

**RADIO MARKET ANALYSIS**  
**RODRIGUEZ RADIO, L.P.**  
**KOUL (FM) RADIO STATION**  
**SINTON, TEXAS**  
**KRAD (FM) RADIO STATION**  
**PORTLAND, TEXAS**  
**KLTG (FM) RADIO STATION**  
**CORPUS CHRISTI, TEXAS**  
**January 2001**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits were prepared on behalf of Rodriguez Radio, L.P. ("RRLP"), proposed assignee of radio stations KOUL, Channel 279C1, Sinton, Texas; KRAD, Channel 288A, Portland, Texas, and KLTG, Channel 243C1, Corpus Christi, Texas. Principals of RRLP have attributable interests in the license of KLBH, Channel 252C3, Odem, Texas<sup>1</sup> and have a local marketing agreement with the licensee of KFLZ, Channel 295C3, Bishop, Texas. Due to the nature of the overlap of the 3.16 mV/m contours of these stations, two distinct radio markets are created. Radio Market #1 consists of stations KOUL/KLTG/KRAD/KLHB. Radio Market #2 consists of stations KOUL/KLTG/KLHB (CP)/KFLZ. This results in RRLP having attributable interests in four FM facilities in two distinct radio markets. Exhibit #1 is a map depicting the subject stations.

2. A study has, therefore, been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission's rules. Since the principal community contours of KLTG and KOUL are considered in both markets, we will determine compliance of the two

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1) There is also an outstanding construction permit to upgrade KHLB to Class C2 facilities on Channel 252 (FCC File # BMPH-19960607IG)

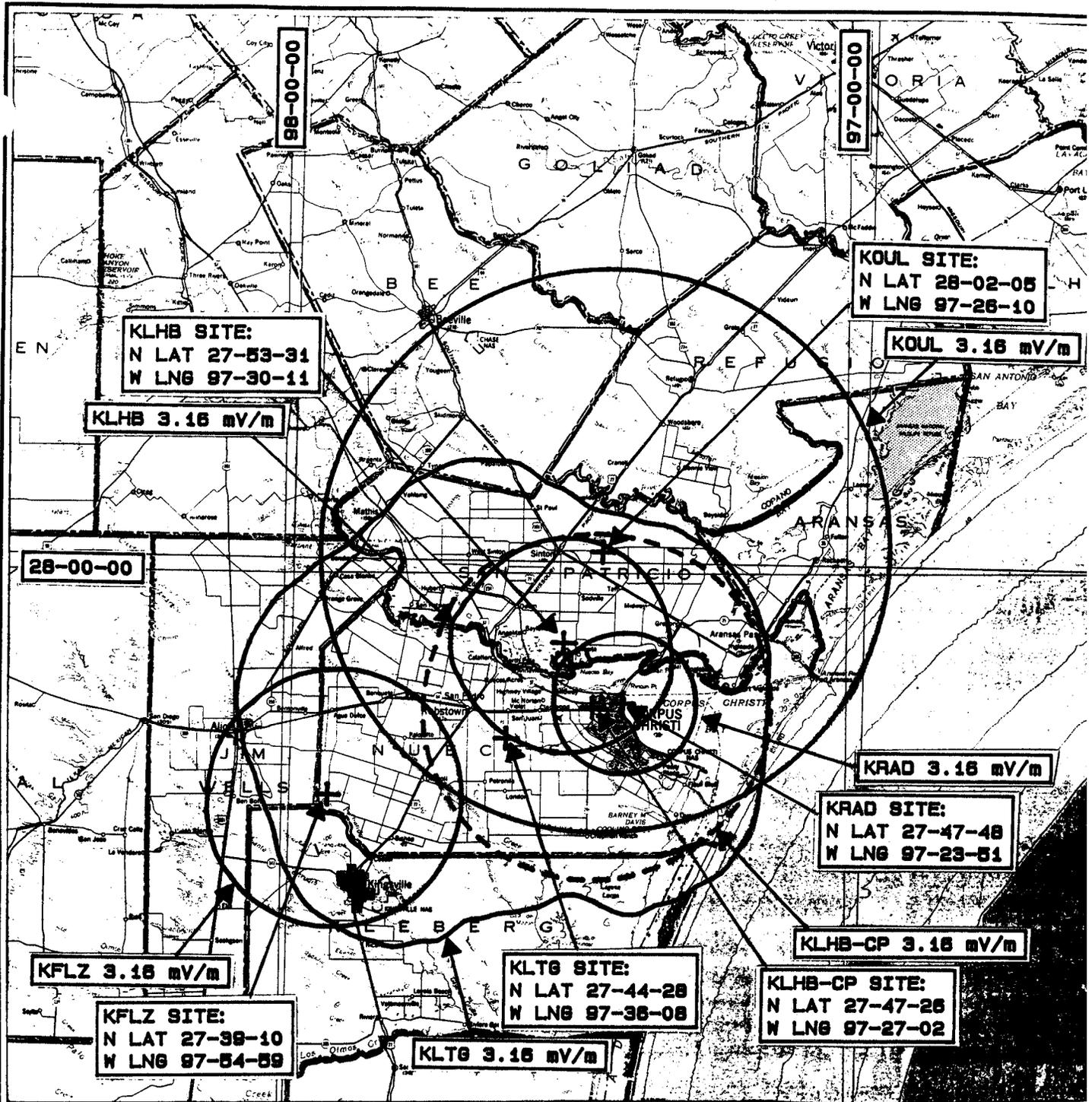
markets based on the number of stations providing service to these stations' contours. The KLTG/KOUL contours therefore establish the market boundary, hereinafter referred to as the "Radio Market". The study will determine the number of other commercial AM and FM station which either have transmitter sites within the subject radio market, or have principal community contour overlap with the stations.

3. Exhibit #2 is a depiction of the Radio Market with the transmitter sites or city grade contours of sixteen commercial AM and FM stations, excluding the relevant subject stations. Exhibit #3 is a tabulation of the stations in Radio Market #1. Exhibit #4 is the tabulation of stations in Radio Market #2. In both markets the number of stations depicted falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.<sup>2</sup> At the fifteen to twenty nine stations level, common ownership or control of up to six stations, with no more than four in the same service, is permissible. Therefore, RRLP's interests in four FM stations in two radio markets are in compliance with the Commission's rules. Therefore, RRLP's proposed ownership of KOUL, KRAD and KLTG is in compliance with §73.3555 of the rules.

4. The foregoing technical statement was prepared on behalf of Rodriguez Radio, L.P., by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities was extracted from the CDBS database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.

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2) Although there are additional stations providing service to the Radio Market, they are not considered since the number of stations was ample to demonstrate compliance with the rules based on the number of stations proposed to be commonly owned.



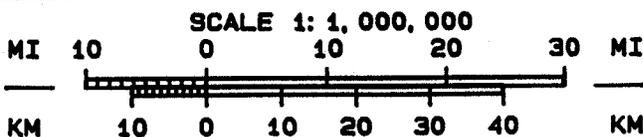
**CITY GRADE CONTOUR MAP**

MAP IS A PORTION OF THE 1: 1,000,000 SCALE U.S.G.S. BASE STATE MAP OF TEXAS.

BLACK CONTOURS ARE FM STATIONS.

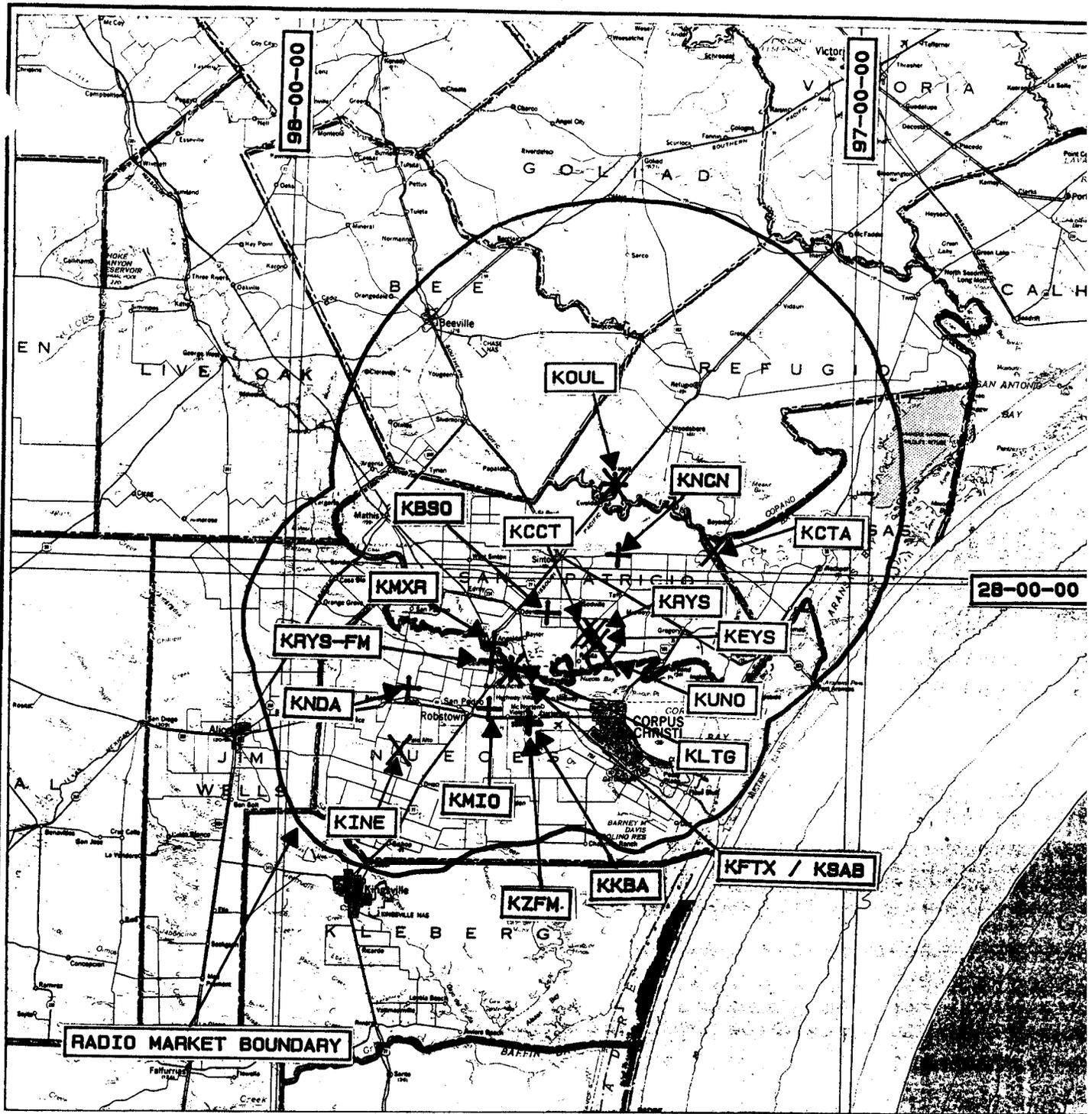
**EXHIBIT #1**

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KOUL - SINTON, TX  
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January 2001



**GRAHAM BROCK, INC.**

BROADCAST TECHNICAL CONSULTANTS



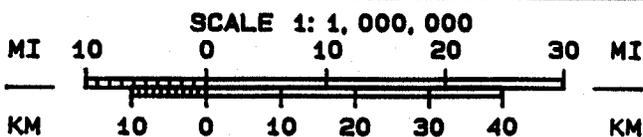
**STATIONS IN RADIO MARKET**

MAP IS A PORTION OF THE 1: 1,000,000 SCALE U.S.G.S. BASE STATE MAP OF TEXAS.

BLACK "+" ARE FM STATIONS.  
 RED "x" ARE AM STATIONS.  
 BLUE "\*" ARE SUBJECT STATIONS.

**EXHIBIT #2**

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**EXHIBIT #3**

**Tabulation of Stations in Radio Market #1**

**AM Stations**

KCTA	1030 kHz	Corpus Christi, TX
KCCT	1150 kHz	Corpus Christi, TX
KINE	1330 kHz	Kingsville, TX
KRYS	1360 kHz	Corpus Christi, TX
KUNO	1400 kHz	Corpus Christi, TX
KEYS	1440 kHz	Corpus Christi, TX

Total AM Stations - 6

**FM Stations**

KKBA	Ch 224C2	Kingsville, TX
KMXR	Ch 230C1	Corpus Christi, TX
KBSO	Ch 234C3	Corpus Christi, TX
KZFM	Ch 238C	Corpus Christi, TX
* KLTG	Ch 243C1	Corpus Christi, TX
KFTX	Ch 248C1	Kingsville, TX
* KLHB	Ch 252C3	Odem, TX
KRYS-FM	Ch 256C1	Corpus Christi, TX
KSAB	Ch 260C1	Robstown, TX
KNCN	Ch 267C1	Sinton, TX
KNDA	Ch 275C2	Alice, TX
* KOUL	Ch 279C1	Sinton, TX
KMIO	Ch 286A	Robstown, TX
* KRAD	Ch 288A	Portland, TX

Total FM Stations - 14

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 20**

\* Subject station

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**EXHIBIT #4**

**Tabulation of Stations in Radio Market #2**

**AM Stations**

KCTA	1030 kHz	Corpus Christi, TX
KCCT	1150 kHz	Corpus Christi, TX
KINE	1330 kHz	Kingsville, TX
KRYS	1360 kHz	Corpus Christi, TX
KUNO	1400 kHz	Corpus Christi, TX
KEYS	1440 kHz	Corpus Christi, TX

Total AM Stations - 6

**FM Stations**

KKBA	Ch 224C2	Kingsville, TX
KMXR	Ch 230C1	Corpus Christi, TX
KBSO	Ch 234C3	Corpus Christi, TX
KZFM	Ch 238C	Corpus Christi, TX
* KLTG	Ch 243C1	Corpus Christi, TX
KFTX	Ch 248C1	Kingsville, TX
* KLHB-CP	Ch 252C3	Odem, TX
KRYS-FM	Ch 256C1	Corpus Christi, TX
KSAB	Ch 260C1	Robstown, TX
KNCN	Ch 267C1	Sinton, TX
KNDA	Ch 275C2	Alice, TX
* KOUL	Ch 279C1	Sinton, TX
KMIO	Ch 286A	Robstown, TX
* KFLZ	Ch 295C3	Bishop, TX

Total FM Stations - 14

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 20**

\* Subject station

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

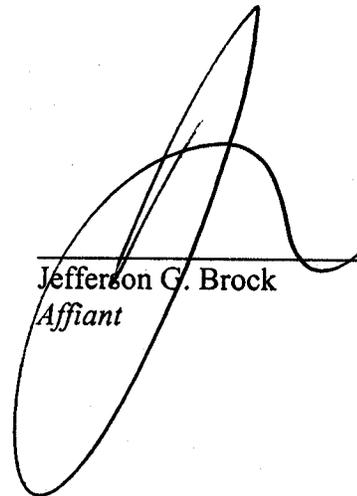
State of Georgia )  
St. Simons Island ) ss:  
County of Glynn )

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Rodriguez Radio, L.P., to prepare the attached Technical Exhibit.

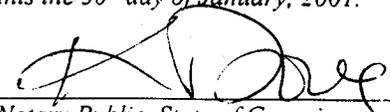
His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 30<sup>th</sup> day of January, 2001.*

  
\_\_\_\_\_  
Jefferson G. Brock  
Affiant

*Sworn to and subscribed before me  
this the 30<sup>th</sup> day of January, 2001.*

  
\_\_\_\_\_  
Notary Public, State of Georgia  
My Commission Expires: April 20, 2002