

ENGINEERING STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS

This radio multiple ownership analysis was prepared to consider common ownership of the stations tabulated below under the FCC “Interim” contour analysis method. \* NRC Broadcasting, Inc. has ownership interest in the stations tabulated below and is proposing to modify the KTUN-FM facility. Below is a tabulation of facilities for each station.

Call Sign / Facility ID	Location	Facilities
KTUN-FM / 44012 Application	Eagle, CO	Channel 269C1 12 kW (MAX-DA) 667 m
KFMU(FM) / 34434 Licensed	Oak Creek, CO	Channel 281C3 1.4 kW 327 m
KRKY(AM) / 24745 Licensed	Granby, CO	930 kHz 4.5 kW-D ND1
KSMT(FM) / 57336 Licensed	Breckenridge, CO	Channel 272A 3 kW -70 m
KSMT(FM) / 57336 Pending Application	Breckenridge, CO	Channel 272A 6 kW -70 m
KSKE-FM / 16269 Licensed Facility	Vail, CO	Channel 284C1 100 kW 102 m
KSPN-FM / 43884 Licensed Facility	Aspen, CO	Channel 276A 3 kW -26 m
KSPN-FM / 43884 Pending Application Facility	Aspen, CO	Channel 276C3 25 kW -9 m
KKCH(FM) / 4360 Licensed Facility	Glenwood Springs, CO	Channel 224C 56 kW 763 m
KNFO(FM) / 8780 Licensed Facility	Basalt, CO	Channel 291A 1.6 kW 111 m
KCUV-FM / 164290 Authorized CP Facility	New Castle, CO	Channel 233C3 25 kW -121 m

The principal community contours of these stations are depicted on a map included herein as Figure 1. Since the principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) of most of the stations are involved in overlap with the proposed KTUN-FM principal community contour, an ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

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

Radio Markets

The “radio markets” applicable to common ownership of the subject stations are defined as the areas encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. There are five “radio markets” to consider based on the proposed KTUN-FM facility. The table below lists the defined markets:

Defined Radio Markets	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	--	KTUN(FM) Application, KFMU(FM)
Market 2	KRKY(AM)	KTUN(FM) Application, KSMT(FM)
Market 3	--	KTUN(FM) Application, KCVU-FM, KKCH(FM)
Market 4	--	KTUN(FM) Application, KSPN-FM (Licensed or Application), KSKE-FM, KKCH(FM)
Market 5	--	KSPN-FM (Licensed or Application), KNFO(FM), KTUN(FM) Application, KKCH(FM)

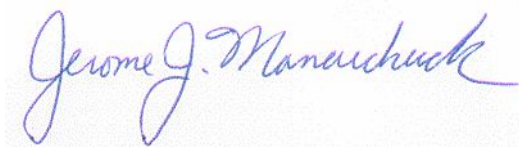
Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating stations having principal community contours which overlap or intersect the principal community contours which 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 were not considered in the count of stations in the defined markets. The results of the analysis are tabulated below:

Defined Radio Markets	Number of Stations in the Radio Market
Market 1	4 AM, 14 FM; 18 Total
Market 2	4 AM, 17 FM; 21 Total
Market 3	3 AM, 18 FM; 21 Total
Market 4	2 AM, 17 FM; 19 Total
Market 5	3 AM, 18 FM; 21 Total

Sheets 1 thru 5 of Figure 2 are tabulations of the radio stations identified in the defined radio markets. 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 of 47 CFR 73.184. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR 73.313. Terrain data was derived from the N.G.D.C. 30 second computer database for each of the FM stations using radials evenly-spaced every 10 degrees of azimuth.

Based on the above, the proposed combination of stations complies Section 73.3555(a) of the FCC Rules.

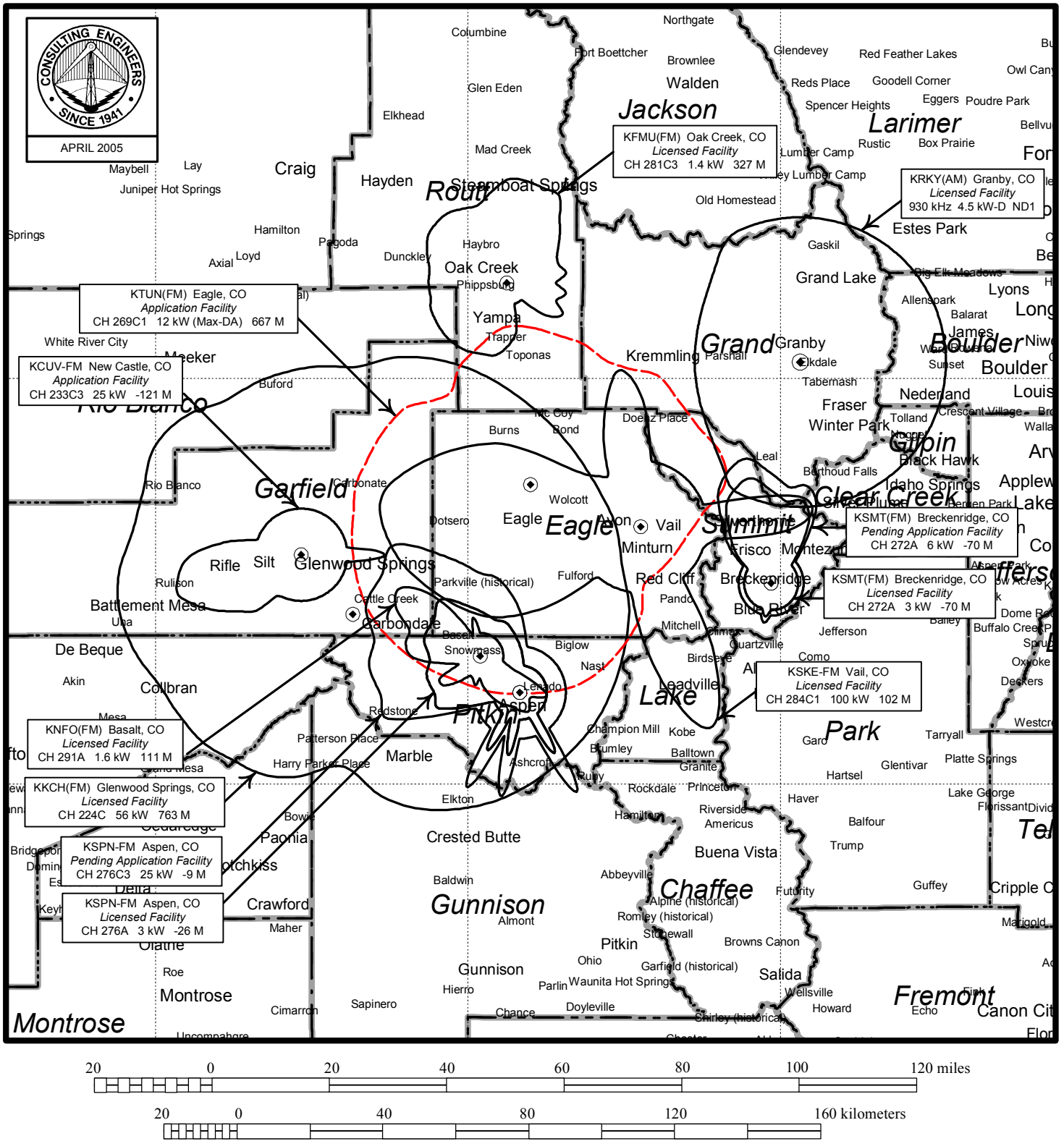


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April 15, 2005

Figure 1



## PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

NRC BROADCASTING, INC.

du Treil, Lundin & Rackley, Inc., Sarasota, Florida

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Tabulation of Other Stations Defined in Radio Market 1

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KRAI	CRAIG	CO	550 kHz
KVLE	VAIL	CO	610
KGLN	GLENWOOD SPRINGS	CO	980
KBCR	STEAMBOAT SPRINGS	CO	1230
KCJX	CARBONDALE	CO	88.9 MHz
KPRE	VAIL	CO	89.9
KVOV	CARBONDALE	CO	90.5
KLXV	GLENWOOD SPRINGS	CO	91.9
KRAI-FM	CRAIG	CO	93.7
KYSL	FRISCO	CO	93.9
KRVG	GLENWOOD SPRINGS	CO	95.5
KBCR-FM	STEAMBOAT SPRINGS	CO	96.9
KZYR	AVON	CO	97.7
KMTS	GLENWOOD SPRINGS	CO	99.1
KSNO-FM	SNOWMASS VILLAGE	CO	103.9
KPVW	ASPEN	CO	107.1

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Tabulation of Other Stations Defined in Radio Market 2

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KVLE	VAIL	CO	610
KVCU	BOULDER	CO	1190
KEZZ	ESTES PARK	CO	1470
KPRE	VAIL	CO	89.9 MHz
KAJX	ASPEN	CO	91.5
KYSL	FRISCO	CO	93.9
KRKS-FM	BOULDER	CO	94.7
KXPK	EVERGREEN	CO	96.5
KBCO-FM	BOULDER	CO	97.3
KZYR	AVON	CO	97.7
KYGO-FM	DENVER	CO	98.5
KIMN	DENVER	CO	100.3
KXDC	ESTES PARK	CO	102.1
KSNO-FM	SNOWMASS VILLAGE	CO	103.9
KXKL-FM	DENVER	CO	105.1
KKHI	KREMMLING	CO	106.3
KBPI	DENVER	CO	106.7
KPVW	ASPEN	CO	107.1

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Tabulation of Other Stations Defined in Radio Market 3

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KVLE	VAIL	CO	610
KRGS	RIFLE	CO	690
KGLN	GLENWOOD SPRINGS	CO	980
KPRE	VAIL	CO	89.9 MHz
KAJX	ASPEN	CO	91.5
KYSL	FRISCO	CO	93.9
KRKS-FM	BOULDER	CO	94.7
KXPK	EVERGREEN	CO	96.5
KBCO-FM	BOULDER	CO	97.3
KZYR	AVON	CO	97.7
KYGO-FM	DENVER	CO	98.5
KIMN	DENVER	CO	100.3
KXDC	ESTES PARK	CO	102.1
KSNO-FM	SNOWMASS VILLAGE	CO	103.9
KXKL-FM	DENVER	CO	105.1
KKHI	KREMMLING	CO	106.3
KBPI	DENVER	CO	106.7
KPVW	ASPEN	CO	107.1

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Tabulation of Other Stations Defined in Radio Market 4

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KVLE	VAIL	CO	610
KGLN	GLENWOOD SPRINGS	CO	980
KCJX	CARBONDALE	CO	88.9
KPRE	VAIL	CO	89.9
KVOV	CARBONDALE	CO	90.5
KAJX	ASPEN	CO	91.5
KLXV	GLENWOOD SPRINGS	CO	91.9
KYSL	FRISCO	CO	93.9
KRVG	GLENWOOD SPRINGS	CO	95.5
KZYR	AVON	CO	97.7
KMTS	GLENWOOD SPRINGS	CO	99.1
KSNO-FM	SNOWMASS VILLAGE	CO	103.9
KZKS	RIFLE	CO	105.3
KKHI	KREMMLING	CO	106.3
KPVW	ASPEN	CO	107.1



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Tabulation of Other Stations Defined in Radio Market 5

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KVLE	VAIL	CO	610
KRGS	RIFLE	CO	690
KGLN	GLENWOOD SPRINGS	CO	980
KCJX	CARBONDALE	CO	205
KPRE	VAIL	CO	210
KBUT	CRESTED BUTTE	CO	212
KVOV	CARBONDALE	CO	213
KAJX	ASPEN	CO	218
KLXV	GLENWOOD SPRINGS	CO	220
KYSL	FRISCO	CO	230
KRVG	GLENWOOD SPRINGS	CO	238
KZYR	AVON	CO	249
KMTS	GLENWOOD SPRINGS	CO	256
KSNO-FM	SNOWMASS VILLAGE	CO	280
KZKS	RIFLE	CO	287
KKHI	KREMMLING	CO	292
KPVW	ASPEN	CO	296