

**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
BLH20040513AAQ 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.

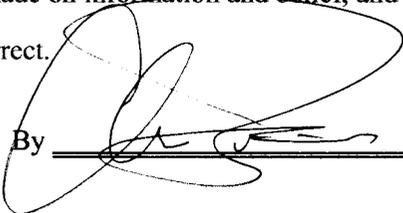
Dinosaur, Colorado is located in Moffat County, Colorado which is not part of any Arbitron metro using the Arbitron Market definition for Fall 2004. The closest market is Grand Junction, Colorado and the associated metro county there is Mesa County. Since Moffat County is not an Arbitron metro county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

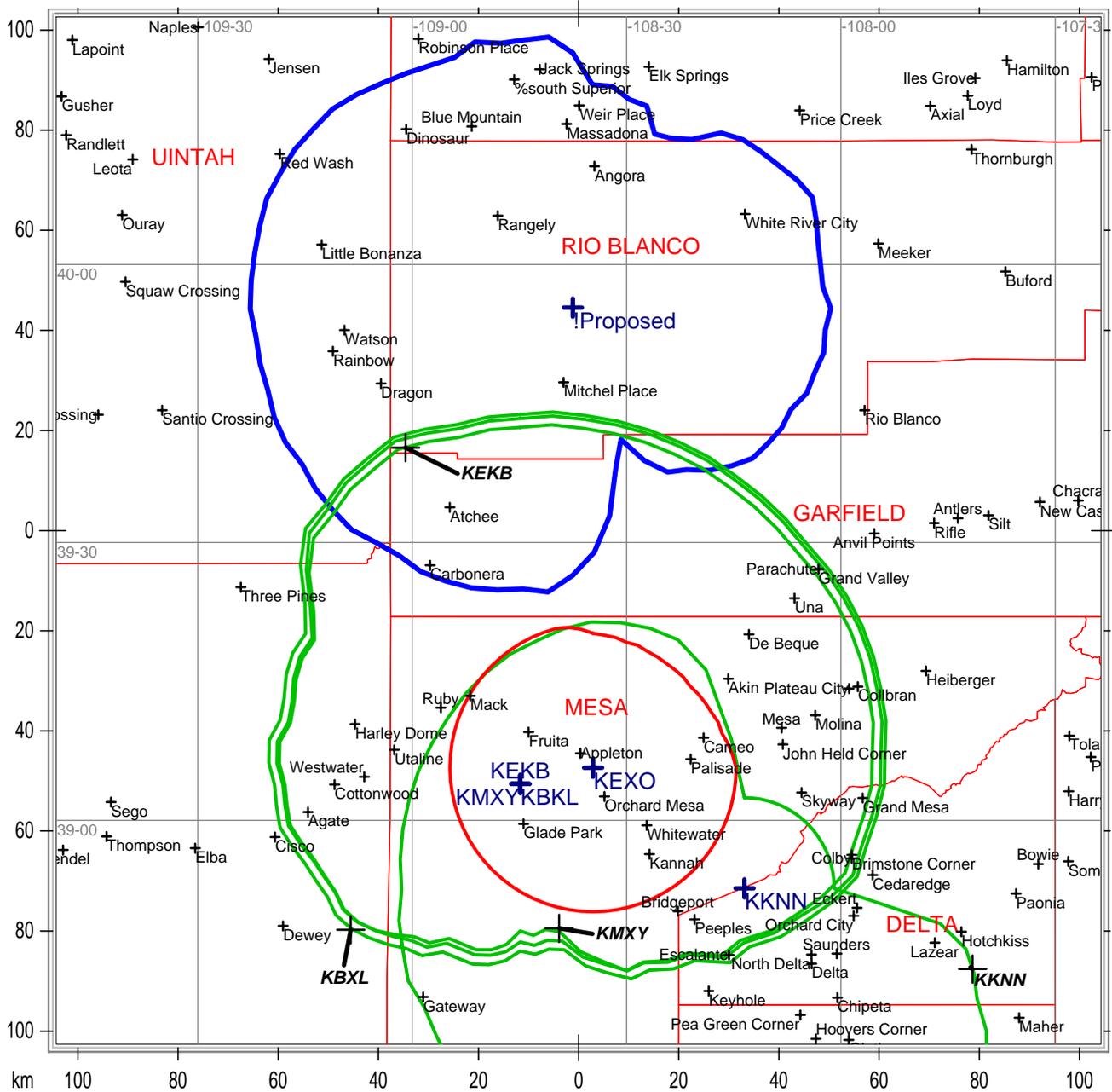
FM CALL ARN	ST OWNER	CITY	FREQ	CHN	CL	ERP	STAT
		LATITUDE	LONGITUDE	HAAT:m	AMSL:m		
KMGJ	CO	GRAND JUNCTION	93.10000	C0		100000.00	LIC
		BLH20021115AAD	MBC GRAND BROADCASTING, INC.				
		39-03-59.0 N	108-44-41.0 W	423.868	2214.000		
KJYE	CO	GRAND JUNCTION	92.30000	C		100000.00	LIC
		BLH19891219KD	MBC 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						

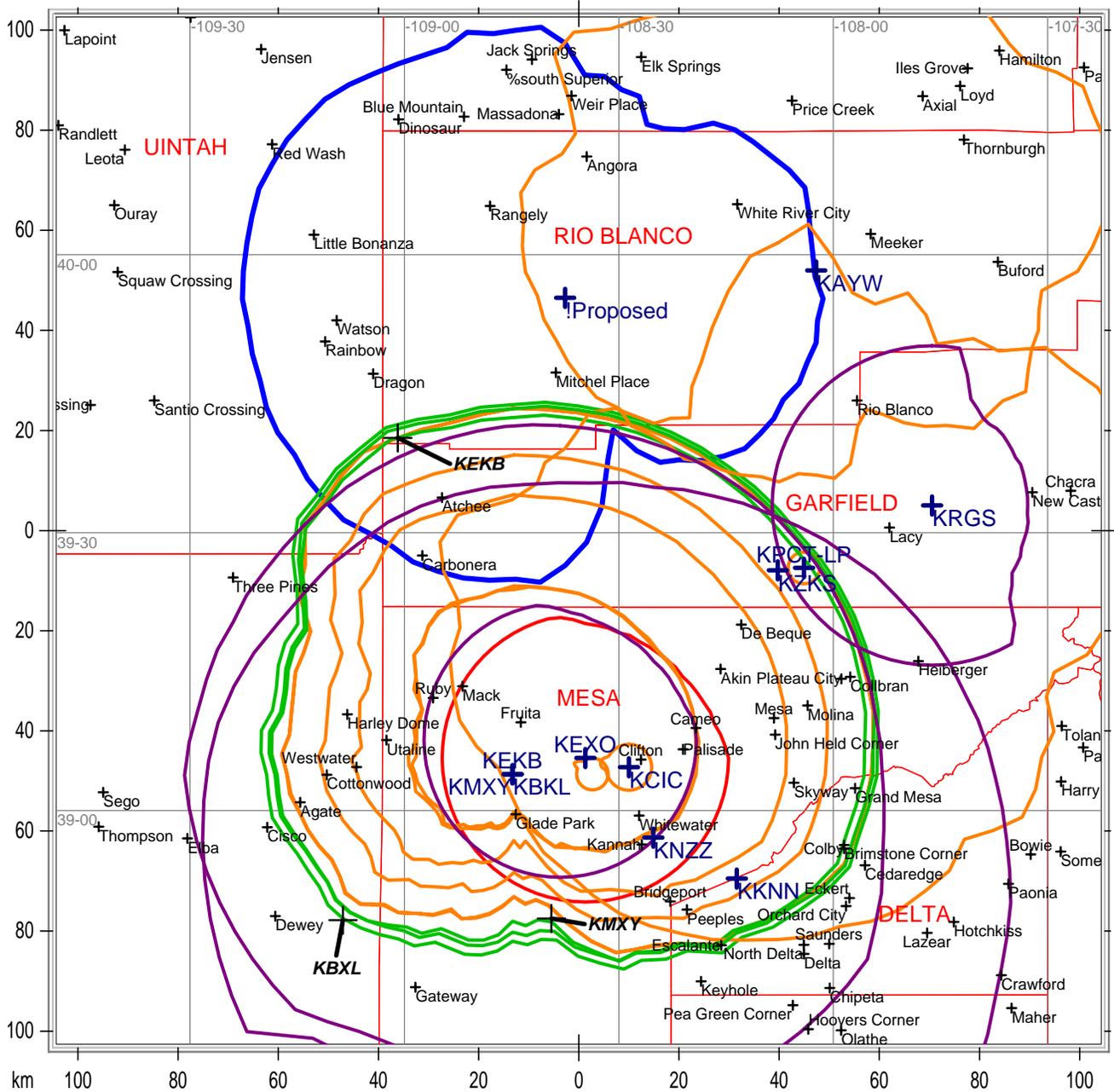
CUMULUS LICENSING LLC CH 266C0 DINOSAUR, CO 43 kW @ 602 M HAAT MARKET MAPPING



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