

RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
WDUZ/WQLH - GREEN BAY, WISCONSIN
WPCK - DENMARK, WISCONSIN
WDUZ-FM - BRILLION, WISCONSIN
WOGB - KAUKAUNA, WISCONSIN
December 2008

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC (“Cumulus”). Cumulus is proposing a Local Programming and Marketing Agreement (“LMA”) with respect to stations WDUZ, 1400 kHz, and WQLH, Channel 253C1, Green Bay, Wisconsin; WPCK, Channel 285C3, Denmark, Wisconsin; WDUZ-FM, Channel 298C3, Brillion, Wisconsin; and WOGB, Channel 276C3, Kaukauna, Wisconsin.¹ Each of these stations is licensed to a community in a metro county in the Green Bay, Wisconsin Arbitron Market, with the exception of WOGB, which is a metro station in the Appleton-Oshkosh, Wisconsin Arbitron Market² and is considered “home” to the Green Bay market³ and WDUZ-FM which is considered “home” in the Appleton-Oshkosh market. Therefore, this review will verify compliance with the Commission’s multiple ownership rules in rated markets.

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- 1) Cumulus is presently the licensee of these stations. Applications have been filed which propose to assign these stations to wholly-owned subsidiaries of Clear Channel. The proposed LMA for these facilities is between Cumulus and the Clear Channel subsidiaries. It is noted that Cumulus is also the licensee of WZNN, Channel 294C3, Allouez, Wisconsin and WWXX, Channel 245A, Oshkosh, Wisconsin. Both WZNN and WWXX are the subject of a separate application requesting Commission consent to assign those stations to WI Radio, LLC. As such, neither of those stations are considered attributable to Cumulus for the purposes of this LMA review.
 - 2) Cumulus is the licensee of stations WPKR, Channel 258C2, Omro, Wisconsin; WNAM, 1280 kHz, Neenah-Menasha, Wisconsin; WVBO, Channel 280C3, Winneconne, Wisconsin; and WOSH, 1490 kHz, Oshkosh, Wisconsin.
 - 3) WOGB was removed from the Green Bay market on January 7, 2008. Therefore, as the two year holding period has not concluded, WOGB is still considered attributable to the Green Bay market as a home to the market facility.

GREEN BAY, WISCONSIN
ARBITRON/BIA MARKET REVIEW

2. As shown on Exhibit #1, there are nineteen AM and FM (commercial and non-commercial) stations listed in the Green Bay, Wisconsin Arbitron Market (Market #187), twenty stations if WOGB is considered as “home” to the market. Under the proposed LMA, Cumulus would be operating four FM stations and one AM station in the market. The number of stations indicated falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules. At this level, common ownership or control of up to six stations, with no more than four in the same service, is permissible. Therefore, the proposed LMA involving stations in the Green Bay, Wisconsin market is in compliance with the rules.

APPLETON-OSHKOSH, WISCONSIN
ARBITRON/BIA MARKET REVIEW

3. As shown on Exhibit #2, there are twenty-four AM and FM (commercial and non-commercial) stations listed in the Appleton-Oshkosh, Wisconsin Arbitron Market (Market #135). Under the proposed LMA and Cumulus’s resulting time brokerage of stations WOGB and WDUZ-FM, Cumulus would be operating four FM stations and two AM stations in the market. The number of stations indicated falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules. At this level, common ownership or control of up to six stations, with no more than four in the same service, is permissible. Therefore, Cumulus’s time brokerage of WOGB and WDUZ-FM in conjunction with ownership interests in other stations in the Appleton-Oshkosh, Wisconsin market is in compliance with the rules.

4. Based on the foregoing, the proposed LMA involving time brokerage of WDUZ, WDUZ-FM, WOGB, WQLH and WPCK by Cumulus is in compliance with §73.3555(a)(1) of the rules.

5. The foregoing technical statement was prepared on behalf of Cumulus Licensing LLC 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 in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.3. BIA database. Technical data related to AM and FM facilities was extracted from the Commission's CDBS database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.



FCC Geographic Market Definition for Green Bay, WI

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WAUN	FM	92.7	C	Rock AC	Green Bay, WI	07/02/2003	187	Magnum Radio	Kewaunee, WI	Kewaunee
WDUZ	AM	1400	C	Sports	Green Bay, WI	07/02/2003	187	Cumulus Broadcasting Inc	Green Bay, WI	Brown
WQLH	FM	98.5	C	Hot AC	Green Bay, WI	07/02/2003	187	Cumulus Broadcasting Inc	Green Bay, WI	Brown
WTAQ	AM	1360	C	News/Info	Green Bay, WI	07/02/2003	187	Midwest Communications Incorporated	Green Bay, WI	Brown
WIXX	FM	101.1	C	CHR	Green Bay, WI	07/02/2003	187	Midwest Communications Incorporated	Green Bay, WI	Brown
WKSZ	FM	95.9	C	CHR	Green Bay, WI	07/02/2003	187	Woodward Communications Inc	De Pere, WI	Brown
WPCK	FM	104.9	C	Country	Green Bay, WI	01/02/2004	187	Cumulus Broadcasting Inc	Denmark, WI	Brown
WNFL	AM	1440	C	Sprts/Talk	Green Bay, WI	07/02/2003	187	Midwest Communications Incorporated	Green Bay, WI	Brown
WOWN	FM	99.3	C	Clsc Hits	Green Bay, WI	12/01/2006	187	Results Broadcasting Inc	Shawano, WI	Shawano
WZBY	FM	99.7	C	AC	Green Bay, WI	07/02/2003	187	Midwest Communications Incorporated	Sturgeon Bay, WI	Door
WTCH	AM	960	C	Cntry/FuSvc	Green Bay, WI	12/01/2006	187	Results Broadcasting Inc	Shawano, WI	Shawano
WGBW	AM	1590	C	Oldies	Green Bay, WI	09/23/2008	187	WTRW Inc	Two Rivers, WI	Manitowoc
WDUZ	FM	107.5	C	Sports	Green Bay, WI	07/02/2003	187	Cumulus Broadcasting Inc	Brillion, WI	Calumet
WZOR	FM	94.7	C	Rock	Green Bay, WI	07/02/2003	187	Woodward Communications Inc	Mishicot, WI	Manitowoc
WZNN	FM	106.7	C	Alternative	Green Bay, WI	07/02/2003	187	Cumulus Broadcasting Inc	Allouez, WI	Brown
WEMY	FM	91.5	NC	ChrsContem	Green Bay, WI	07/02/2003	187	Evangel Ministries Incorporated	Green Bay, WI	Brown
WHID	FM	88.1	NC	Talk	Green Bay, WI	07/02/2003	187	University of Wisconsin	Green Bay, WI	Brown
WORQ	FM	90.1	NC	Chrst/CHR	Green Bay, WI	07/02/2003	187	Lakeshore Communications Inc	Green Bay, WI	Brown
WPNE	FM	89.3	NC	Clsc/NPR	Green Bay, WI	07/02/2003	187	State of Wisconsin - Educational Communications	Green Bay, WI	Brown

Number of Stations in Geographic Market 19

Previous Stations in Geographic Market

WGOB	FM	103.1	C	70s & 80s	Appleton-Oshkosh, WI	01/07/2008	135	Cumulus Broadcasting Inc	Kaukauna, WI	Outagamie
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"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for Appleton-Oshkosh, WI

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WWWX	FM	96.9	C	Rock	Appleton-Oshkosh, WI	07/02/2003	135	Cumulus Broadcasting Inc	Oshkosh, WI	Winnebago
WAPL	FM	105.7	C	Clsc Rock	Appleton-Oshkosh, WI	07/02/2003	135	Woodward Communications Inc	Appleton, WI	Outagamie
WVCY	AM	690	NC	Christian	Appleton-Oshkosh, WI	07/02/2003	135	VCY America Inc	Oshkosh, WI	Winnebago
WNCY	FM	100.3	C	Country	Appleton-Oshkosh, WI	07/02/2003	135	Midwest Communications Incorporated	Neenah-Menasha, WI	Winnebago
WOTE	AM	1380	C	Nostalgia	Appleton-Oshkosh, WI	12/01/2006	135	Results Broadcasting Inc	Clintonville, WI	Waupaca
WJMQ	FM	92.3	C	Country	Appleton-Oshkosh, WI	12/01/2006	135	Results Broadcasting Inc	Clintonville, WI	Waupaca
WFON	FM	107.1	C	Hot AC	Appleton-Oshkosh, WI	07/02/2003	135	RBH Enterprises Incorporated	Fond Du Lac, WI	Fond Du Lac
WPKR	FM	99.5	C	Country	Appleton-Oshkosh, WI	07/02/2003	135	Cumulus Broadcasting Inc	Omro, WI	Winnebago
WBJZ	FM	104.7	C	CHR	Appleton-Oshkosh, WI	02/15/2005	135	Caxambas Corporation	Berlin, WI	Green Lake
WJOK	AM	1050	C	Religion	Appleton-Oshkosh, WI	07/02/2003	135	Starboard Media Foundation Inc D/B/ARelevant	Kaukauna, WI	Outagamie
WMBE	AM	1530	C	Sports	Appleton-Oshkosh, WI	07/02/2003	135	Maszka-Pacer Radio Inc	Chilton, WI	Calumet
WNAM	AM	1280	C	Christmas	Appleton-Oshkosh, WI	07/02/2003	135	Cumulus Broadcasting Inc	Neenah-Menasha, WI	Winnebago
WOZZ	FM	93.5	C	Clsc Rock	Appleton-Oshkosh, WI	07/02/2003	135	Midwest Communications Incorporated	New London, WI	Outagamie
WVBO	FM	103.9	C	Oldies	Appleton-Oshkosh, WI	07/02/2003	135	Cumulus Broadcasting Inc	Winneconne, WI	Winnebago
WROE	FM	94.3	C	AC	Appleton-Oshkosh, WI	07/02/2003	135	Midwest Communications Incorporated	Neenah-Menasha, WI	Winnebago
WSCO	AM	1570	C	Sports	Appleton-Oshkosh, WI	07/02/2003	135	Woodward Communications Inc	Appleton, WI	Outagamie
WHBY	AM	1150	C	News/Talk	Appleton-Oshkosh, WI	07/02/2003	135	Woodward Communications Inc	Kimberly, WI	Outagamie
WOSH	AM	1490	C	Nws/Tlk/Spt	Appleton-Oshkosh, WI	07/02/2003	135	Cumulus Broadcasting Inc	Oshkosh, WI	Winnebago
WDUZ	FM	107.5	C	Sports	Green Bay, WI	07/02/2003	187	Cumulus Broadcasting Inc	Brillion, WI	Calumet
WOGB	FM	103.1	C	70s & 80s	Appleton-Oshkosh, WI	01/07/2008	135	Cumulus Broadcasting Inc	Kaukauna, WI	Outagamie
WECB	FM	104.3	C	Christmas	Appleton-Oshkosh, WI	07/02/2003	135	Woodward Communications Inc	Seymour, WI	Outagamie
WEMI	FM	91.9	NC	ChrsContem	Appleton-Oshkosh, WI	07/02/2003	135	Evangel Ministries Incorporated	Appleton, WI	Outagamie
WOVM	FM	91.1	NC	Christmas	Appleton-Oshkosh, WI	07/02/2003	135	Music That Matters Inc	Appleton, WI	Outagamie
WRST	FM	90.3	NC	Talk/Motvl	Appleton-Oshkosh, WI	07/02/2003	135	University of Wisconsin	Oshkosh, WI	Winnebago

Number of Stations in Geographic Market **24**

Previous Stations in Geographic Market

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

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 Cumulus Licensing LLC 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 23rd day of December 2008.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 23rd day of December 2008*



Notary Public, State of Georgia
My Commission Expires: June 16, 2012