

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
CITADEL BROADCASTING COMPANY

This radio multiple ownership analysis was prepared on behalf of Citadel Broadcasting Company (“Citadel”) concerning stations proposed for acquisition in the Muskegon, Michigan area. This analysis was prepared under the FCC interim contour analysis method.\* Considering the stations to be acquired and all other radio stations attributable to Citadel in the region, the following stations were analyzed:

Call Sign	City of License	Facilities
WUBR(AM)	Whitehall, MI	1490 kHz, 1 kW, U
Newaygo FM	Newaygo, MI	Ch 223A, 2.25 kW, 165 m (CP, BMPH-20030609ACU)
WLAV-FM	Grand Rapids, MI	Ch 245B, 50 kW, 149 m
WEFG-FM	Whitehall, MI	Ch 248A, 1.7 kW, 130 m
WLCS(FM)	North Muskegon, MI	Ch 252A, 1.6 kW, 139 m
WSHN-FM	Holton, MI	Ch 261A, 3 kW, 92 m (License) Ch 261A, 2.9 kW, 144 m (CP, BPH-20010921AAB)

The principal community contours of all of these stations are depicted on a map included herein as Figure 1.† The radio multiple ownership analysis considers only those stations with overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations). An ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

\* See Report and Order and Notice of Proposed Rulemaking, MB Docket 02-277, FCC 03-127, Released July 2, 2003.

† Also depicted in Figure 1 are nearby Citadel-owned stations WKLQ(FM), WTNR(FM) and WBBL(AM), which do not form markets for consideration with the subject stations, but are shown for reference.

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 stations proposed to be commonly owned. As listed in the table below, there are three defined “radio markets” formed by the subject stations:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	WUBR	WEFG, WLCS, WSHN(CP)
Market 2	--	Newaygo, WLCS, WSHN(Lic or CP)
Market 3	--	Newaygo, WLAV

Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating stations that have principal community contours that intersect the principal community contours that define the radio market. Only those stations located within 92 km of the perimeter of the mutual overlap area of the defined market area were employed in the count of stations. Commonly owned stations, other than those that form the market in question, were not considered in the count of stations in the defined markets. The results of the analysis are tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	4 AM; 10 FM; 14 Total
Market 2	7 AM; 14 FM; 21 Total

Defined Radio Market	Number of Stations in Radio Market
Market 3	14 AM; 22 FM; 36 Total

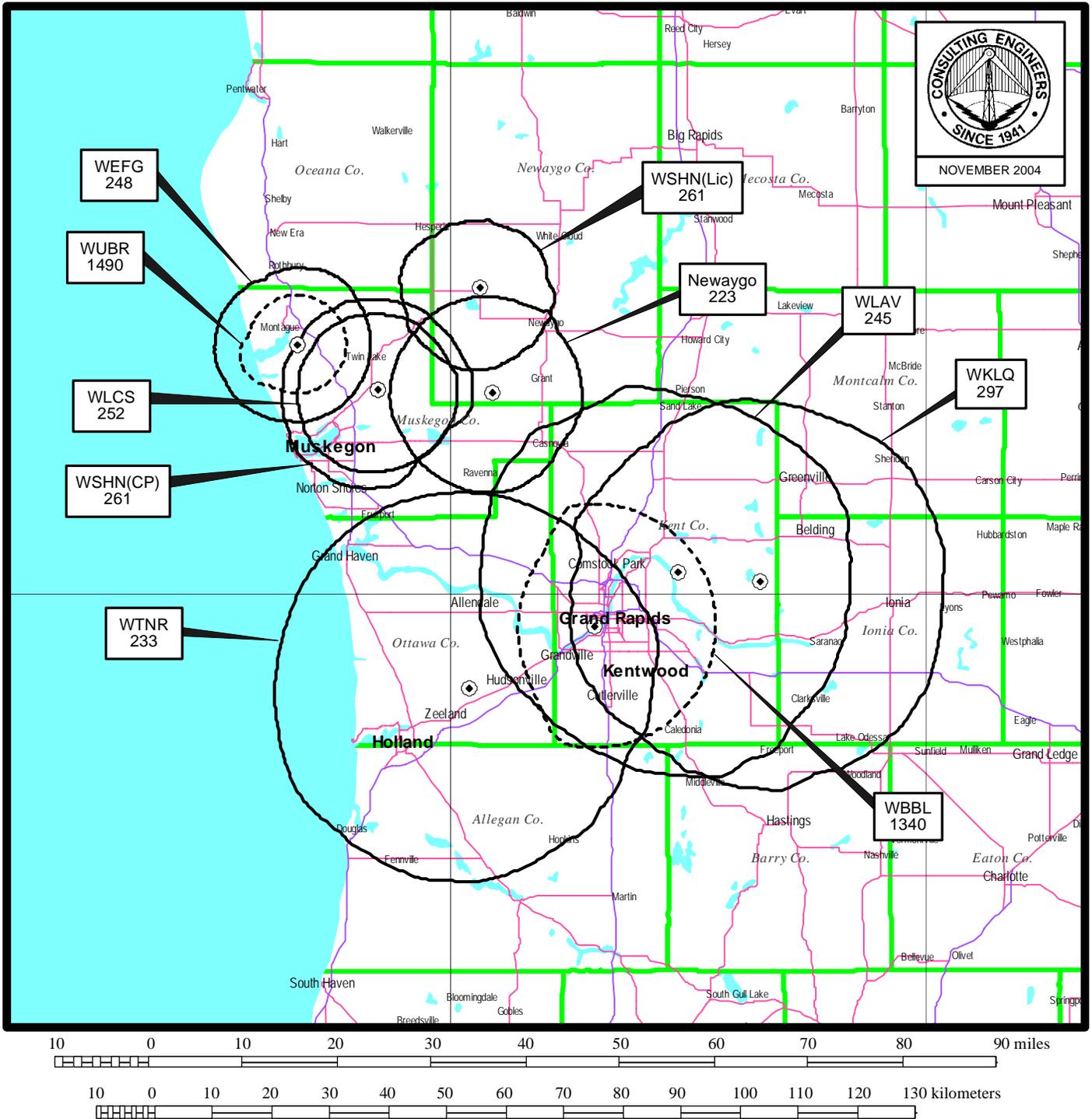
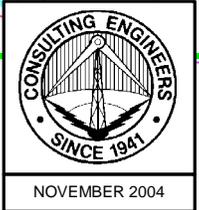
Figure 2 is a tabulation of the radio stations identified in the defined radio markets. Only known licensed, operating stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's AM database and the appropriate Ground Wave Field Strength versus Distance Graph described in Section 73.184 of the FCC Rules. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method outlined in Section 73.313 of the FCC Rules. Terrain data were derived from the U.S.G.S. 3-second computer database for each of the FM stations using radials evenly-spaced every 2 degrees of azimuth.

Based on the above, it is concluded that the proposed combination of the stations to be owned complies with Section 73.3555(a) of the FCC Rules.

Louis Robert du Treil, Jr.

du Treil, Lundin & Rackley, Inc.  
201 Fletcher Ave.  
Sarasota, Florida 34237

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## PREDICTED PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

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Tabulation of Stations in Radio Markets

<b>Market 1</b>	
Number	Station
<b>AM Stations</b>	
1	WGVS, MUSKEGON, MI, 850 kHz
2	WMUS, MUSKEGON, MI, 1090 kHz
3	WUBR, WHITEHALL, MI, 1490 kHz
4	WMHG, MUSKEGON, MI, 1600 kHz
<b>FM Stations</b>	
1	WBLV, TWIN LAKE, MI, Channel 212
2	WGVS-F, WHITEHALL, MI, Channel 237
3	WEFG-F, WHITEHALL, MI, Channel 248
4	WLCS, NORTH MUSKEGON, MI, Channel 252
5	WSHN-F, HOLTON, MI, Channel 261
6	WMRR, MUSKEGON HEIGHTS, MI, Channel 269
7	WSNX-F, MUSKEGON, MI, Channel 283
8	WCXT, HART, MI, Channel 287
9	WMUS-F, MUSKEGON, MI, Channel 295
10	WSHZ, MUSKEGON, MI, Channel 300

<b>Market 2</b>	
Number	Station
<b>AM Stations</b>	
1	WMJH, ROCKFORD, MI, 810 kHz
2	WGVS, MUSKEGON, MI, 850 kHz
3	WMUS, MUSKEGON, MI, 1090 kHz
4	WJNZ, KENTWOOD, MI, 1140 kHz
5	WOOD, GRAND RAPIDS, MI, 1300 kHz
6	WSHN, FREMONT, MI, 1550 kHz
7	WMHG, MUSKEGON, MI, 1600 kHz

<b>Market 2</b>	
Number	Station
<b>FM Stations</b>	
1	WGVU-F, ALLENDALE, MI, Channel 203
2	WBLV, TWIN LAKE, MI, Channel 212
3	Newaygo, NEWAYGO, MI, Channel 223
4	WGVF-F, WHITEHALL, MI, Channel 237
5	WLHT-F, GRAND RAPIDS, MI, Channel 239
6	WLAV-F, GRAND RAPIDS, MI, Channel 245
7	WLCS, NORTH MUSKEGON, MI, Channel 252
8	WSHN-F, HOLTON, MI, Channel 261
9	WMRR, MUSKEGON HEIGHTS, MI, Channel 269
10	WFUR-F, GRAND RAPIDS, MI, Channel 275
11	WSNX-F, MUSKEGON, MI, Channel 283
12	WCXT, HART, MI, Channel 287
13	WMUS-F, MUSKEGON, MI, Channel 295
14	WSHZ, MUSKEGON, MI, Channel 300

<b>Market 3</b>	
Number	Station
<b>AM Stations</b>	
1	WMFN, ZEELAND, MI, 640 kHz
2	WMJH, ROCKFORD, MI, 810 kHz
3	WGVF, MUSKEGON, MI, 850 kHz
4	WMUS, MUSKEGON, MI, 1090 kHz
5	WJNZ, KENTWOOD, MI, 1140 kHz
6	WTKG, GRAND RAPIDS, MI, 1230 kHz
7	WOOD, GRAND RAPIDS, MI, 1300 kHz
8	WSCG, GREENVILLE, MI, 1380 kHz
9	WNWZ, GRAND RAPIDS, MI, 1410 kHz
10	WGVU, KENTWOOD, MI, 1480 kHz
11	WYGR, WYOMING, MI, 1530 kHz
12	WSHN, FREMONT, MI, 1550 kHz
13	WFUR, GRAND RAPIDS, MI, 1570 kHz
14	WMHG, MUSKEGON, MI, 1600 kHz
<b>FM Stations</b>	
1	WYCE, WYOMING, MI, Channel 201
2	WGVU-F, ALLENDALE, MI, Channel 203
3	WBLU-F, GRAND RAPIDS, MI, Channel 205
4	WGNB, ZEELAND, MI, Channel 207
5	WAYG, GRAND RAPIDS, MI, Channel 210

<b>Market 3</b>	
Number	Station
6	WBLV, TWIN LAKE, MI, Channel 212
7	WCSG, GRAND RAPIDS, MI, Channel 217
8	Newaygo, NEWAYGO, MI, Channel 223
9	WLHT-F, GRAND RAPIDS, MI, Channel 239
10	WVTI, HOLLAND, MI, Channel 241
11	WLAV-F, GRAND RAPIDS, MI, Channel 245
12	WGRD-F, GRAND RAPIDS, MI, Channel 250
13	WFGD, GRAND RAPIDS, MI, Channel 254
14	WJQK, ZEELAND, MI, Channel 257
15	WTRV, WALKER, MI, Channel 263
16	WBFX, GRAND RAPIDS, MI, Channel 267
17	WMRR, MUSKEGON HEIGHTS, MI, Channel 269
18	WFUR-F, GRAND RAPIDS, MI, Channel 275
19	WSNX-F, MUSKEGON, MI, Channel 283
20	WCXT, HART, MI, Channel 287
21	WMUS-F, MUSKEGON, MI, Channel 295
22	WSHZ, MUSKEGON, MI, Channel 300