

Exhibit 15 - Idaho Falls-Pocatello-Blackfoot Market

This exhibit with attached maps demonstrates that the acquisition proposed in the instant application comports with the Commission's radio duopoly rule.

In this application, and a related application filed concurrently herewith, assignee Bonneville Holding Company ("BHC") proposes, as a result of the instant transaction to hold the licenses of Stations KCVI(FM), Blackfoot, Idaho, KLCE(FM) Blackfoot, Idaho, KZNR(AM), Blackfoot, Idaho, KZNI(AM), Idaho Falls, Idaho, KPLV(FM), Idaho Falls, Idaho, and KFTZ(FM), Idaho Falls, Idaho.¹

The principal community contours of the six stations contemplated by the instant application mutually overlap with one another (See attached map at Exhibit A). Section 73.3555 of the Commission's rules provides that in a radio market with between 15 and 29 commercial radio stations, a party may own, operate or control up to six commercial radio stations, no more than four of which are in the same service. There are more than 15 commercial radio stations whose principal community contours overlap the relevant market (See Exhibits B and C). Thus, BHC can hold the licenses for KCVI(FM), KLCE(FM), KZNR(AM), KZNI(AM), KPLV(FM), KFTZ(FM) under the radio duopoly rule.

¹ KZNR(AM) has an associated expanded band AM station, call sign KBLI(AM), Blackfoot, Idaho, which Applicant would also acquire. This station has not been included in the instant analysis. Consistent with Commission policy, expanded band stations are not considered in a local radio ownership analysis. See 47 C.F.R. § 73.3555 Notes 9 & 10; *Entercom Kansas City License, LLC Request for Waiver of Section 73.3555 Note 10*, FCC 02-313, *Memorandum Opinion and Order* (rel. Nov. 20, 2002). As in the *Entercom* case, herein the applicant seeks a limited waiver of Section 73.3555 Note 10 to afford the expanded band station consistent treatment in calculating the ownership exemption and the operating period. Such action eliminates application of a rule that "would disserve the public interest" by "significantly erod[ing]" the licensee's "ability to evaluate its expanded band operation." *Entercom*, FCC 02-131, ¶ 6.

EXHIBIT A

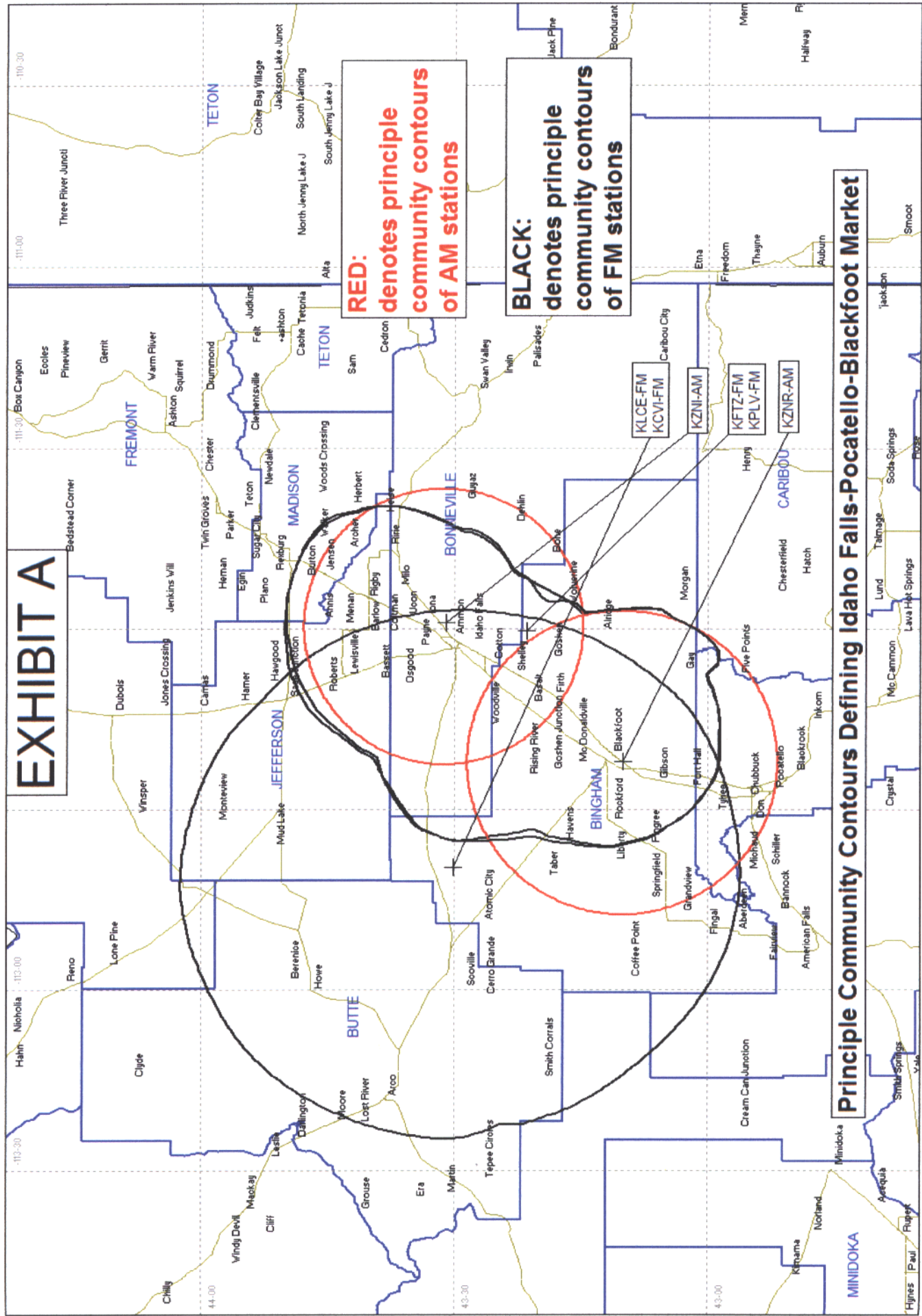


EXHIBIT B

Commercial radio stations in the Idaho Falls-Pocatello-Blackfoot market that have principle community contour overlap as defined in FCC rule 73.3555

Station #	Call Sign	City, State	Frequency	Class	Power
1	KBJX-FM	Shelly, Idaho	106.3 mHz	C1	100,000.00
2	KCVI-FM ***	Blackfoot, Idaho	101.5 mHz	C	100,000.00
3	KFTZ-FM ***	Idaho Falls, Idaho	103.3 mHz	C1	100,000.00
4	KID-AM	Idaho Falls, Idaho	590 kHz	B	5,000.00
5	KID-FM	Idaho Falls, Idaho	96.1 mHz	C	100,000.00
6	KLCE-FM ***	Blackfoot, Idaho	97.3 mHz	C	100,000.00
7	KLLP-FM	Chubbuck, Idaho	98.5 mHz	C2	6,200.00
8	KMGI-FM	Pocatello, Idaho	102.5 mHz	C	100,000.00
9	KORR-FM	American Falls, Idaho	104.1 mHz	C1	56,000.00
10	KOUU-AM	Pocatello, Idaho	1290 kHz	D	1,000.00
11	KPKY-FM	Pocatello, Idaho	94.9 mHz	C	100,000.00
12	KPLV-FM ***	Idaho Falls, Idaho	105.5 mHz	C1	100,000.00
13	KRTK-AM	Chubbuck, Idaho	1490 kHz	C	1,000.00
14	KRXK-AM	Rexburg, Idaho	1230 kHz	C	1,000.00
15	KSEI-AM	Pocatello, Idaho	930 kHz	B	5,000.00
16	KUPI-AM	Ammon, Idaho	980 kHz	B	5,000.00
17	KUPI-FM	Idaho Falls, Idaho	99.1 mHz	C1	100,000.00
18	KWIK-AM	Pocatello, Idaho	1240 kHz	C	1,000.00
19	KZBQ-FM	Pocatello, Idaho	93.7 mHz	C	98,000.00
20	KZNI-AM ***	Idaho Falls, Idaho	1260 kHz	D	5,000.00
21	KZNR-AM ***	Blackfoot, Idaho	690 kHz	D	1,000.00

*** stations involved in the proposed acquisition.

EXHIBIT C

