

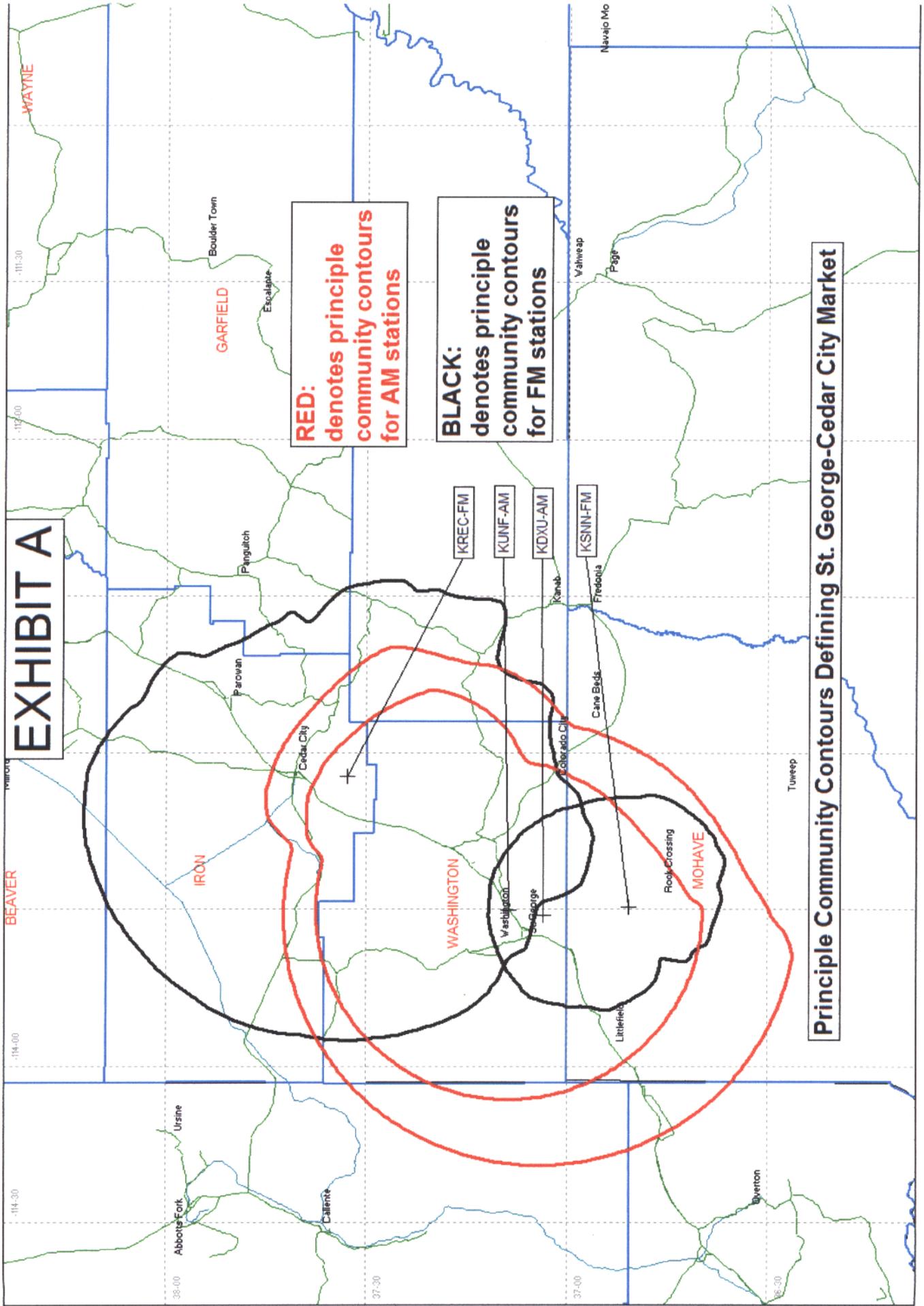
Exhibit 15 - St. George-Cedar City, Utah

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 KDXU(AM), St. George, Utah, KSNN(FM), St. George, Utah, KUNF(AM) Washington, Utah, and KREC(FM) Brian Head, Utah.

The principal community contours of the four 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 14 or fewer commercial radio stations, a party may own, operate or control up to five commercial radio stations, not more than three of which are in the same service, except that a party may not own, operate, or control more than 50 percent of the stations in such market. There are more than eight commercial radio stations whose principal community contours overlap the relevant market (See Exhibits B and C). Thus, BHC can hold the licenses for KDXU(AM), KSNN(FM), KUNF(AM), and KREC(FM) under the radio duopoly rule.

EXHIBIT A



RED:
denotes principle
community contours
for AM stations

BLACK:
denotes principle
community contours
for FM stations

Principle Community Contours Defining St. George-Cedar City Market

EXHIBIT B

Commercial radio stations in the St. George-Cedar City market that have principle community contour overlap as defined in FCC rule 73.3555

Station #	Call Sign	City, State	Frequency	Class	Power
1	KDWN-AM	Las Vegas, Nevada	720 kHz	B	50,000.00
2	KDXU-AM ***	St. George, Utah	890 kHz	B	10,000.00
3	KHUL-FM	Kanab, Utah	101.1 mHz	C	100,000.00
4	KNNZ-AM	Cedar City, Utah	940 kHz	D	10,000.00
5	KONY-FM	St. George, Utah	99.7 mHz	C	89,000.00
6	KREC-FM ***	Brian Head, Utah	98.1 mHz	C	54,000.00
7	KSNN-FM ***	St. George, Utah	93.5 mHz	C2	2,400.00
8	KSUB-AM	Cedar City, Utah	590 kHz	B	5,000.00
9	KUNF-AM ***	Washington, Utah	1210 kHz	B	10,000.00
10	KVEG-FM	Mesquite, Nevada	97.5 MHz	C	100,000.00
11	KXBN-FM	Cedar City, Utah	94.9 mHz	C1	55,000.00
12	KXFF-FM	Cedar City, Utah	92.5 mHz	C	41,000.00
13	KZHK-FM	St. George, Utah	95.9 mHz	C	100,000.00
14	KZNU-AM	St. George, Utah	1440 kHz	B	10,000.00
15	KZNZ-FM	Colorado City, Arizona	107.1 mHz	C3	6,100.00

*** stations involved in the proposed acquisition.

