

**ENGINEERING EXHIBIT
IN SUPPORT OF AN APPLICATION
FOR ASSIGNMENT OF LICENSE OF
KKWB(TV) EL PASO, TEXAS
PREPARED ON BEHALF OF
ENTRAVISION HOLDINGS, LLC**

ENGINEERING STATEMENT

INTRODUCTION

The Engineering Exhibit, of which this Statement is part, has been prepared on behalf of Entravision Holdings, LLC (hereinafter Entravision), licensee of commercial FM stations KHRO, KINT-FM, and KOFX, commercial AM station KSVE, commercial UHF television station KINT-TV, all El Paso, Texas, and permittee of new commercial AM station KBIV,¹ also El Paso, Texas, in support of an application to be assigned the license of UHF television station KKWB, El Paso, Texas. The purpose of the instant Engineering Exhibit is to present data showing compliance by Entravision's four El Paso radio stations

¹ KBIV is the expanded band counterpart of KSVE. Pursuant to Note 9 to 47 C.F.R. 73.3555, expanded band stations are not counted for multiple ownership purposes.

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and proposed two El Paso television stations with the requirements of Section 73.3555(c) of the FCC Rules governing radio-television cross ownership.

COMPLIANCE WITH RADIO-TELEVISION CROSS OWNERSHIP RULES

The calculated KHRO, KINT-FM, and KOFX 1 millivolt-per-meter (mV/m) contours, predicted in accordance with Section 73.313 of the FCC Rules; the calculated KSVE 2 mV/m contour, predicted in accordance with Section 73.183 of the FCC Rules; and the calculated KINT-TV and KKWB Grade A (74 dB μ) contour, predicted in accordance with Section 73.684 of the FCC Rules, each encompass 100 percent of El Paso, Texas. Pursuant to Section 73.3555(c)(2)(ii) of the FCC Rules, an entity may directly or indirectly own, operate, or control up to two television stations and four commercial radio stations in a market, provided that at least 10 other independently owned media voices exist following the requested assignment.²

² Section 73.3555(c)(2)(i)(b) of the FCC Rules also may apply to permit ownership of up to seven commercial radio stations. Since Section 73.3555(c)(2)(ii) of the FCC Rules applies, we need not discuss the applicability of the other rule.

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Television Voices in Market

According to the *Broadcasting & Cable Yearbook 2001*, KKWB and KINT-TV are in the El Paso Nielsen Designated Market Area (DMA). The El Paso DMA, number 98 of the 210 2001 Nielsen DMAs, is composed of four counties: Culberson, El Paso, and Hudspeth Counties in Texas, and Dona Ana County in New Mexico. There are 275,850 households in the El Paso DMA. As shown on Figure 1 of this Engineering Exhibit, in addition to KKWB and KINT-TV, there are eight United States (US) independently owned and operating, full-power (five commercial and three noncommercial) television broadcast stations in the El Paso DMA. Thus, these television stations count as eight independent media voices in the El Paso market, following completion of the proposed assignments.

Radio Voices in Market

According to *Duncan's American Radio* Spring 2001 Ratings Report, El Paso is market 73 of the 286 Arbitron ranked radio markets. As shown on Figure 1 of this Engineering Exhibit, in addition to KHRO, KINT-FM, KOFX, and KSVE, there are 10 operating US FM broadcast stations (seven commercial

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and three non-commercial), and 8 operating US commercial AM stations, comprising nine independent media voices in the El Paso radio market.

Cable Television Voices in Market

According to *Television & Cable Factbook*, Cable Volume No. 69, 2001 Edition, there are four cable systems providing cable television services to the counties in the El Paso DMA. Time Warner Communications provides cable service to El Paso County, Texas; A.T.&T. Broadband and Adelphia Communications provide cable service to Dona Ana County, New Mexico; US Cable of West Texas provides cable service to Culberson County, Texas; and Sierra Cable TV provides cable service to Hudspeth County, Texas. Thus, cable service is available to the households in the El Paso DMA, and this availability counts as one independent media voice in the El Paso market.

Newspaper Voices in Market

According to the 2001 *Bacon's Newspaper & Magazines Directories*, the *El Paso Times* is the only independently owned daily newspaper, published in English, in the El Paso DMA. The *El Paso Times* reports a daily circulation of 75,181, and a Sunday circulation of 98,098. Since the *El Paso Times* daily

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circulation represents 27 percent of the households in the El Paso DMA, and the Sunday circulation represents 36 percent of the households in the El Paso DMA, the *El Paso Times* newspaper counts as one independent media voice in the El Paso market.

CONCLUSIONS

There are eight other independently owned and operating television media voices in the El Paso DMA. There are nine other independently owned and operating radio media voices in the El Paso Arbitron radio metro market. There are five cable systems providing service to the El Paso DMA, which counts as one independently owned media voice. There is one independently owned, daily English language newspaper published in the El Paso DMA, which counts as one independently owned media voice. Thus, there are 19 other independent media voices in the El Paso market, and the proposed Entravision ownership of four radio stations, KHRO, KINT-FM, KOFX, and KSVE, and two television stations, KINT-TV and KKWB, in El Paso, Texas, comports with the requirements of Section 73.3555(c)(2)(ii) of the FCC Rules.

DENNY & ASSOCIATES, P.C.
CONSULTING ENGINEERS
OXON HILL, MARYLAND

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CERTIFICATION

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on October 16, 2001.



Alan R. Rosner, P.E.

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BROADCAST VOICES IN THE EL PASO MARKET¹

<u>Licensee</u>	<u>Call Sign</u>	<u>Community of License</u>	<u>FCC Facility Number</u>
1. KDBC-TV Limited Partnership	KDBC-TV	El Paso, TX	33764
2. NPG of Texas, L.P.	KVIA-TV	El Paso, TX	49832
3. Clear Channel Radio Licenses, Inc.	KTSM-TV	El Paso, TX	67760
	KHEY-FM	El Paso, TX	69563
	KTSM-FM	El Paso, TX	67762
	KPRR(FM)	El Paso, TX	68688
	KHEY(AM)	El Paso, TX	67771
	KTSM(AM)	El Paso, TX	69561
4. El Paso Public Television Foundation	KCOS(TV) ²	El Paso, TX	19117
5. KTVU Partnership	KFOX-TV	El Paso, TX	33716
6. Regents of NM State University	KRWG-TV ²	Las Cruces, NM	55516
7. Channel 38 Christian Television	KSCE(TV) ²	El Paso, TX	10202
8. Council Tree Communications VI, L.P.	KTYO(TV)	Las Cruces, NM	36916
9. University of Texas at El Paso	KTEP(FM) ²	El Paso, TX	69342
10. Etcom, Inc.	KXCR(FM) ²	El Paso, TX	19786
11. World Radio Network, Inc.	KVER(FM) ²	El Paso, TX	73745
12. Regent Licensee of El Paso, Inc.	KSII(FM)	El Paso, TX	36949
	KLAQ(FM)	El Paso, TX	48670
	KROD(AM)	El Paso, TX	14908
13. Tichenor License Corporation	KBNA-FM	El Paso, TX	67066
	KAMA(AM)	El Paso, TX	36948
	KBNA(AM)	El Paso, TX	67065
14. K-Fina Results, Inc.	KXPL(AM)	El Paso, TX	33067
15. Spanish Christian Broadcasting of El Paso	KVIV(AM)	El Paso, TX	17740
16. McClatchey Broadcasting	KELP(AM)	El Paso, TX	40831
17. Rio Grande Christian Broadcasting Co	KROL(FM)	Las Cruces, NM	63453

¹ All station data reported herein were extracted from the October 16, 2001, FCC databases.

² Noncommercial educational station.