



STATEMENT OF HERMAN E. HURST, JR.  
IN SUPPORT OF AN APPLICATION  
FOR CONSENT TO ASSIGNMENT  
OF BROADCAST LICENSE

I am a Radio Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission.

This office has been authorized by Salem Media of Hawaii, Inc. ("Salem") to prepare this statement and the associated exhibits in support of an Application for Consent to Assignment of Broadcast License (FCC Form 314). The applicant presently owns attributable interest in full service FM station KAIM-FM, and AM stations: KAIM(AM), KGU(AM), KHCM(AM), KHNR(AM), and KJPN(AM)<sup>1</sup>. All stations serve the Honolulu area. This material supports the applicant's proposed acquisition of two FM stations, KPOI-FM and KHUI(FM), both licensed to Honolulu, Hawaii.

As shown in the attached Exhibit 1, the principal community contours of the 5 AM stations overlap. All three FM stations' principal community contours overlap the common area of overlap between the 5 AM stations. Consequently, pursuant to Section 73.3555

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<sup>1</sup>On April 7, 2004, the Commission approved the Application for Assignment of License (BAL-20031212ADY) for KJPN, Honolulu to Salem. While Salem has not consummated this acquisition, it plans to do so soon; therefore, for this study, KJPN is considered an existing Salem station. It should be noted that the FCC approved BAL-20031212ADY based on a finding that the instant radio market is comprised of at least 45 stations.

of the FCC Rules, the instant radio market is defined by the total principal community contour coverage area of the eight subject stations.

As a result of the proposed acquisition, the applicant will own or control five AM stations and 3 FM stations in the instant radio market. Pursuant to Section 73.3555(a)(1)(i) of the FCC Rules, the applicant is permitted to own up to eight radio stations (five in the same service) if the radio market is served by at least 45 total operating commercial radio stations. As explained below, the instant radio market contains at least 50 operating commercial radio stations (including the 8 subject stations).

For the FM stations considered herein, the principal community contour is the predicted 3.16 mV/m (70 dBu) contour computed in accordance with Section 73.313 of the FCC Rules. For the AM stations considered herein, the principal community contour is the predicted daytime 5.0 mV/m groundwave contour computed in accordance with Section 73.813 of the FCC Rules. All AM and FM facilities represented herein are operating commercial radio stations.

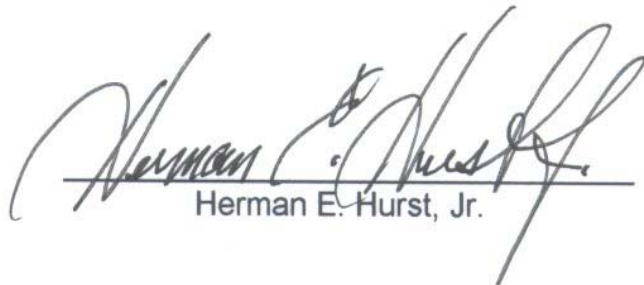
The transmitter sites of 34 operating, commercial radio stations (including the 8 subject stations) are contained in the instant radio market. The principal community contours of 16 additional radio stations overlap a portion of the radio market. Therefore, pursuant to Section 73.3555 of the FCC Rules, there are 50 stations counted in the instant radio market. Exhibit 1 is a map which shows the radio market and all the stations counted in the market. Table 1 contains each station's call sign, city of license, state, channel of operation, and technical facilities. While 3 AM stations (KJPN, KHCM, and KZOO)

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currently have minor change applications pending for frequency changes, no change in power is proposed. If granted and implemented no change in coverage will occur.

This statement and the supporting Exhibit and Table were prepared by me or under my direct supervision and are believed to be true and correct.

DATED: May 5, 2004



Herman E. Hurst, Jr.



TECHNICAL DESCRIPTION  
OF RADIO STATIONS  
COUNTED IN PROPOSED  
RADIO MARKET  
MAY '04

<i>Station #</i>	<i>Call Sign</i>	<i>City, State</i>	<i>Channel/Frequency</i>	<i>Facility</i>
1	KPOI-FM	Honolulu, HI	248C1	80.0 kW - 14 m HAAT
1	KPOI(CP)	Honolulu, HI	248C	100.0 kW (DA) - 572 m HAAT
2	KHUI	Honolulu, HI	258C	100.0 kW (DA) - 599 m HAAT
3	KJPN	Honolulu, HI	1170 kHz	6.0 kW - ND3
4	KAIM-FM	Honolulu, HI	238C	100.0 kW (DA) - 565 m HAAT
5	KAIM	Honolulu, HI	870 kHz	50.0 kW - DA1
6	KHNR	Honolulu, HI	650 kHz	10.0 kW - ND1
7	KHCM	Waipahu, HI	940 kHz	10.0 kW - ND1
8	KGU	Honolulu, HI	760 kHz	10.0 kW - ND1
9	KSSK	Honolulu, HI	590 kHz	7.5 kW - ND1
10	KORL	Honolulu, HI	690 kHz	10.0 kW - ND1
11	KHVH	Honolulu, HI	830 kHz	10.0 kW - ND1
12	KHBZ	Honolulu, HI	990 kHz	5.0 kW - ND1
13	KLHT	Honolulu, HI	1040 kHz	10 kW - ND2
14	KWAI	Honolulu, HI	1080 kHz	5.0 kW - ND1
15	KZOO	Honolulu, HI	1210 kHz	1.0 kW - ND1
16	KNDI	Honolulu, HI	1270 kHz	5.0 kW - ND1
17	KKEA	Honolulu, HI	1420 kHz	5.0 kW - ND1
18	KHRA	Honolulu, HI	1460 kHz	5.0 kW - ND1
19	KUMU	Honolulu, HI	1500 kHz	10.0 kW - ND1
20	KREA	Honolulu, HI	1540 kHz	5.0 kW - ND1
21	KNUI	Kahului, HI	900 kHz	5.0 kW - ND1
22	KAOI	Kihei, HI	1110 kHz	5.0 kW - ND1
23	KMVI	Wailuku, HI	550 kHz	5.0 kW - ND1
24	KGMZ-FM	Aiea, HI	300C	100.0 kW (DA) - 599 m HAAT
25	KPMW	Haliimaile, HI	288A	6.0 kW - (-156) m HAAT
26	KQMQ-FM	Honolulu, HI	226C	100.0 kW (DA) - 565 m HAAT
27	KIKI-FM	Honolulu, HI	230C1	100.0 kW - (-44) m HAAT
28	KUMU-FM	Honolulu, HI	234C1	100.0 kW - 24 m HAAT
29	KDNN	Honolulu, HI	253C1	51.0 kW - 18 m HAAT
30	KCCN-FM	Honolulu, HI	262C	100.0 kW (DA) - 599 m HAAT
31	KINE-FM	Honolulu, HI	286C	100.0 kW (DA) - 599 m HAAT
32	KAHA	Honolulu, HI	290C	100.0 kW (DA) - 599 m HAAT
33	KLEO	Kahului, HI	291C	7.3 kW - 913 m HAAT
34	KNUI-FM	Kahului, HI	260C	72.0 kW (DA) - 696 m HAAT
35	KRTR-FM	Kailua, HI	242C	75.0 kW - 645 m HAAT
36	KLUA	Kailua Kona, HI	230C	40.0 kW - 893 m HAAT
37	KXME	Kaneohe, HI	282C	75.0 kW - 645 m HAAT
38	KWYI	Kawaihae, HI	295A	5.5 kW - 104 m HAAT

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MAY '04

<i>Station #</i>	<i>Call Sign</i>	<i>City, State</i>	<i>Channel/Frequency</i>	<i>Facility</i>
39	KAQY	Kealahou, HI	268C1	7.1 kW - 838 m HAAT
40	KPOA	Lahaina, HI	228C	72.0 kW (DA) - 696 m HAAT
41	KLHI-FM	Lahaina, HI	266C	72.0 kW (DA) - 696 m HAAT
42	KONI	Lanai City, HI	284C	72.0 kW (DA) - 696 m HAAT
43	KDLX	Makawao, HI	232A	3.0 kW - (-17) m HAAT
44	KNUQ	Paauilo, HI	279C	100.0 kW - 369 m HAAT
45	KUCD	Pearl City, HI	270C	100.0 kW (DA) - 599 m HAAT
46	KJMD	Pukalani, HI	252C2	50.0 kW - 31 m HAAT
47	KAQI-FM	Wailuku, HI	236C	100.0 kW - 375 m HAAT
48	KAGB	Waimea, HI	256C	42.0 kW - 860 m HAAT
49	KSSK-FM	Waipahu, HI	222C	100.0 kW (DA) - 594 m HAAT
50	KDDB	Waipahu, HI	274C	61.0 kW (DA) - 577 m HAAT