

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
HBC LICENSE CORPORATION

This statement and the attached figures were prepared on behalf of HBC License Corporation ("HBC"). HBC is acquiring radio station KVCQ(FM). HBC owns nearby stations KXTN-FM, KXTN(AM), KROM(FM), KCOR(AM), KCOR-FM and KBBT(FM).

Therefore, a multiple ownership analysis was prepared considering the following radio stations under proposed common ownership or control:

Call Sign	Location	Facilities
KCOR(AM)	San Antonio, TX	1350 kHz 5 kW-U DA-N
KXTN(AM)	San Antonio, TX	1310 kHz 5 kW-D 0.28 kW-N DA-2
KVCQ(FM)	Cuero, TX	CH 249C3 25 kW 92 M
KCOR-FM	Comfort, TX	CH 236C2 36 kW 172 M
KBBT(FM)	Schertz, TX	CH 253C1 98 kW 302 M
KROM(FM)	San Antonio, TX	CH 225C1 45 kW 412 M
KXTN-FM	San Antonio, TX	CH 298C 100 kW 448 M

Since these stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations), an ownership study has been prepared in accordance with the Federal Communications Commission multiple ownership rules (See Section 73.3555 of the FCC Rules).

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. The predicted principal contours are shown on Figure 1. The acquisition of KVCQ(FM) will result in the creation of one new radio market.

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	KXTN	KVCQ(FM)/KXTN-FM/KROM(FM)

It is noted that the one new market created by station KVCQ(FM) is based upon the KVCQ(FM) pending application for construction permit (BPH-20010124AJI). The licensed KVCQ(FM) facility principal community contour does not overlap any of the existing HBC commonly owned stations.

Count of Stations in Defined Market

The number of radio stations in a "radio market" includes the operating, commercial stations having transmitter sites within and hence have principal community contours which overlap the principal community contours which define the radio market (although other stations may be included within the FCC's definition of a "radio market"). The results of the analysis are tabulated below:

Radio Market	Minimum Number of Stations in Radio Market
Market 1	20 AM, 20 FM; 40 total

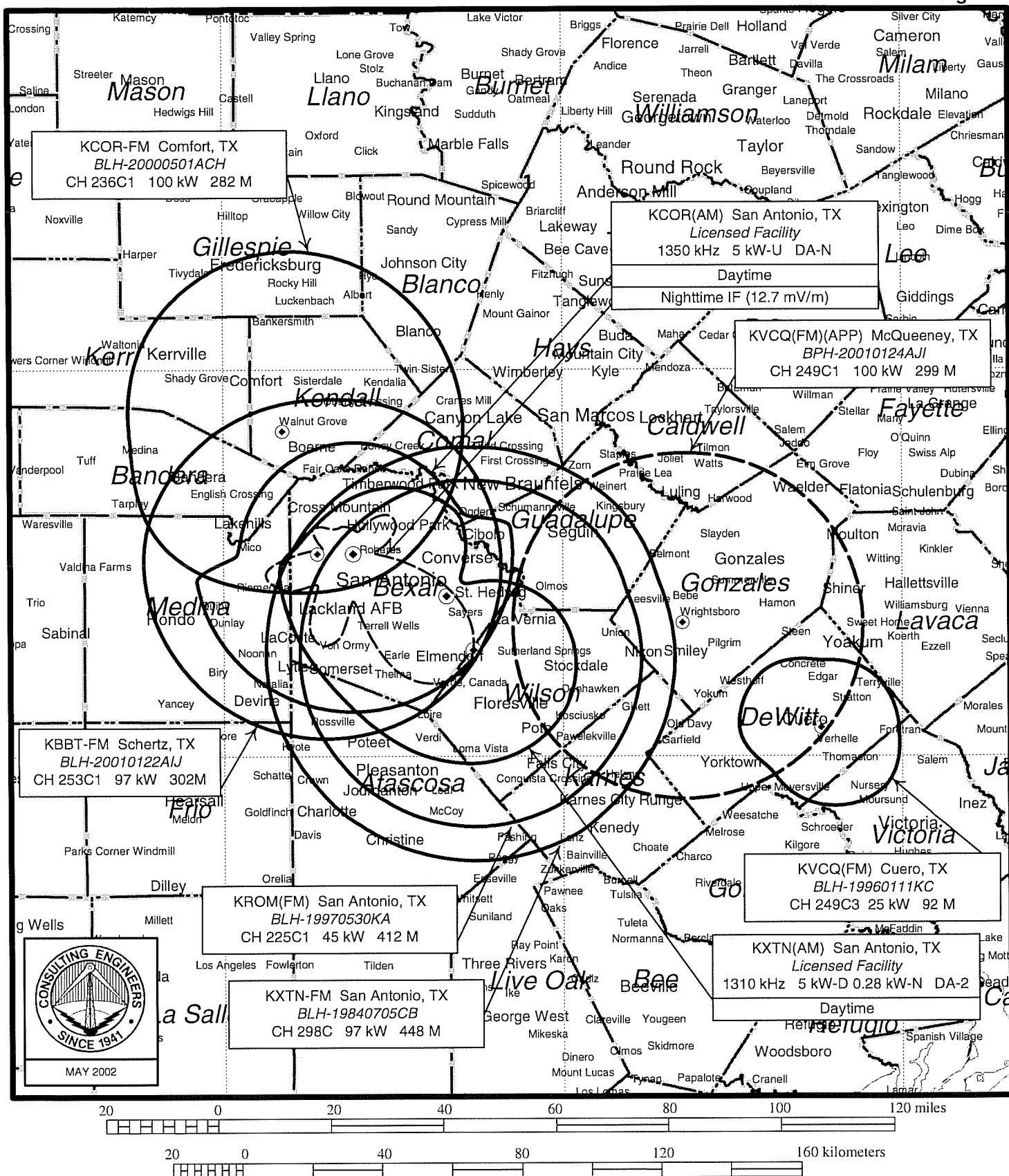
Figure 2 is a tabulation of the radio stations identified within the radio market. Only known licensed, operating commercial stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's AM database and the appropriate Ground Wave Field Strength versus Distance Graph of 47 CFR 73.184. Ground conductivities were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR 73.313.

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

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# PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

HBC LICENSE CORPORATION

du Treil, Lundin & Rackley, Inc., Sarasota, Florida

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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>
KTSA	San Antonio	TX	550
KSLR	San Antonio	TX	630
KSAH	Universal City	TX	720
KTKR	San Antonio	TX	760
KSJL	Somerset	TX	810
KONO	San Antonio	TX	860
KLUP	Terrell Hills	TX	930
KBIB	Marion	TX	1000
KDRY	Alamo Heights	TX	1100
KENS	San Antonio	TX	1160
WOAI	San Antonio	TX	1200
KZDC	San Antonio	TX	1250
KXTN	San Antonio	TX	1310
KCOR	San Antonio	TX	1350
KFNI	Pleasanton	TX	1380
KGNB	New Braunfels	TX	1420
KCTI	Gonzales	TX	1450
KCHL	San Antonio	TX	1480
KEDA	San Antonio	TX	1540
KWED	Seguin	TX	1580
KNBT	New Braunfels	TX	92.1
KYKM	Yoakum	TX	92.5
KROM	San Antonio	TX	92.9
KLEY-FM	Floresville	TX	94.1
KBUC	Jourdanton	TX	95.7
KXXM	San Antonio	TX	96.1
KAJA	San Antonio	TX	97.3
KVCQ	Cuero	TX	97.7
KBBT	Schertz	TX	98.5
KISS-FM	San Antonio	TX	99.5
KCY Y	San Antonio	TX	100.3
KCY Y	San Antonio	TX	100.3
KONO-FM	Helotes	TX	101.1
KQXT-FM	San Antonio	TX	101.9
KTFM	San Antonio	TX	102.7
KZEP-FM	San Antonio	TX	104.5
KSMG	Seguin	TX	105.3
KQQT	Gonzales	TX	106.3
KCJZ	Terrell Hills	TX	106.7
KXTN-FM	San Antonio	TX	107.5