

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CC LICENSES, LLC

This statement and the attached figures were prepared on behalf of CC Licenses, LLC ("CCL"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CCL proposes to modify the facilities of WOOD-FM, Grand Rapids, Michigan. 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	FID	BAND	COMMUNITY	COUNTY	STATE	Geographic Arbitron Market	Declared Arbitron Market
WBCT	73606	FM	Grand Rapids	Kent	MI	Grand Rapids, MI	Grand Rapids, MI
WBFX	51727	FM	Grand Rapids	Kent	MI	Grand Rapids, MI	Grand Rapids, MI
WMAX-FM	27471	FM	Holland	Ottawa	MI	Grand Rapids, MI	Grand Rapids, MI
WOOD	73604	AM	Grand Rapids	Kent	MI	Grand Rapids, MI	Grand Rapids, MI
WOOD-FM	73605	FM	Grand Rapids	Kent	MI	Grand Rapids, MI	Grand Rapids, MI
WSNX-FM	24644	FM	Muskegon	Muskegon	MI	Muskegon, MI	Grand Rapids, MI
WTKG	51729	AM	Grand Rapids	Kent	MI	Grand Rapids, MI	Grand Rapids, MI
WBXX	37461	FM	Battle Creek	Calhoun	MI	Battle Creek, MI	Battle Creek, MI
WRCC	37463	FM	Marshall	Calhoun	MI	Battle Creek, MI	Battle Creek, MI
WMUS	25086	FM	Muskegon	Muskegon	MI	Muskegon, MI	Muskegon, MI
WBFN	37462	AM	Battle Creek	Calhoun	MI	Battle Creek, MI	Battle Creek, MI
WBCK	37459	AM	Battle Creek	Calhoun	MI	Battle Creek, MI	Battle Creek, MI

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 WOOD-FM as proposed, or which is located in the same Arbitron Metro⁴ as WOOD-FM. The community of license of WOOD-FM is located within the Grand Rapids, MI Metro, and WOOD-FM is reported by BIA as being

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).

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.

"Home" to that Metro only. Contour overlap of the station to be modified also occurs with commonly-owned stations whose communities of license are located in the nearby Muskegon, MI Arbitron Metro market and Battle Creek, MI Arbitron Metro market.

Arbitron Market Study

WOOD-FM is reported by BIA as being "Home" to the Grand Rapids, MI Arbitron Metro. The number of stations attributable to CCC in this Arbitron Metro does not comply with the local radio ownership rules, as evidenced by Table 2 below. However, the existing combination of attributable stations, including WOOD-FM as currently licensed, is also not in compliance with the Arbitron Metro-based rules. This proposal maintains the *status quo* in the Grand Rapids, MI Arbitron Metro -- no stations are added to or removed from the Metro, nor is WOOD-FM's "Home" Arbitron Metro changed, by virtue of this instant application. Because this proposed 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
Grand Rapids, MI Metro⁵

COUNT	CALLS	FID	BAND	OWNER	Status	COMMUNITY	COUNTY
1	WMCQ	84851	FM	American Family Association Incorporated	a	Muskegon	Muskegon
2	WMFN	55089	AM	Birach Broadcasting Corporation	b	Zeeland	Ottawa
3	WMJH	55300	AM	Birach Broadcasting Corporation	b	Rockford	Kent
4	WBLU-FM	5903	FM	Blue Lake Fine Art Camp	b	Grand Rapids	Kent
5	WBCT	73606	FM	Clear Channel	b	Grand Rapids	Kent
6	WBFX	51727	FM	Clear Channel	b	Grand Rapids	Kent
7	WMAX-FM	27471	FM	Clear Channel	b	Holland	Ottawa
8	WOOD	73604	AM	Clear Channel	b	Grand Rapids	Kent
9	WOOD-FM	73605	FM	Clear Channel	b	Grand Rapids	Kent
10	WSNX-FM	24644	FM	Clear Channel	a	Muskegon	Muskegon
11	WTKG	51729	AM	Clear Channel	b	Grand Rapids	Kent
12	WBBL	41679	AM	Citadel Communications	b	Grand Rapids	Kent
13	WHTS	71090	FM	Citadel Communications	b	Coopersville	Ottawa
14	WKLQ	24639	FM	Citadel Communications	a	Greenville	Montcalm
15	WLAV-FM	41680	FM	Citadel Communications	b	Grand Rapids	Kent
16	WTNR	41678	FM	Citadel Communications	b	Holland	Ottawa

⁵ Source: BIA.

COUNT	CALLS	FID	BAND	OWNER	Status	COMMUNITY	COUNTY
17	WAYG	24772	FM	Cornerstone University	b	Grand Rapids	Kent
18	WCSG	13935	FM	Cornerstone University	b	Grand Rapids	Kent
19	WYCE	24773	FM	Grand Rapids Cable Access Center	b	Wyoming	Kent
20	WGVU	24785	AM	Grand Valley State University	b	Kentwood	Kent
21	WGVU-FM	4174	FM	Grand Valley State University	b	Allendale	Ottawa
22	WTHS	27622	FM	Hope College	b	Holland	Ottawa
23	WFUR	22916	AM	Kuiper Stations	b	Grand Rapids	Kent
24	WFUR-FM	22918	FM	Kuiper Stations	b	Grand Rapids	Kent
25	WJQK	4364	FM	Lanser Broadcasting Corp	b	Zeeland	Ottawa
26	WPNW	36532	AM	Lanser Broadcasting Corp	b	Zeeland	Ottawa
27	WHTC	27470	AM	Midwest Communications Incorporated	b	Holland	Ottawa
28	WGNB	18425	FM	Moody Bible Institute of Chicago Incorporated	b	Zeeland	Ottawa
29	WFGR	25837	FM	Regent Communications Inc	b	Grand Rapids	Kent
30	WGRD-FM	55650	FM	Regent Communications Inc	b	Grand Rapids	Kent
31	WLHT-FM	37457	FM	Regent Communications Inc	b	Grand Rapids	Kent
32	WNWZ	55648	AM	Regent Communications Inc	b	Grand Rapids	Kent
33	WTRV	72529	FM	Regent Communications Inc	b	Walker	Kent
34	WVGR	66309	FM	University of Michigan	b	Grand Rapids	Kent
35	WGHN	72104	AM	WGHN Inc	b	Grand Haven	Ottawa
36	WGHN-FM	72105	FM	WGHN Inc	b	Grand Haven	Ottawa
37	WJNZ	41667	AM	WJNZ Radio LLC	b	Kentwood	Kent
38	WYGR	74248	AM	WYGR Broadcasting Michigan General Partnership	b	Wyoming	Kent

Interim Contour-Overlap Analysis

Because the 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 38 radio stations, including the subject commonly-owned 2-AM / 5-FM stations, which are home to the Grand Rapids, MI Metro. This proposal does not affect the existing number of commonly-owned stations in the subject Arbitron Metro.

Respectfully submitted,

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FCC Engineer
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