

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
ALWAYSMOUNTAINTIME, LLC
ASPEN ET AL., COLORADO

This radio multiple ownership analysis was prepared on behalf of AlwaysMountainTime, LLC in regard to the proposed acquisition of station KKVM(FM) in the Aspen, Colorado area. This analysis was prepared under the FCC interim contour analysis method.* Considering all attributable radio stations in the area, the following stations were analyzed:

Call Sign	City of License	Facilities
KRKY(AM)	Granby, CO	930 kHz, 0.121 kW-N, 4.5 kW-D, U
KTUN(FM)	New Castle, CO	Ch. 233C3, 25 kW, -121 m (for reference)
KQSE(FM)	Gypsum, CO	Ch. 273C3, 1.35 kW, 660 m
KFMU-FM	Oak Creek, CO	Ch. 281C3, 1.4 kW, 327 m (for reference)
KIDN-FM	Hayden, CO	Ch. 240C3, 6 kW, 198 m (for reference)
KKCH(FM)	Glenwood Springs, CO	Ch. 224C, 56 kW, 763 m
KSKE-FM	Eagle, CO	Ch. 269C1, 12 kW, 667 m
KSMT(FM)	Breckenridge, CO	Ch. 271A, 6 kW, -64 m
KSPN-FM	Aspen, CO	Ch. 276A, 3 kW, -26 m
<u>KKVM(FM)</u>	<u>Vail, CO</u>	<u>Ch. 284C1, 100 kW, 102 m</u>
KNFO(FM)	Basalt, CO	Ch. 291A, 1.6 kW, 111 m (for reference)
KQZR(FM)	Hayden, CO	Ch. 297C2, 29 kW, 198 m (for reference)
KIFT(FM)	Kremmling, CO	Ch. 292C2, 50 kW, 150 m

* See Report and Order and Notice of Proposed Rulemaking, MB Docket 02-277, FCC 03-127, Released July 2, 2003.

The principal community contours of all of these stations are depicted on a map included herein as Figure 1. The radio multiple ownership analysis considers only those stations with overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations). An ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

Radio Markets

The “radio market” applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. As listed in the table below, there are four defined “radio markets” formed by the subject stations:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
1	KRKY	KSMT, <u>KKVM</u>
2	--	KSKE, KQSE, <u>KKVM</u> , KIFT
3	--	KKCH, KSKE, <u>KKVM</u>
4	--	KKCH, KSKE, KSPN, <u>KKVM</u>

Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating stations that have principal community contours that intersect the principal community contours that define the radio market. Only those stations located within 92 km of the perimeter of the mutual overlap area of the defined market area were employed in the count of stations. Commonly owned stations, other than those that form

the market in question were not considered in the count of stations in the defined market. The results of the analysis are tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	4 AM; 23 FM; 27 Total
Market 2	2 AM; 30 FM; 32 Total
Market 3	4 AM; 32 FM; 36 Total
Market 4	3 AM; 27 FM; 30 Total

Figure 2 is a tabulation of the radio stations identified in the defined radio market. Only known licensed, operating stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's AM database and the appropriate Ground Wave Field Strength versus Distance Graph described in Section 73.184 of the FCC Rules. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method outlined in Section 73.313 of the FCC Rules. Terrain data were derived from the N.G.D.C. 30-second computer database for each of the FM stations using radials evenly-spaced every 5 degrees of azimuth.

Based on the above, it is concluded that the proposed combination of the stations to be owned complies with Section 73.3555(a) of the FCC Rules.



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Call Sign	City	State	Frequency		Call Sign	City	State	Frequency
KPOF	DENVER	CO	910					
KRKY	GRANBY	CO	930					
KRKS	DENVER	CO	990					
KVCU	BOULDER	CO	1190					

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Call Sign	City	State	Channel	Call Sign	City	State	Channel
KVJZ	VAIL	CO	203				
KPRE	VAIL	CO	210				
KMPB	BRECKENRIDGE	CO	214				
KTOL	LEADVILLE	CO	215				
KVNC	MINTURN	CO	215				
KLDV	MORRISON	CO	216				
KLRY	GYPSUM	CO	217				
KTND	ASPEN	CO	228				
KYSL	FRISCO	CO	230				
KRKS-FM	LAFAYETTE	CO	234				
KXPK	EVERGREEN	CO	243				
KBCO	BOULDER	CO	247				
KZYR	AVON	CO	249				
KYGO-FM	DENVER	CO	253				
KIMN	DENVER	CO	262				
KGHT	EL JEBEL	CO	263				
KSMT	BRECKENRIDGE	CO	271				
KSNO-FM	SNOWMASS VILLAGE	CO	280				
KKVM	VAIL	CO	284				
KXKL-FM	DENVER	CO	286				
KALC	DENVER	CO	290				
KBPI	DENVER	CO	294				
KPVW	ASPEN	CO	296				

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Call Sign	City	State	Frequency		Call Sign	City	State	Frequency
KRKY	GRANBY	CO	930					
KGLN	GLENWOOD SPRINGS	CO	980					

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KDNK	GLENWOOD SPRINGS	CO	201				
KVJZ	VAIL	CO	203				
KCJX	CARBONDALE	CO	205				
KLBV	STEAMBOAT SPRINGS	CO	207				
KPRE	VAIL	CO	210				
KHCO	HAYDEN	CO	211				
KVOV	CARBONDALE	CO	213				
KMPB	BRECKENRIDGE	CO	214				
KTOL	LEADVILLE	CO	215				
KVNC	MINTURN	CO	215				
KLRY	GYP SUM	CO	217				
KAJX	ASPEN	CO	218				
KTSG	STEAMBOAT SPRINGS	CO	219				
KLXV	GLENWOOD SPRINGS	CO	220				
KTND	ASPEN	CO	228				
KYSL	FRISCO	CO	230				
KEZZ	PHIPPSBURG	CO	231				
KXPK	EVERGREEN	CO	243				
KUUR	CARBONDALE	CO	244				
KBCR-FM	STEAMBOAT SPRINGS	CO	245				
KZYZ	AVON	CO	249				
KYGO-FM	DENVER	CO	253				
KMTS	GLENWOOD SPRINGS	CO	256				
KGHT	EL JEBEL	CO	263				
KSKE-FM	EAGLE	CO	269				
KQSE	GYP SUM	CO	273				
KSNO-FM	SNOWMASS VILLAGE	CO	280				
KKVM	VAIL	CO	284				
KIFT	KREMMLING	CO	292				
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KRAI	CRAIG	CO	550					
KRGS	RIFLE	CO	690					
KGLN	GLENWOOD SPRINGS	CO	980					
KNAM	SILT	CO	1490					

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KVJZ	VAIL	CO	203				
KCJX	CARBONDALE	CO	205				
KLBV	STEAMBOAT SPRINGS	CO	207				
KPRE	VAIL	CO	210				
KBUT	CRESTED BUTTE	CO	212				
KVOV	CARBONDALE	CO	213				
KMPB	BRECKENRIDGE	CO	214				
KTOL	LEADVILLE	CO	215				
KVNC	MINTURN	CO	215				
KLRY	GYP SUM	CO	217				
KAJX	ASPEN	CO	218				
KLXV	GLENWOOD SPRINGS	CO	220				
KKCH	GLENWOOD SPRINGS	CO	224				
KTND	ASPEN	CO	228				
KYSL	FRISCO	CO	230				
KXPK	EVERGREEN	CO	243				
KUUR	CARBONDALE	CO	244				
KBCR-FM	STEAMBOAT SPRINGS	CO	245				
KAYV	CRESTED BUTTE	CO	246				
KZYZ	AVON	CO	249				
KAYW	MEEKER	CO	251				
KYGO-FM	DENVER	CO	253				
KMTS	GLENWOOD SPRINGS	CO	256				
KGHT	EL JEBEL	CO	263				
KDBN	PARACHUTE	CO	266				
KSKE-FM	EAGLE	CO	269				
KQSE	GYP SUM	CO	273				
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KUUR	CARBONDALE	CO	244				
KAYV	CRESTED BUTTE	CO	246				
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KGHT	EL JEBEL	CO	263				
KDBN	PARACHUTE	CO	266				
KSKE-FM	EAGLE	CO	269				
KSPN-FM	ASPEN	CO	276				
KSNO-FM	SNOWMASS VILLAGE	CO	280				
KKVM	VAIL	CO	284				
KNFO	BASALT	CO	291				
KPVW	ASPEN	CO	296				