

MULTIPLE OWNERSHIP STUDY

The following engineering statement and attached exhibits have been prepared for **Greeley Broadcasting Corp.** ("Greeley"), proposed assignee of two broadcast station in the state of Colorado, and are in support of their multiple ownership study for the acquisition of these facilities.

It is proposed that Greeley acquire the two stations listed in the following table:

Callsign	Community	Facility ID	Service
KGRE-FM	Estes Park, Colorado	76780	FM
KRYE(FM)	Rye, Colorado ¹	164276	FM

At present, Greeley has an attributable interest in the facilities listed in the following table:

Callsign	Community	Facility ID	Service
KGRE	Greeley, Colorado	33821	AM
KFVR-FM	Beulah, Colorado	81305	FM

Exhibit E-1 provides an illustration of the principal community coverage contours of these facilities. As this map demonstrates, there is no contour overlap between KGRE and any other facility in which Greeley would have an attributable interest. This map does, however, demonstrate overlap between KFVR-FM and the construction permit for KRYE. There is no overlap between KFVR-FM and any other station that would be attributable to Greeley.

In Exhibit E-2, this market is illustrated in greater detail. In addition to the contours and overlap area being illustrated, this map also indicates the perimeter of the Pueblo, Colorado rated

¹ KRYE has an outstanding construction permit issued in 2018. See FCC File No. BPH-20180202AAX. This construction permit makes no changes to the technical parameters authorized for the facility. Rather, this construction permit authorizes a change in the community of license back to Rye, Colorado. References to KRYE in this study assume the community of license to be Rye, Colorado.

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radio market. According to BIA data, both KRYE and KFVR-FM are considered home to this market. The same data indicates that there are eighteen (18) total stations within the market. Greeley would therefore not have an attributable interest in more than fifty percent of the stations serving the market.

A portion of the overlap area between these two stations falls outside the boundaries of the Pueblo market. As a result, the contour methodology is also being utilized for that area. The contour market under consideration is comprised of the common overlap between two facilities in the same service. Exhibit E-3 illustrates the analysis for this market.

Since the contour market in question is defined by the overlap between two facilities in the same service, it is necessary and sufficient to demonstrate that Greeley would not have an attributable interest in greater than fifty percent of the stations serving the market. This map indicates that there are at least an additional five (5) stations serving the market with transmitter site locations within 92 kilometers of the overlap perimeter. These five stations are summarized in the following table.

Callsign	Community	Facility ID	Service	Type
KFEZ	Walsenburg, CO	164170	FM	
KIQN	Colorado City, CO	164269	FM	
KLCX	Pueblo, CO	25526	FM	
KPHT	Rocky Ford, CO	87658	FM	
KSPK-FM	Walsenburg, CO	39677	FM	

It is therefore respectfully submitted that the acquisition of the KGRE and KRYE by Greeley would be in compliance with the provisions of Section 73.3555 of the Commission's Rules.

JEREMY RUCK & ASSOCIATES, INC.

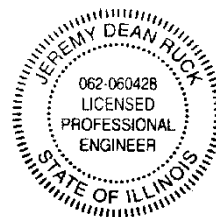
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12.28.2018

2

The preceding statement and attached exhibits have been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.



Above signature is digitized copy of actual signature
License Expires November 30, 2019

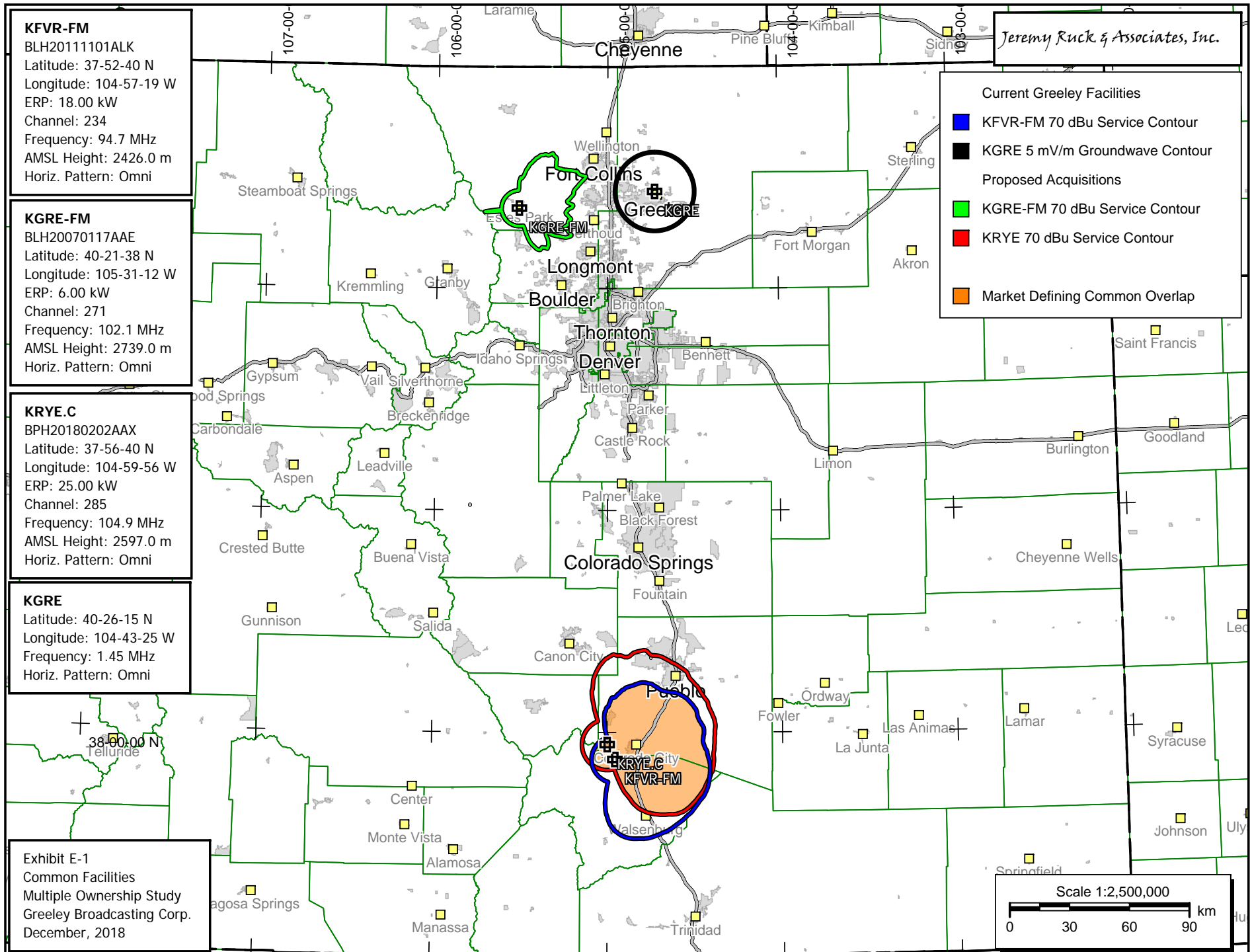
Jeremy D. Ruck, PE
December 28, 2018

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KFVR-FM

BLH20111101ALK
Latitude: 37-52-40 N
Longitude: 104-57-19 W
ERP: 18.00 kW
Channel: 234
Frequency: 94.7 MHz
AMSL Height: 2426.0 m
Horiz. Pattern: Omni

KRYE.C

BPH20180202AAX
Latitude: 37-56-40 N
Longitude: 104-59-56 W
ERP: 25.00 kW
Channel: 285
Frequency: 104.9 MHz
AMSL Height: 2597.0 m
Horiz. Pattern: Omni

Jeremy Ruck & Associates, Inc.

- KFVR-FM 70 dBu Service Contour
- KRYE 70 dBu Service Contour
- Market Defining Common Overlap
- Pueblo Rated Market

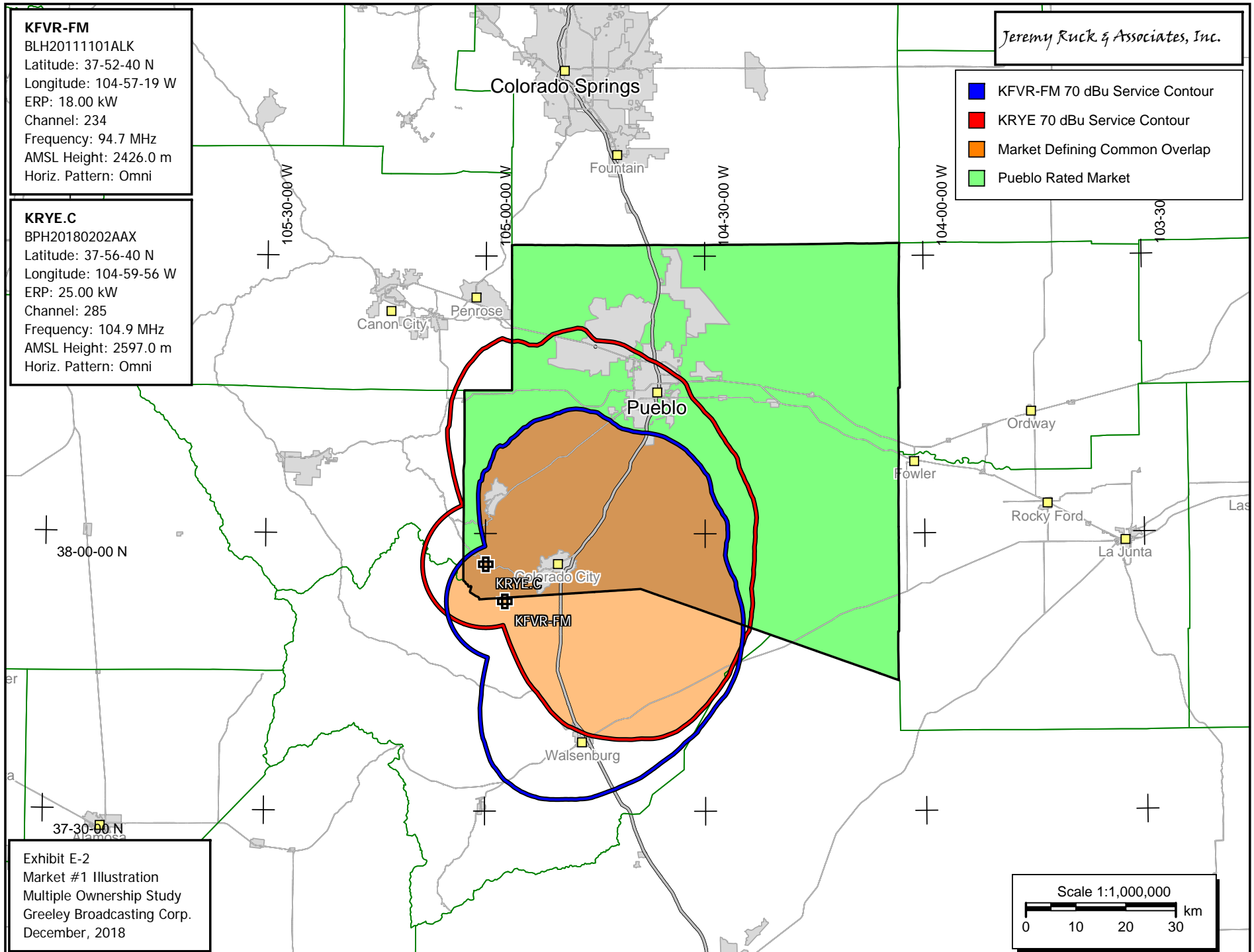


Exhibit E-2
Market #1 Illustration
Multiple Ownership Study
Greeley Broadcasting Corp.
December, 2018

KFVR-FM

BLH20111101ALK
Latitude: 37-52-40 N
Longitude: 104-57-19 W
ERP: 18.00 kW
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KRYE.C

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Horiz. Pattern: Omni

Jeremy Ruck & Associates, Inc.

- KFVR-FM 70 dBu Service Contour
- KRYE 70 dBu Service Contour
- Market Defining Common Overlap
- 70 dBu Service Contours of Other FM Stations:
- KFEZ - Walsenburg, CO (164170)
- KIQN - Colorado City, CO (164269)
- KLCX - Pueblo, CO (25526)
- KPHT - Rocky Ford, CO (87658)
- KSPK-FM - Walsenburg, CO (39677)

