

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS

APPALOOSA BROADCASTING COMPANY, INC.

This radio multiple ownership analysis was prepared on behalf of Appaloosa Broadcasting Company, Inc. The following stations are considered under proposed ownership or control:

Call Sign/Facility ID	Location	Facilities
KRQU/9761 Licensed	Laramie, WY	Channel 283C2 8 kW 327 m
KRQU/9761 Authorized CP	Laramie, WY	Channel 283C2 10.5 kW 286 m
KHAT/82007 Licensed	Laramie, WY	Channel 244C2 6.5 kW 284 m
KIMX/38345 Licensed	Laramie, WY	Channel 288C3 2.2 kW 313 m
KIMX/38345 Authorized CP	Laramie, WY	Channel 288C2 25 kW 214 m
KIMX/38345 Pending Application	Timnath, CO	Channel 288C2 7.7 kW 371 m
KKHI/10333 Licensed	Laramie, WY	1210 kHz 10 kW-D DAN

The principal community contours of all of these stations are depicted on a map included herein as Figure 1. Since the stations have overlapping principal community contours (3.16 mV/m for FM stations, 5 mV/m for AM stations), an ownership study was prepared in accordance with the Federal Communications Commission metro-radio multiple ownership rules as outlined in Section 73.3555.

Radio Markets

The “radio markets” applicable to common ownership of the subject stations are defined as the areas encompassed by the mutually overlapping principal

community contours of the stations proposed to be commonly owned.* There are two “radio markets” defined for analysis under the Commission’s Rules. The table below lists the defined markets:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	KKHI	KRQU(Licensed and CP), KHAT, KIMX(Licensed and CP)
Market 2	KKHI	KIMX(Pending Application)

Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating, commercial stations having principal community contours which overlap or intersect the principal community contours which define the radio market, plus the subject stations to be owned or controlled. The results of the analysis are tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	5 AM, 8 FM; 13 Total
Market 2	13 AM, 14 FM; 27 Total

Figures 2 and 3 are tabulations of the radio stations identified in the defined radio markets tabulated above. It is noted that there may be more stations in each of the defined markets, however, the stations tabulated were more than enough to show compliance and did not require further research.† Only known licensed, operating 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

* See Order in Implementation of Section 202(a) and 202(b)(1) of the Telecommunications Act of 1996 (Broadcast Radio Ownership) FCC 96-90, released March 8, 1996 and Memorandum Opinion and Order in Revision of Radio Rules and Policies 7 FCC Rcd 6387, 6395 para. 39 (1992).

† In Market 1, commonly owned or controlled stations are fewer than the limit of 5 commercial stations, 3 FM stations and less than 50% of the total stations and in Market 2, the commonly owned or controlled stations are fewer than the limit of 6 commercial stations and 4 FM stations.

Wave Field Strength versus Distance Graph of 47 CFR 73.184. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR 73.313. Terrain data was derived from the N.G.D.C. 30-second computer database for each of the FM stations using radials evenly-spaced every 10 degrees of azimuth.

Based on the above, it is concluded that the proposed combination of the stations to be owned complies with Section 73.3555(a) of the FCC Rules, and in particular, Sections 73.3555(a)(1)(iii) and (iv).

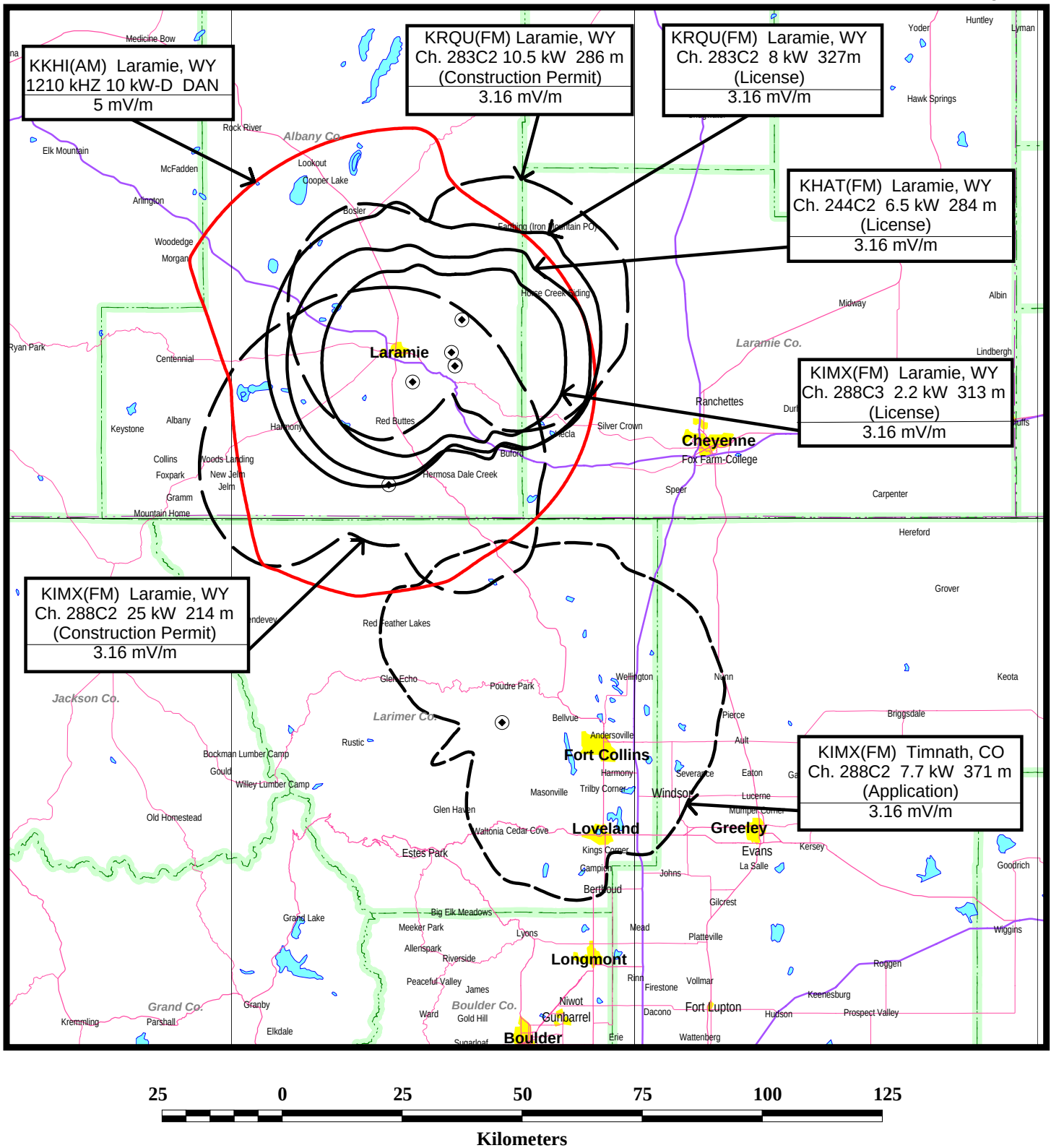


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Figure 1



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Tabulation of Stations Defined in Radio Market 1

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KCOL	WELLINGTON	CO	600 KHz
KGAB	ORCHARD VALLEY	WY	650
KKZN	THORNTON	CO	760
KKHI	LARAMIE	WY	1210
KOWB	LARAMIE	WY	1290
KCGY	LARAMIE	WY	95.1 MHz
KHAT	LARAMIE	WY	96.7
KQLF	CHEYENNE	WY	97.9
KKPL	CHEYENNE	WY	99.9
KOLZ	CHEYENNE	WY	100.7
KARS-FM	LARAMIE	WY	102.9
KRQU	LARAMIE	WY	104.5
KIMX	LARAMIE	WY	105.5

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Tabulation of Stations Defined in Radio Market 2

<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
KCOL	WELLINGTON	CO	600 KHz
KGAB	ORCHARD VALLEY	WY	650
KLTT	COMMERCE CITY	CO	670
KKZN	THORNTON	CO	760
KLMO	LONGMONT	CO	1060
KJJD	WINDSOR	CO	1170
KKHI	LARAMIE	WY	1210
KOWB	LARAMIE	WY	1290
KFKA	GREELEY	CO	1310
KHNC	JOHNSTOWN	CO	1360
KIIX	FORT COLLINS	CO	1410
KEZZ	ESTES PARK	CO	1470
KSXT	LOVELAND	CO	1570
KDJM	BROOMFIELD	CO	92.5 MHz
KTCL	FORT COLLINS	CO	93.3
KKQZ	WELLINGTON	CO	94.3
KCGY	LARAMIE	WY	95.1
KSME	GREELEY	CO	96.1
KQLF	CHEYENNE	WY	97.9
KUAD-FM	WINDSOR	CO	99.1
KKPL	CHEYENNE	WY	99.9
KOLZ	CHEYENNE	WY	100.7
KXDC	ESTES PARK	CO	102.1
KTRR	LOVELAND	CO	102.5
KPAW	FORT COLLINS	CO	102.5
KARS-FM	LARAMIE	WY	102.9
KIMX	TIMNATH	CO	105.5