

Multiple Ownership Study

Pursuant to the Commission's ownership rules in Section 73.3555, the following Multiple Ownership Study was conducted to determine if a grant of the instant application will comply with the Rules.

College Creek Media, LLC ("College Creek") proposes to modify the permitted facilities for the following station:

Delete KYEN(FM) from Cheyenne, WY
Add KYEN(FM) to Severance, CO

Arbitron Market Study

The addition of KYEN(FM) to Severance, Colorado, places that station into Weld County, Colorado. Weld County is included in the Ft. Collins/Greeley Arbitron Market. However, KYEN will represent College Creek's sole station in this Arbitron Market and, therefore, the application complies with Section 73.3555 from an Arbitron Market standpoint.

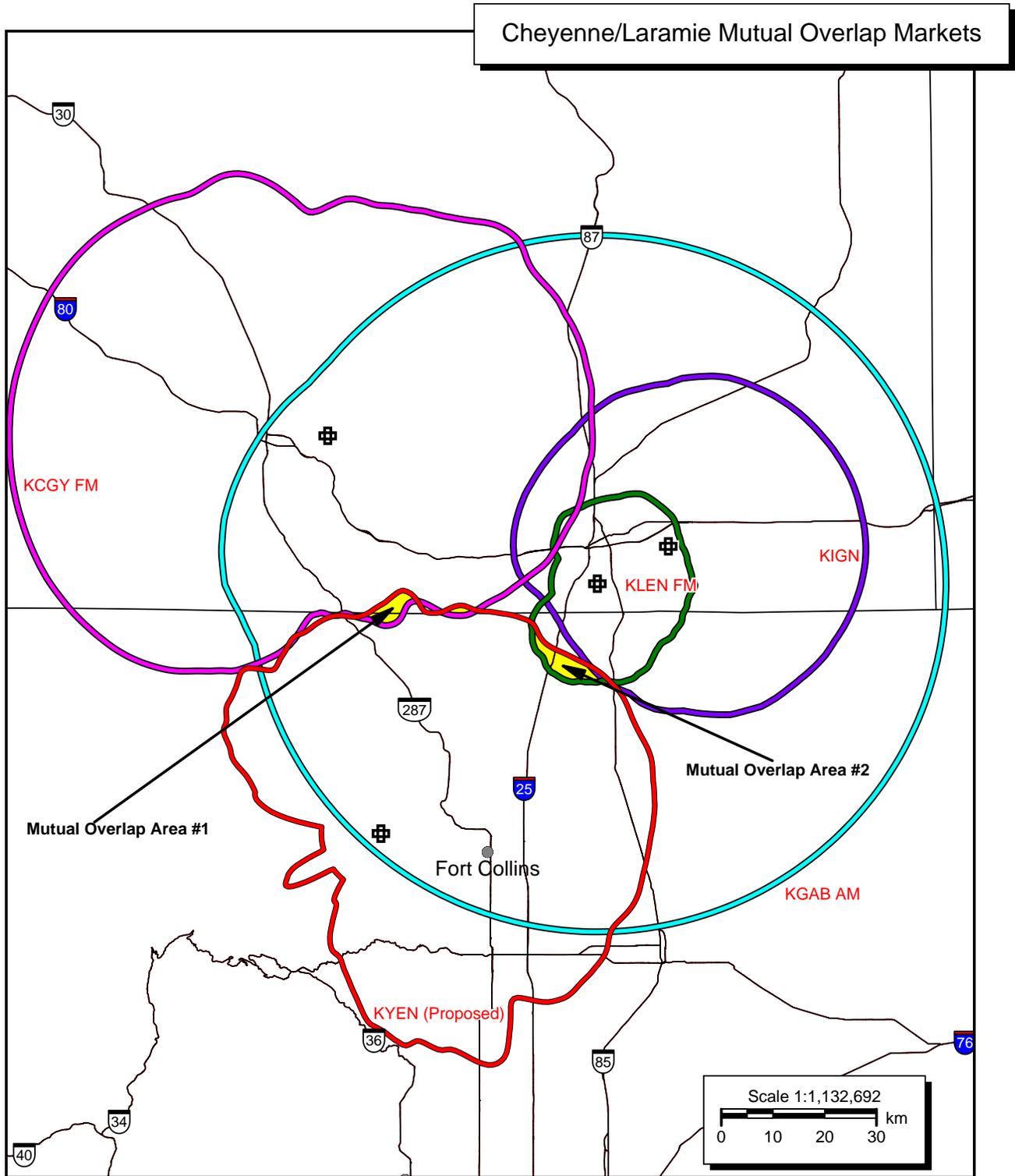
Contour Overlap Study

One of College Creek's principals is also a principal of Blue Point Media, LLC ("Blue Point"). On March 13, 2007, the Commission authorized the assignment of the following licenses to Blue Point which share a mutual overlap area with the proposed facility:

KCGY(FM) Laramie, WY
KOWB(FM) Laramie, WY
KGAB (AM) Orchard Valley, WY
KIGN(FM) Cheyenne, WY
KLEN(FM) Cheyenne, WY

Due to the fact that the Blue Point stations share contour overlap with the proposed KYEN(FM) facility forming two different mutual overlap radio markets, two contour overlap showings are included herein to demonstrate compliance.

The accompanying map entitled "Numerator" illustrates the area encompassed by the principal community contours (predicted 5 mV/m groundwave AM contours and predicted 3.16 mV/m FM contours) of the stations listed above. As shown on Map A and in Table 2, below, parties holding attributable interests in College Creek shall hold attributable interests in the following facilities forming two radio markets, as defined under the interim methodology, identified herein as Radio Markets #1 and #2, upon consummation of the proposed assignment.



- KGAB AM
- KIGN
- KLEN FM
- KCGY FM
- KYEN (Proposed)

Mutual Overlap Radio Markets

Overlap Area #1: 1 AM (KGAB) and 2 FM (KCGY, KYEN)

Overlap Area #2: 1 AM (KGAB) and 3 FM (KIGN, KLEN, KYEN)

TABLE 2 – Radio Market Numerators

<u>Radio Market</u>	<u>FM Stations</u>	<u>AM Stations</u>
1	KCGY , KYEN	KGAB
2	KIGN, KLEN, KYEN	KGAB

Radio Market #1 Examination:

The radio stations that define Radio Market #1 (the “numerator” stations) are listed in Table 2 and shown on the map entitled “Numerator.” The radio stations included in the total number of stations in Radio Market #1 (the “denominator” stations) include those stations listed in Table 3 and depicted on the map entitled “Denominator.”

The radio stations listed in Table 3 satisfy the following requirements:

- Each is a full-power radio station whose principal community contour overlaps or intersects at least one of the principal community contours that define the radio market; and
- Each station has its transmitter site located within 92 kilometers from the perimeter of the area of mutual overlap of the commonly attributable stations that define the radio market.

Any stations which are commonly attributable with College Creek and do not define the radio market are not included in the denominator. Commercial and noncommercial stations have been counted in the denominator.

The following stations listed in Table 3 are included in the “denominator” for Radio Market #1:

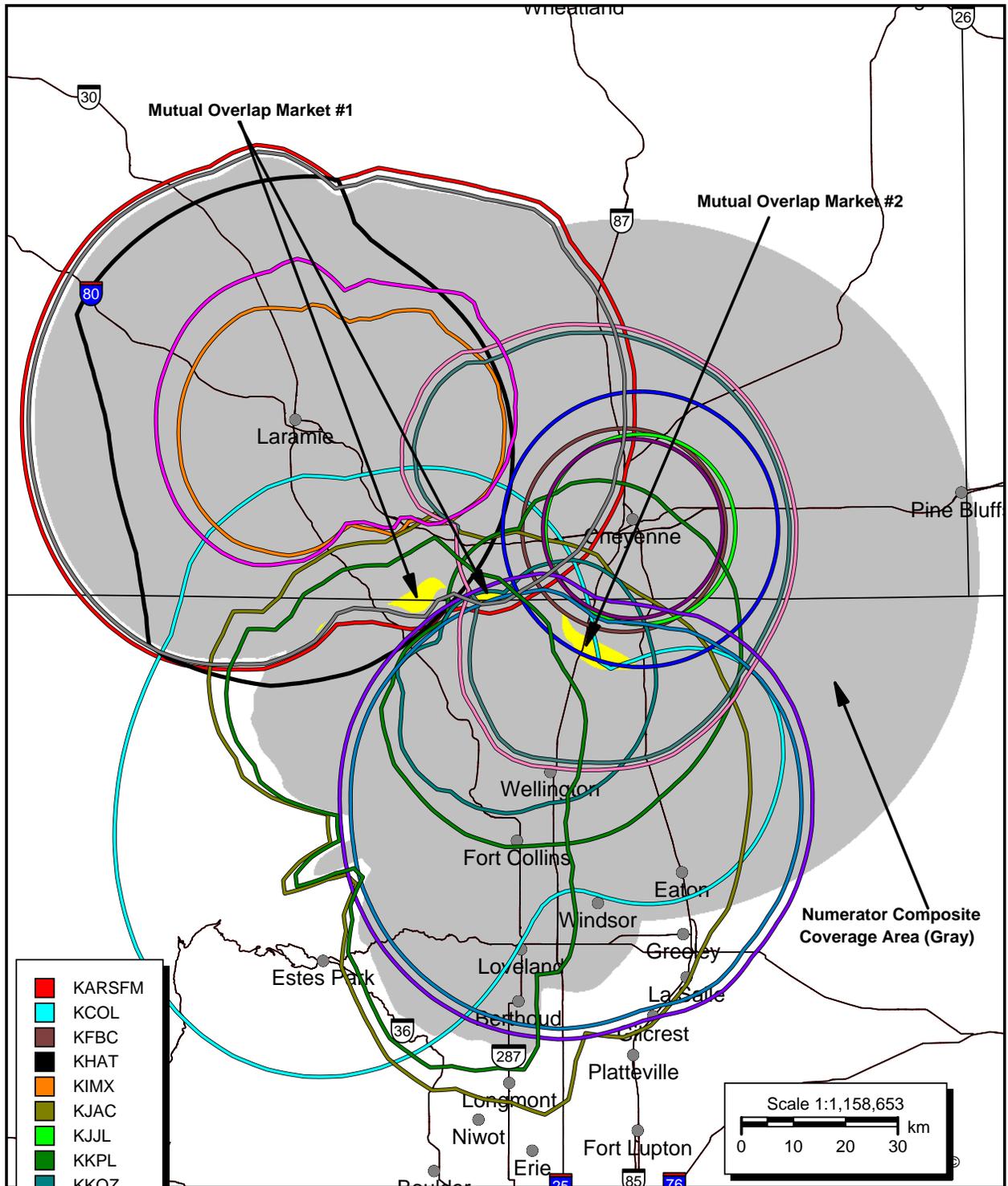
TABLE 3 – Radio Market #1 Denominator

- | | | | | |
|------------|----------|----------|-----------|-----------|
| 1) KARS-FM | 6) KJAC | 11) KOLZ | 16) KSME | 21) KYEN* |
| 2) KCOL | 7) KJL | 12) KPAW | 17) KUWR | |
| 3) KFBC | 8) KKPL | 13) KQLF | 18) KXWA | |
| 4) KHAT | 9) KKQZ | 14) KRAE | 19) KGAB* | |
| 5) KIMX | 10) KKWY | 15) KRQU | 20) KCGY* | |

*also included in numerator

The contour overlap method for Radio Markets #1 shows the market as having at least 20 or more “home” commercial and noncommercial educational full-power stations. In such a market, Commission Rules allow a party to have an attributable interest in up to six (6) full-power commercial radio stations, not more than 4 of which are in the same service (AM or FM).

Denominator



- KARSFM
- KCOL
- KFBC
- KHAT
- KIMX
- KJAC
- KJJL
- KKPL
- KKQZ
- KKWY
- KOLZ
- KPAW
- KQLF
- KRAE
- KRQU
- KSME
- KUWR
- KXWA

Mutual Overlap Market #1:
 Numerator: 1 AM and 2 FMs (KGAB, KCGY, & KYEN)
 Denominator: Numerator plus 18 other stations

Mutual Overlap Market #2:
 Numerator: 1 AM and 3 FM (KGAB, KLEN, KIGN, KYEN)
 Denominator: Numerator plus at least 18 other stations

In Radio Market #1, College Creek or parties holding attributable interests in College Creek will have an attributable interest in not more than three (3) total stations. One (1) station is in the AM service and two (2) stations are in the FM service. Consequently, it would appear as if the number of FM stations commonly attributable with College Creek complies with Section 73.3555 in Radio Market #1 from a contour overlap standpoint.

Radio Market #2 Examination:

The radio stations included in the “numerator” of Radio Markets #2 is also listed in Table 2. The radio stations included in the total number of stations in Radio Market #2 (the “denominator” stations) include only those stations listed in Table 4 and depicted on the map entitled “Denominator.”

The radio stations listed in Table 4 satisfy the following requirements:

- Each is a full-power radio station whose principal community contour overlaps or intersects at least one of the principal community contours that define the radio market; and
- Each station has its transmitter site located within 92 kilometers from the perimeter of the area of mutual overlap of the commonly attributable stations that define the radio market.

Any stations which are commonly attributable with College Creek and do not define the radio market are not included in the denominator. Commercial and noncommercial stations have been counted in the denominator.

The following stations listed in Table 4 are included in the “denominator” for Radio Market #2:

TABLE 4 – Radio Market #2 Denominator

1) KARS-FM	6) KJAC	11) KOLZ	16) KSME	21) KIGN*
2) KCOL	7) KJL	12) KPAW	17) KUWR	22) KYEN*
3) KFBC	8) KKPL	13) KQLF	18) KXWA	
4) KHAT	9) KKQZ	14) KRAE	19) KGAB*	
5) KIMX	10) KKWY	15) KRQU	20) KLEN*	

*also included in numerator

The contour overlap method for Radio Market #2 shows the market as having 22 or more “home” commercial and noncommercial educational full-power stations. In such a market, Commission Rules allow a party to have an attributable interest in up to eight (6) full-power commercial radio stations, not more than 4 of which are in the same service (AM or FM).

In Radio Market #2 College Creek or parties holding attributable interests in College Creek will have an attributable interest in not more than four (4) total stations. Three (3) stations are in the FM service and one (1) station is in the AM service.

Therefore, College Creek submits that the instant application complies with Section 73.3555 of the Commission's Rules with regard to Radio Market #2 from a contour overlap standpoint.