

Multiple Ownership Study

Pursuant to the Commission's ownership rules in Section 73.3555, the following Multiple Ownership Study was conducted to determine if a grant of the instant assignment application will comply with the Rules.

Citicasters Licenses, L.P. ("Citicasters") and Blue Point Media, LLC ("Blue Point") propose herein to assign the following Citicasters stations to Blue Point serving the Casper, Wyoming, Arbitron Market:

KKTL (AM)
KTWO (AM)

Contemporaneously, Clear Channel Broadcasting Licenses, Inc. ("CCBL") and Blue Point propose to assign the following CCBL station to Blue Point serving the Casper, Wyoming, Arbitron Market:

KMGW (FM)
KWYY (FM)
KTRS-FM
KRVK (FM)

Even though all of the stations proposed to be assigned to Blue Point in the two contemporaneous transactions are included in the Casper Arbitron Market, two multiple ownership showings are included herein to demonstrate ownership compliance. The first study, "Blue Point Multiple Ownership Study – Contour Overlap Market," and the second study, "Blue Point Multiple Ownership Study – Casper Arbitron Market," demonstrate that, using both the Arbitron methodology and the revised contour overlap methodology, a grant of the instant assignment application will comply with Section 73.3555.

Multiple Ownership Study – Contour Overlap Market

Blue Point proposes to hold attributable interests in the following radio stations, which overlap each other in the Casper area:

TABLE 1:

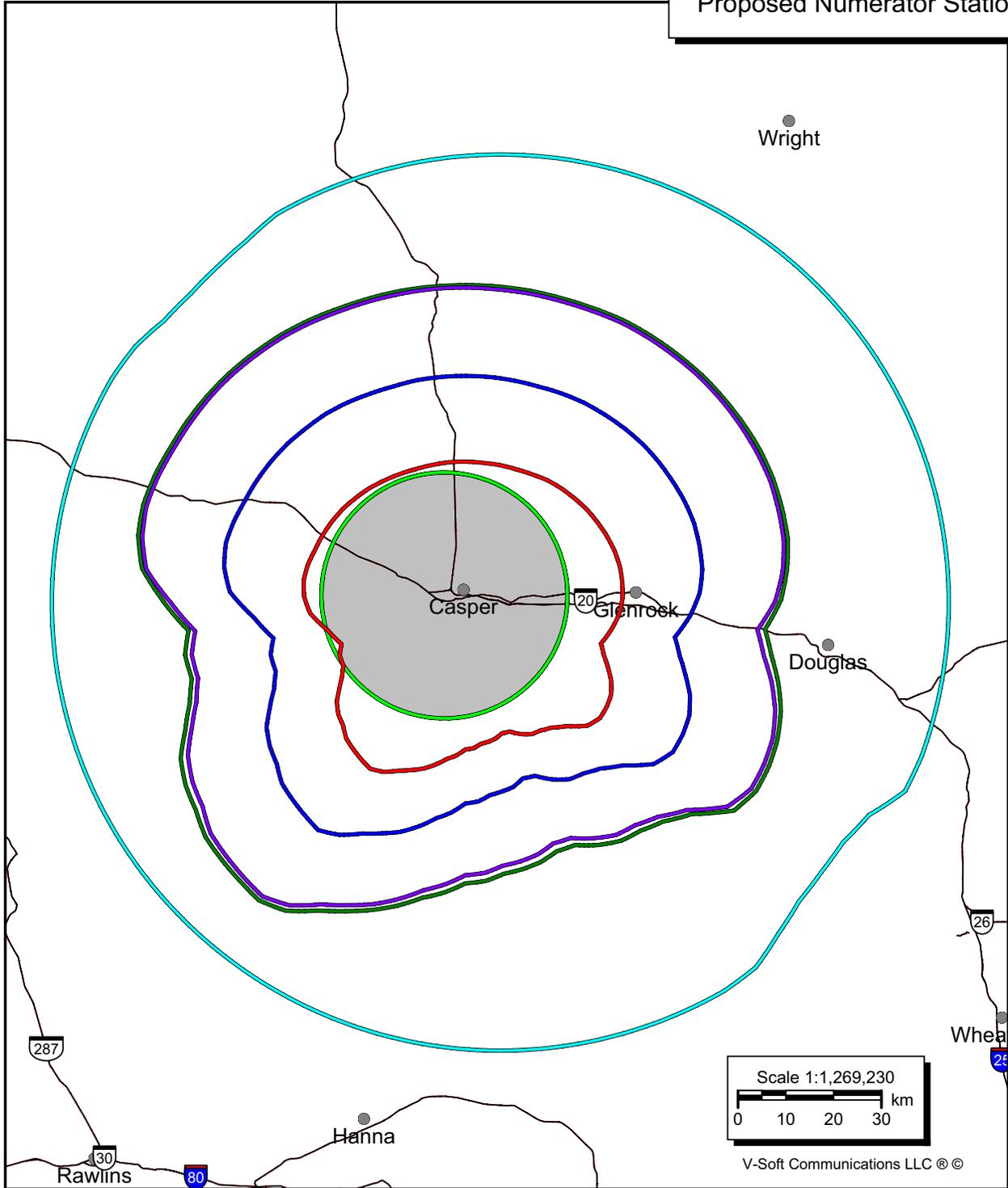
<u>Station</u>	<u>Channel/Class</u>	<u>City of License</u>	<u>Current Licensee</u>
KKTL (AM)	1400 kHz	Casper	Citicasters
KTWO (AM)	1030 kHz	Casper	Citicasters
KMGW (FM)	244C2	Casper	CCLB
KWYY (FM)	238C	Casper	CCLB
KTRS-FM	284C1	Casper	CCLB
KRVK (FM)	300C (300 C1 CP)	Midwest	CCLB

The accompanying “Map A” illustrates the area encompassed by the principal community contours (predicted 5 mV/m groundwave AM contours and predicted 3.16 mV/m FM contours) of the stations listed above. As shown on Map A and in Table 2, below, parties holding attributable interests in Blue Point shall hold attributable interests in the following facilities forming one radio market, as defined under the interim methodology, identified herein as Radio Markets #1, upon consummation of the proposed assignment.

TABLE 2 – Radio Market Numerator

<u>Radio Market</u>	<u>FM Stations</u>	<u>AM Stations</u>
1	KMGW, KWYY, KTRS-FM, KRVK	KKTL, KTWO

Proposed Numerator Stations



- KTWO AM
- KKTL AM
- KMGW FM
- KRVK FM
- KTRS FM
- KWYY FM

Mutual Overlap Radio Market:

- 2 AM (KKTL, KTWO)
- 4 FM (KMGW, KRVK, KKWY, KTRS-FM)

Radio Market #1 Examination:

The radio stations that define Radio Market #1 (the “numerator” stations) are listed in Table 2. The radio stations included in the total number of stations in Radio Markets #1 (the “denominator” stations) include those stations listed in Table 3 and depicted on “Map B.”

The radio stations listed in Table 3 satisfy the following requirements:

- Each is a full-power radio station whose principal community contour overlaps or intersects at least one of the principal community contours that define the radio market; and
- Each station has its transmitter site located within 92 kilometers from the perimeter of the area of mutual overlap of the commonly attributable stations that define the radio market.

Any stations which are commonly attributable with Blue Point and do not define the radio market are not included in the denominator. Commercial and noncommercial stations have been counted in the denominator.

The following stations listed in Table 3 are included in the “denominator” for Radio Markets #1 and #2:

TABLE 3 – Radio Market #1 Denominator

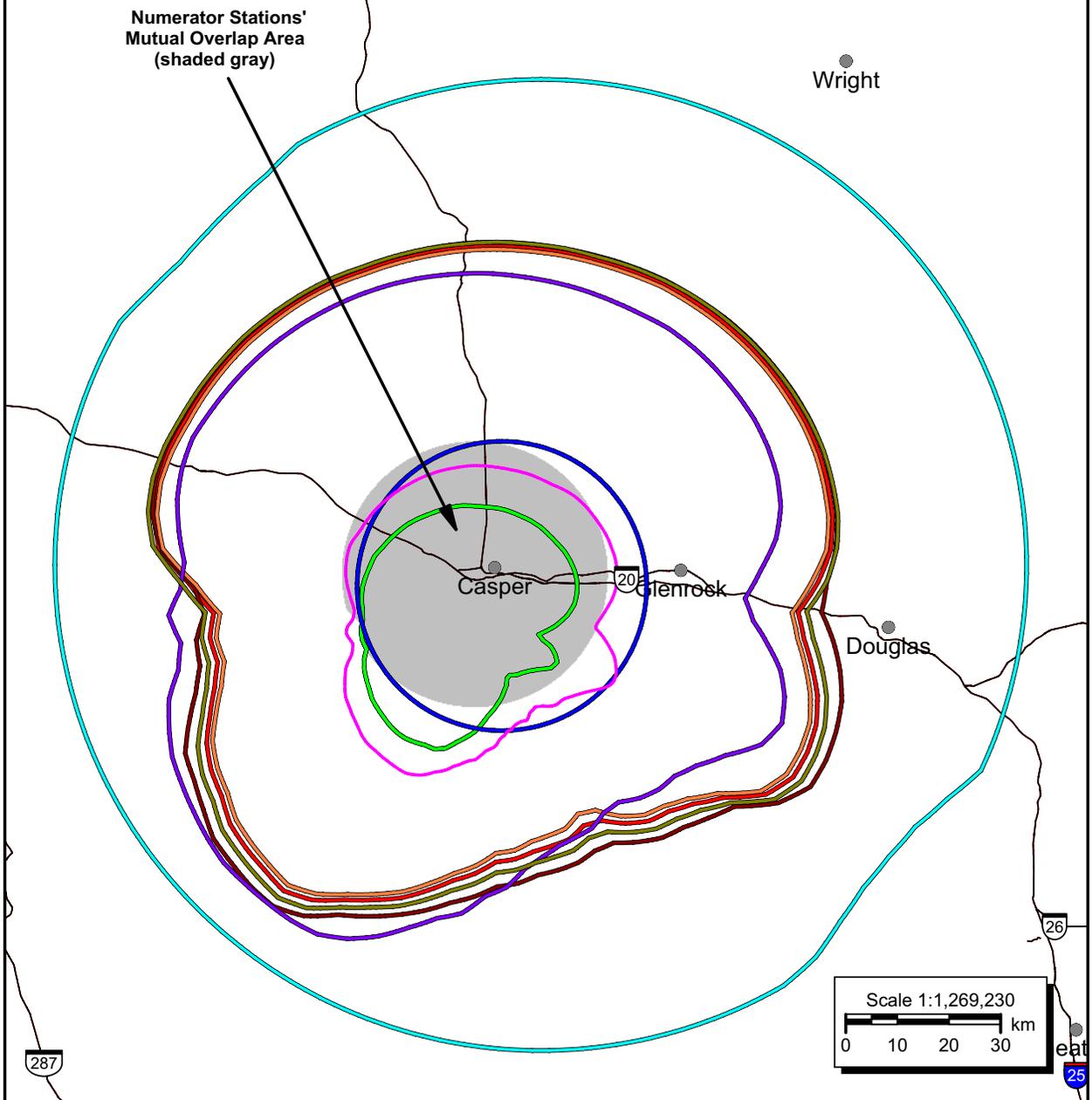
1) KASS	5) KQLT	9) KLWC	13) KWYY*
2) KCSP-FM	6) KUWC	10) KKTL*	14) KTRS-FM*
3) KHOC	7) KUYO	11) KTWO*	15) KRVK*
4) KMLD	8) KVOC	12) KMGW*	

*also included in numerator

The contour overlap method for Radio Markets #1 shows the market as having at least 15 or more “home” commercial and noncommercial educational full-power stations. In such a market, Commission Rules allow a party to have an attributable interest in up to six (6) full-power commercial radio stations, not more than 4 of which are in the same service (AM or FM).

In Radio Markets #1, Blue Point or parties holding attributable interests in Blue Point will have an attributable interest in not more than six (6) total stations. Four (4) stations are in the FM service and two (2) stations are in the AM service. Consequently, it would appear as if the number of stations commonly attributable with Blue Point complies with Section 73.3555 using the contour overlap methodology.

Casper Market Denominator
(Contours of non-attributable stations)



- KASS
- KCSPFM
- KHOC
- KMLD
- KQLT
- KUWC
- KUYO
- KVOC
- KLWC

Casper Radio Market:

Numerator:
2 AM: KTWO, KKTL
4 FM: KKWY, KRVK, KMGW, KTRS-FM

Denominator:
15 total stations of which 6 shall be commonly attributable to Blue Point and 9 are attributable to other parties (listed at left).

Multiple Ownership Study – Casper, WY
Arbitron Market

The principals of Blue Point propose having an attributable interest in the radio stations listed in Table 4. These stations are considered by Arbitron and BIA as being “home” to the Casper, WY, radio market.

TABLE 4

<u>Station</u>	<u>Channel/Class</u>	<u>City of License</u>	<u>Current Licensee</u>
KKTL (AM)	1400 kHz	Casper	Citicasters
KTWO (AM)	1030 kHz	Casper	Citicasters
KMGW (FM)	244C2	Casper	CCLB
KWYY (FM)	238C	Casper	CCLB
KTRS-FM	284C1	Casper	CCLB
KRVK (FM)	300C (300 C1 CP)	Midwest	CCLB

The Casper radio market, as surveyed by Arbitron and reported by BIA, includes the AM and FM commercial and non-commercial stations listed in the following BIA table entitled “FCC Geographic Market Definition for Casper, WY.” As can be shown by the following BIA table, the Casper radio market includes fifteen (15) operating stations. In such a Market, Commission Rules allow a party to have a cognizable interest in up to six (6) full-power commercial radio stations, not more than 4 of which are in the same service (AM or FM).

As indicated above, Blue Point or parties holding attributable interests in Blue Point propose to hold attributable interests in a total of six (6) radio stations (4 FM and 2 AM) that BIA classifies as having the Casper Arbitron Metro Market as their “home” market, a total that complies with Section 73.3555 using the Arbitron Market methodology.



Kevin Terry
Director of Engineering
Blue Point Media, LLC
(801) 560-9595



FCC Geographic Market Definition for Casper, WY

Call Letters	AM/FM	Freq	Type	Station	Format	Home Market	Market		City & State of License	County of License
							Designntn Date	Home Mkt Rank		
KMGW	FM	96.7	C	Mix AC	Casper, WY	07/02/2003	297	Clear Channel Communications	Casper, WY	Natrona
KQLT	FM	103.7	C	Country	Casper, WY	07/02/2003	297	Mt Rushmore Broadcasting Inc	Casper, WY	Natrona
KWYY	FM	95.5	C	Country	Casper, WY	07/02/2003	297	Clear Channel Communications	Casper, WY	Natrona
KTWO	AM	1030	C	Talk/Sprts	Casper, WY	07/02/2003	297	Clear Channel Communications	Casper, WY	Natrona
KUYO	AM	830	C	Chrst/Talk	Casper, WY	07/02/2003	297	Wyoming Christian Broadcasting	Evansville, WY	Natrona
KVOC	AM	1230	C	Sports	Casper, WY	07/02/2003	297	Mt Rushmore Broadcasting Inc	Casper, WY	Natrona
KASS	FM	106.9	C	Clsc Rock	Casper, WY	07/02/2003	297	Mt Rushmore Broadcasting Inc	Casper, WY	Natrona
KTRS	FM	104.7	C	Top 40	Casper, WY	07/02/2003	297	Clear Channel Communications	Casper, WY	Natrona
KMLD	FM	94.5	C	Oldies	Casper, WY	07/02/2003	297	Mountain States Radio Inc	Casper, WY	Natrona
KKTL	AM	1400	C	Talk	Casper, WY	07/02/2003	297	Clear Channel Communications	Casper, WY	Natrona
KRVK	FM	107.9	C	Clsc Hits	Casper, WY	07/02/2003	297	Clear Channel Communications	Midwest, WY	Natrona
KHOC	FM	102.5	C	Hot AC	Casper, WY	07/02/2003	297	Mt Rushmore Broadcasting Inc	Casper, WY	Natrona
KCSP	FM	90.3	NC	ChrsContem	Casper, WY	07/02/2003	297	Western Inspirational Broadcasters Inc	Casper, WY	Natrona
KLWC	FM	89.1	NC	ChrsContem	Casper, WY	10/29/2004	297	Educational Media Foundation	Casper, WY	Natrona
KUWC	FM	91.3	NC	News/Altve	Casper, WY	07/02/2003	297	University of Wyoming	Casper, WY	Natrona

Number of Stations in Geographic Market 15

Previous Stations in Geographic Market

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

"p" indicates pending sale to owner listed