

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CC LICENSES, LLC
April 8, 2011

This statement and the attached figures were prepared on behalf of a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CCC proposes to modify the facilities of KTWI(FM), Bennington, NE. 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	Fac ID	Band	Community	County	Geographic Arbitron Market	Declared Arbitron Market
KFAB	26931	AM	Omaha	Sarpy	Omaha-Council Bluffs, NE-IA	Omaha-Council Bluffs, NE-IA
KGOR	26928	FM	Omaha	Sarpy	Omaha-Council Bluffs, NE-IA	Omaha-Council Bluffs, NE-IA
KQBW	71411	FM	Omaha	Sarpy	Omaha-Council Bluffs, NE-IA	Omaha-Council Bluffs, NE-IA
KTWI	163	FM	Bennington	Douglas	Omaha-Council Bluffs, NE-IA	Omaha-Council Bluffs, NE-IA
KXKT	69686	FM	Glenwood	Cass	Non-Metro	Omaha-Council Bluffs, NE-IA

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 market, 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 KTWI(FM), as proposed, which is not located in an Arbitron market, or regardless of contour overlap, which is located in the same Arbitron Metro⁴ as KTWI(FM). The community of license of KTWI(FM) is located within the Omaha-Council Bluffs, NE-IA Arbitron Metro, and KTWI(FM) is reported by BIA as being "Home" to that Metro. Contour overlap of the station to be modified, as depicted in Figure 1, also occurs with commonly-owned stations whose communities of license are located in the Omaha-Council Bluffs, NE-IA Arbitron Metro market, and commonly owned stations whose communities of license are located outside any Arbitron Metro market.

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.

Arbitron Market Study

KTWI(FM) is reported by BIA as being "Home" to the Omaha-Council Bluffs, NE-IA Metro. This proposal is in compliance with the local radio ownership rules for that Arbitron Metro, as evidenced by Table 2 below:

Table 2 - Stations Considered to be in the
Arbitron Metro⁵

Count	Calls	Band	Owner	Status ⁶	Community	MKT Date
1	KYFG	FM	Bible Broadcasting Network	b	Omaha	7/2/2003
2	KFAB	AM	Clear Channel Communications Inc	b	Omaha	7/2/2003
3	KGOR	FM	Clear Channel Communications Inc	b	Omaha	7/2/2003
4	KQBW	FM	Clear Channel Communications Inc	b	Omaha	7/2/2003
5	KTWI	FM	Clear Channel Communications Inc	b	Bennington	7/2/2003
6	KXKT	FM	Clear Channel Communications Inc	a	Glenwood	7/2/2003
7	KOMJ	AM	Cochise Broadcasting LLC	b	Omaha	7/2/2003
8	KBBX-FM	FM	Connoisseur Media LLC	a	Nebraska City	7/2/2003
9	KDCV-FM	FM	Cordes and Company Inc, Receiver	b	Blair	7/2/2003
10	KIOS-FM	FM	Douglas County School District 001	b	Omaha	7/2/2003
11	KMLV	FM	Educational Media Foundation	b	Ralston	7/2/2003
12	KCSI	FM	Hawkeye Communications Inc	a	Red Oak	9/20/2007
13	KIWR	FM	Iowa Western Community College	b	Council Bluffs	7/2/2003
14	KEZO-FM	FM	Journal Broadcast Group Inc	b	Omaha	7/2/2003
15	KKCD	FM	Journal Broadcast Group Inc	b	Omaha	7/2/2003
16	KQCH	FM	Journal Broadcast Group Inc	b	Omaha	7/2/2003
17	KSRZ	FM	Journal Broadcast Group Inc	b	Omaha	7/2/2003
18	KXSP	AM	Journal Broadcast Group Inc	b	Omaha	7/2/2003
19	KBLR-FM	FM	NRG Media LLC	b	Blair	7/2/2003
20	KKAR	AM	NRG Media LLC	b	Omaha	7/2/2003
21	KMMQ	AM	NRG Media LLC	a	Plattsmouth	7/2/2003
22	KOIL	AM	NRG Media LLC	b	Bellevue	7/2/2003
23	KOOO	FM	NRG Media LLC	a	Lincoln	7/2/2003
24	KOPW	FM	NRG Media LLC	a	Plattsmouth	7/2/2003
25	KOZN	AM	NRG Media LLC	b	Bellevue	7/2/2003
26	KQKQ-FM	FM	NRG Media LLC	b	Council Bluffs	7/2/2003
27	KYME	FM	Radioactive LLC	b	Rockford	4/13/2008
28	KCRO	AM	Salem Communications Corporation	b	Omaha	7/2/2003
29	KGBI-FM	FM	Salem Communications Corporation	b	Omaha	7/2/2003
30	KOTK	AM	Salem Communications Corporation	b	Omaha	7/2/2003
31	KVNO	FM	University of Nebraska	b	Omaha	7/2/2003
32	KLNG	AM	Wilkins Communications Network Inc	b	Council Bluffs	7/2/2003
	KVSS	FM	VSS Catholic Communications Inc	b	Papillion	5/4/2010

⁵ Source: BIA.

⁶ Status: "a" -- the station is reported by BIA as "Home" to this Arbitron Metro; "g" -- the station's community of license is located within the geographic boundaries of this Arbitron Metro; "b" -- the station is both listed by BIA as "Home" to this Arbitron Metro, and its community of license is located in this Arbitron Metro.

Interim Contour-Overlap Analysis

Because the proposed principal community contour of the station to be modified intersects the principal community contour of a station under common ownership or attribution whose community of license is located outside any Arbitron Metro, an interim contour-overlap analysis is also set forth in this statement.

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 KTWI(FM), KFAB(AM), KGOR(FM), KQBW(FM), and KXKT(FM). 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 2*. *Figure 3* is the tabulation of some of the radio stations identified in the contour-overlap "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 28 radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio market." *Figure 3* is the tabulation of some of the radio stations identified in the contour-overlap "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 Arbitron Metro market studied herein, there are at least 32 radio stations, including the subject commonly-owned 1-AM / 4-FM stations, which are home to the Omaha-Council Bluffs, NE-IA Metro. This proposal does not affect the existing number of commonly-owned stations in the subject Arbitron Metro.

In the interim contour-overlap "radio market" studied herein, there are at least 53 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.

Figure 1

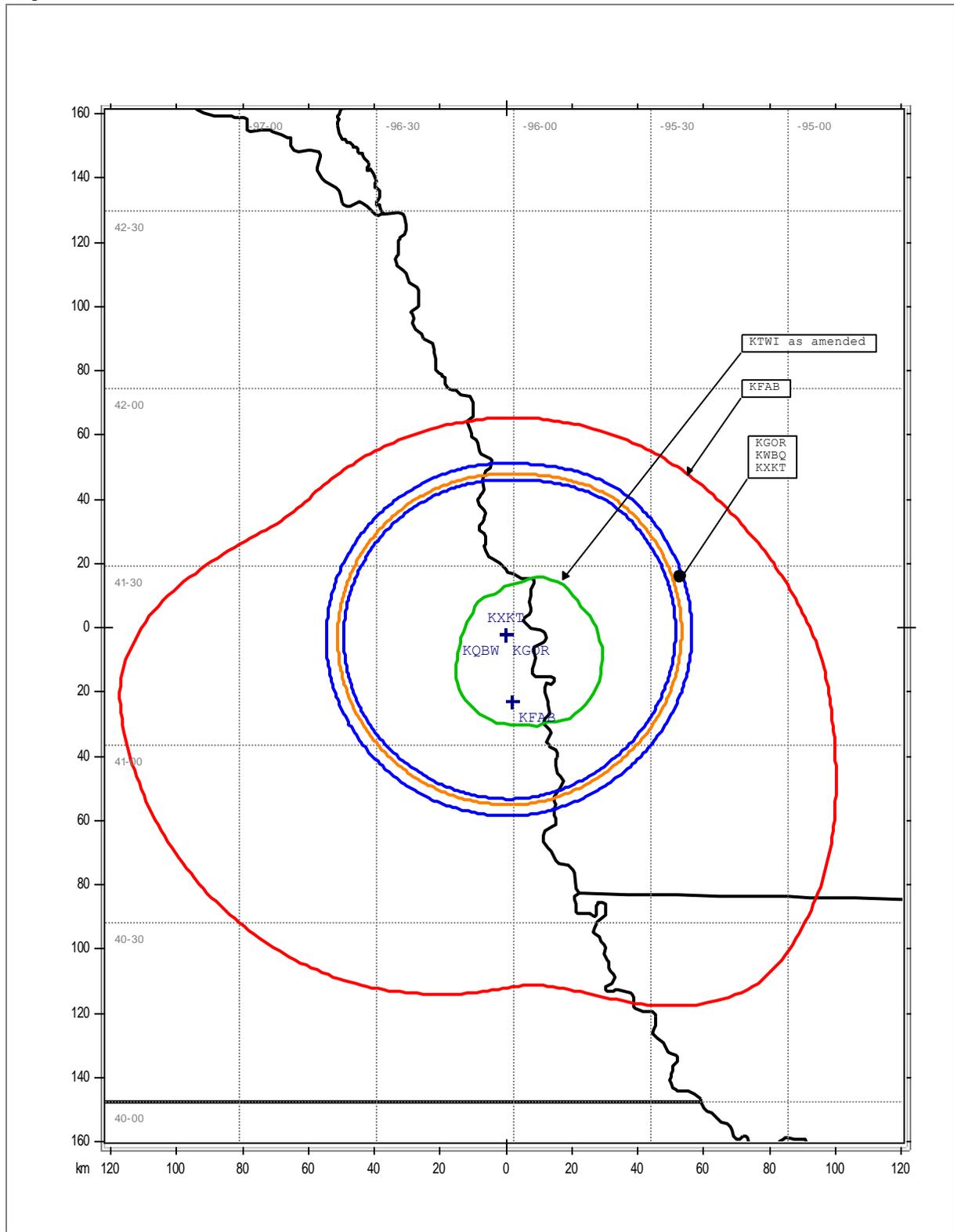


Figure 2

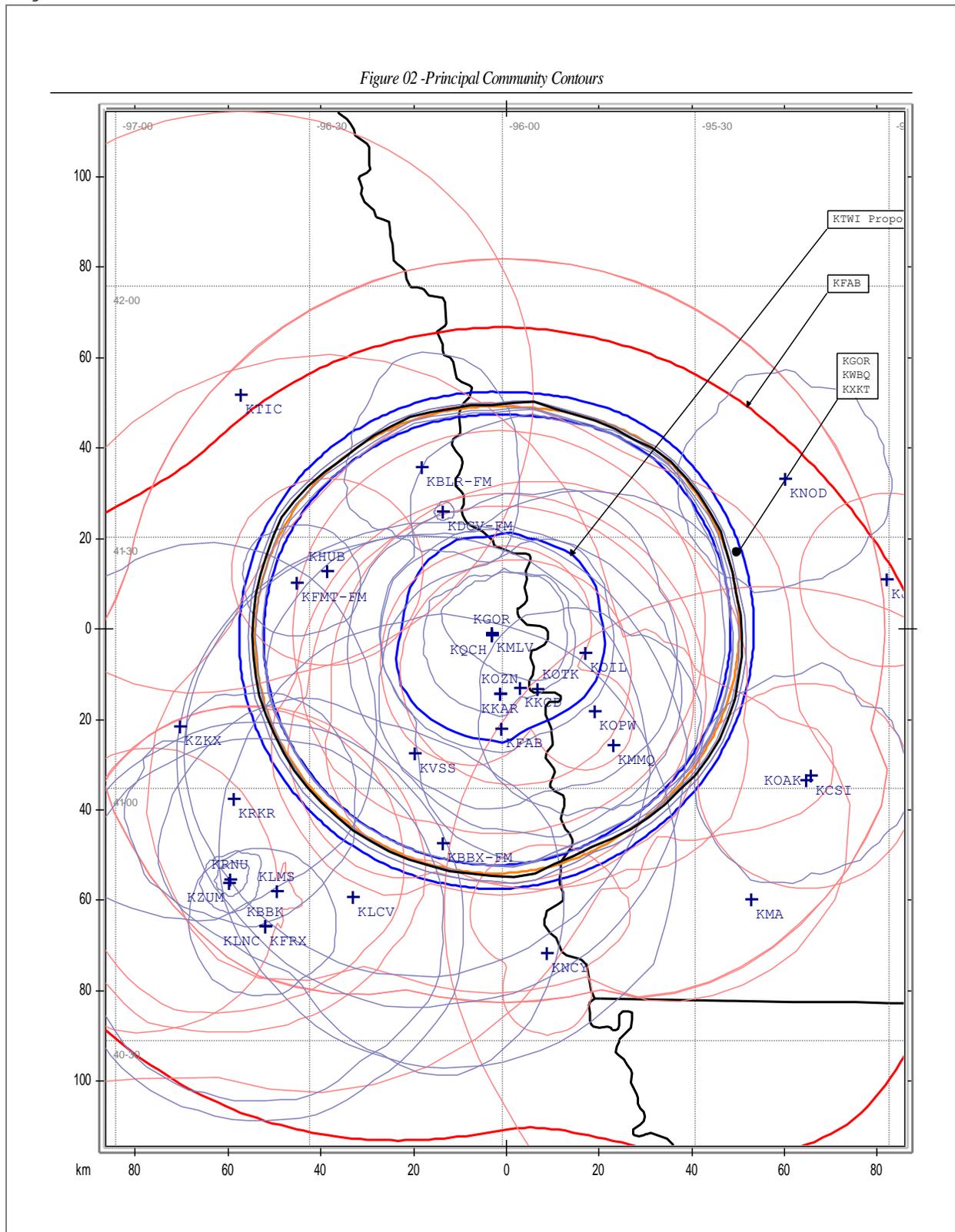


Figure 3 - Tabulation of stations in Radio Market

Count	Call Sign	Faci_id	Licensee	Dist_km
1	KYFG	50311	BIBLE BROADCASTING NETWORK, INC.	1.51
2	KFAB	26931	CAPSTAR TX LLC	22.13
3	KGOR	26928	CAPSTAR TX LLC	3.01
4	KXKT	69686	CAPSTAR TX LLC	2.91
5	KTWI PRP	163	CAPSTAR TX LLC	2.91
6	KQBW	71411	CLEAR CHANNEL BROADCASTING LICENSES, INC.	2.91
7	KOMJ	74104	COCHISE BROADCASTING LLC	9.79
8	KLCV	12837	COMMUNITY BROADCASTING, INC.	67.74
9	KBBX-FM	47957	CONNOISSEUR MEDIA OF OMAHA, LLC	49.39
10	KDCV-FM	15376	DANA COLLEGE	29.21
11	KIOS-FM	17416	DOUGLAS COUNTY SCHOOL DISTRICT 001	3.49
12	KMLV	85846	EDUCATIONAL MEDIA FOUNDATION	2.92
13	KOAK	26457	HAWKEYE COMMUNICATIONS, INC.	73.63
14	KCSI	26456	HAWKEYE COMMUNICATIONS, INC.	74
15	KIWR	29126	IOWA WESTERN COMMUNITY COLLEGE	2.92
16	KXSP	50313	JOURNAL BROADCAST CORPORATION	0.53
17	KXSP	50313	JOURNAL BROADCAST CORPORATION	0.42
18	KSRZ	50308	JOURNAL BROADCAST CORPORATION	3.3
19	KQCH	50314	JOURNAL BROADCAST CORPORATION	3.3
20	KEZO-FM	74105	JOURNAL BROADCAST CORPORATION	3.3
21	KKCD	74103	JOURNAL BROADCAST CORPORATION	3.3
22	KKCD	74103	JOURNAL BROADCAST CORPORATION	13.51
23	KMA	35107	KMA BROADCASTING L.P.	80.33
24	KRKR	54707	MISSION NEBRASKA, INC.	69.95
25	KTIC	33880	NEBRASKA RURAL RADIO ASSOCIATION	77.04
26	KOPW	52801	NRG LICENSE SUB, L.L.C.	26.64
27	KLIN	35064	NRG LICENSE SUB, LLC	77.5
28	KHUB	34550	NRG LICENSE SUB, LLC	40.57
29	KOZN	87182	NRG LICENSE SUB, LLC	14.44
30	KKAR	542	NRG LICENSE SUB, LLC	14.47
31	KOIL	43237	NRG LICENSE SUB, LLC	18.21
32	KMMQ	52802	NRG LICENSE SUB, LLC	34.93
33	KLNC	58730	NRG LICENSE SUB, LLC	83.91
34	KBBK	35063	NRG LICENSE SUB, LLC	83.91
35	KFMT-FM	34549	NRG LICENSE SUB, LLC	46.14
36	KQKQ-FM	43238	NRG LICENSE SUB, LLC	3.09
37	KOOO	35067	NRG LICENSE SUB, LLC	34.18
38	KBLR-FM	87840	NRG LICENSE SUB, LLC	39.84
39	KOTK	50307	PENNSYLVANIA MEDIA ASSOCIATES, INC.	15
40	KGBI-FM	24713	PENNSYLVANIA MEDIA ASSOCIATES, INC.	2.92
41	KNCY	63941	RIVERFRONT BROADCASTING LLC	72.17
42	KCRO	54902	SALEM MEDIA OF ILLINOIS, LLC	1.51
43	KZUM	63955	SUNRISE COMMUNICATIONS, INC.	82.14
44	KVNO	69395	THE BOARD OF REGENTS OF THE UNIVERSITY OF NEBRASKA	3.09
45	KLNE	54708	THREE EAGLES OF LINCOLN, INC.	76.25
46	KFOR	34436	THREE EAGLES OF LINCOLN, INC.	78.66
47	KFRX	57287	THREE EAGLES OF LINCOLN, INC.	83.85
48	KZKX	53143	THREE EAGLES OF LINCOLN, INC.	73.73
49	KRNU	69268	UNIVERSITY OF NEBRASKA	81.41
50	KVSS	34435	VSS CATHOLIC COMMUNICATIONS, INC.	33.69
51	KLNG	72464	WILKINS COMMUNICATIONS NETWORK, INC.	14.33
52	KNOD	15141	WIRELESS BROADCASTING, L.L.C.	68.95