

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CAPSTAR TX LIMITED PARTNERSHIP

This statement and the attached figures were prepared on behalf of Capstar TX Limited Partnership ("CTLTP"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CTLTP proposes to modify the facilities of KRVI(FM), Barnesville, Minnesota. A multiple ownership analysis was prepared considering the following radio stations under present or proposed common ownership, time brokerage or joint sales.¹

Table 1: Proposed Commonly Owned, Brokered or Jointly-Sold Stations
Studied and Associated Arbitron Metro² Information

| Calls | Fac ID | Band | Community | County | State | Geographic Arbitron Market | Declared Arbitron Market |
|---------|-----------|------|-------------|--------|-------|----------------------------------|--------------------------------|
| KDAM | 88502 | FM | Hope | Steele | ND | Non - Metro | Fargo- Moorhead, ND- MN |
| KFAB-FM | 10066 | FM | Kindred | Cass | ND | Fargo- Moorhead, ND- MN | Fargo- Moorhead, ND- MN |
| KFGO | 34421 | AM | Fargo | Cass | ND | Fargo- Moorhead, ND- MN | Fargo- Moorhead, ND- MN |
| KKBX | 34422 | FM | Fargo | Cass | ND | Fargo- Moorhead, ND- MN | Fargo- Moorhead, ND- MN |
| KRVI | 37001 | FM | Barnesville | Clay | MN | Fargo- Moorhead, ND- MN | Fargo- Moorhead, ND- MN |
| KVOX | 35863 | AM | Moorhead | Clay | MN | Fargo- Moorhead, ND- MN | Fargo- Moorhead, ND- MN |
| WDAY-FM | 22123 | FM | Fargo | Cass | ND | Fargo- Moorhead, ND- MN | Fargo- Moorhead, ND- MN |

Since certain of these stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations), or are located in, or home to, the same Arbitron Metro Markets, an ownership study has been prepared in accordance with the Federal Communications Commission's local radio ownership rule.³

CCC does not have an attributable interest in any other station with a principal community contour that overlaps or intersects the principal community contour of KRVI(FM) as proposed, or which is located in the same

¹ None of the following stations are attributable by virtue of a time brokerage agreement or joint sales agreement.

² Arbitron data presented herein is obtained from BIA's "Media Access Pro."

³ See 47 C.F.R. § 73.3555(a).

Arbitron Metro⁴ as KRVI(FM). The community of license of KRVI(FM) is located within the Fargo-Moorhead, ND-MN Metro, and KRVI(FM) is reported by BIA as being "Home" to that Metro only. Contour overlap of the station to be modified, as depicted in Figure 1, also occurs with commonly-owned stations whose communities of license are located in the Fargo-Moorhead, ND-MN Arbitron Metro markets.

Arbitron Market Study

KRVI(FM) is reported by BIA as being "Home" to the Fargo-Moorhead, ND-MN Arbitron Metro. This combination of stations is not in compliance with the local radio ownership rules for that Arbitron Metro, as evidenced by Table 2 below. However, with the existing KRVI(FM) licensed facility, this combination also was not in compliance with the Arbitron Metro-based rules. This proposal maintains the *status quo* in the Fargo-Moorhead, ND-MN Arbitron Metro -- no stations are added to or removed from the Metro, nor is KRVI(FM)'s "Home" Arbitron Metro changed, by virtue of this instant application. Because this modification would not create a "new violation" of the ownership rules, this existing combination of radio stations qualifies for grandfathering. See Note 4 to 47 C.F.R. Section 73.3555 (minor modification applications are subject to ownership restrictions only if implementing a change in an FM radio station's community of license or if new or increased concentration of ownership among commonly-owned media would be created); accord 2002 Biennial Regulatory Review--Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, 18 FCC Rcd 13,620 at fn. 1033 (2003) (modifications of facilities in a grandfathered combination are prohibited if the proposed modification would create a new violation of the ownership rules).

Table 2 - Stations Considered to be in the
Fargo-Moorhead, ND-MN Metro⁵

| COUNT | CALLS | FID | A/F | OWNER | Status ⁶ | COMMUNITY | COUNTY |
|-------|-------------|--------|-----|---|---------------------|-----------|----------|
| 1 | WZFN | 135930 | AM | Brantley Broadcast Associates LLC | b | Dilworth | Clay |
| 2 | KSJB | 10778 | AM | Chesterman Communications Inc | a | Jamestown | Stutsman |
| 3 | KDAM | 88502 | FM | Clear Channel Communications | a | Hope | Steele |
| 4 | KFAB- FM | 10066 | FM | Clear Channel Communications | b | Kindred | Cass |

⁴ A station is considered to be "located in an Arbitron Metro" if the station's community of license is located within the boundaries of that Metro, or, the station is listed as "Home" to that Metro by BIA.

⁵ Source: BIA.

⁶ Status: "a" -- the station is reported by BIA as "Home" to this Arbitron Metro; "g" -- the station's community of license is located within the geographic boundaries of this Arbitron Metro; "b" -- the station is both listed by BIA as "Home" to this Arbitron Metro, and its community of license is located in this Arbitron Metro.

| | | | | | | | |
|----|---------|-------|----|------------------------------------|---|--------------|----------|
| 5 | KFGO | 34421 | AM | Clear Channel Communications | b | Fargo | Cass |
| 6 | KKBX | 34422 | FM | Clear Channel Communications | b | Fargo | Cass |
| 7 | KRVI | 37001 | FM | Clear Channel Communications | b | Barnesville | Clay |
| 8 | KVOX | 35863 | AM | Clear Channel Communications | b | Moorhead | Clay |
| 9 | WDAY-FM | 22123 | FM | Clear Channel Communications | b | Fargo | Cass |
| 10 | KKLQ | 77951 | FM | Educational Media Foundation | b | Harwood | Cass |
| 11 | KFBN | 82193 | FM | Fargo Baptist Church | b | Fargo | Cass |
| 12 | WDAY | 22126 | AM | Forum Communications Co | b | Fargo | Cass |
| 13 | KCCD | 42951 | FM | Minnesota Public Radio | b | Moorhead | Clay |
| 14 | KCCM-FM | 42926 | FM | Minnesota Public Radio | b | Moorhead | Clay |
| 15 | KFNW | 49792 | AM | Northwestern College Radio Network | b | West Fargo | Cass |
| 16 | KFNW-FM | 49772 | FM | Northwestern College Radio Network | b | Fargo | Cass |
| 17 | KDSU | 49213 | FM | Prairie Public Broadcasting | b | Fargo | Cass |
| 18 | KEGK | 25533 | FM | Guderian Broadcasting Inc | a | Wahpeton | Richland |
| 19 | KLTA | 64359 | FM | Triad Broadcasting Company | a | Breckenridge | Wilkin |
| 20 | KPFX | 47310 | FM | Triad Broadcasting Company | b | Fargo | Cass |
| 21 | KQWB | 87146 | AM | Triad Broadcasting Company | b | West Fargo | Cass |
| 22 | KQWB-FM | 21191 | FM | Triad Broadcasting Company | b | Moorhead | Clay |
| 23 | KVOX-FM | 35864 | FM | Triad Broadcasting Company | b | Moorhead | Clay |
| 24 | KVMI | 41898 | FM | Vision Media Inc | b | Arthur | Cass |

Interim Contour-Overlap Analysis

Because the principal community of the station to be modified, and the communities of all commonly-owned or attributable stations with overlapping principal contours with the station to be modified, are located in an Arbitron Metro, an interim contour-overlap analysis is not required.

Conclusions

In the Arbitron Metro Market studied herein, there are at least 24 radio stations, including the subject commonly-owned 2-AM / 5-FM stations, which are home to the Fargo-Moorhead, ND-MN Metro. This proposal does not affect the existing number of commonly-owned stations in the subject Arbitron Metro.

Respectfully submitted,

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Figure 1

