

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
OKLAHOMA CITY, OKLAHOMA

This Technical Statement was prepared concerning a radio multiple ownership analysis for the Oklahoma City, Oklahoma market area. This analysis was prepared under the FCC interim contour analysis method* considering the following radio stations:

Call Sign	City of License	Facilities
WWLS(AM)	Moore, OK	640 kHz, 1 kW-N, 5 kW-D, U, DA-2
WKY(AM)	Oklahoma City, OK	930 kHz, 5 kW, U, DA-2
KQOB(FM)	Enid, OK	Channel 245C, 100 kW, 442 m (License) Channel 245C, 100 kW, 451 m (CP)
WWLS-FM	Edmond, OK	Channel 250A, 6 kW, 96 m
KYIS(FM)	Oklahoma City, OK	Channel 255C, 100 kW, 335 m (License) Channel 255C, 100 kW, 468 m (Application)
KATT-FM	Oklahoma City, OK	Channel 263C, 100 kW, 363 m (License) Channel 263C, 100 kW, 468 m (Application)

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

* See Report and Order and Notice of Proposed Rulemaking, MB Docket 02-277, FCC 03-127, Released July 2, 2003.

Radio Markets

The “radio market” applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. As listed in the table below, there is one defined “radio market” formed by the subject stations:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	WWLS, WKY	KQOB, WWLS, KYIS, KATT

Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating stations that have principal community contours that intersect the principal community contours that define the radio market. Only those stations located within 92 km of the perimeter of the mutual overlap area of the defined market area were employed in the count of stations. Commonly owned stations, other than those that form the market in question, were not considered in the count of stations in the defined market. The results of the analysis are tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	16 AM; 33 FM; 49 Total

Figure 2 is a tabulation of the radio stations identified in the defined radio market. 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 Wave Field Strength versus

Distance Graph described in Section 73.184 of the FCC Rules. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method outlined in Section 73.313 of the FCC Rules. Terrain data were derived from the U.S.G.S. 3-second computer database for each of the FM stations using radials evenly-spaced every 5 degrees of azimuth.

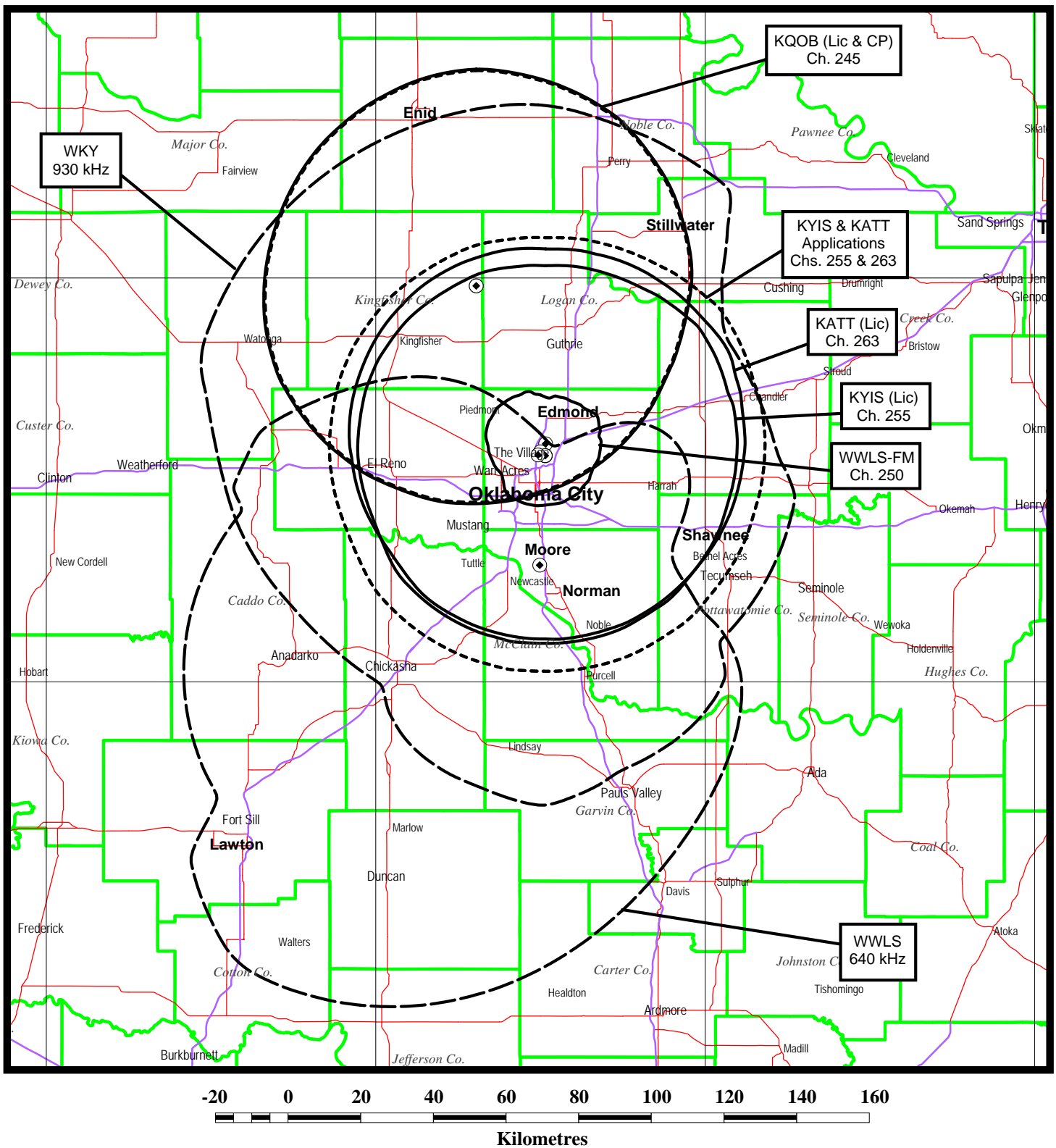
Based on the above, it is concluded that the proposed combination of the stations to be owned complies with Section 73.3555(a) of the FCC Rules.



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PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

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Tabulation of Stations in Radio Markets

Market 1	
Number	Station
AM Stations	
1	WWLS, MOORE, OK, 640 kHz
2	KSPI, STILLWATER, OK, 780 kHz
3	KQCV, OKLAHOMA CITY, OK, 800 kHz
4	KTLR, OKLAHOMA CITY, OK, 890 kHz
5	WKY, OKLAHOMA CITY, OK, 930 kHz
6	KTOK, OKLAHOMA CITY, OK, 1000 kHz
7	KOKP, PERRY, OK, 1020 kHz
8	KRMP, OKLAHOMA CITY, OK, 1140 kHz
9	KTLV, MIDWEST CITY, OK, 1220 kHz
10	KEBC, MIDWEST CITY, OK, 1340 kHz
11	KREF, NORMAN, OK, 1400 kHz
12	KGFF, SHAWNEE, OK, 1450 kHz
13	KZUE, EL RENO, OK, 1460 kHz
14	KMFS, GUTHRIE, OK, 1490 kHz
15	KOKC, OKLAHOMA CITY, OK, 1520 kHz
16	KOCY, DEL CITY, OK, 1560 kHz
FM Stations	
1	KMSI, MOORE, OK, Channel 201
2	KYLV, OKLAHOMA CITY, OK, Channel 205
3	KALU, LANGSTON, OK, Channel 207
4	KSSO, NORMAN, OK, Channel 207
5	KCSC, EDMOND, OK, Channel 211
6	KOKF, EDMOND, OK, Channel 215
7	KAKO, ADA, OK, Channel 217
8	KOSU, STILLWATER, OK, Channel 219
9	KOMA, OKLAHOMA CITY, OK, Channel 223
10	KKNG-F, NEWCASTLE, OK, Channel 227
11	KSPI-F, STILLWATER, OK, Channel 229
12	KIMY, WATONGA, OK, Channel 230
13	KHBZ-F, OKLAHOMA CITY, OK, Channel 234
14	KXXY-F, OKLAHOMA CITY, OK, Channel 241
15	KQOB, ENID, OK, Channel 245
16	KOJK, BLANCHARD, OK, Channel 247

Market 1	
Number	Station
17	WWLS-F, EDMOND, OK, Channel 250
18	KVRO, STILLWATER, OK, Channel 251
19	KYIS, OKLAHOMA CITY, OK, Channel 255
20	KATT-F, OKLAHOMA CITY, OK, Channel 263
21	KTST, OKLAHOMA CITY, OK, Channel 270
22	KJYO, OKLAHOMA CITY, OK, Channel 274
23	KMGL, OKLAHOMA CITY, OK, Channel 281
24	KKWD, BETHANY, OK, Channel 285
25	KBLP, LINDSAY, OK, Channel 286
26	KOSB, PERRY, OK, Channel 286
27	KINB, KINGFISHER, OK, Channel 287
28	KWCO-F, CHICKASHA, OK, Channel 288
29	KGFY, STILLWATER, OK, Channel 288
30	KROU, SPENCER, OK, Channel 289
31	KGOU, NORMAN, OK, Channel 292
32	KTUZ-F, OKARCHE, OK, Channel 294
33	KRXO, OKLAHOMA CITY, OK, Channel 299