

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
JEFFERSON PILOT

This statement and the attached figures were prepared on behalf of Jefferson Pilot ("Jeff-Pilot"). Jeff-Pilot has interest in radio stations KSON-FM, KIFM(FM), KBZT(FM) and KSON(AM). Jeff-Pilot is proposing the acquisition of KFSD-FM. Therefore, a multiple ownership analysis was prepared considering the following radio stations under proposed common ownership or control:

Call Sign	Location	Facilities		
KSON(AM)	San Diego, CA	1240 kHz	1 kW-U	ND-1
KSON-FM	San Diego, CA	CH 247B	50 kW	134 M
KIFM(FM)	San Diego, CA	CH 251B	26.5 kW	209 M
KBZT(FM)	San Diego, CA	CH 235B	26.5 kW	209 M
KFSD-FM	Escondido, CA	CH 221A	0.58 kW	312 M

Since some of these stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations), an ownership study has been prepared in accordance with the Federal Communications Commission multiple ownership rules (See Section 73.3555 of the FCC Rules).

Count of Stations in Defined Market

The number of radio stations in a "radio market" is determined by counting the operating, commercial stations having transmitter sites within and hence have principal community contours which overlap the principal community contours which define the radio market, plus the subject stations to be co-owned. There is one new radio market created by the acquisition of KFSD-FM:

Defined Radio Market	Minimum Number of Stations in Radio Market
KIFM(FM)/KFSD-FM/KSON-FM/KBZT(FM)	10 - AM/15 - FM/25 Total

Figure 2 is a tabulation of the radio stations identified in the defined Radio Market. Only known licensed, operating commercial stations were employed for the study. 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. Distances to the FM contours were determined based on the method of 47 CFR 73.313.

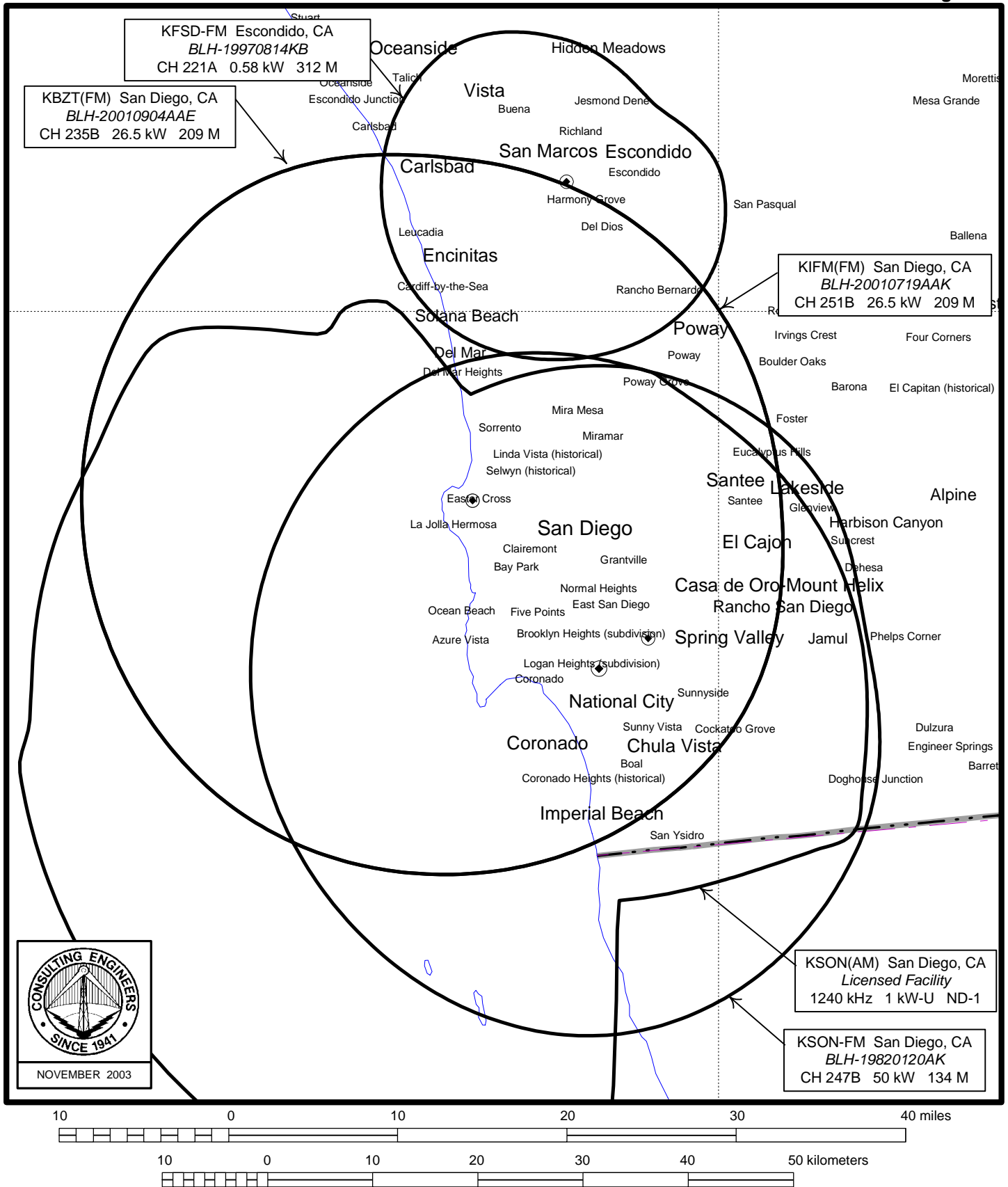
Based on the above, it is concluded that the proposed combination of stations complies with Section 73.3555(a) of the FCC Rules.

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Figure 1



PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

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du Treil, Lundin & Rackley, Inc., Sarasota, Florida

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Tabulation of Stations Defined in Radio Market

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KOGO	San Diego	CA	600
KFMB	San Diego	CA	760
KURS	San Diego	CA	1040
KSDO	San Diego	CA	1130
KCBQ	San Diego	CA	1170
KPRZ	San Marcos	CA	1210
KSON	San Diego	CA	1240
KPOP	San Diego	CA	1360
KFSD	Escondido	CA	1450
KFSD-FM	Escondido	CA	92.1
KHTS-FM	El Cajon	CA	93.3
KMYI	San Diego	CA	94.1
KBZT	San Diego	CA	94.9
KOCL	Carlsbad	CA	95.7
KYXY	San Diego	CA	96.5
KSON-FM	San Diego	CA	97.3
KIFM	San Diego	CA	98.1
KFMB-FM	San Diego	CA	100.7
KGB-FM	San Diego	CA	101.5
KPRI	Encinitas	CA	102.1
KLQV	San Diego	CA	102.9
KPLN	San Diego	CA	103.7
KIOZ	San Diego	CA	105.3
KLNV	San Diego	CA	106.5