

MULTIPLE OWNERSHIP NARRATIVE

KLZ Radio, Inc., is the licensee of radio stations
KLZ(AM) Denver, Colorado
KLDC(AM) Brighton, Colorado
KLTT(AM) Commerce City, Colorado
KCBR(AM) Monument, Colorado
KCMN(AM) Colorado Springs, Colorado
KLVZ(AM) Denver, Colorado

The Market Study Map submitted herewith depicts the licensed city-grade (5 mV/m) contours of these six AM stations. The Commission approved common ownership of these stations in File Nos. BAL-19981201HF and BAL-19990713AI. The contour study also depicts the 5 mV/m contour proposed for KLDC in the instant Form301 application for minor change of licensed facilities.

The Commission's radio local ownership rules recognize that there will not necessarily be city-grade signal overlap between same service stations in a group of commonly-owned stations. In such cases, the rules requires that each group of same service stations with signal overlap be considered as a distinct market are and receive a separate evaluation. See, e.g., Great Bend, Kansas, 10 FCC Rcd 5330 (1995). As shown by the contour study, the proposed city-grade contour for station KLDC overlaps the city-grade contours of KLTT, KLVZ and KLZ, but not those of KCBR nor KCMN. For purposes of Section 73.3555, therefore, this contour arrangement reflects two markets: the KLTT/KLZ/KLVZ/KLDC market ("Market 1") and the KCBR/KCMN/KLZ/KLTT market ("Market 2").

Section 73.3555 of the rules provides that in a radio market with between 15 and 29 commercial radio stations a party may own or control up to six commercial stations, not more than four of which are in the same service.

The Market Study Map lists 15 radio stations with a licensed tower site situated within the Market 1 study area. Given the location of the tower site coordinates of the 6 stations licensed to the Lookout Mountain Antenna Farm, KJCD, KQKS, KHOW, KOA and KPOF, each station serves the market study area with a city-grade contour. There are many more stations serving the Denver area with a city-grade signal than are identified in this study. The applicant will identify these additional stations if so requested by the Commission's staff

As there are at least 15 stations serving Market 1, the proposed power increase for station KLDC would create no undue concentration of ownership and is permissible under Section 73.3555 of the rules.

The city-grade contours of the stations at issue do not overlap the city-grade contours of any other stations commonly owned by the principals of KLZ Radio, Inc., therefore, no other stations are implicated under the Commission's multiple ownership rules with regard to the proposed minor change of KLDC, nor required to be include in this market study.