

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 WDCG(FM) Durham NC. A multiple ownership analysis was prepared considering the following radio stations under present or proposed common ownership or time brokerage:

Table 1: Proposed Commonly Owned or Controlled Stations Studied and Associated Arbitron Metro¹ Information

<i>Call Sign</i>	<i>City</i>	<i>State</i>	<i>Status</i>	<i>Distance_km</i>	<i>COL Home²</i>	<i>Decl. Home³</i>
WDCG	DURHAM	NC	APP	10.14	RDU	RDU
WDCG	DURHAM	NC	LIC	44.55	RDU	RDU
WMAG	HIGH POINT	NC	LIC	104.04	GWS	GWS
WRDU	WILSON	NC	CP	47.45	non-metro	RDU
WRDU	WILSON	NC	LIC	47.45	non-metro	RDU
WRSN	BURLINGTON	NC	LIC	44.74	GWS	RDU
WTRG	ROCKY MOUNT	NC	LIC	52.19	non-metro	RDU
WVBZ	HIGH POINT	NC	CP	71.02	GWS	GWS
WVBZ	HIGH POINT	NC	LIC	105.02	GWS	GWS
WDUR	DURHAM	NC	LU	64.74	RDU	RDU

RDU: Raleigh-Durham, NC Arbitron Metro

GWS: Greensboro-Winston Salem-High Point, NC Arbitron Metro

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 multiple ownership rules⁴.

Aside from those stations enumerated in Table 1 above, 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 WDCG(FM), or which is located in the same Arbitron Metro⁵ as WDCG (FM). WDCG (FM) has its city of license located within the Raleigh-Durham, NC Arbitron Metro, and is listed by Arbitron as being "Home" to that metro. Contour overlap, as depicted in Figure 1, occurs with stations whose cities of

¹ Arbitron Data presented herein is taken from BIA's "Media Access Pro".

² The Arbitron Metro within which the station's City of License is Located, if any.

³ The Arbitron Metro to which this station is listed as "Home" in Arbitron, if any.

⁴ See 47 C.F.R. § 73.3555.

⁵ A station is considered to be "Located in an Arbitron Metro" if the station's city of license is located within the boundaries of that metro, or, the station is listed as "Home" to that metro by Arbitron.

license are located in the nearby Greensboro-Winston Salem-High Point, NC Arbitron metro; the Raleigh-Durham, NC Arbitron Metro; and some stations whose cities of license are not located within any Arbitron Metro.

Arbitron Market Study

WDCG (FM) is located within the Raleigh-Durham Arbitron Metro, and is declared Home to that metro. This proposal is in compliance with the local radio ownership rules for that Arbitron Metro, as evidenced by Table 2 below:

Table 2 - Stations Considered to be in the
Raleigh-Durham, NC Arbitron Metro⁶

Owner	Fac ID	Legal CALLS	Service	Status ⁷	City
Alchemy Communications	888	WRBZ	AM	b	Raleigh
Bass Music Corporation	71088	WBZB	AM	b	Selma
Benson Broadcasting Inc	4774	WPYB	AM	b	Benson
Capitol Broadcasting Company Inc	73920	WRAL	FM	b	Raleigh
Carolina Broadcasting Service	9051	WMPM	AM	b	Smithfield
Chatham Broadcasting Co Inc	10664	WNCA	AM	b	Siler City
Clear Channel Communications	53597	WDCG	FM	b	Durham
Clear Channel Communications	36943	WDUR	AM	b	Durham
Clear Channel Communications	73936	WRDU	FM	a	Wilson
Clear Channel Communications	53596	WRSN	FM	a	Burlington
Clear Channel Communications	74125	WTRG	FM	a	Rocky Mount
Curtis Media Group	889	WBBB	FM	b	Raleigh
Curtis Media Group	70191	WCHL	AM	b	Chapel Hill
Curtis Media Group	51262	WCLY	AM	b	Raleigh
Curtis Media Group	17762	WDNC	AM	b	Durham
Curtis Media Group	61698	WDNZ	AM	b	Raleigh
Curtis Media Group	22322	WHLQ	FM	b	Louisburg
Curtis Media Group	9080	WKXU	FM	a	Burlington
Curtis Media Group	21630	WPTF	AM	b	Raleigh
Curtis Media Group	9076	WQDR	FM	b	Raleigh
Curtis Media Group	4841	WWMY	FM	b	Raleigh
Curtis Media Group	48369	WYMY	FM	a	Goldsboro
Curtis Media Group	22312	WYRN	AM	b	Louisburg
Davidson Media Group LLC	53104	WFTK	AM	b	Wake Forest
Davidson Media Group LLC	53105	WTIK	AM	b	Durham
Duke University	17695	WXDU	FM	b	Durham
Educational Information Corporation	18831	WCPE	FM	b	Raleigh
Fellowship Christian Academy	30615	WHPY	AM	b	Clayton

⁶ Source: BIA.

⁷ Status: "a", the station is listed by Arbitron as "Home" to this metro. "g" the station's Community of License is located within the boundaries of this Arbitron metro. "b" the station is both listed as "Home" to the metro, and its Community of License is located in the metro.

North Carolina Central University	49162	WNCU	FM	b	Durham
North Carolina State University	49160	WKNC-FM	FM	b	Raleigh
Prieto Communications Inc	18269	WETC	AM	b	Wendell-Zebulon
Radio One Inc	36952	WFXC	FM	b	Durham
Radio One Inc	24931	WFXX	FM	a	Tarboro
Radio One Inc	9728	WNNL	FM	b	Fuquay-Varina
Radio One Inc	69559	WQOK	FM	a	South Boston
Radio Training Network Inc	9072	WRTG	AM	b	Garner
Radio Training Network Inc	9068	WRTP	AM	b	Chapel Hill
Shaw University	60028	WSHA	FM	b	Raleigh
St Augustine's College	58586	WAUG	AM	b	New Hope
Student Educational Broadcasting Inc	63561	WXYC	FM	b	Chapel Hill
Suttles, William/WPJL Inc	73884	WPJL	AM	b	Raleigh
University of North Carolina	66581	WUNC	FM	b	Chapel Hill
Willis Broadcasting Corporation	52645	WCRY	AM	b	Fuquay-Varina
Willis Broadcasting Corporation	17761	WSRC	AM	b	Durham

Contour-Based 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 proposed commonly owned stations. A station is considered for analysis for this purpose if it's community of license is located outside any Arbitron Metro. These mutually overlapping contours form one "radio market" for analysis under the Commission's rules.

Radio Market 1 is defined by the mutually overlapping principal community contours of WDCG(FM), WTRG(FM), and WRDU(FM). The predicted principal community contours of these stations (3 FM), as well as other stations whose principal community contours overlap this combination, are shown in *Figure 2*.

Count of Stations in Defined Markets

The number of radio stations in a "radio market" is determined by counting the operating radio stations having principal community contours which overlap or intersect the principal community contours which define the radio market, plus the subject commonly owned or controlled stations, excluding any stations whose transmitter sites are further than 92 kilometers from the perimeter of mutual overlap, and, excluding any commonly owned or controlled stations which do not serve to define the market.

In the "radio markets" studied herein, there are at least 44 radio stations, including the subject co-owned stations, that overlap or intersect with the defined "radio market." *Figure 3* is the tabulation of some of the radio stations identified in the "radio market".

Only known licensed, operating radio stations were included in this tabulation. Distances to contours for AM stations 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 C.F.R. § 73.184. Ground conductivities were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 C.F.R. § 73.313. Terrain data was derived from the N.G.D.C. 30 second computer database for each of the FM stations using radials spaced every 45 degrees of azimuth.

Based on the above, it is concluded that the proposed modifications comply with § 73.3555(a) of the FCC Rules.

Sincerely,

Stephen G. Davis
Senior Vice President, Engineering
Capstar TX Limited Partnership