*</i>	<i>434416N 981439W</i>	<i>290C1</i>	<i>100</i>	<i>Mitchell</i>	<i>SD</i>	<i>BLH20010919AAS</i>
KIJV.L	442045N 981235W	1340	1	HURON	SD	BL19990414DC
KOKK.L	442144N 980909W	1210	5	HURON	SD	BL19881128AJ
KORN.L	434214N 975957W	1490	1	MITCHELL	SD	BL19790801AD
KXRB.L	432913N 963548W	1000	10	SIOUX FALLS	SD	BL20030127AEI
KIKNFM.L	432922N 972633W	263C1	100	Salem	SD	BLH20071113AIH
KJRV.L	441139N 981905W	227C1	65	Wessington Sp	SD	BLH20050801APD
KQRN.L	434214N 975957W	297C1	100	Mitchell	SD	BLH19790731AF
KTSDFM.L	435755N 993556W	216C	100	Reliance	SD	BLED19840224AC

*\* Indicates stations defining the market*

Only a minimum number of stations have been shown which insures compliance with the Rules. A complete tabulation of stations entering the market will be supplied upon request. Co-owned stations entering, but not defining the market, have been omitted. In addition, all stations whose transmitter sites reside more than 92 km from the perimeter of the area of mutual overlap of the commonly attributable stations have been omitted.