

Radio Market Analysis

Cumulus Licensing Corp.

KQXY

Beaumont, Texas

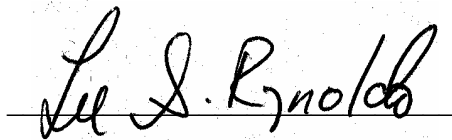
Technical Statement

1. Cumulus Licensing Corp. ("Cumulus") is the licensee of radio station KQXY(FM), Beaumont, Texas. Cumulus also owns several other stations in the Beaumont market (KTCX, KQHN(AM), KIKR(AM), KRWP, and KAYD). Of these stations, a Radio Market is defined by the overlaps shown in Exhibit 1. (KYKZ, another station owned by Cumulus, is filing another application, but it is not contingent on the instant application.) The instant market analysis/ownership study is conducted to show that the proposed modifications of these stations is in compliance with §73.3555.
2. Exhibit 1 shows the principal community contours for the stations that define a radio market (KAYD, KQXY, KQHN(AM), and KYKZ). Coverage over unpopulated areas (i.e. water) is ignored when determining the Radio Market boundary.
3. By examining this exhibit it is possible to determine the boundary of the Radio Market. The Radio Market has with it an associated map showing the stations in the market (Exhibit 2) as well as having them listed in a subsequent exhibit (Exhibit 3).
4. Section 73.3555(a)(1)(ii) states that in a radio market with between 30 and 44 commercial radio stations, it is allowable for a party to own up to 7 stations, with no more than 4 in the same service. According to these analyses there are 32 stations in the market (when allowances for the proposed modifications of KQXY and KYKZ are made). This market will have 4 (3 FM, 1 AM) stations. This results in the

proposed Cumulus modifications of KQXY and KYKZ meeting the Commission's ownership rules and regulations.

5. The foregoing technical statement was prepared on behalf of Cumulus by Reynolds Technical Associates, its technical consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities was extracted from the CDBS database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.

For Cumulus:

A handwritten signature in black ink, reading "Lee S. Reynolds", is written over a horizontal line.

Lee S. Reynolds
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