

**ENGINEERING STATEMENT COVERING
BROADCAST MULTIPLE OWNERSHIP STUDY
CUMULUS LICENSING LLC
DINOSAUR, COLORADO**

DECEMBER 2004

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

Cumulus owns the following five licensed stations which are being considered along with the proposed Dinosaur facility to determine if the proposed dinosaur facility will result in 70 dBu contour overlap.

Proposed	CH266C0	DINOSAUR, CO	101.1 MHz	C0	APP
KBKL	CO	GRAND JUNCTION	107.9 MHz	C	CP
BPH20040513AAQ CUMULUS LICENSING LLC					
KEKB	CO	FRUITA	99.9 MHz	C	LIC
BLH19980304KJ CUMULUS LICENSING LLC					
KMXY	CO	GRAND JUNCTION	104.3 MHz	C0	LIC
BLH19960402KD CUMULUS LICENSING LLC					
KKNN	CO	DELTA	95.1 MHz	C	LIC
BMLH19870227PC CUMULUS LICENSING LLC					
KEXO	CO	GRAND JUNCTION	1230 kHz	LU	ND1
BR19961125WF CUMULUS LICENSING LLC					

The principal community contours for these six are plotted on map Figure 1 attached. Dinosaur, CO is plotted in Blue, the remaining FM stations in Green and the two AM stations in Red.

By examination of the map it is apparent that the Dinosaur, CO CH266C0 proposal makes up a market composed of the Dinosaur, CO facility with FM stations KBKL, KEKB and KMXV and AM station KEXO.

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 or control 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 the four FM and one AM station as previously described.

Dinosaur, Colorado is located in Moffat County, Colorado which is not part of any Arbitron metro using the Arbitron Market definition for Fall 2004. The closest market is Grand Junction, Colorado and the associated metro county there is Mesa County. Since Moffat County is not an Arbitron metro county the market has been calculated based on contour overlap.

A search of the FCC CDBS database was undertaken to determine the approximate number of other stations in the market. A total of 11 other FM and 4 other AM stations were located which are listed on Table I attached. Other FM station 70 dBu contours are plotted in orange on Map *Figure 2*, with the five Cumulus stations that make up the market. Other AM station 5 mV/m contours are also plotted on *Figure 2* in purple.

Only known CP or licensed operating full service stations were employed in the study. Distances to the FM contours were determined based on the methodology of 47 CFR 73.313. Terrain data was derived from the FCC 30 second terrain database for each of the FM stations, using radials spaced every 5 degrees of azimuth. 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 conductivities were obtained from FCC Figure M3.

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 minimum of 15 FM stations (**Cumulus** KKNN not included in this total) and 5 AM stations (20 stations total) in the market which includes the five **Cumulus** stations listed at the top of page 2. *Rule Section 73.3555(a)(1)(iii)* provides for the proposed **Cumulus** Case, cognizable interest in four FM stations and 1 AM station, because there are between 15 and 29 radio stations in the market.

The foregoing was prepared on behalf of **Cumulus Licensing 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

TABLE I

OTHER AM & FM STATIONS IN THE MARKET

CUMULUS LICENSING LLC DINOSAUR, CO

DECEMBER 2004

FM CALL ARN	ST CITY OWNER	FREQ	CHN CL	ERP	STAT
LATITUDE LONGITUDE		HAAT:m	AMSL:m		
KMGJ	CO GRAND JUNCTION	93.10000	C0	100000.00	LIC
BLH20021115AAD MBC GRAND BROADCASTING, INC.					
39-03-59.0 N 108-44-41.0 W 423.868 2214.000					
KJYE	CO GRAND JUNCTION	92.30000	C	100000.00	LIC
BLH19891219KD MBC GRAND BROADCASTING, INC.					
39-04-00.0 N 108-44-41.0 W 423.526 2213.000					
KPRN	CO GRAND JUNCTION	89.50000	C1	20000.00	CP
BPED20030923ACE PUBLIC BROADCASTING OF COLORADO, INC.					
39-03-58.0 N 108-44-43.0 W 403.553 2195.000					
KPCT-LP	CO PARACHUTE	106.70000	LP100	100.00	CP
BNPL20010116ADB COLORADO, STATE OF, TELECOM SERVS					
39-26-12.0 N 108-04-06.0 W -499.974 1572.000					
KGJN-LP	CO GRAND JUNCTION	106.70000	LP100	100.00	CP
BNPL20010116ADC COLORADO, STATE OF, TELECOM SERVS					
39-03-57.0 N 108-33-42.0 W -132.368 1425.000					
KZKS	CO RIFLE	105.30000	C	60000.00	LIC
BLH19940928KB WESTERN SLOPE COMMUNICATIONS, L.L.C.					
39-25-57.0 N 108-07-46.0 W 732.566 2690.000					
KMSA	CO GRAND JUNCTION	91.30000	C2	3000.00	LIC
BLED20030402ABS MESA STATE COLLEGE					
39-04-00.0 N 108-44-41.0 W 398.526 2188.000					
KCIC	CO GRAND JUNCTION	88.50000	A	440.00	LIC
BLED19980206KC PEAR PARK BAPTIST SCHOOLS					
39-04-41.0 N 108-28-36.0 W -110.566 1447.000					
KAYW	CO MEEKER	98.10000	C	100000.00	LIC
BLH20001219ACK WESTERN SLOPE COMMUNICATIONS LLC					
39-58-18.0 N 108-02-23.0 W 365.684 2462.000					
KLFV	CO GRAND JUNCTION	90.30000	C2	3000.00	LIC
BLED20031118AAP EDUCATIONAL MEDIA FOUNDATION					
39-03-57.0 N 108-44-48.0 W 396.789 2196.000					

TABLE I

OTHER AM & FM STATIONS IN THE MARKET

CUMULUS LICENSING LLC DINOSAUR, CO

DECEMBER 2004

FM CALL ARN	ST CITY OWNER	FREQ	CHN	CL	ERP	STAT
LATITUDE	LONGITUDE	HAAT:m	AMSL:m			

KMOZ-FM	CO GRAND JUNCTION	100.70000	C1	42000.00	LIC	
BLH19990415KC MBC GRAND BROADCASTING, INC.						
39-04-00.0 N 108-44-41.0 W 421.526 2211.000						

AM CALL ARN	ST CITY OWNER	FREQ	PAT	AG	PWR	DESC
LATITUDE	LONGITUDE					

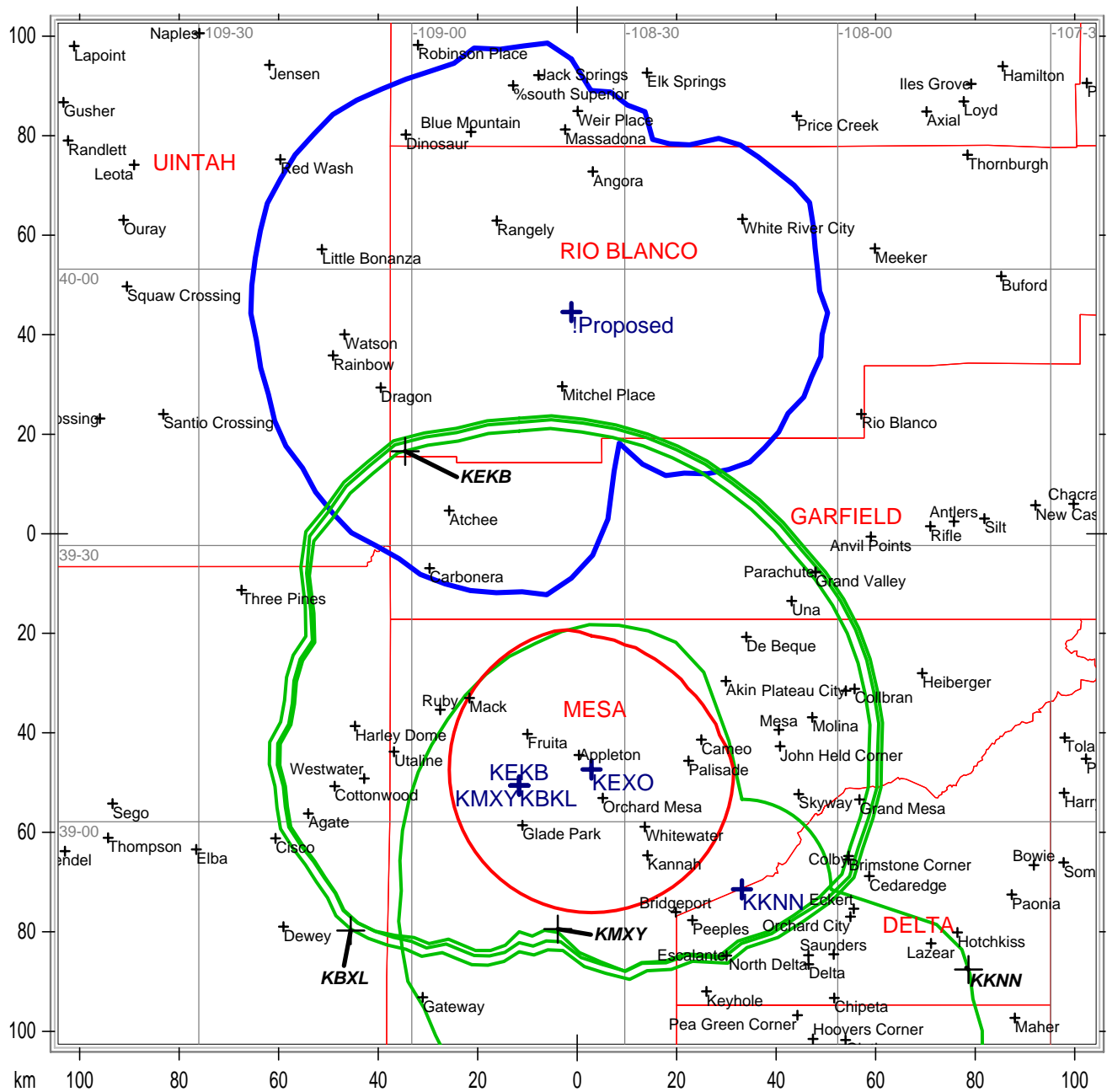
KNZZ	CO GRAND JUNCTION	1100.00000	LD	50.000	DAN	
BL19980330KA MBC GRAND BROADCASTING, INC.						
38-57-06.0 N 108-25-10.0 W						

KJOL	CO GRAND JUNCTION	620.00000	LD	5.000	NDD	
BL19800919AD UNITED MINISTRIES						
39-07-35.0 N 108-38-13.0 W						

KTMM	CO GRAND JUNCTION	1340.00000	CD	1.000	ND2	
BP20010828AAM MBC GRAND BROADCASTING, INC.						
39-07-35.0 N 108-38-12.0 W						

KRGS	CO RIFLE	690.00000	LD	0.900	ND1	
BL19951204AH WESTERN SLOPE COMMUNICATIONS, L.L.C.						
39-32-56.0 N 107-46-11.0 W						

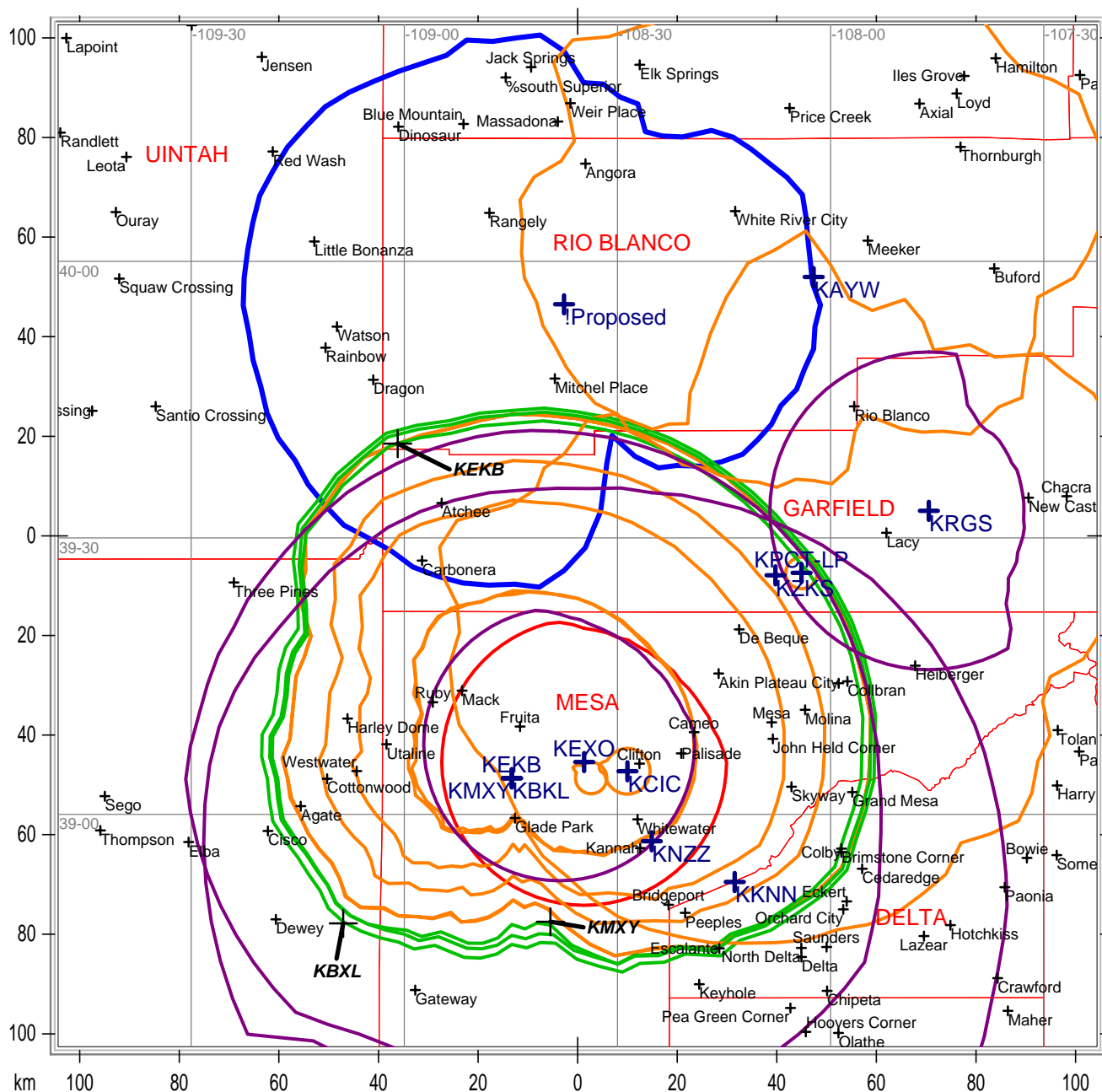
CUMULUS LICENSING LLC CH 266C0 DINOSAUR, CO 43 kW @ 602 M HAAT MARKET MAPPING



Communications Technologies, Inc. Marlton, New Jersey

County Borders Lat/Lon Grid

CUMULUS LICENSING LLC CH 266C0 DINOSAUR, CO 43 kW @ 602 M HAAT MARKET MAPPING WITH OTHER AM & FM



Communications Technologies, Inc. Marlton, New Jersey

County Borders Lat/Lon Grid