

TECHNICAL STATEMENT

KFMD(FM), FACILITY ID 48967
CITICASTERS LICENSES, L.P.

KBPI(FM), FACILITY ID 29739
JACOR BROADCASTING OF COLORADO, INC.

KRFX(FM), FACILITY ID 29731
JACOR BROADCASTING OF COLORADO, INC.

RADIO MULTIPLE OWNERSHIP ANALYSIS -- 05/09/2003

This statement and the attached figures were prepared on behalf of Citicasters Licenses, LP and Jacor Broadcasting of Colorado, Inc., both licensee subsidiaries of Clear Channel Communications, Inc. ("APPLICANT"). The APPLICANT proposes to modify the facilities of KFMD(FM), KBPI(FM), and KRFX(FM). A multiple ownership analysis was prepared considering the following radio stations under present or proposed common ownership or time brokerage:

Table 1: Proposed Commonly Owned or Controlled Stations Studied

Call Sign	City	State	Freq	Status
KTCL(FM)	FORT COLLINS	CO	93.3	LIC
KFMD(FM)	DENVER	CO	95.7	APP ¹
KSME(FM)	GREELEY	CO	96.1	LIC
KCCY(FM)	PUEBLO	CO	96.9	LIC/CP ²
KBCO-FM	BOULDER	CO	97.3	LIC
KVUU(FM)	PUEBLO	CO	99.9	LIC
KRFX(FM)	DENVER	CO	103.5	APP ¹
KBPI(FM)	DENVER	CO	106.7	APP ¹
KPAW(FM)	FORT COLLINS	CO	107.9	LIC
KCOL(AM)	WELLINGTON	CO	600	LIC
KHOW(AM)	DENVER	CO	630	LIC
KKZN(AM)	THORNTON	CO	760	LIC
KOA(AM)	DENVER	CO	850	LIC

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 multiple ownership rules³.

¹ One of the three applications for which this ownership study has been prepared.

² Station KCCY(FM) has been granted permit BPH-20000724ABL. The licensing of this permit would not change any market definitions and would not alter the count of stations in any of the markets studied herein.

³ See 47 C.F.R. § 73.3555.

The APPLICANT does not have an attributable interest in any other station with a principal community contour that overlaps or intersects the existing facilities of KFMD(FM), KBPI(FM), or KRFX(FM).

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 proposed commonly owned stations. These mutually overlapping contours form five "radio markets", as shown in *Figure 1*, for analysis under the Commission's rules.

Radio Market "1" is defined by the mutually overlapping principal community contours of KBPI(FM)⁴, KOA(AM), KKZN(AM), KHOW(AM), and KCOL(AM). The predicted principal community contours of these stations (1 FM, 4 AM) are shown in *Figure 2*.

Radio Market "2" is defined by the mutually overlapping principal community contours of KBPI(FM)⁴, KTCL(FM), KOA(AM), KKZN(AM), and KCOL(AM). The predicted principal community contours of these stations (2 FM, 3 AM) are shown in *Figure 4*.

Radio Market "3" is defined by the mutually overlapping principal community contours of KBPI(FM)⁴, KSME(FM), KTCL(FM), KBCO-FM, KPAW(FM), KOA(AM), KKZN(AM), and KHOW(AM). The predicted principal community contours of these stations (5 FM, 3 AM) are shown in *Figure 6*.

Radio Market "4" is defined by the mutually overlapping principal community contours of KFMD(FM)⁴, KBPI(FM)⁴, KRFX(FM)⁴, KBCO-FM, KTCL(FM), KOA(AM), KKZN(AM), and KHOW(AM). The predicted principal community contours of these stations (5 FM, 3 AM) are shown in *Figure 8*.

Radio Market "5" is defined by the mutually overlapping principal community contours of KFMD(FM)⁴, KBPI(FM)⁴, KRFX(FM)⁴, KVUU(FM), KCCY(FM) (LIC/CP), KOA(AM), KKZN(AM), and KHOW(AM). The predicted principal community contours of these stations (5 FM, 3 AM) are shown in *Figure 10*.

Count of Stations in Defined Markets

The number of radio stations in a "radio market" is determined by counting the operating, commercial stations having principal community contours that overlap or intersect the principal community contours that define the radio market, plus the subject commonly owned or controlled stations.

⁴ As proposed in the accompanying Form 301 applications.

There are over 100 radio stations, including the subject co-owned stations, but not including co-owned stations that are not part of the respective "radio market", that overlap or intersect with each of the defined "radio markets." Tabulations of the radio stations identified in Radio Markets "1", "2", "3", "4", and "5" are included as *Figures 3, 5, 7, 9, and 11*, respectively.

Only known licensed, operating commercial 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 5 degrees of azimuth.

Based on the above, it is concluded that the proposed modifications comply with § 73.3555(a) of the FCC Rules.

Sincerely,

Nestor Custodio
FCC Processing Administrator
Clear Channel Communications, Inc.