

**RADIO MARKET ANALYSIS**  
**CUMULUS MEDIA, INC.**  
**SOUTHERN MINNESOTA BROADCASTING CO.**  
**KROC/KROC-FM RADIO STATIONS**  
**ROCHESTER, MINNESOTA**  
**KYBA RADIO STATION**  
**STEWARTVILLE, MINNESOTA**  
**CUMULUS LICENSING CORP.**  
**KOLM/KWWK RADIO STATIONS**  
**ROCHESTER, MINNESOTA**  
**KLCX RADIO STATION**  
**ST. CHARLES, MINNESOTA**  
**KFIL, INC.**  
**KFIL/KFIL-FM PRESTON, MINNESOTA**  
**KVGO, INC.**  
**KVGO RADIO STATION**  
**SPRING VALLEY, MINNESOTA**  
**December 2003**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits were prepared on behalf of Cumulus Media, Inc. ("CMI"), the proposed transferee of Southern Minnesota Broadcasting Company ("SMB"). SMB is licensee of stations KROC, 1340 kHz, and KROC-FM, Channel 295C0, Rochester, Minnesota,<sup>1</sup> and KYBA, Channel 287C2, Stewartville, Minnesota. CMI, through Cumulus Licensing Corp. ("Cumulus"), is the proposed assignee of stations KOLM, 1520 kHz, and KWWK, Channel 243C2, Rochester, Minnesota, and KLCX, Channel 299A, St. Charles, Minnesota. Cumulus will also have attributable interests in the proposed transferee of stations KFIL, 1060 kHz, and KFIL-FM,<sup>2</sup> Channel 276C3, Preston, Minnesota, under the name of KFIL, Inc., and station KVGO, Channel 282C3, Spring Valley, Minnesota, under the name of KVGO, Inc. Cumulus is also the licensee of stations KDHL, 920 kHz, and KQCL, Channel 240A,

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- 1) There is also a pending application to increase height, and slightly change site coordinates for the station. The contour of the proposed facility is also considered in this instant review.
- 2) There is an outstanding permit authorizing minor changes in the facilities of KFIL-FM which is also considered in this instant analysis.

Faribault, Minnesota; KRFO, 1390 kHz, and KRFO-FM, Channel 285A, Owatonna, Minnesota, and KOEL, 950 kHz, and KKHQ-FM, Channel 222C, Oelwein, Iowa. Exhibit #1 is a map depicting the subject stations.

2. Because of the number of stations involved and where the city grade contours overlap, ten distinct radio markets are created and will be reviewed as part of this instant analysis: Radio Market #1 consists of FM station KWWK and AM stations KRFO and KDHL; Radio Market #2 consists of FM station KWWK and AM stations KOLM and KRFO; Radio Market #3 consists of FM stations KYBA, KROC-FM (licensed and applied for), KVGO and KWWK and AM station KOLM; Radio Market #4 consists of FM stations KROC-FM (both licensed and applied for), KLCX, KWWK and the outstanding permit for KFIL-FM and AM station KOLM; Radio Market #5 consists of FM station KYBA, KROC-FM (both licensed and applied for), KVGO and AM stations KOLM and KFIL. Radio Market #6 consists of FM stations KROC-FM (both licensed and applied for), KFIL-FM (license) and AM stations KFIL and KOLM. Market #7 consists of FM stations KROC-FM (both licensed and applied for), KYBA and KFIL-FM (construction permit) and AM stations KFIL and KOLM. Market #8 consists of FM stations KYBA, KROC-FM (both licensed and applied for) and KWWK and AM stations KROC and KOLM. Market #9 consists of FM station KKHQ-FM and KROC-FM (licensed). Market #10 consists of FM stations KKHQ-FM and KROC-FM (applied for) and AM station KOEL. Since KWWK is a subject station in the first two markets and KROC-FM<sup>3</sup> is a subject station in the remainder of the markets, their respective contours will be used to determine the number of other commercial

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3) Since the applied for KROC-FM contour encompasses the licensed KROC-FM contour, we have used the licensed contour of KROC-FM for evaluation purposes where applicable. It has a smaller footprint than the applied for station and would, therefore, be a worst case analysis.

AM and FM stations that either have transmitter sites within, or provide coverage to, the relevant station's contour (KWWK or KROC-FM). Once this is determined, the subject stations in each of the markets will be added to demonstrate compliance with the Commission's rules.<sup>4</sup>

3. Exhibit #2 is a depiction of the other stations within the KWWK city grade/Radio Market boundary; six commercial AM and FM stations are depicted. Exhibit #3 is a tabulation of the stations in Radio Market #1 (KWWK/KRFO/KDHL), a total of nine stations, including the subject stations. The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules.<sup>5</sup> At the fourteen or fewer stations level, common ownership or control of up to five stations, with no more than three in the same service, is permissible.

4. Exhibit #4 is a tabulation of the stations in Radio Market #2 (KWWK/KRFO/KOLM), a total of nine stations, including the subject stations. The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules.<sup>6</sup> At the fourteen or fewer stations level, common ownership or control of up to five stations, with no more than three in the same service, is permissible.

5. Exhibit #5 is a depiction of the other stations within the KROC-FM city grade/Radio Market boundary; fifteen commercial AM and FM stations are depicted. Exhibit #6 is a

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4) Present or proposed Cumulus facilities that are not relevant to the market under study will not be considered as contributing stations to that market.

5) Although there are additional stations providing service to the Radio Market, they are not considered since the number of stations was ample to demonstrate compliance with the rules based on the number of stations proposed to be commonly owned.

6) See Footnote 5 supra.



tabulation of the stations in Radio Market #3 (KWWK/KYBA/KVGO/KROC-FM/KOLM), a total of twenty stations, including the subject stations. The number of stations depicted falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.<sup>7</sup> At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service, is permissible.

6. Exhibit #7 is a tabulation of the stations in Radio Market #4 (KLCX/KFIL-FM (CP)/KROC-FM/KWWK/KOLM), a total of twenty stations, including the subject stations. The number of stations depicted falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.<sup>8</sup> At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service, is permissible.

7. Exhibit #8 is a tabulation of the stations in Radio Market #5 (KYBA/KVGO/KROC-FM/ KOLM/KFIL), a total of twenty stations, including the subject stations. The number of stations depicted falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.<sup>9</sup> At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service, is permissible.

8. Exhibit #9 is a tabulation of the stations in Radio Market #6 (KFIL-FM (license)/KROC-FM/KOLM/KFIL), a total of nineteen stations, including the subject stations. The

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7) See Footnote 5 supra.

8) See Footnote 5 supra.

9) See Footnote 5 supra.

number of stations depicted falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.<sup>10</sup> At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service, is permissible.

9. Exhibit #10 is a tabulation of the stations in Radio Market #7 KFIL-FM (CP)/KROC-FM/KYBA/KFIL/KOLM), a total of twenty stations, including the subject stations. The number of stations depicted falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.<sup>11</sup> At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service, is permissible.

10. Exhibit #11 is a tabulation of the stations in Radio Market #8 (KYBA/KWWK/KROC-FM/KROC/KOLM), a total of twenty stations, including the subject stations. The number of stations depicted falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.<sup>12</sup> At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service, is permissible.

11. Exhibit #12 is a tabulation of the stations in Radio Market #9 (KKHQ-FM/KROC-FM), a total of seventeen stations, including the subject stations. The number of stations depicted falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.<sup>13</sup>

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10) See Footnote 5 *supra*.

11) See Footnote 5 *supra*.

12) See Footnote 5 *supra*.

13) See Footnote 5 *supra*.

At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service, is permissible.

12. Exhibit #13 is a tabulation of the stations in Radio Market #10 (KKHQ-FM/KROC-FM/KOEL), a total of eighteen stations, including the subject stations. The number of stations depicted falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.<sup>14</sup> At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service, is permissible.

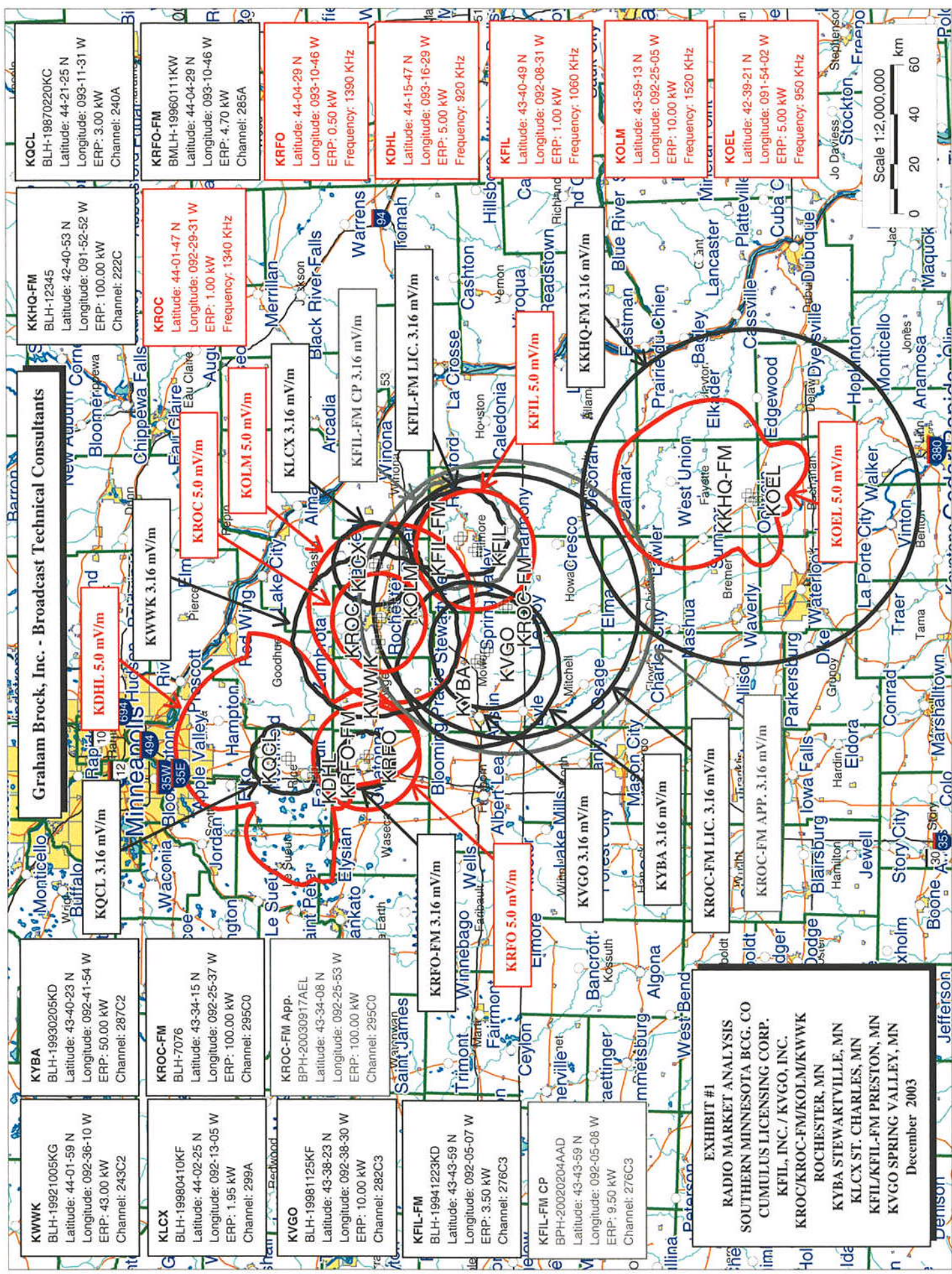
13. Based on CMI's interests in the above referenced stations, in ten separate markets, it has been herein demonstrated that the proposed assignment of these stations is in compliance with the Commission's multiple ownership rules. Therefore, the proposed ownership of KROC, KROC-FM, KYBA, KOLM, KWWK, KLCX, KFIL, KFIL-FM, and KVGO by CMI (including Cumulus, KFIL, Inc., and KVGO, Inc.) is in compliance with §73.3555 of the rules.

14. The foregoing technical statement was prepared on behalf of Cumulus Media, Inc., Southern Minnesota Broadcasting Co., Cumulus Licensing Corp., KFIL, Inc., and KVGO, Inc., by Graham Brock, Inc., 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.

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14) See Footnote 5 supra.





Graham Brock, Inc. - Broadcast Technical Consultants

**KQCL**  
BLH-19870220KC  
Latitude: 44-21-25 N  
Longitude: 093-11-31 W  
ERP: 3.00 kW  
Channel: 240A

**KKHQ-FM**  
BLH-12345  
Latitude: 42-40-53 N  
Longitude: 091-52-52 W  
ERP: 100.00 kW  
Channel: 222C

**KRFO-FM**  
BMLH-19960111KW  
Latitude: 44-04-29 N  
Longitude: 093-10-46 W  
ERP: 4.70 kW  
Channel: 285A

**KROC**  
Latitude: 44-01-47 N  
Longitude: 092-29-31 W  
ERP: 1.00 kW  
Frequency: 1340 KHz

**KRFO**  
Latitude: 44-04-29 N  
Longitude: 093-10-46 W  
ERP: 0.50 kW  
Frequency: 1390 KHz

**KHHL**  
Latitude: 44-15-47 N  
Longitude: 093-16-29 W  
ERP: 5.00 kW  
Frequency: 920 KHz

**KFIL**  
Latitude: 43-40-49 N  
Longitude: 092-08-31 W  
ERP: 1.00 kW  
Frequency: 1060 KHz

**KOLM**  
Latitude: 43-59-13 N  
Longitude: 092-25-05 W  
ERP: 10.00 kW  
Frequency: 1520 KHz

**KOEL**  
Latitude: 42-39-21 N  
Longitude: 091-54-02 W  
ERP: 5.00 kW  
Frequency: 950 KHz

**KKWL**  
BLH-19921005KG  
Latitude: 44-01-59 N  
Longitude: 092-36-10 W  
ERP: 43.00 kW  
Channel: 243C2

**KLCX**  
BLH-19980410KF  
Latitude: 44-02-25 N  
Longitude: 092-13-05 W  
ERP: 1.95 kW  
Channel: 299A

**KVGO**  
BLH-19981125KF  
Latitude: 43-38-23 N  
Longitude: 092-38-30 W  
ERP: 10.00 kW  
Channel: 282C3

**KFIL-FM**  
BLH-19941223KD  
Latitude: 43-43-59 N  
Longitude: 092-05-07 W  
ERP: 3.50 kW  
Channel: 276C3

**KFIL-FM CP**  
BPH-200204AAAD  
Latitude: 43-43-59 N  
Longitude: 092-05-08 W  
ERP: 9.50 kW  
Channel: 276C3

**KRFO-FM**  
BPH-20030917AEL  
Latitude: 43-34-08 N  
Longitude: 092-25-53 W  
ERP: 100.00 kW  
Channel: 295C0

**KRFO-FM App.**  
BPH-20030917AEL  
Latitude: 43-34-08 N  
Longitude: 092-25-53 W  
ERP: 100.00 kW  
Channel: 295C0

**KRFO-FM**  
BPH-20030917AEL  
Latitude: 43-34-08 N  
Longitude: 092-25-53 W  
ERP: 100.00 kW  
Channel: 295C0

**KRFO-FM**  
BPH-20030917AEL  
Latitude: 43-34-08 N  
Longitude: 092-25-53 W  
ERP: 100.00 kW  
Channel: 295C0

**KRFO-FM**  
BPH-20030917AEL  
Latitude: 43-34-08 N  
Longitude: 092-25-53 W  
ERP: 100.00 kW  
Channel: 295C0

**KRFO-FM**  
BPH-20030917AEL  
Latitude: 43-34-08 N  
Longitude: 092-25-53 W  
ERP: 100.00 kW  
Channel: 295C0

**KRFO-FM**  
BPH-20030917AEL  
Latitude: 43-34-08 N  
Longitude: 092-25-53 W  
ERP: 100.00 kW  
Channel: 295C0

EXHIBIT #1  
RADIO MARKET ANALYSIS  
SOUTHERN MINNESOTA BCG, CO  
CUMULUS LICENSING CORP.  
KFIL, INC. / KVGO, INC.  
KROC/KROC-FM/KOLM/KWWK  
ROCHESTER, MN  
KYBA STEWARTVILLE, MN  
KLCX ST. CHARLES, MN  
KFIL/KFIL-FM PRESTON, MN  
KVGO SPRING VALLEY, MN  
December 2003

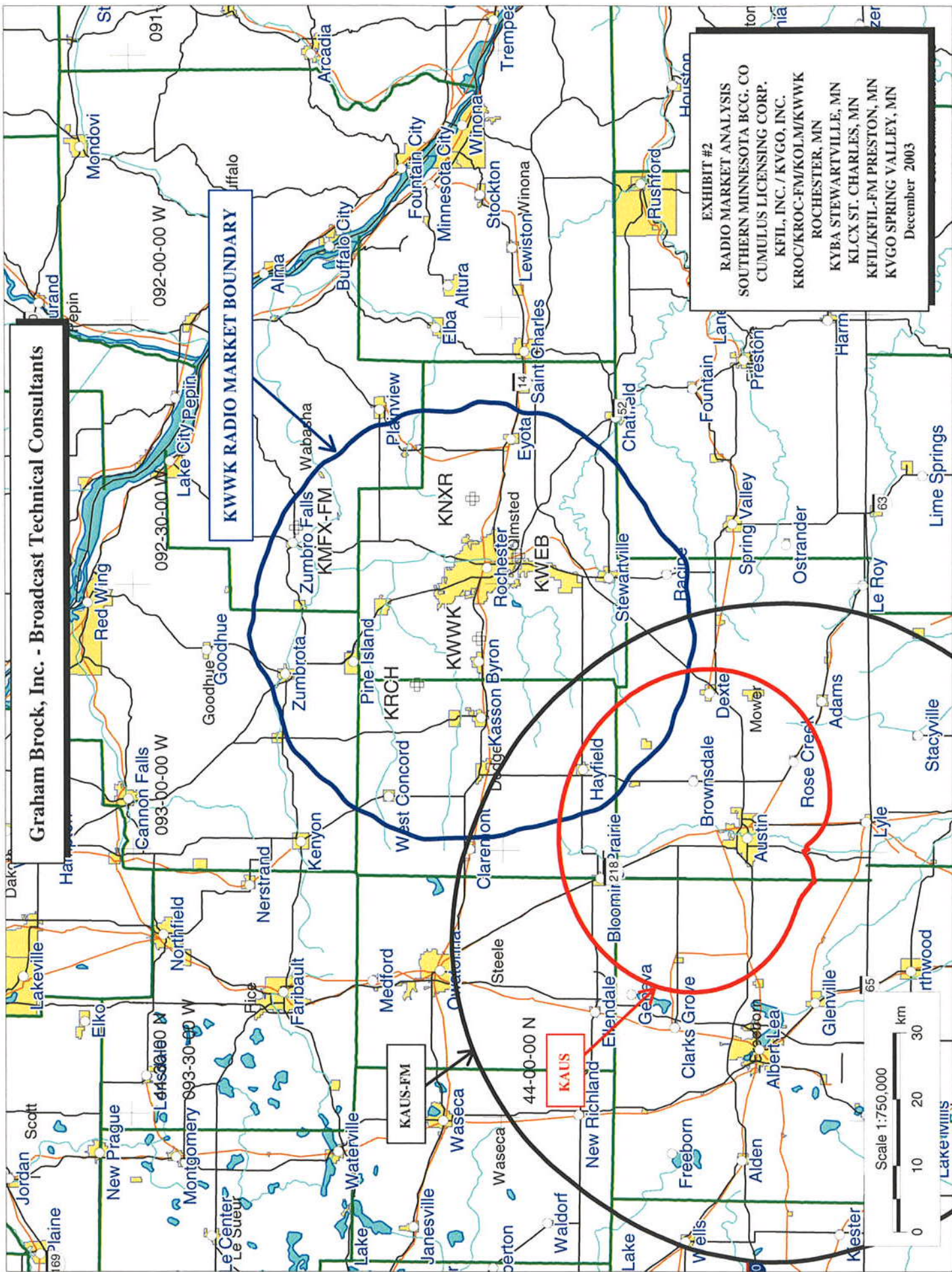


# Graham Brock, Inc. - Broadcast Technical Consultants

## KWWK RADIO MARKET BOUNDARY

### EXHIBIT #2

RADIO MARKET ANALYSIS  
SOUTHERN MINNESOTA BCG, CO  
CUMULUS LICENSING CORP.  
KFIL, INC. / KVGO, INC.  
KROC/KROC-FM/KOLM/KWWK  
ROCHESTER, MN  
KYBA STEWARTVILLE, MN  
KL/CX ST. CHARLES, MN  
KFIL/KFIL-FM PRESTON, MN  
KVGO SPRING VALLEY, MN  
December 2003





**RADIO MARKET ANALYSIS**  
**CUMULUS MEDIA, INC.**  
**SOUTHERN MINNESOTA BROADCASTING CO.**  
**CUMULUS LICENSING CORP.**  
**KFIL, INC.**  
**KVGO, INC.**  
**December 2003**

**EXHIBIT #3**

**Tabulation of Stations in Radio Market #1**

**AM Stations**

* KDHL	920 kHz	Faribault, MN
KWEB	1270 kHz	Rochester, MN
* KRFO	1390 kHz	Owatonna, MN
+ KAUS	1480 kHz	Austin, MN

Total AM Stations - 4

**FM Stations**

* KWWK	Ch 243C2	Rochester, MN
KXNR	Ch 248C	Rochester, MN
+ KAUS-FM	Ch 260C1	Austin, MN
KRCH	Ch 269C2	Rochester, MN
KMFX-FM	Ch 273C3	Lake City, MN

Total FM Stations - 5

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 9**

- \* Subject station.
- + Station provides city grade contour to radio market.

**RADIO MARKET ANALYSIS**  
**CUMULUS MEDIA, INC.**  
**SOUTHERN MINNESOTA BROADCASTING CO.**  
**CUMULUS LICENSING CORP.**  
**KFIL, INC.**  
**KVGO, INC.**  
**December 2003**

**EXHIBIT #4**

**Tabulation of Stations in Radio Market #2**

**AM Stations**

	KWEB	1270 kHz	Rochester, MN
*	KRFO	1390 kHz	Owatonna, MN
+	KAUS	1480 kHz	Austin, MN
*	KOLM	1520 kHz	Rochester, MN

Total AM Stations - 4

**FM Stations**

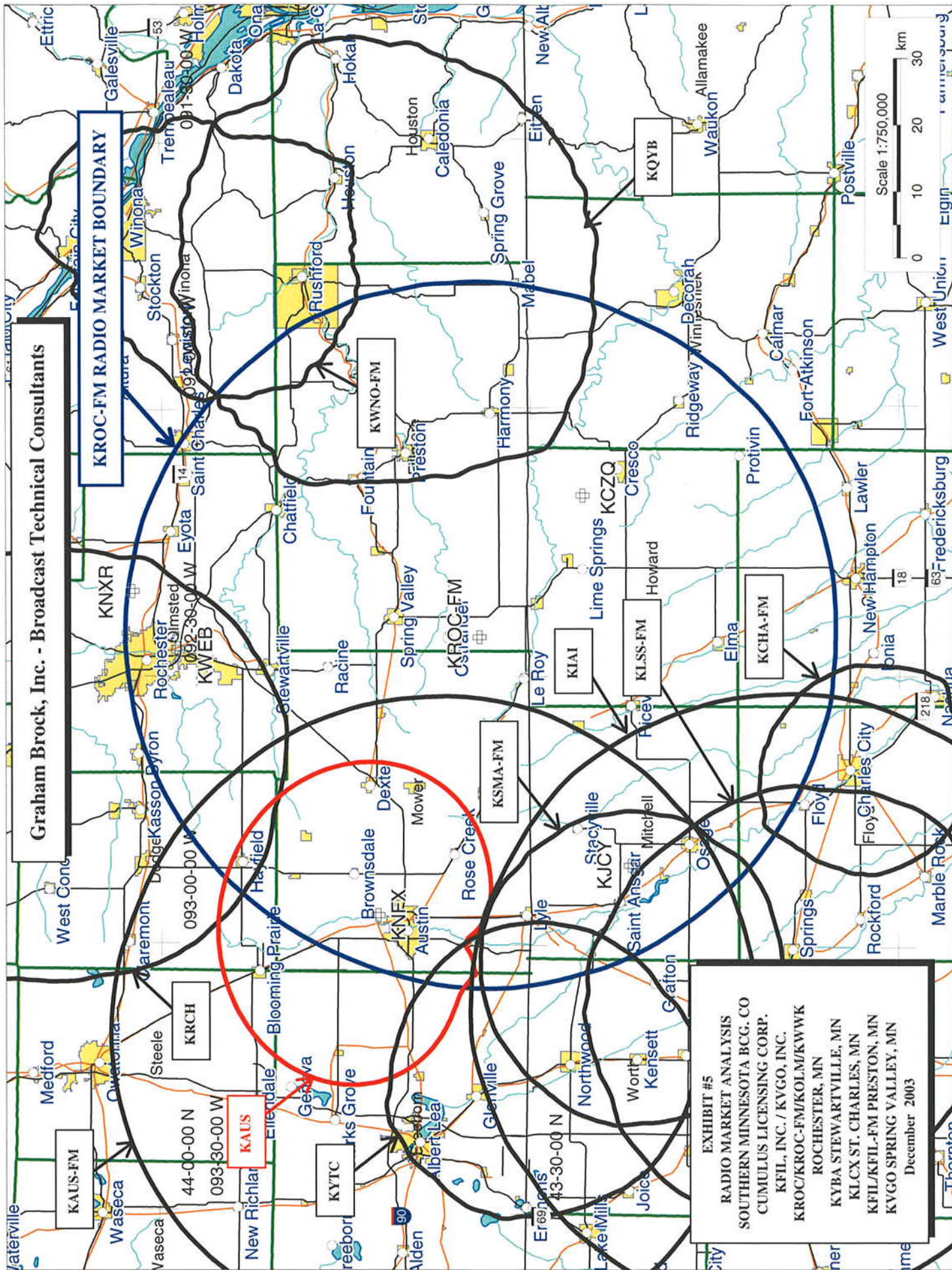
*	KWWK	Ch 243C2	Rochester, MN
	KXNR	Ch 248C	Rochester, MN
+	KAUS-FM	Ch 260C1	Austin, MN
	KRCH	Ch 269C2	Rochester, MN
	KMFX-FM	Ch 273C3	Lake City, MN

Total FM Stations - 5

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 9**

- \* Subject station.
- + Station provides city grade contour to radio market.





**RADIO MARKET ANALYSIS**  
**CUMULUS MEDIA, INC.**  
**SOUTHERN MINNESOTA BROADCASTING CO.**  
**CUMULUS LICENSING CORP.**  
**KFIL, INC.**  
**KVGO, INC.**  
**December 2003**

**EXHIBIT #6**

**Tabulation of Stations in Radio Market #3**

**AM Stations**

KNFX	970 kHz	Austin, MN
KWEB	1270 kHz	Rochester, MN
+ KAUS	1480 kHz	Austin, MN
* KOLM	1520 kHz	Rochester, MN

Total AM Stations - 4

**FM Stations**

+ KIAI	Ch 230C1	Mason City, IA
KJCY	Ch 238A	St. Ansgar, IA
+ KCHA-FM	Ch 240A	Charles City, IA
* KWWK	Ch 243C2	Rochester, MN
KNXR	Ch 248C	Rochester, MN
+ KQYB	Ch 252C2	Spring Grove, MN
+ KSMA-FM	Ch 254C3	Osage, IA
+ KWNO-FM	Ch 257C3	Rushford, MN
+ KAUS-FM	Ch 260C1	Austin, MN
+ KRCH	Ch 269C2	Rochester, MN
KCZQ	Ch 272A	Cresco, IA
+ KYTC	Ch 274C3	Northwood, IA
* KVGO	Ch 282C3	Spring Valley, MN
* KYBA	Ch 287C2	Stewartville, MN
+ KLSS-FM	Ch 291C1	Mason City, IA
* KROC-FM	Ch 295C0	Rochester, MN

Total FM Stations - 16

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 20**

- \* Subject station.
- + Station provides city grade contour to radio market.



**RADIO MARKET ANALYSIS**  
**CUMULUS MEDIA, INC.**  
**SOUTHERN MINNESOTA BROADCASTING CO.**  
**CUMULUS LICENSING CORP.**  
**KFIL, INC.**  
**KVGO, INC.**  
**December 2003**

**EXHIBIT #7**

**Tabulation of Stations in Radio Market #4**

**AM Stations**

	KNFX	970 kHz	Austin, MN
	KWEB	1270 kHz	Rochester, MN
+	KAUS	1480 kHz	Austin, MN
*	KOLM	1520 kHz	Rochester, MN

Total AM Stations - 4

**FM Stations**

+	KIAI	Ch 230C1	Mason City, IA
	KJCY	Ch 238A	St. Ansgar, IA
+	KCHA-FM	Ch 240A	Charles City, IA
*	KWWK	Ch 243C2	Rochester, MN
	KNXR	Ch 248C	Rochester, MN
+	KQYB	Ch 252C2	Spring Grove, MN
+	KSMA-FM	Ch 254C3	Osage, IA
+	KWNO-FM	Ch 257C3	Rushford, MN
+	KAUS-FM	Ch 260C1	Austin, MN
+	KRCH	Ch 269C2	Rochester, MN
	KCZQ	Ch 272A	Cresco, IA
+	KYTC	Ch 274C3	Northwood, IA
*	KFIL-FM	Ch 276C3	Preston, MN
+	KLSS-FM	Ch 291C1	Mason City, IA
*	KROC-FM	Ch 295C0	Rochester, MN
*	KLCX	Ch 299A	St. Charles, MN

Total FM Stations - 16

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 20**

- \* Subject station.
- + Station provides city grade contour to radio market.

**RADIO MARKET ANALYSIS**  
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**SOUTHERN MINNESOTA BROADCASTING CO.**  
**CUMULUS LICENSING CORP.**  
**KFIL, INC.**  
**KVGO, INC.**  
**December 2003**

**EXHIBIT #8**

**Tabulation of Stations in Radio Market #5**

**AM Stations**

	KNFX	970 kHz	Austin, MN
*	KFIL	1060 kHz	Preston, MN
	KWEB	1270 kHz	Rochester, MN
+	KAUS	1480 kHz	Austin, MN
*	KOLM	1520 kHz	Rochester, MN

Total AM Stations - 5

**FM Stations**

+	KIAI	Ch 230C1	Mason City, IA
	KJCY	Ch 238A	St. Ansgar, IA
+	KCHA-FM	Ch 240A	Charles City, IA
	KNXR	Ch 248C	Rochester, MN
+	KQYB	Ch 252C2	Spring Grove, MN
+	KSMA-FM	Ch 254C3	Osage, IA
+	KWNO-FM	Ch 257C3	Rushford, MN
+	KAUS-FM	Ch 260C1	Austin, MN
+	KRCH	Ch 269C2	Rochester, MN
	KCZQ	Ch 272A	Cresco, IA
+	KYTC	Ch 274C3	Northwood, IA
*	KVGO	Ch 282C3	Spring Valley, MN
*	KYBA	Ch 287C2	Stewartville, MN
+	KLSS-FM	Ch 291C1	Mason City, IA
*	KROC-FM	Ch 295C0	Rochester, MN

Total FM Stations - 15

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 20**

- \* Subject station.
- + Station provides city grade contour to radio market.



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**KFIL, INC.**  
**KVGO, INC.**  
**December 2003**

**EXHIBIT #9**

**Tabulation of Stations in Radio Market #6**

**AM Stations**

	KNFX	970 kHz	Austin, MN
*	KFIL	1060 kHz	Preston, MN
	KWEB	1270 kHz	Rochester, MN
+	KAUS	1480 kHz	Austin, MN
*	KOLM	1520 kHz	Rochester, MN

Total AM Stations - 5

**FM Stations**

+	KIAI	Ch 230C1	Mason City, IA
	KJCY	Ch 238A	St. Ansgar, IA
+	KCHA-FM	Ch 240A	Charles City, IA
	KNXR	Ch 248C	Rochester, MN
+	KQYB	Ch 252C2	Spring Grove, MN
+	KSMA-FM	Ch 254C3	Osage, IA
+	KWNO-FM	Ch 257C3	Rushford, MN
+	KAUS-FM	Ch 260C1	Austin, MN
+	KRCH	Ch 269C2	Rochester, MN
	KCZQ	Ch 272A	Cresco, IA
+	KYTC	Ch 274C3	Northwood, IA
*	KFIL-FM	Ch 276C3	Preston, MN
+	KLSS-FM	Ch 291C1	Mason City, IA
*	KROC-FM	Ch 295C0	Rochester, MN

Total FM Stations - 14

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 19**

- \* Subject station.
- + Station provides city grade contour to radio market.

**RADIO MARKET ANALYSIS**  
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**KFIL, INC.**  
**KVGO, INC.**  
**December 2003**

**EXHIBIT #10**

**Tabulation of Stations in Radio Market #7**

**AM Stations**

	KNFX	970 kHz	Austin, MN
*	KFIL	1060 kHz	Preston, MN
	KWEB	1270 kHz	Rochester, MN
+	KAUS	1480 kHz	Austin, MN
*	KOLM	1520 kHz	Rochester, MN

Total AM Stations - 5

**FM Stations**

+	KIAI	Ch 230C1	Mason City, IA
	KJCY	Ch 238A	St. Ansgar, IA
+	KCHA-FM	Ch 240A	Charles City, IA
	KNXR	Ch 248C	Rochester, MN
+	KQYB	Ch 252C2	Spring Grove, MN
+	KSMA-FM	Ch 254C3	Osage, IA
+	KWNO-FM	Ch 257C3	Rushford, MN
+	KAUS-FM	Ch 260C1	Austin, MN
+	KRCH	Ch 269C2	Rochester, MN
	KCZQ	Ch 272A	Cresco, IA
+	KYTC	Ch 274C3	Northwood, IA
*	KFIL-FM	Ch 276C3	Preston, MN
+	KLSS-FM	Ch 291C1	Mason City, IA
*	KROC-FM	Ch 295C0	Rochester, MN
*	KYBA	Ch 287C2	Stewartville, MN

Total FM Stations - 15

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 20**

- \* Subject station.
- + Station provides city grade contour to radio market.



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**KVGO, INC.**  
**December 2003**

**EXHIBIT #11**

**Tabulation of Stations in Radio Market #8**

**AM Stations**

KNFX	970 kHz	Austin, MN
KWEB	1270 kHz	Rochester, MN
* KROC	1340 kHz	Rochester, MN
+ KAUS	1480 kHz	Austin, MN
* KOLM	1520 kHz	Rochester, MN

Total AM Stations - 5

**FM Stations**

+ KIAI	Ch 230C1	Mason City, IA
KJCY	Ch 238A	St. Ansgar, IA
+ KCHA-FM	Ch 240A	Charles City, IA
* KWWK	Ch 243C2	Rochester, MN
KNXR	Ch 248C	Rochester, MN
+ KQYB	Ch 252C2	Spring Grove, MN
+ KSMA-FM	Ch 254C3	Osage, IA
+ KWNO-FM	Ch 257C3	Rushford, MN
+ KAUS-FM	Ch 260C1	Austin, MN
+ KRCH	Ch 269C2	Rochester, MN
KCZQ	Ch 272A	Cresco, IA
+ KYTC	Ch 274C3	Northwood, IA
* KYBA	Ch 287C2	Stewartville, MN
+ KLSS-FM	Ch 291C1	Mason City, IA
* KROC-FM	Ch 295C0	Rochester, MN

Total FM Stations - 15

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 20**

- \* Subject station.
- + Station provides city grade contour to radio market.

**RADIO MARKET ANALYSIS**  
**CUMULUS MEDIA, INC.**  
**SOUTHERN MINNESOTA BROADCASTING CO.**  
**CUMULUS LICENSING CORP.**  
**KFIL, INC.**  
**KVGO, INC.**  
**December 2003**

**EXHIBIT #12**

**Tabulation of Stations in Radio Market #9**

**AM Stations**

KNFX	970 kHz	Austin, MN
KWEB	1270 kHz	Rochester, MN
+ KAUS	1480 kHz	Austin, MN

Total AM Stations - 3

**FM Stations**

* KKHQ-FM	Ch 222C	Oelwein, IA
+ KIAI	Ch 230C1	Mason City, IA
KJCY	Ch 238A	St. Ansgar, IA
+ KCHA-FM	Ch 240A	Charles City, IA
KNXR	Ch 248C	Rochester, MN
+ KQYB	Ch 252C2	Spring Grove, MN
+ KSMA-FM	Ch 254C3	Osage, IA
+ KWNO-FM	Ch 257C3	Rushford, MN
+ KAUS-FM	Ch 260C1	Austin, MN
+ KRCH	Ch 269C2	Rochester, MN
KCZQ	Ch 272A	Cresco, IA
+ KYTC	Ch 274C3	Northwood, IA
+ KLSS-FM	Ch 291C1	Mason City, IA
* KROC-FM	Ch 295C0	Rochester, MN

Total FM Stations - 14

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 17**

- \* Subject station.
- + Station provides city grade contour to radio market.



**RADIO MARKET ANALYSIS**  
**CUMULUS MEDIA, INC.**  
**SOUTHERN MINNESOTA BROADCASTING CO.**  
**CUMULUS LICENSING CORP.**  
**KFIL, INC.**  
**KVGO, INC.**  
**December 2003**

**EXHIBIT #13**

**Tabulation of Stations in Radio Market #10**

**AM Stations**

* KOEL	950 kHz	Oelwein, IA
KNFX	970 kHz	Austin, MN
KWEB	1270 kHz	Rochester, MN
+ KAUS	1480 kHz	Austin, MN

Total AM Stations - 4

**FM Stations**

* KKHQ-FM	Ch 222C	Oelwein, IA
+ KIAI	Ch 230C1	Mason City, IA
KJCY	Ch 238A	St. Ansgar, IA
+ KCHA-FM	Ch 240A	Charles City, IA
KNXR	Ch 248C	Rochester, MN
+ KQYB	Ch 252C2	Spring Grove, MN
+ KSMA-FM	Ch 254C3	Osage, IA
+ KWNO-FM	Ch 257C3	Rushford, MN
+ KAUS-FM	Ch 260C1	Austin, MN
+ KRCH	Ch 269C2	Rochester, MN
KCZQ	Ch 272A	Cresco, IA
+ KYTC	Ch 274C3	Northwood, IA
+ KLSS-FM	Ch 291C1	Mason City, IA
* KROC-FM	Ch 295C0	Rochester, MN

Total FM Stations - 14

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 18**

- \* Subject station.
- + Station provides city grade contour to radio market.

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

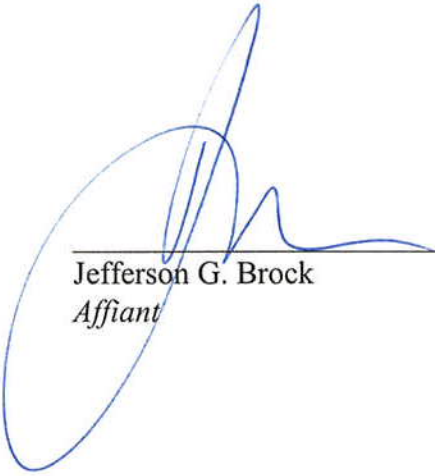
*State of Georgia    )*  
*St. Simons Island ) ss:*  
*County of Glynn    )*

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Southern Minnesota Broadcasting Co., Cumulus Licensing Corp., KFIL, Inc., and KVGO, Inc., to prepare the attached Technical Exhibit.

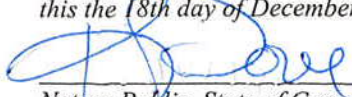
His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 18th day of December, 2003.*

  
\_\_\_\_\_  
Jefferson G. Brock  
Affiant

*Sworn to and subscribed before me  
this the 18th day of December, 2003*

  
\_\_\_\_\_  
Notary Public, State of Georgia  
My Commission Expires: April 16, 2006