

**ENGINEERING STATEMENT COVERING
BROADCAST MULTIPLE OWNERSHIP STUDY
RADIO FRONTIER BROADCASTING, LLC
PIERCE AND TIMNATH, COLORADO**

MARCH 2004

**ENGINEERING STATEMENT COVERING
BROADCAST MULTIPLE OWNERSHIP STUDY
RADIO FRONTIER BROADCASTING, LLC
PIERCE AND TIMNATH, COLORADO**

MARCH 2004

This engineering statement and supporting tabulations and figures has been prepared on behalf of **Radio Frontier Broadcasting, LLC (“RFB”)**. The purpose of the statement is to demonstrate **RFB** compliance with *Section 73.3555* of the Commission’s Rules with respect to multiple ownership of AM and FM broadcast facilities.

RFB proposes common ownership in the following two stations:

KJMP(AM)	Pierce, CO	870 kHz	1.2 kW Day	FCC ID# 129513
KKHI(FM)	Timnath, CO	CH 288C2	7.7 kW	FCC ID# 38345

These two stations are considered as one market since the principal community contours for KJMP and KKHI do overlap. Principals of **RFB** have an ownership interest in eight other broadcast stations licensed in Wyoming and Colorado. These facilities are not discussed as their principal community contours do not duplicate any portion of the KJMP 5 mV/m contour.

A multiple ownership analysis was prepared considering the above described radio stations under proposed common ownership or control, which stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) in accordance with *Section 73.3555* of the FCC Rules.

RADIO MARKETS & METHODOLOGY

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. In this case, the market is made up of KKHI(FM) and KJMP(AM). The predicted principal community contours for both stations are shown on *Figure 1*, attached. Counties in the market are Larimer and Weld Counties, Colorado.

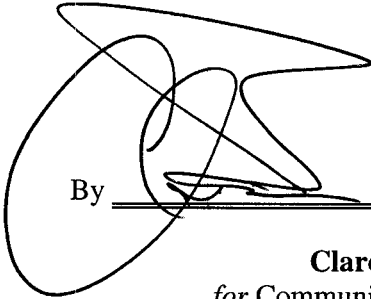
Table I lists all AM stations whose 5 mV/m daytime contour duplicates some portion of the market. The contours for these stations are plotted on Figure 2 in blue along with the market.

Table I also lists all FM stations whose 70 dBu contour duplicates some portion of the market. The contours for these stations are plotted on Figure 3 in blue along with the market.

Only known CP or licensed operating full service commercial stations were employed in the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's CDBS database, with the exception of KJMP where CP mod facilities to be filed were specified, and the appropriate Ground Wave Field Strength versus Distance Graph of 47 CFR 73.184. Ground conductivities were obtained from FCC Figure M3. Distances to the FM contours were determined based on the methodology 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 spaced every 5 degrees of azimuth.

Based on the above analysis, it is believed that the proposed common ownership of stations complies with *Section 73.3555* of the Commission's Rules as there are a total of 14 FM and 10 AM stations in the Market. **RFB** will own one AM and one FM station in the Market.

The foregoing was prepared on behalf of **Radio Frontier Broadcasting, LLC** by Clarence M. Beverage of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.

By  _____
Clarence M. Beverage
for Communications Technologies, Inc.
Marlton, New Jersey

SUBSCRIBED AND SWORN TO before me,

this 19th day of March, 2004,

Esther G. Sperbeck, NOTARY PUBLIC

ESTHER G. SPERBECK
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES OCT. 15, 2007

EXHIBIT 1

AM STATIONS WHICH MAKE UP THE PIERCE AND TIMNATH, COLORADO RADIO MARKET RADIO FRONTIER BROADCASTING, LLC

OTHER AM SERVICES

MARCH 2004

CALL FORMAT LATITUDE	ST	CITY ARN LONGITUDE	FREQ OWNER	PAT	AG	PWR	DESC
KJMPMOD	CO	PIERCE	870.00000	LD		1.200	
40-36-25.0	N	104-41-19.0	W				
KIIX	CO	FORT COLLINS BL	1410.00000	LD		1.000	DAN JACOR BROADCASTING OF COLORADO, INC.
40-35-34.0	N	105-06-18.0	W				
KCOL	CO	WELLINGTON BL19850919AC	600.00000	LD		5.000	DA2 JACOR BROADCASTING OF COLORADO, INC.
40-39-00.0	N	105-02-51.0	W				
KLZ	CO	DENVER BL	560.00000	LU	AG	5.000	DA1 KLZ RADIO, INC.
39-50-36.0	N	104-57-14.0	W				
KGRE	CO	GREELEY BL	1450.00000	LU		1.000	ND1 GREELEY BROADCASTING CORPORATION
40-26-15.0	N	104-43-25.0	W				
KHNC	CO	JOHNSTOWN BP20021216AAJ	1360.00000	CD		10.000	DAN DONALD A. AND SHARON E. WIEDEMAN
40-23-11.0	N	104-54-19.0	W				
KKZN	CO	THORNTON BL19931222AD	760.00000	LD		50.000	DA2 JACOR BROADCASTING OF COLORADO, INC.
40-00-33.0	N	104-56-21.0	W				
KJJJ	CO	WINDSOR BL	1170.00000	LD		1.000	NDD RODRIGUEZ-GALLEGOS BROADCASTING CORPORATION
40-27-46.0	N	104-54-47.0	W				
KFKA	CO	GREELEY BL	1310.00000	LD		5.000	DAN MUSIC VENTURES, LLC, DBA BROADCAST MEDIA LLC
40-21-56.0	N	104-43-56.0	W				
KGAB	WY	ORCHARD VALLEY BL19870605AC	650.00000	LD		8.500	DAN CITICASTERS LICENSES, L.P.
41-03-09.0	N	104-49-53.0	W				

EXHIBIT 1 PAGE 2

FM STATIONS WHICH MAKE UP THE PIERCE AND TIMNATH, COLORADO RADIO MARKET RADIO FRONTIER BROADCASTING, LLC

OTHER FM SERVICES

MARCH 2004

CALL FORMAT LATITUDE	ST	CITY ARN LONGITUDE	FREQ OWNER HAAT:m AMSL:m	CHN	CL	ERP	STAT
KKHI-FM Unknown or New 40-37-03.0	CO CP N	TIMNATH BPH20030919ABL 105-19-40.0	105.50010 LARAMIE MOUNTAIN BROADCASTING, L.L.C. 370.921 2560.000		C2	7700.00	CP
KOLZ Unknown or New 41-06-01.0	WY CP N	CHEYENNE BLH19790806AO 105-00-23.0	100.70010 CITICASTERS LICENSES, L.P. 146.842 2155.000		C1	97000.00	LIC
KIGN Unknown or New 41-07-01.0	WY CP N	BURNS BMLH19950920KD 104-40-07.0	101.90010 CITICASTERS LICENSES, L.P. 149.118 1963.000		C2	50000.00	LIC
KTCL Unknown or New 40-05-47.0	CO CP N	FORT COLLINS BLH19960530KA 104-54-04.0	93.30010 JACOR BROADCASTING OF COLORADO, INC. 345.184 1864.000		C	100000.00	LIC
KQLF Unknown or New 40-53-42.0	WY CP N	CHEYENNE BPH19981207IC 105-11-38.0	97.90010 CITICASTERS LICENSES, L.P. 248.447 2197.000		C1	100000.00	CP
KPAW Unknown or New 40-40-50.0	CO CP N	FORT COLLINS BLH19981216KC 104-56-32.0	107.90010 JACOR BROADCASTING OF COLORADO, INC. 194.342 1790.000		C1	100000.00	LIC
KUAD-FM Unknown or New 40-38-31.0	CO CP N	WINDSOR BPH20000914ABS 104-49-03.0	99.10010 REGENT BROADCASTING OF FT. COLLINS, INC. 257.316 1816.000		C1	100000.00	CP
KSME Unknown or New 40-40-50.0	CO CP N	GREELEY BLH20010411AAR 104-56-32.0	96.10010 JACOR BROADCASTING OF COLORADO, INC. 223.342 1819.000		C1	100000.00	LIC
KDJM Unknown or New 40-05-47.0	CO CP N	BROOMFIELD BLH20010501AAA 104-54-04.0	92.50010 INFINITY RADIO INC. 376.184 1895.000		C1	57000.00	LIC
KXDC Unknown or New 40-15-56.0	CO CP N	ESTES PARK BPH20020507AAH 105-33-37.0	102.10010 SUPERIOR BROADCASTING OF DENVER, LLC 149.632 3067.000		C3	10000.00	CP
KARS-FM Unknown or New 40-52-37.0	WY CP N	LARAMIE BMPH20020926ABK 105-41-44.0	102.90010 AGM-NEVADA LLC 245.579 2999.000		C1	83000.00	CP MOD

EXHIBIT 1 PAGE 3

FM STATIONS WHICH MAKE UP THE
PIERCE AND TIMNATH, COLORADO RADIO MARKET
RADIO FRONTIER BROADCASTING, LLC

OTHER FM SERVICES

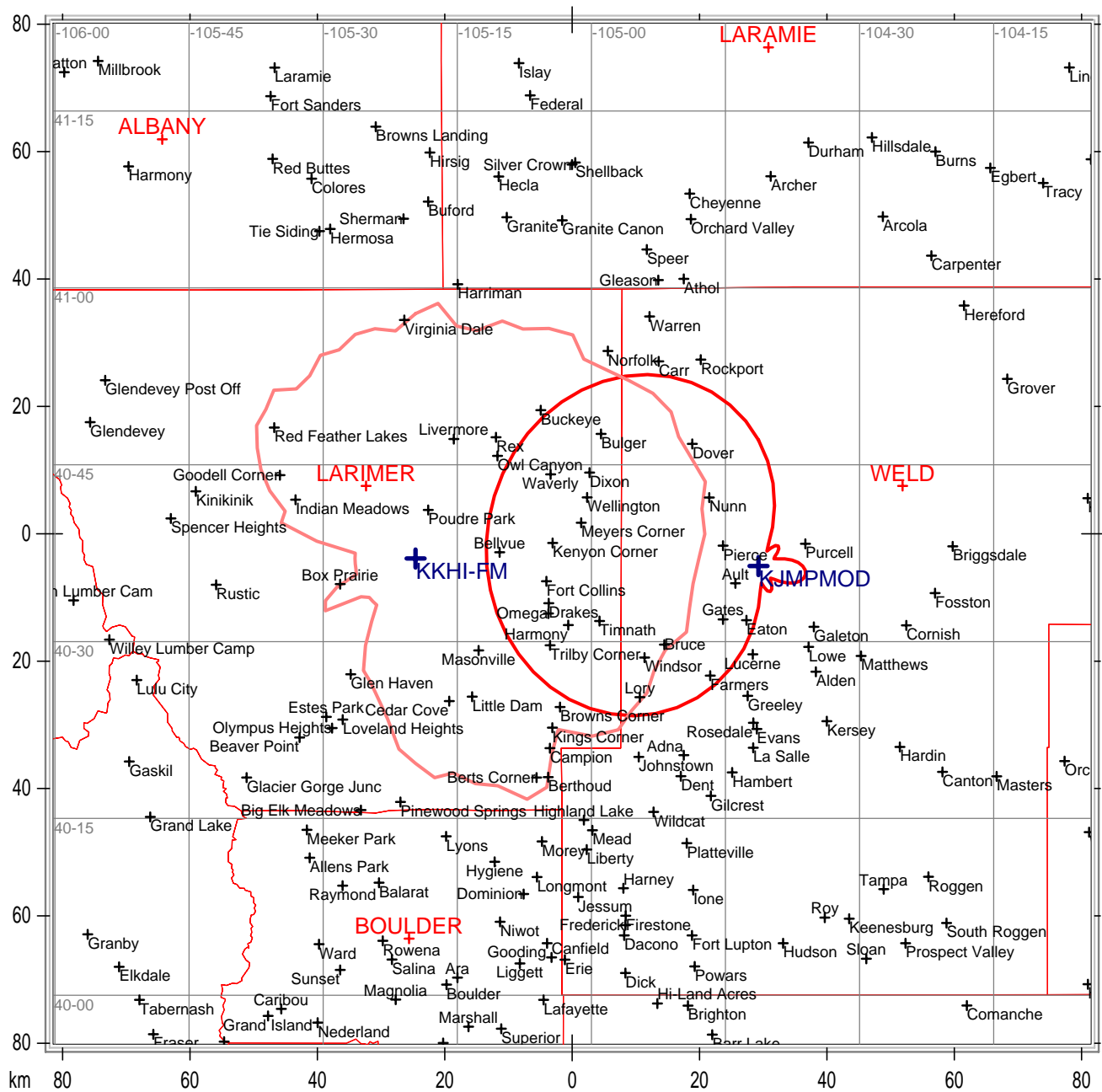
MARCH 2004

KKQZ CO WELLINGTON 94.30010 C3 8700.00 LIC
Unknown or New CP BLH20021101AAV REGENT BROADCASTING OF FT. COLLINS, INC.
40-55-41.0 N 105-08-36.0 W 171.000 2131.000

KKPL WY CHEYENNE 99.90010 C2 50000.00 LIC
Unknown or New CP BMLH20010426AAK AGM-NEVADA, LLC
40-59-22.0 N 105-03-47.0 W 148.145 2129.000

KTRR CO LOVELAND 102.50010 C2 50000.00 LIC
Unknown or New CP BLH20031023AAQ REGENT BROADCASTING OF FT. COLLINS, INC.
40-27-19.0 N 104-55-25.0 W 125.658 1615.000

KJMP 870 kHz PIERCE, CO RED= 5 mV/m KKHI FM TIMNATH, CO SALMON = 70 dBu



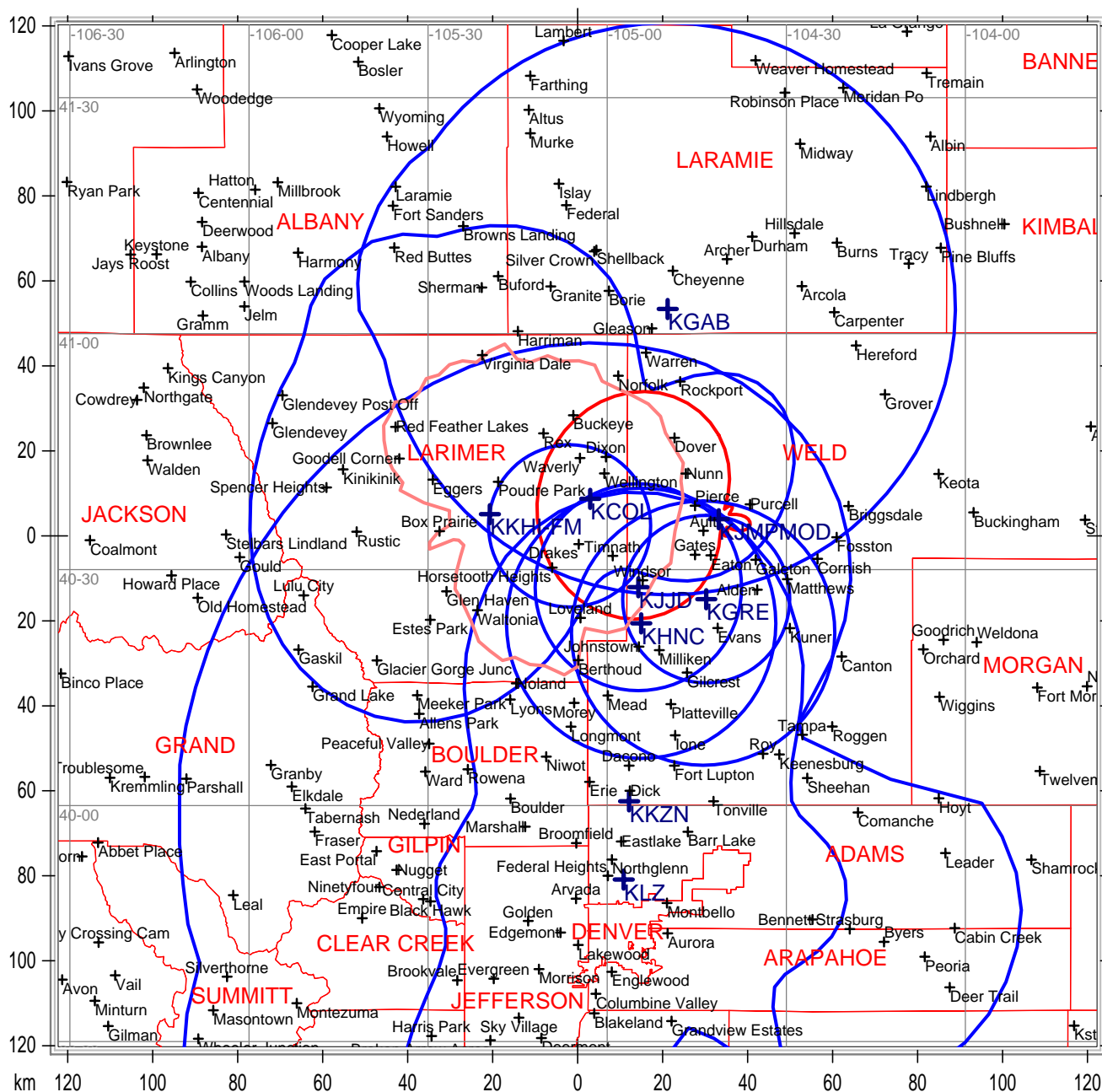
Communications Technologies, Inc. Marlton, New Jersey

County Borders Lat/Lon Grid

Map Scale: 1:1000000 1 cm = 10.00 km V/H Size: 160.30 x 162.99 km

Figure 1

KJMP 870 kHz PIERCE, CO RED= 5 mV/m SALMON = KKHI 70 dBu



Communications Technologies, Inc. Marlton, New Jersey

OTHER AM SERVICES PLOTTED IN BLUE

County Borders Lat/Lon Grid

[illegible]

OTHER FM SERVICES PLOTTED IN BLUE

Figure 1