

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CLEAR CHANNEL BROADCASTING LICENSES, INC.

This statement and the attached figures were prepared on behalf of Clear Channel Broadcasting Licenses, Inc. ("CCBL"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CCBL proposes to modify the facilities of WYBL(FM), Ashtabula, Ohio. 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

| Call Sign | Facility_id | City | County | State | Freq | Geographic Arbitron Market | Geographic Arbitron Market |
|-----------|-------------|------------------|-----------|-------|------|----------------------------|----------------------------|
| WFUN | 54565 | ASHTABULA | ASHTABULA | OH | AM | Non Metro | Non Metro |
| WZOO-FM | 7819 | EDGEWOOD | ASHTABULA | OH | FM | Non Metro | Non Metro |
| WREO-FM | 54566 | ASHTABULA | ASHTABULA | OH | FM | Non Metro | Non Metro |
| WFXJ-FM | 76320 | NORTH KINGSVILLE | ASHTABULA | OH | FM | Non Metro | Non Metro |
| WYBL | 87818 | ASHTABULA | ASHTABULA | OH | FM | Non Metro | Non Metro |

Since certain of 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's local radio ownership rule.³ The proposed commonly owned stations are not located within any Arbitron Metro.

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 WYBL(FM) as proposed, or which is located in the same Arbitron Metro⁴ as WYBL(FM).

Interim Contour-Overlap Analysis

Because the principal community contour of the station to be modified intersects the principal community contour of an attributable station located outside any Arbitron Metro, and the subject station is itself located outside any Arbitron Metro, an interim contour-overlap analysis is set forth in this statement.

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.

Interim Contour-Based Radio Markets

A "radio market" under the interim contour-overlap method is the area encompassed by the mutually overlapping principal community contours of the stations under common-ownership or attribution. Here, such mutually overlapping contours form one "radio market" for interim contour-overlap analysis under the Commission's rules.

The "radio market" is defined by the mutually overlapping principal community contours of WYBL(FM)(APP) (this instant application), WZOO-FM, WREO-FM, WFXJ-FM and WFUN(AM). The predicted principal community contours of these stations (1 AM / 4 FM), as well as other stations whose principal community contours overlap this combination, are shown in *Figure 1*. *Figure 2* is the tabulation of some of the radio stations identified in the "radio market."

Count of Stations in Defined Markets

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

In the interim contour-overlap "radio market" studied herein, there are at least 22 radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio market." *Figure 2* 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.

Conclusions

In the interim contour-overlap "radio market" studied herein, there are at least 22 stations, including the commonly-owned 1-AM / 4-FM stations.

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

Respectfully submitted,

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FCC Engineering Supervisor
October 21, 2004

Figure 2 - List of Stations in Radio Market 1

| Count | Call Sign | Facility_id | Licensee | Dist_km |
|-------|-----------|-------------|--|---------|
| 1 | WCVJ | 612 | AGAPE SCHOOL, INC. | 26.43 |
| 2 | WGRP | 25227 | BEACON BROADCASTING, INC. | 57.33 |
| 3 | WGOJ | 5092 | BIBLE BROADCASTING, INC. | 13.52 |
| 4 | WXTA | 72892 | CITADEL BROADCASTING COMPANY | 48.61 |
| 5 | WFUN | 54565 | CLEAR CHANNEL BROADCASTING LICENSES, INC. | 9.74 |
| 6 | WZOO-FM | 7819 | CLEAR CHANNEL BROADCASTING LICENSES, INC. | 12.53 |
| 7 | WREO-FM | 54566 | CLEAR CHANNEL BROADCASTING LICENSES, INC. | 9.78 |
| 8 | WFXJ-FM | 76320 | CLEAR CHANNEL BROADCASTING LICENSES, INC. | 4.14 |
| 9 | WYBL | 87818 | CLEAR CHANNEL BROADCASTING LICENSES, INC. | 0 |
| 10 | WWOW | 13724 | DEVELOPING RADIO, LLC | 13.49 |
| 11 | WFSE | 18665 | EDINBORO UNIVERSITY OF PENNSYLVANIA | 41.72 |
| 12 | WHUZ | 12918 | FOREVER BROADCASTING, LLC | 48.97 |
| 13 | WXXO | 76254 | FOREVER BROADCASTING, LLC | 46.25 |
| 14 | WGYW | 24940 | FOREVER BROADCASTING, LLC | 48.97 |
| 15 | WMGW | 24942 | FOREVER BROADCASTING, LLC | 48.97 |
| 16 | WKSJ | 34040 | KENT STATE UNIVERSITY | 35.87 |
| 17 | WKTX | 42365 | MIKLOS KOSSANYI, MARIA KOSSANYI MUSIC X-PRESS BROADCASTING CORP. OF NORTHEAST OHIO | 49.63 |
| 18 | WKKY | 47103 | PUBLIC BROADCASTING OF NORTHWEST PENNSYLVANIA. | 35.1 |
| 19 | WQLN-FM | 53720 | INC. | 54.73 |
| 20 | WVME | 88021 | THE MOODY BIBLE INSTITUTE OF CHICAGO | 49 |
| 21 | WMVL | 2900 | VILKIE COMMUNICATIONS, INC. | 27.53 |
| 22 | WBKC | 13685 | WATER'S EDGE COMMUNICATIONS CORP. | 48.16 |