

**TV/RADIO CROSS-OWNERSHIP**

The instant application is one of three applications on FCC Form 315 that are being filed concurrently for Commission consent to the transfer of control of subsidiaries of The Ackerley Group, Inc. (“Ackerley”) from the Shareholders of Ackerley to Clear Channel Communications, Inc. (“Clear Channel”). Ackerley controls the licenses of the following 16 full-power television stations in various markets nationwide:

Ackerley Media Group, Inc.

KCOY-TV, Santa Maria, CA  
KFTY(TV), Santa Rosa, CA  
KGET(TV), Bakersfield, CA  
KION(TV), Monterey, CA  
KMTR(TV), Eugene, OR  
KMTX-TV, Roseburg, OR  
KMTZ(TV), Coos Bay, OR  
KTVF(TV), Fairbanks, AK  
KVIQ-TV, Eureka, CA  
KVOS-TV, Bellingham, WA

Central NY News, Inc.

WIVT(TV), Binghamton, NY  
WIXT(TV), Syracuse, NY  
WOKR(TV), Rochester, NY  
WUTR(TV), Utica, NY  
WWTI(TV), Watertown, NY

Ackerley Broadcasting Fresno, LLC

KGPE(TV), Fresno, CA

Certain of these television stations (KVIQ-TV, KVOS-TV, and WWTI) are in markets where Clear Channel does not currently have an attributable interest in any radio stations. Accordingly, the Commission’s TV/radio cross-ownership rule does not apply to Clear

Channel's acquisition of these stations.<sup>1</sup> The rest of Ackerley's television stations are in markets where Clear Channel does have attributable radio stations, creating new TV/radio combinations. Section I of this exhibit addresses those new combinations that comply with the Commission's TV/radio cross-ownership rule. Section II addresses those new combinations that exceed the Commission's limits. Finally, Section III provides information supporting Clear Channel's request for a temporary waiver of the TV/radio cross-ownership rule in those markets where divestitures will be required to come into compliance with the rule.

## **I. COMPLIANT COMBINATIONS**

### Bakersfield, CA

Ackerley controls the license of KGET(TV), Bakersfield, California. Clear Channel controls the licenses of the following 6 radio stations, all of which are part of the Bakersfield, California Arbitron radio metro market: KDFO(AM), KZTK(AM) and KKXF-FM, Bakersfield, California; KDFO-FM and KKDJ(FM), Delano, California; and KRAB(FM), Greenacres, California. Attached hereto as Attachment 2 is a map demonstrating that the Grade A contour of KGET encompasses the communities of license of the radio stations, triggering the TV/radio cross-ownership rule. Attached hereto as Attachment 3 is a study demonstrating that at least 20 independent media voices will remain in the market following the proposed transaction, a sufficient number to permit common ownership of this 1 TV/6 radio combination.

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<sup>1</sup> In addition to KVOS-TV, Ackerley controls the licenses of the following four radio stations in the Seattle-Tacoma, Washington Arbitron radio metro market: KHHO(AM), Tacoma, Washington; and KJR(AM), KBTB(FM) and KUBE(FM), Seattle, Washington. As demonstrated in the map attached hereto as Attachment 1, however, the Grade A contour of KVOS-TV does not encompass Seattle, and only the 2 mV/m contour of KJR encompasses Bellingham. The resulting 1 TV/1 radio combination complies with the Commission's rules without regard to the number of independent media voices remaining in the market.

## Eugene, OR

Ackerley controls the licenses of KMTR(TV), Eugene, Oregon, and its satellite stations KMTX-TV, Roseburg, Oregon, and KMTZ(TV), Coos Bay, Oregon.<sup>2</sup> Clear Channel controls the licenses of the following 9 radio stations in communities in and around Eugene: KRKT(AM) and KRKT-FM, Albany, Oregon; KEJO(AM), KFLY(FM), KLOO(AM) and KLOO-FM, Corvallis, Oregon; KPNW(AM) and KODZ(FM), Eugene, Oregon; and KDUK-FM, Florence, Oregon. KPNW, KODZ and KDUK-FM are part of the Eugene-Springfield, Oregon Arbitron radio metro market. The stations in Albany and Corvallis are not associated with any Arbitron-defined radio metro market.

Attached hereto as Attachment 5 is a map demonstrating that the Grade A contour of KMTR encompasses the communities of Eugene, Florence and Corvallis, triggering the TV/radio cross-ownership rule.<sup>3</sup> Because the radio stations licensed to these communities are part of two separate radio markets, two separate TV/radio combinations are created, even though the radio stations fall within the Grade A contour of the same TV station.<sup>4</sup> At a minimum, then, the first combination, in the Eugene-Springfield market, consists of the following stations:

KMTR(TV), Eugene, OR  
KPNW(AM), Eugene, OR  
KODZ(FM), Eugene, OR  
KDUK-FM, Florence, OR

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<sup>2</sup> Attached hereto as Attachment 4 is information supporting the continued satellite status of KMTX-TV and KMTZ.

<sup>3</sup> The Grade A contour of KMTR does not, however, encompass the community of Albany. Neither does the 2 mV/m contour of KRKT encompass the community of Eugene. The TV/radio cross-ownership rule, therefore, is not triggered with respect to KRKT. Its contour is included for informational purposes.

<sup>4</sup> Memorandum Opinion and Second Order on Reconsideration, *Review of the Commission's Regulations Governing Television Broadcasting*, 16 FCC Rcd 1067, ¶ 41 (2001) (“[F]or purposes of the radio/TV cross-ownership rule, we generally do not count radio stations located in one Arbitron radio market toward the limits on the number of radio stations a party may own in another Arbitron radio market, even when the radio stations in the different markets fall within the Grade A contour of a commonly owned TV station.”).

Also at a minimum, the second combination, in what Clear Channel has defined below as the “functionally equivalent” Albany-Corvallis radio market, consists of the following stations:

KMTR(TV), Eugene, OR  
KEJO(AM), Corvallis, OR  
KFLY(FM), Corvallis, OR  
KLOO(AM), Corvallis, OR  
KLOO-FM, Corvallis, OR

The Commission, however, does count “a radio station assigned to one Arbitron radio market toward an entity’s ownership limits in a distant market when the contour of the radio station triggers the rule.”<sup>5</sup> As the map demonstrates, the 1 mV/m contours of KFLY, KLOO-FM and KRKT-FM encompass Eugene, triggering the TV/radio cross-ownership rule independently of the TV station. These three radio stations, therefore, must be included in the TV/radio combination in the Eugene-Springfield market, resulting in a final combination of:

KMTR(TV), Eugene, OR  
KPNW(AM), Eugene, OR  
KODZ(FM), Eugene, OR  
KDUK-FM, Florence, OR  
KFLY(FM), Corvallis, OR  
KLOO-FM, Corvallis, OR  
KRKT-FM, Albany, OR

As the 1 mV/m contour of KRKT-FM triggers the TV/radio cross-ownership rule independently of the TV station, it must likewise be included in the TV/radio combination in the functionally equivalent Albany-Corvallis market, resulting in a final combination of:

KMTR(TV), Eugene, OR  
KEJO(AM), Corvallis, OR  
KFLY(FM), Corvallis, OR  
KLOO(AM), Corvallis, OR  
KLOO-FM, Corvallis, OR  
KRKT-FM, Albany, OR

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<sup>5</sup> *Id.*

Attached hereto as Attachment 6 is a study demonstrating that at least 20 independent media voices will remain in both the Eugene-Springfield Arbitron radio metro market and the functionally equivalent Albany-Corvallis radio market<sup>6</sup> following the proposed transaction.<sup>7</sup> This is a sufficient number of voices to permit common ownership of the 1 TV/6 radio combination in Eugene-Springfield and the 1 TV/5 radio combination in Albany-Corvallis.

#### Fairbanks, AK

Ackerley controls the license of KTVF(TV), Fairbanks, Alaska. Clear Channel controls the licenses of the following 4 radio stations: KAKQ-FM, KIAK(AM), KIAK-FM and KKED(FM), Fairbanks, Alaska. Attached hereto as Attachment 8 is a map depicting the relevant contours of these stations. Attached hereto as Attachment 9 is a study demonstrating that at least 10 independent media voices will remain in the “functionally equivalent” Fairbanks, Alaska market following the proposed transaction, a sufficient number to permit common ownership of this 1 TV/4 radio combination.<sup>8</sup>

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<sup>6</sup> Pursuant to Section 73.3555(c)(3)(ii)(C) of the Commission’s rules, Clear Channel has created the functional equivalent of a radio market for the Albany-Corvallis area. Specifically, Clear Channel has counted those geographically proximate radio stations with a principal community contour that overlaps or intersects with the principal community contours of its owned stations. The contours of the stations thus defining the market are depicted on Attachment 7. Clear Channel has also included in the functionally equivalent market those stations from outside the market that have a reportable audience share in the area according to an Arbitron custom survey, which is attached.

<sup>7</sup> Section 73.3555(c)(3)(ii)(B) of the Commission’s rules states that “[w]hen a proposed combination involves stations in different radio markets, the voice requirement must be met in each market.”

<sup>8</sup> Pursuant to Section 73.3555(c)(3)(ii)(C) of the Commission’s rules, Clear Channel has created the functional equivalent of a radio market for the Fairbanks area. Specifically, Clear Channel has counted those geographically proximate radio stations with a principal community contour that overlaps or intersects with the principal community contours of its owned stations. The contours of the stations thus defining the market are depicted on Attachment 10.

Fresno, CA

Ackerley controls the license of KGPE(TV), Fresno, California. Clear Channel controls the licenses of the following 8 radio stations, all of which are part of the Fresno, California Arbitron radio metro market: KCBL(AM) and KALZ(FM), Fresno, California; KBOS-FM, Tulare, California; KEZL(FM), Fowler, California; KFSO-FM, Visalia, California; KRDU(AM) and KSOF(FM), Dinuba, California; and KRZR(FM), Hanford, California.<sup>9</sup> Attached hereto as Attachment 11 is a map demonstrating that the Grade A contour of KGPE encompasses the communities of Fresno, Fowler, Hanford, and Dinuba, triggering the TV/radio cross-ownership rule. The Grade A contour of KGPE does not, however, encompass Tulare and Visalia, nor do the 1 mV/m contours of the stations licensed to those communities, KBOS-FM and KFSO-FM, respectively, encompass Fresno. Accordingly, the TV/radio cross-ownership rules is not triggered with respect to those stations. Thus, the new TV/radio combination is comprised of:

KGPE(TV), Fresno, CA  
KALZ(FM), Fresno, CA  
KCBL(AM), Fresno, CA  
KEZL(FM), Fowler, CA  
KRDU(AM), Dinuba, CA  
KRZR(FM), Hanford, CA  
KSOF(FM), Dinuba, CA

Attached hereto as Attachment 12 is a study demonstrating that at least 20 independent media voices will remain in the market following the proposed transaction, a sufficient number to permit common ownership of this 1 TV/6 radio combination.

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<sup>9</sup> Clear Channel also controls the license of KVBL(AM), Visalia, California. The Grade A contour of KGPE does not encompass the community of Visalia. Neither does the 2 mV/m contour of KVBL encompass the community of Fresno. The TV/radio cross-ownership rule, therefore, is not triggered with respect to KVBL. Its contour is included for informational purposes.

### Monterey-Salinas, CA

Ackerley controls the license of KION(TV), Monterey, California. Clear Channel controls the licenses of the following 6 radio stations, all of which are part of the Monterey-Salinas-Santa Cruz, California Arbitron radio metro market: KDON-FM, KTOM(AM), KTOM-FM and KTXS(AM), Salinas, California; KMJO(FM), Marina, California; and KOCN(FM), Pacific Grove, California. Attached hereto as Attachment 13 is a map demonstrating that the Grade A contour of KION encompasses the communities of license of the radio stations, triggering the TV/radio cross-ownership rule. Attached hereto as Attachment 14 is a study demonstrating that at least 20 independent media voices will remain in the market following the proposed transaction, a sufficient number to permit common ownership of this 1 TV/6 radio combination.

### Santa Rosa, CA

Ackerley controls the license of KFTY(TV), Santa Rosa, California. Clear Channel controls the licenses of several radio stations in the nearby San Francisco, California and Sacramento, California Arbitron radio metro markets. Attached hereto as Attachment \_\_ is a map depicting the relevant contours of these stations. The map demonstrates that, while the Grade A contour of KFTY does not encompass the communities of license of any of the radio stations, the contours of the following 4 radio stations encompass Santa Rosa, triggering the TV/radio cross-ownership rule: KSTE(AM), Sacramento, California; KABL(AM) and KNEW(AM), Oakland, California; and KISQ-FM, San Francisco, California. Thus, even though the radio stations are located in different Arbitron radio metro markets, they are counted together in a single TV/radio combination.<sup>10</sup> Attached hereto as Attachment \_\_ is a study demonstrating

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<sup>10</sup> See *supra*, note 4.

that at least 10 independent media voices will remain in the Santa Rosa, Sacramento and San Francisco markets following the proposed transaction,<sup>11</sup> a sufficient number to permit common ownership of this 1 TV/4 radio combination.

## **I. NONCOMPLIANT COMBINATIONS**

### Binghamton, NY

Ackerley controls the license of WIVT(TV), Binghamton, New York. Clear Channel controls the licenses of the following 6 radio stations, all of which are part of the Binghamton, New York Arbitron radio metro market: WBBi(FM), Endwell, New York; WENE(AM) and WMRV-FM, Endicott, New York; WINR(AM), Binghamton, New York; WKGB-FM, Conklin, New York; and WMXW(FM), Vestal, New York. Attached hereto as Attachment 17 is a map demonstrating that the Grade A contour of WIVT encompasses the communities of license of the radio stations, triggering the TV/radio cross-ownership rule and creating a 1 TV/6 radio combination. Attached hereto as Attachment 18 is a study showing that enough independent media voices will remain in the market following the proposed transaction to support a 1 TV/4 radio combination, but not a 1 TV/6 radio combination. Please see Section III below for information supporting Clear Channel's request for a temporary waiver of the TV/radio cross-ownership rule.

### Rochester, NY

Ackerley controls the license of WOKR(TV), Rochester, New York. Clear Channel controls the licenses of the following 7 radio stations, all of which are part of the Rochester, New York Arbitron radio metro market: WHAM(AM), WHTK(AM) and WVOR-FM, Rochester, New York; WISY(FM), Canandaigua, New York; WKGS(FM), Irondequoit, New York;

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<sup>11</sup> See *supra*, note 7.



WLCL(FM), Honeoye Falls, New York; and WNVE(FM), S. Bristol Township, New York. Attached hereto as Attachment 19 is a map demonstrating that the Grade A contour of WOKR encompasses the communities of license of the radio stations, triggering the TV/radio cross-ownership rule and creating a 1 TV/7 radio combination. Attached hereto as Attachment 20 is a study showing that, although enough independent media voices will remain in the market following the proposed transaction to support a 1 TV/7 radio combination, there are fewer than 8 independent television voices in the Rochester DMA. Thus, a 1 TV/6 radio combination is the maximum permitted by the rules. Please see Section III below for information supporting Clear Channel's request for a temporary waiver of the TV/radio cross-ownership rule.

Santa Maria, CA

Ackerley controls the license of KCOY-TV, Santa Maria, California. Clear Channel controls the licenses of 15 radio stations in the region, which are divided among three separate Arbitron radio metro markets. In the Santa Maria-Lompoc, California market Clear Channel controls the following licenses: KSMA(AM), KSNI-FM and KXFM(FM), Santa Maria, California; and KSMY(FM), Lompoc, California. In the San Luis Obispo, California market Clear Channel controls the following licenses: KSLY-FM and KVEC(AM), San Luis Obispo, California; KSTT-FM, Los Osos, California; and KURQ(FM), Grover Beach, California. In the Santa Barbara, California market Clear Channel controls the following licenses: KBKO(AM), KIST(AM), KIST-FM, KTMS(AM) and KTYD(FM), Santa Barbara, California; KSBL(FM), Carpinteria, California; and KSPE-FM, Ellwood, California.

Attached hereto as Attachment 21 is a map depicting the contours of the stations. The map demonstrates that the Grade A contour of KCOY-TV encompasses the communities of license of the stations in the Santa Maria-Lompoc and San Luis Obispo markets, triggering the

TV/radio cross-ownership rule. In the Santa Barbara market, the Grade A contour of KCOY-TV only encompasses Ellwood, the community of license of KSPE-FM. Because the radio stations are divided among three separate radio markets, three separate TV/radio combinations are created, even though the radio stations fall within the Grade A contour of the same TV station.<sup>12</sup> At a minimum, then, the first combination, in the Santa Maria-Lompoc market, consists of the following stations:

KCOY-TV, Santa Maria, CA  
KSMA(AM), Santa Maria, CA  
KSMY(FM), Lompoc, CA  
KSNI-FM, Santa Maria, CA  
KXFM(FM), Santa Maria, CA

Also at a minimum, the second combination, in the San Luis Obispo market, consists of the following stations:

KCOY-TV, Santa Maria, CA  
KSLY-FM, San Luis Obispo, CA  
KSTT-FM, Los Osos, CA  
KURQ(FM), Grover Beach, CA  
KVEC(AM), San Luis Obispo, CA

Finally, the third combination, in the Santa Barbara market, consists of the following stations:<sup>13</sup>

KCOY-TV, Santa Maria, CA  
KSPE-FM, Ellwood, CA

As noted above, the Commission does count radio stations assigned to one Arbitron radio market toward an entity's ownership limits in a separate Arbitron market when the contour of the

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<sup>12</sup> See *supra*, note 4.

<sup>13</sup> The resulting 1 TV/1 radio combination complies with the Commission's rules without regard to the number of independent media voices remaining in the market.

radio station triggers the rule.<sup>14</sup> As the map demonstrates, the 1 mV/m contours of KSLY-FM, KSTT-FM and KURQ encompass Santa Maria, triggering the TV/radio cross-ownership rule independently of the TV station. The 2 mV/m contour of KVEC, however, does not encompass Santa Maria. These three FM radio stations, therefore, must be included in the TV/radio combination in the Santa Maria-Lompoc market, resulting in a final combination of:

KCOY-TV, Santa Maria, CA  
KSMA(AM), Santa Maria, CA  
KSMY(FM), Lompoc, CA  
KSNI-FM, Santa Maria, CA  
KXFM(FM), Santa Maria, CA  
KSLY-FM, San Luis Obispo, CA  
KSTT-FM, Los Osos, CA  
KURQ(FM), Grover Beach, CA

Attached hereto as Attachment 22 is a study demonstrating that at least 20 independent media voices will remain in both the Santa Maria-Lompoc and San Luis Obispo Arbitron radio metro markets following the proposed transaction.<sup>15</sup> This is a sufficient number of voices to permit common ownership of the 1 TV/4 radio combination in the San Luis Obispo market. It is also sufficient to support a 1 TV/7 radio combination in the San Luis Obispo market. There are, however, fewer than 8 independent television voices in the Santa Barbara-Santa Maria-San Luis Obispo television DMA. Thus, a 1 TV/6 radio combination is the maximum permitted by the rules. Please see Section III below for information supporting Clear Channel's request for a temporary waiver of the TV/radio cross-ownership rule.

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<sup>14</sup> See *supra*, note 5.

<sup>15</sup> See *supra*, note \_\_\_\_.

Syracuse, NY

Ackerley controls the license of WIXT(TV), Syracuse, New York. Clear Channel controls the licenses of 16 radio stations in the region, which are divided among two separate Arbitron radio metro markets. In the Syracuse, New York market Clear Channel controls the following licenses: WBBS(FM), Fulton, New York; WHEN(AM), WSYR(AM), WWHT(FM) and WYYY(FM), Syracuse, New York; WPHR(FM), Auburn, New York; and WXBB(FM), DeRuyter, New York. In the Utica-Rome, New York market Clear Channel controls the following licenses: WADR(AM) and WRFM(FM), Remsen, New York; WLFH(AM) and WSKU(FM), Little Falls, New York; WOUR(FM) and WUTQ(AM), Utica, New York; WRBY(FM) and WRNY(AM), Rome, New York; and WSKS(FM), Whitesboro, New York.

Attached hereto as Attachment 23 is a map depicting the contours of the stations. The map demonstrates that the Grade A contour of WIXT encompasses the communities of license of the stations in the Syracuse market, triggering the TV/radio cross-ownership rule. In the Utica-Rome market, the Grade A contour of WIXT only encompasses Rome, the community of license of WRBY and WRNY. Because the radio stations are divided among two separate radio markets, two separate TV/radio combinations are created, even though the radio stations fall within the Grade A contour of the same TV station.<sup>16</sup> The first combination, in the Syracuse

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<sup>16</sup> See *supra*, note 7.

market, consists of the following stations:

WIXT(TV), Syracuse, NY  
WBBS(FM), Fulton, NY  
WHEN(AM), Syracuse, NY  
WPHR(FM), Auburn, NY  
WSYR(AM), Syracuse, NY  
WWHT(FM), Syracuse, NY  
WXBB(FM), DeRuyter, NY  
WYYY(FM), Syracuse, NY

The second combination, in the Utica-Rome market, consists of the following stations:

WIXT(TV), Syracuse, NY  
WRBY(FM), Rome, NY  
WRNY(FM), Rome, NY

Attached hereto as Attachment 24 is a study demonstrating that at least 20 independent media voices will remain in both the Syracuse and Utica-Rome Arbitron radio metro markets following the proposed transaction.<sup>17</sup> This is a sufficient number of voices to permit common ownership of the 1 TV/2 radio combination in the Utica-Rome market. It is also sufficient to support a 1 TV/7 radio combination in the Syracuse market. There are, however, fewer than 8 independent television voices in the Syracuse television DMA. Thus, a 1 TV/6 radio combination is the maximum permitted by the rules. Please see Section III below for information supporting Clear Channel's request for a temporary waiver of the TV/radio cross-ownership rule.

#### Utica, NY

Ackerley controls the license of WUTR(TV), Utica, New York. Clear Channel controls the licenses of the following stations in the Utica-Rome, New York market: WADR(AM) and WRFM(FM), Remsen, New York; WLFH(AM) and WSKU(FM), Little Falls, New York;

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<sup>17</sup> See *supra*, note 7.

WOUR(FM) and WUTQ(AM), Utica, New York; WRBY(FM) and WRNY(AM), Rome, New York; and WSKS(FM), Whitesboro, New York. Clear Channel also controls the license of WSYR(AM), Syracuse, New York.

Attached hereto as Attachment 25 is a map depicting the contours of these stations. The map demonstrates that the Grade A contour of WUTR encompasses the communities of license of the radio stations in the Utica-Rome Arbitron radio metro market, triggering the TV/radio cross-ownership rule. The map also demonstrates that the 2 mV/m contour of WSYR encompasses Utica, so that it must be included in the resulting 1 TV/10 radio combination.<sup>18</sup>

Attached hereto as Attachment 26 is a study demonstrating that at least 20 independent media voices will remain in both the Syracuse and Utica-Rome Arbitron radio metro markets following the proposed transaction.<sup>19</sup> This is a sufficient number of voices to permit common ownership of a 1 TV/6 radio combination. Please see Section III below for information supporting Clear Channel's request for a temporary waiver of the TV/radio cross-ownership rule.

### **III. REQUEST FOR TEMPORARY WAIVER OF TV/RADIO CROSS-OWNERSHIP RULE**

As shown in Section II above, Clear Channel's acquisition of control of Ackerley will create five new TV/radio combinations that do not comply with the radio/TV cross-ownership rule. To facilitate multi-station transactions such as this, the Commission has in the past granted temporary waivers of its multiple ownership rules to provide reasonable time for the station divestitures necessary to come into compliance with the rules. The Commission has stated that

where the [ownership] conflicts are incidental to a much larger merger that we find is in the public interest, we believe facilitating

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<sup>18</sup> See *supra*, note 5.

<sup>19</sup> See *supra*, note 7.

such a multiple-station transaction by temporary waiver of our multiple ownership rules will “promote commerce, encourage investment in the broadcast industry, and allow for the free transferability of broadcast licenses.”<sup>20</sup>

Further, the Commission has acknowledged that “a ‘forced’ sale could ‘unnecessarily restrict’ the value of the stations to be divested and could ‘artificially limit’ the range of potential buyers to only those with immediate access to the capital needed for such purchases, thereby precluding acquisition by local groups or minority-owned or –controlled entities.”<sup>21</sup>

In its most recent cases involving temporary multiple ownership waivers, the Commission has found six months to be a reasonable period of time for parties to divest necessary properties.<sup>22</sup> Those cases arose, however, in a far different economic climate than exists now. For the reasons set forth below, supported by an expert assessment which is attached, Clear Channel respectfully requests the Commission waive the radio/TV cross-ownership rule for a period of twelve (12) months from closing of the Clear Channel/Ackerley

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<sup>20</sup> *Multimedia, Inc.*, 11 FCC Rcd 4483, 4485 (1995) (citing *Stockholders of Westinghouse, Inc.*, 11 FCC Rcd 3733, 3755 (1995)). In *Multimedia, Inc.*, the Commission granted Gannett Co., Inc. a twelve-month temporary waiver to come into compliance with various provisions of the broadcast and cable multiple ownership rules following Gannett’s acquisition of Multimedia.

<sup>21</sup> *Id.* (citing *Midwest Communications, Inc.*, 7 FCC Rcd 159, 160 (1991)). In *Midwest Communications, Inc.*, the Commission granted CBS an 18-month temporary waiver of the national radio multiple ownership rule, based upon “the depressed state of the radio station market where, without a reasonable time period to divest, [CBS] will be at a negotiating disadvantage if forced to dispose of an FM station in less than 18 months.” *Midwest Communications, Inc.*, 7 FCC Rcd at 160.

<sup>22</sup> See *Shareholders of CBS Corporation*, 15 FCC Rcd 8230 (2000) (granting CBS a six-month temporary waiver to divest radio stations to come into compliance with the TV/radio cross-ownership rule following its merger with Viacom). See also *Counterpoint Communications, Inc.*, FCC 01-220 (August 3, 2001) (six-month temporary waiver for Tribune Television Company to come into compliance with newspaper-broadcast cross-ownership rule following purchase of a Hartford, CT television station); *UTV of San Francisco, Inc.*, FCC 01-209 (July 25, 2001) (six-month temporary waiver for compliance with television duopoly rule in Fox/Chris Craft merger, but 24-month temporary waiver for compliance with newspaper/broadcast cross-ownership rule).

merger, in order to allow Clear Channel to complete the necessary divestitures in the five non-compliant markets.

Attached hereto as Attachment 27 is a statement [hereinafter, the “Fratik Statement”] by Mark R. Fratrik, Ph.D., Vice President of BIA Financial Network.<sup>23</sup> Mr. Fratrik’s expert analysis confirms a conclusion that has been widely reported by observers of the broadcast industry, and should come as no secret: an already-slowing economy and a resulting decline in advertising expenditures, compounded by the events of September 11, 2001 and their aftermath, have resulted in a market for buying selling radio and television stations that is bleak in the near term.<sup>24</sup> Mr. Fratrik observes that these factors also have made financing from banks and other capital sources less available – a situation that most affects would-be startup broadcast companies, including minority and woman-owned ventures.<sup>25</sup> Aside from an overall severe decrease in the number and value of station sales in both radio and television, Mr. Fratrik notes that uncertainty about the DTV transition is yet another factor negatively affecting values of television stations, especially in markets outside the top 50.<sup>26</sup> These are precisely the markets in which Clear Channel will need to divest stations: the five non-compliant markets discussed above are ranked, in terms of Nielsen DMA, between #74 and #168. Mr. Fratrik concludes that

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<sup>23</sup> BIA is a recognized expert source of economic information and analysis on the broadcast industry. Mr. Fratrik’s *curriculum vitae* accompanies his attached statement.

<sup>24</sup> See Fratrik Statement at 1-2; see also, e.g., “Sellers face big obstacles,” *Broadcasting & Cable* (Oct. 15, 2001), p. 30.

<sup>25</sup> Fratrik Statement at 8.

<sup>26</sup> *Id.* at 9.



“[b]uying and selling radio and television stations could be an active undertaking by the end of 2002, but certainly not before then.”<sup>27</sup>

Given the conditions that Mr. Fratrik confirms in his statement, Clear Channel believes that a twelve-month temporary waiver is the minimum duration necessary for it to complete divestitures in the non-compliant markets. With a broadcast trading market not expected to become active until the end of 2002 at the earliest, a temporary waiver of anything less than twelve months will almost certainly result in Clear Channel being required to market divestiture properties at unnecessarily restricted prices to an artificially limited number of potential buyers. As noted above, in fashioning temporary waivers the Commission has sought to avoid such “forced sale” situations. Moreover, Chairman Powell has only recently emphasized the Commission’s need to acknowledge the “new realities that have arisen out of the tragic events of September 11” and “be aware of the financial impact of the attacks on our media companies.”<sup>28</sup> For all of these reasons, the Commission should find that a twelve-month temporary waiver of the radio/TV cross-ownership rule – the minimum amount necessary for Clear Channel to undertake the necessary divestitures in a healthier marketplace – is reasonable and in the public interest.<sup>29</sup>

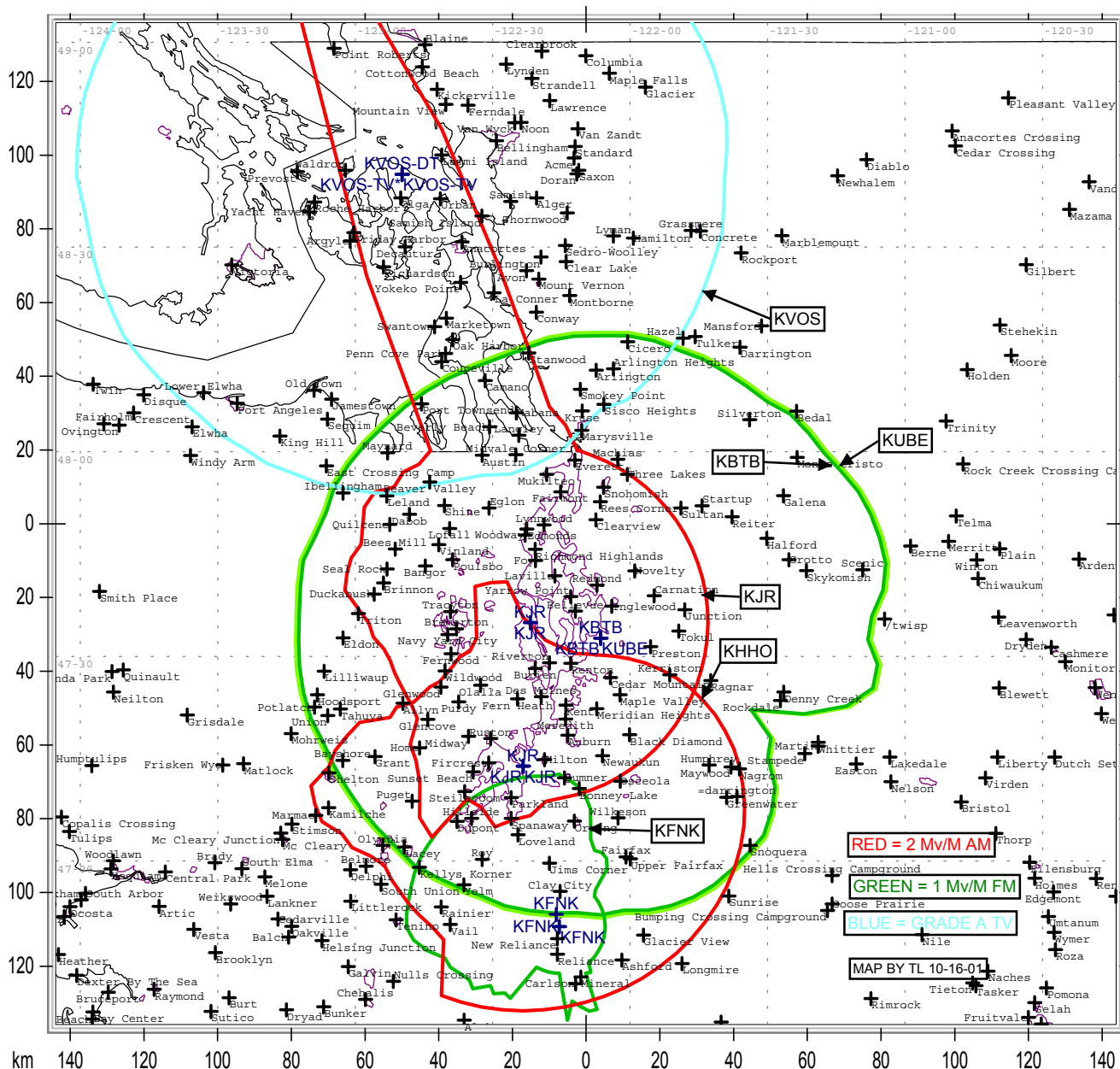
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<sup>27</sup> *Id.* at 10.

<sup>28</sup> FCC News Release, “FCC Chairman Michael Powell Announces Creation of FCC Digital Television Task Force” (October 11, 2001).

<sup>29</sup> A twelve-month temporary waiver will not undermine the Commission’s goals of diversity and competition. As the voice studies appended as attachments to this exhibit show, an ample number of independent media voices will remain in each of the five non-compliant markets following the proposed merger.

## ATTACHMENT 1



## ATTACHMENT 2



### ATTACHMENT 3

BAKERSFIELD, CALIFORNIA - TELEVISION DMA <sup>1</sup>				
CALL	COMMUNITY OF LICENSE	COUNTY	CHANNEL	OWNER
GET	Bakersfield, CA	Kern	17	Clear Channel Communications, Inc. (proposed)
UVI	Bakersfield, CA	Kern	45	KUVI License Partnership, G.P.
ERO	Bakersfield, CA	Kern	23	McGraw-Hill Broadcasting Company, Inc.
BAK	Bakersfield, CA	Kern	29	Westwind Communications, L.L.C.

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<sup>1</sup> The Bakersfield, California television DMA consists of the following counties: In California; Kern.

BAKERSFIELD, CALIFORNIA - RADIO METRO <sup>2</sup>				
CALL SIGN	FREQUENCY	COMMUNITY OF LICENSE	COUNTY	OWNER
KBID	1350	Bakersfield, CA	Kern	American General Media
KERN	1410	Bakersfield, CA	Kern	American General Media
KISV	94.1	Bakersfield, CA	Kern	American General Media
KCOO	104.3	Shafter, CA	Kern	American General Media
KMQA	100.5	E. Porterville	Tulare*	Azia's Entertainment
KCNQ	102.5	Kernville, CA	Kern	Bohn, Robert & Katherine
KQAB	1140	Lake Isabella, CA	Kern	Bohn, Robert & Katherine
KVLI	104.5	Lake Isabella, CA	Kern	Bohn, Robert & Katherine
KCWR	107.1	Bakersfield, CA	Kern	Buck Owens Production Company Incorporated
KUZZ	550	Bakersfield, CA	Kern	Buck Owens Production Company Incorporated
KUZZ	107.9	Bakersfield, CA	Kern	Buck Owens Production Company Incorporated
KBB	99.3	Bakersfield, CA	Kern	Buckley Broadcasting Corporation
KNZR	1560	Bakersfield, CA	Kern	Buckley Broadcasting Corporation
KLLY	95.3	Oildale, CA	Kern	Buckley Broadcasting Corporation
KSMJ	97.7	Shafter, CA	Kern	Buckley Broadcasting Corporation
KDFO	800	Bakersfield, CA	Kern	Clear Channel Communications
KXXX	96.5	Bakersfield, CA	Kern	Clear Channel Communications
KZTK	970	Bakersfield, CA	Kern	Clear Channel Communications
KDFO	98.5	Delano, CA	Kern	Clear Channel Communications
KDJ	105.3	Delano, CA	Kern	Clear Channel Communications
KRAB	106.1	Greenacres, CA	Kern	Clear Channel Communications
KTP	103.1	Tehachapi, CA	Kern*	Concord Media Group
KFRB	91.3	Bakersfield, CA	Kern	Family Stations, Inc.
KAFY	1100	Bakersfield, CA	Kern	Gomez, Nelson F.
KMJ	580	Fresno	Fresno*	Infinity Radio
KFR	104.1	Woodlake, CA	Tulare*	Ionosphere Broadcasting LP
KLOS	95.5	Los Angeles, CA	Los Angeles*	KLOS-FM Radio
KMAP	1050	Frazier Park, CA	Kern	KMAP Inc
KERI	1180	Wasco, CA	Kern	KWSO Inc
KGO	1230	Bakersfield, CA	Kern	Lagniappe Broadcasting Inc
KGFM	101.5	Bakersfield, CA	Kern	Lagniappe Broadcasting Inc
KWI	92.1	Bakersfield, CA	Kern	Lotus Communications Corporation
KWAC	1490	Bakersfield, CA	Kern	Lotus Communications Corporation
KCHJ	1010	Delano, CA	Kern	Lotus Communications Corporation
KPSL	102.9	McFarland, CA	Kern	Lotus Communications Corporation
KQX	90.1	Bakersfield, CA	Kern	Radio Bilingue, Inc.
KMYX	92.5	Arvin, CA	Kern	Radio Campesina Inc
KBDS	103.9	Taft, CA	Kern	Radio Campesina Inc
KMYX	1310	Taft, CA	Kern	Radio Campesina Inc
KWRU	940	Fresno	Fresno*	Radio Unica
KAXL	88.3	Greenacres, CA	Kern	Skyride Unlimited, Inc
KPRX	89.1	Bakersfield, CA	Kern	White Ash Broadcasting, Inc.

<sup>2</sup> The Bakersfield, California Radio Metro consists of the following counties: In California; Kern.

\* These stations have a reportable share in the Utica-Rome, New York Radio Metro according to Arbitron or BIA.



NEWSPAPER VOICES			
NAME	CIRCULATION	>5% OF DMA	PUBLICATION FREQUENCY
The Bakersfield Californian	72,853	Yes	M-Sat

1 CABLE VOICE
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## ATTACHMENT 4

## **SATELLITE STATION WAIVER REQUEST**

The proposed transaction involves the transfer of control of The Ackerley Group, Inc. ("Ackerley") from its Shareholders to Clear Channel Communications, Inc. ("Clear Channel"). Ackerley controls AK Media Group, Inc., licensee of KMTR(TV), Channel 16, Eugene, Oregon, KMTZ(TV), Channel 23, Coos Bay, Oregon, and KMTX-TV, Channel 46, Roseburg, Oregon. KMTZ and KMTX-TV are operated as satellites of KMTR pursuant to satellite waivers granted in 1991 and 1992, and authorization for continued satellite operation granted in 1999. See Letter to AK Media Group, Inc. from Barbara K. Kreisman, Chief, Video Services Division, Ref. 1800E1-LSS (March 12, 1999). Applicants seeking to transfer or assign satellite stations must demonstrate that "the conditions warranting satellite status . . . prevail at the time of transfer or assignment." *Television Satellite Stations*, 6 FCC Rcd 4212, 4216 (1991). Based on the showing made below, continuation of the KMTR satellite waivers is warranted.

Under its 1991 policy statement, the FCC presumes that a satellite proposal serves the public interest if (i) there is no city grade contour overlap between the parent and the satellite; (ii) the proposed satellite would serve an underserved area; and (iii) no alternative operator is ready and able to purchase and operate the satellite as a full service station. *Id.* at 4212. In 1999, the FCC noted that the continued operation of KMTX-TV and KMTZ as satellites of KMTR was consistent with the satellite policy. In the ensuing three years, the facts underlying this determination have not changed.

Regarding the first criterion, the attached contour map study demonstrates that the KMTX-TV and KMTZ city grade contours do not overlap that of KMTR. See Exhibit 1, Contour Map. With respect to the second criterion, both satellite stations serve an

underserved area under the Commission's "transmission test," which considers an area underserved if two or fewer full-service stations are licensed to the satellite station's community of license. In this instance, only one other full-service station (KCBY-TV) is licensed to Coos Bay, the KMTZ community of license, and only two other stations (KPIC(TV) and KTVC(TV)) are licensed to Roseburg, the KMTX community of license.<sup>1</sup>

Finally, the attached statement from Brian E. Cobb, President of CobbCorp, LLC, a broadcast brokerage and appraisal firm, demonstrates that no alternative operator would be ready and able to purchase and operate the satellites as full-service stations, thereby satisfying the third criterion. See Exhibit 2, Letter from Brian E. Cobb to Clay C. Pendarvis, Chief, Television Branch (October 15, 2001). In the 1998 request for continued satellite waiver, the broker concluded that no alternative operator would be interested in operating KMTZ and KMTX-TV on a stand-alone basis.<sup>2</sup> Indeed, the general downturn in the U.S. economy has had a negative impact on the broadcast industry and made it even more difficult for television stations to be profitable. Similarly, in the attached letter Mr. Cobb states that the satellite stations could not operate successfully on a stand-alone basis.

Specifically, Mr. Cobb notes that due to rugged terrain, KMTZ and KMTX-TV each cover a very small portion of the Eugene DMA, the 122<sup>nd</sup> largest television market in the country. Even if the two stations covered a larger portion of the market, they would most likely not garner network affiliation agreements. The two stations would

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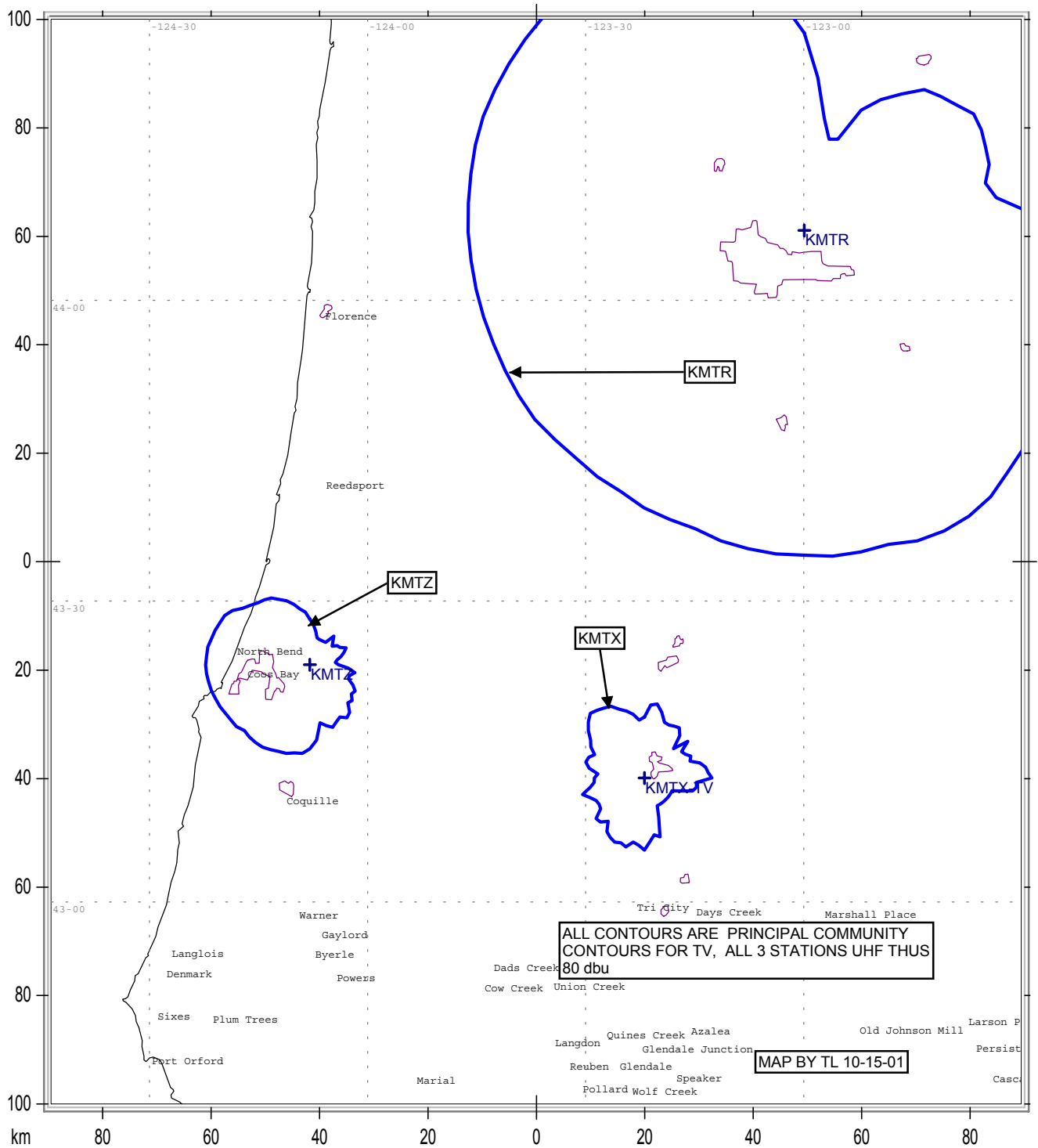
<sup>1</sup> This information was determined by a search of the Commission's CDBS Public Access "Search for Station Information" database.

<sup>2</sup> Because the proposed transfer of control of KMTR and its satellite stations is part of a merger transaction involving all of Ackerley, separate purchase offers for the stations were not solicited.

therefore face the difficult task of competing against each other, and the other stations in the market, as independents. This would make it extremely difficult for the stations to generate sufficient advertising revenue to survive as stand-alone stations. Mr. Cobb concludes that “[f]or the stations to survive and provide service to their communities, they should continue to operate as satellites of a viable sister facility.” In sum, in the three years between the satellite waiver requests, there have been no changes in the market that would alter the conclusion reached in 1999.

For all of the foregoing reasons, Clear Channel asserts that the continuation of the satellite waiver for KMTZ and KMTX-TV is warranted under the satellite exception of Note 5 of Section 73.3555.

**Exhibit 1**  
**Contour Map**



State Borders City Borders Lat/Lon Grid

**Exhibit 2**

**Letter from Brian E. Cobb to Clay C. Pendarvis, Chief, Television  
Branch (October 15, 2001)**



October 15, 2001

Mr. Clay C. Pendarvis  
Chief - Television Branch  
Federal Communications Commission  
Portals II  
445 12<sup>th</sup> Street, SW  
Room #2-A662  
Washington, DC 20554

Re: Application for Transfer of Control of:

KMTR-TV, Eugene, Oregon  
KMTZ-TV, Coos Bay, Oregon  
KMTX-TV, Roseburg, Oregon

Dear Mr. Pendarvis:

In connection with the above referenced applications, I have been requested by the parties thereto to supply you with information related to the continued operation of KMTZ-TV and KMTX-TV as satellites of KMTR-TV. This letter addresses the feasibility of operating and marketing KMTZ-TV and KMTX-TV as stand-alone operations rather than as satellites.

By way of background, I have more than thirty years of experience in the broadcast industry as an owner, manager and broker of broadcast stations. I am the founder and President of CobbCorp, LLC, and a former founder and managing director of Media Venture Partners, both nationally recognized media brokerage and appraisal firms. I am responsible for the brokerage and appraisal of television stations for CobbCorp, and, during the past fourteen years, I have personally been involved in the brokerage of more television stations than any other media broker in the United States. I served as the President of the National Association of Media Brokers and regularly speak on industry panels.

I am familiar with the Eugene market and its surrounding television markets, am knowledgeable of the signals of the television stations available in the market, and the level of competition among them and other relevant market data. As a result, I have enough knowledge to reach certain conclusions concerning KMTZ-TV and KMTX-TV's positions in the market.

Mr. Clay C. Pendarvis  
October 15, 2001  
Page Two

There are 10 operating commercial television stations assigned to the Eugene DMA, the 122<sup>nd</sup> largest television market as defined by Nielsen.

KMTZ and KMTX are operated as satellites of KMTR as previously approved by the FCC. With other stations in the market providing multiple signals, particularly the highest rated station, it would be very difficult for KMTR and its satellites to viably compete.

If KMTZ and KMTX were converted to full service stations, it is highly probable that they would be financially unsuccessful and at a significant competitive disadvantage. Coverage maps of the stations show that they are unable to adequately cover the DMA due in part to rugged terrain.

Even if it were possible for KMTZ-TV and KMTX-TV to serve a greater portion of the market, they would have little prospect of garnering affiliation agreements with any of the existing networks. If KMTZ-TV and KMTX-TV were forced to broadcast as independents, competing against the other stations that currently serve the market would make their prospects of survival slim.

As a result of an insufficient signal in the entire DMA, and the lack of any prospects of any meaningful network affiliation, it is my opinion that KMTZ and KMTX could not *generate sufficient advertising revenue* to operate successfully as stand-alone stations. For the stations to survive and provide service to their communities, they should continue to operate as satellites of a viable sister facility.

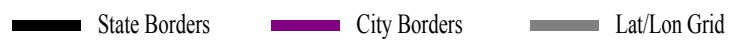
If you have any questions concerning the foregoing opinions, I will be available to respond to them.

Sincerely,



Brian E. Cobb  
President

## ATTACHMENT 5



EUGENE, OR TELEVISION DMA <sup>1</sup>				
CALL	COMMUNITY OF LICENSE	COUNTY	CHANNEL	OWNER
MTZ	Coos Bay, OR	Coos	22	Clear Channel Communications, Inc. (proposed)
MTR	Eugene, OR	Lane	16	Clear Channel Communications, Inc. (proposed)
MTX	Roseburg, OR	Douglas	46	Clear Channel Communications, Inc. (proposed)
LSR	Eugene, OR	Lane	34	California Oregon Broadcasting, Inc.
CBY	Coos Bay, OR	Coos	11	Fisher Broadcasting, Inc.
VAL	Eugene, OR	Lane	13	Fisher Broadcasting, Inc.
TVC	Roseburg, OR	Douglas	36	Johanna Broadcasting, Inc.
EZI	Eugene, OR	Lane	9	KEZI, Inc.
OAC	Corvallis, OR	Benton	7	Oregon Public Broadcasting
EPB	Eugene, OR	Lane	28	Oregon Public Broadcasting
PIC	Roseburg, OR	Douglas	4	South West Oregon TV Broadcasting Corp.

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<sup>1</sup> The Eugene, Oregon television DMA consists of the following counties: In Oregon; Benton, Coos, Douglas, Lane.

EUGENE – SPRINGFIELD, OR RADIO METRO <sup>2</sup>				
CALL SIGN	FREQUENCY	COMMUNITY OF LICENSE	COUNTY	OWNER
KEED	1600	Eugene, OR	Lane	Albany Radio Corp
KWVA	88.1	Eugene, OR	Lane	Assoc. Students of the University of Oregon
KDUK	104.7	Florence, OR	Lane	Clear Channel Communications
KODZ	99.1	Eugene, OR	Lane	Clear Channel Communications
KPNW	1120	Eugene, OR	Lane	Clear Channel Communications
KCST	106.9	Florence, OR	Lane	Coast Broadcasting Company Incorporated
KCST	1250	Florence, OR	Lane	Coast Broadcasting Company Incorporated
KEHK	102.3	Brownsville, OR	Linn*	Cumulus Media Inc
KTTT	97.9	Eugene, OR	Lane	Cumulus Media Inc
KNRQ	95.3	Creswell, OR	Lane	Cumulus Media Inc
KSCR	1320	Eugene, OR	Lane	Cumulus Media Inc
KUGN	590	Eugene, OR	Lane	Cumulus Media Inc
KZEL	96.1	Eugene, OR	Lane	Cumulus Media Inc
KQFE	88.9	Springfield, OR	Lane	Family Stations, Inc.
KLCC	89.7	Eugene, OR	Lane	Lane Community College
KKNU	93.1	Springfield, OR	Lane	McKenzie River Broadcasting
KKXO	1450	Eugene, OR	Lane	McKenzie River Broadcasting
KMGE	94.5	Eugene, OR	Lane	McKenzie River Broadcasting
KCGR	100.5	Cottage Grove, OR	Lane	O'Renicks, Robert & Diane
KNNB	1400	Cottage Grove, OR	Lane	O'Renicks, Robert & Diane
KZTU	660	Eugene, OR	Lane	Pamplin Communications Corporation
KRVB	91.9	Eugene, OR	Lane	School Dist. 43, Lane County, Oregon
KEUG	105.5	Cottage Grove, OR	Lane	Signal Communications Incorporated
KWAX	91.1	Eugene, OR	Lane	State of Oregon
KORE	1050	Springfield, OR	Lane	Support Christian Broadcasting
KKNX	840	Eugene, OR	Lane	Willamette Media Group

<sup>2</sup> The Eugene – Springfield, Oregon radio metro consists of the following counties in Oregon; Lane.

\* These stations have a reportable share in the Utica-Rome, New York Radio Metro according to Arbitron or BIA.

FUNCTIONALLY EQUIVALENT ALBANY-CORVALLIS, OR RADIO METRO <sup>3</sup>				
CALL SIGN	FREQUENCY	COMMUNITY OF LICENSE	COUNTY	OWNER
KHPE	107.9	Albany, OR	Linn	Albany Radio Corporation
KWIL	790	Albany, OR	Linn	Albany Radio Corporation
KDUK	104.7	Florence, OR	Lane*	Clear Channel Communications, Inc.
KEJO	1240	Corvallis, OR	Linn	Clear Channel Communications, Inc.
KFLY	101.5	Corvallis, OR	Linn	Clear Channel Communications, Inc.
KKRZ	100.3	Portland, OR	Multnomah*	Clear Channel Communications, Inc.
KLOO	1340	Corvallis, OR	Linn	Clear Channel Communications, Inc.
KLOO	106.1	Corvallis, OR	Linn	Clear Channel Communications, Inc.
KODZ	99.1	Eugene, OR	Lane*	Clear Channel Communications, Inc.
KRKT	990	Albany, OR	Linn	Clear Channel Communications, Inc.
KRKT	99.9	Albany, OR	Linn	Clear Channel Communications, Inc.
KUGN	590	Eugene, OR	Lane*	Cumulus Licensing Corp.
KZEL	96.1	Eugene, OR	Lane*	Cumulus Licensing Corp.
KSHO	920	Lebanon, OR	Linn	Eads Broadcasting Corp.
KLVU	107.1	Sweet Home, OR	Linn	Educational Media Foundation
KGON	92.3	Portland, OR	Multnomah*	Entercom
KKSN	1520	Oregon City, OR	Clackamas*	Entercom
KRSK	105.1	Salem, OR	Marion	Entercom
KUFO	101.1	Portland, OR	Multnomah*	Infinity Radio
KWIP	880	Dallas, OR	Polk	Jupiter Communications Corporation
KMGE	94.5	Eugene, OR	Lane*	McKenzie River Broadcasting
KOAC	550	Corvallis, OR	Linn	Oregon Public Broadcasting
KBVR	88.7	Corvallis, OR	Linn	Oregon St. Board of Higher Education
KXPC	103.7	Lebanon, OR	Linn	Portland Broadcasting, LLC
KXJM	95.5	Portland, OR	Multnomah*	Rose City Radio Corporation
KFIR	1370	Sweet Home, OR	Linn	Shae Enterprises, Inc.

<sup>3</sup> The functionally equivalent Albany-Corvallis, Oregon radio market consists of geographically proximate stations with intersecting principal community contours.

\* These stations have a reportable share in the functionally equivalent Albany-Corvallis, Oregon radio market according to Arbitron.

NEWSPAPER VOICES			
NAME	CIRCULATION	>5% OF DMA	PUBLICATION FREQUENCY
Eugene Register-Guard	82,820	Yes	M-Sat; S

1 CABLE VOICE
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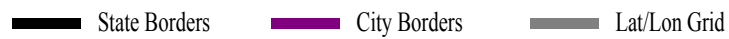


## ATTACHMENT 7



 State Borders
  City Borders
  Lat/Lon Grid

## ATTACHMENT 8



## ATTACHMENT 9

FAIRBANKS, AK TELEVISION DMA <sup>1</sup>				
CALL	COMMUNITY OF LICENSE	COUNTY	CHANNEL	OWNER
JNP	North Pole, AK	Fairbanks	4	Evangelistic Alaska Mission
TVF	Fairbanks, AK	Fairbanks	11	Clear Channel Communications, Inc. (proposed)
ATN	Fairbanks, AK	Fairbanks	2	Smith Broadcasting Group, Inc.
FXF	Fairbanks, AK	Fairbanks	7	Tanana Valley TV Company
UAC	Fairbanks, AK	Fairbanks	9	University of Alaska

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<sup>1</sup> The Fairbanks, Alaska television DMA consists of the following counties: In Alaska, Fairbanks.

FUNCTIONALLY EQUIVALENT FAIRBANKS, AK RADIO METRO<sup>2</sup>

CALL SIGN	FREQUENCY	COMMUNITY OF LICENSE	COUNTY	OWNER
KIAK	970	Fairbanks, AK	Fairbanks	Clear Channel Communications, Inc.
KIAK	102.5	Fairbanks, AK	Fairbanks	Clear Channel Communications, Inc.
KED	104.7	Fairbanks, AK	Fairbanks	Clear Channel Communications, Inc.
KAKQ	101.1	Fairbanks, AK	Fairbanks	Clear Channel Communications, Inc.
KJNP	1170	North Pole, AK	Fairbanks	Evangelistic Alaska Mission
KJNP	100.3	North Pole, AK	Fairbanks	Evangelistic Alaska Mission
KCBF	820	Fairbanks, AK	Fairbanks	New Northwest Broadcasters
KFAR	660	Fairbanks, AK	Fairbanks	New Northwest Broadcasters
KUWL	103.9	College, AK	Fairbanks	New Northwest Broadcasters
KWLF	98.1	Fairbanks, AK	Fairbanks	New Northwest Broadcasters
KXLR	95.9	Fairbanks, AK	Fairbanks	New Northwest Broadcasters
KYSC	96.9	Fairbanks, AK	Fairbanks	Northern Radio, Inc.
KSUA	91.5	Fairbanks, AK	Fairbanks	University of Alaska
KUAC	89.9	Fairbanks, AK	Fairbanks	University of Alaska
KIAM	630	Nenana, AK	Yukon Koyukuk	Voice for Christ

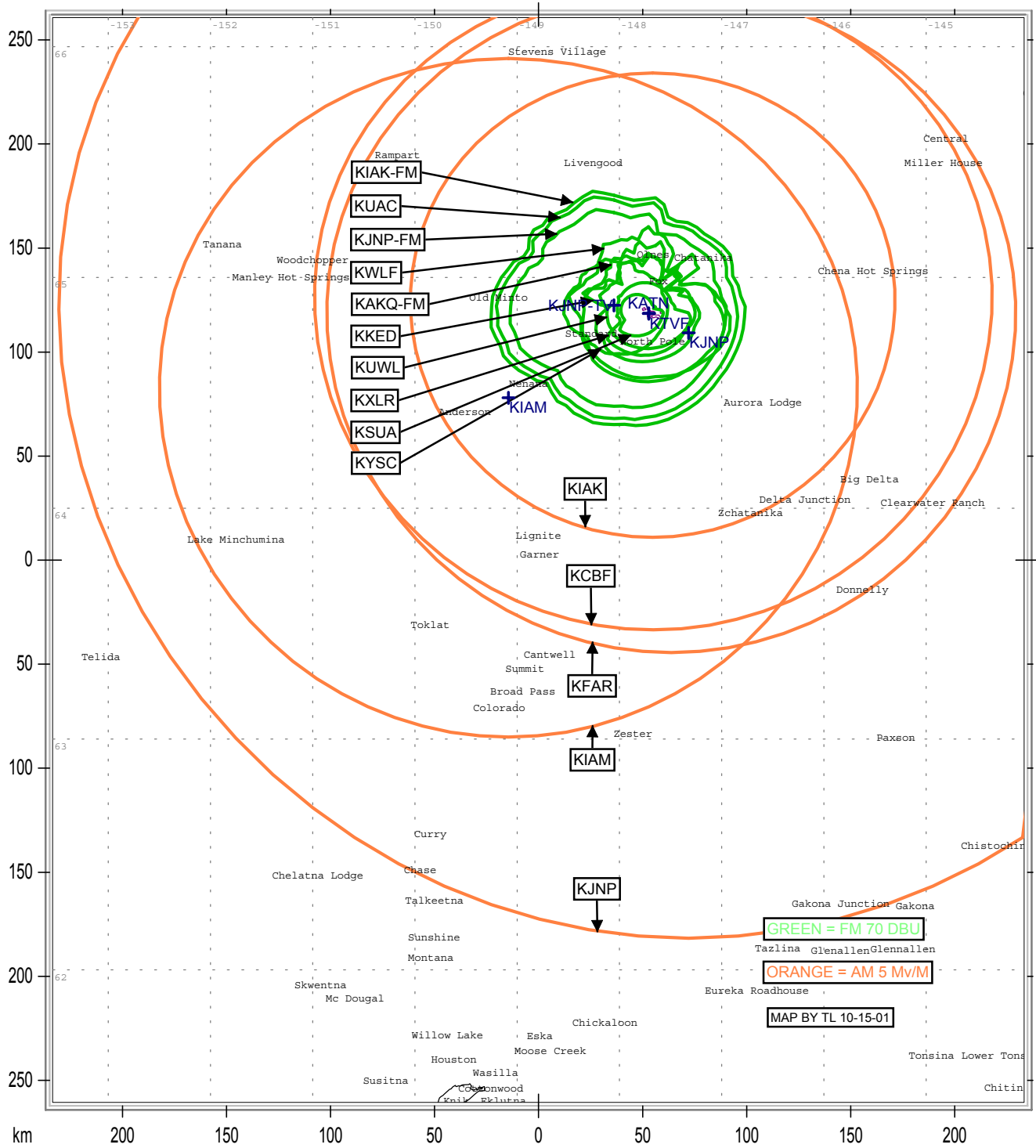
<sup>2</sup> The functionally equivalent Fairbanks, Alaska radio market consists of geographically proximate stations with intersecting principal community contours.

NEWSPAPER VOICES			
NAME	CIRCULATION	>5% OF DMA	PUBLICATION FREQUENCY
Fairbanks Daily News-Miner	16,205	Yes	M-Sat; S

1 CABLE VOICE
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## ATTACHMENT 10



## ATTACHMENT 11



## ATTACHMENT 12

FRESNO – VISALIA, CA TELEVISION DMA <sup>1</sup>				
CALL	COMMUNITY OF LICENSE	COUNTY	CHANNEL	OWNER
FSN	Fresno, CA	Fresno	30	ABC, Inc.
NXT	Visalia, CA	Tulare	49	Diocese of Fresno Ed. Corporation
GPE	Fresno, CA	Fresno	47	Clear Channel Communications, Inc. (proposed)
GMC	Clovis, CA	Fresno	43	Gary M. Cocola Family Trust, Gary M. Cocola Trustee
FTV	Hanford, CA	Kings	21	KFTV License Partnership, G.P.
SEE	Fresno, CA	Fresno	24	KSEE License, Inc.
MPH	Fresno, CA	Fresno	26	Pappas Telecasting, Inc.
PXF	Porterville, CA	Tulare	61	Paxson Communications License Company, L.L.C.
NSO	Merced, CA	Merced	51	Sainte 51, L.P.
MSG	Sanger, CA	Fresno	59	Sanger Telecasters, Inc.
AIL	Fresno, CA	Fresno	53	Trans America Broadcasting Corp.
VPT	Fresno, CA	Fresno	18	Valley Public Television, Inc.

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<sup>1</sup> The Fresno – Visalia, California television DMA consists of the following counties: In California; Fresno, Kings, Madera, Mariposa, Merced, Tulare.

FRESNO, CA RADIO METRO <sup>2</sup>				
CALL SIGN	FREQUENCY	COMMUNITY OF LICENSE	COUNTY	OWNER
KLBN	105.1	Auberry, CA	Fresno	Lotus Communications Corporation
KOOR	790	Clovis, CA	Fresno	Viacom International Inc
KZFO	92.1	Clovis, CA	Fresno	Entravision Communications Company LLC
KEZL	96.7	Fowler, CA	Fresno	Clear Channel Communications
KALZ	102.7	Fresno, CA	Fresno	Clear Channel Communications
KAVT	1680	Fresno, CA	Fresno	RAK Communications Inc
KBIF	900	Fresno, CA	Fresno	Gore-Overgaard Broadcasting, Inc.
KCBL	1340	Fresno, CA	Fresno	Clear Channel Communications
KEYQ	980	Fresno, CA	Fresno	Association for Community Education
KFIG	1430	Fresno, CA	Fresno	Big Dawg Broadcasting
KGST	1600	Fresno, CA	Fresno	Lotus Communications Corporation
KIRV	1510	Fresno, CA	Fresno	Gore-Overgaard Broadcasting, Inc.
KJFX	95.7	Fresno, CA	Fresno	Mondosphere Broadcasting
KJWL	99.3	Fresno, CA	Fresno	Ostlund, John Edward
KMGV	97.9	Fresno, CA	Fresno	Viacom International Inc
KMJ	580	Fresno, CA	Fresno	Viacom International Inc
KOQO	101.9	Fresno, CA	Fresno	Viacom International Inc
KRNC	105.9	Fresno, CA	Fresno	Viacom International Inc
KSKS	93.7	Fresno, CA	Fresno	Viacom International Inc
KVSR	101.1	Fresno, CA	Fresno	Viacom International Inc
KWRU	940	Fresno, CA	Fresno	Radio Unica
KXEX	1550	Fresno, CA	Fresno	RAK Communications Inc
KYNO	1300	Fresno, CA	Fresno	Spanish Catholic Radio
KKPW	94.3	Kerman, CA	Fresno	Big Broadcast of Arizona LLC
KMAK	100.3	Orange Cove, CA	Fresno	Smith, Richard B.
KWOL	105.5	San Joaquin, CA	Fresno	Mondosphere Broadcasting
KFSR	90.7	Fresno, CA	Fresno	California State University
KFNO	90.3	Fresno, CA	Fresno	Family Stations, Inc.
KFCF	88.1	Fresno, CA	Fresno	Fresno Free College Foundation
KJGS	620	Hanford, CA	Kings	P&C Broadcasting
KMPH	107.5	Hanford, CA	Kings	Pappas Telecasting
KRZR	103.7	Hanford, CA	Kings	Clear Channel Communications
KHOT	1250	Madera, CA	Madera*	Entravision Communications Company LLC
KMMM	107.1	Madera, CA	Madera*	Lotus Communications Corporation
K AAT	103.1	Oakhurst, CA	Madera*	Calif-Sierra Corp
KL VY	91.1	Fairmead, CA	Madera*	White Ash Broadcasting, Inc.
KRDU	1130	Dinuba, CA	Tulare	Clear Channel Communications
KSOF	98.9	Dinuba, CA	Tulare	Clear Channel Communications
KBOS	94.9	Tulare, CA	Tulare	Clear Channel Communications
KFSO	92.9	Visalia, CA	Tulare	Clear Channel Communications
KFRR	104.1	Woodlake, CA	Tulare	Mondosphere Broadcasting

<sup>2</sup> The Fresno, California radio metro consists of the following counties in California; Fresno, Kings, Tulare.

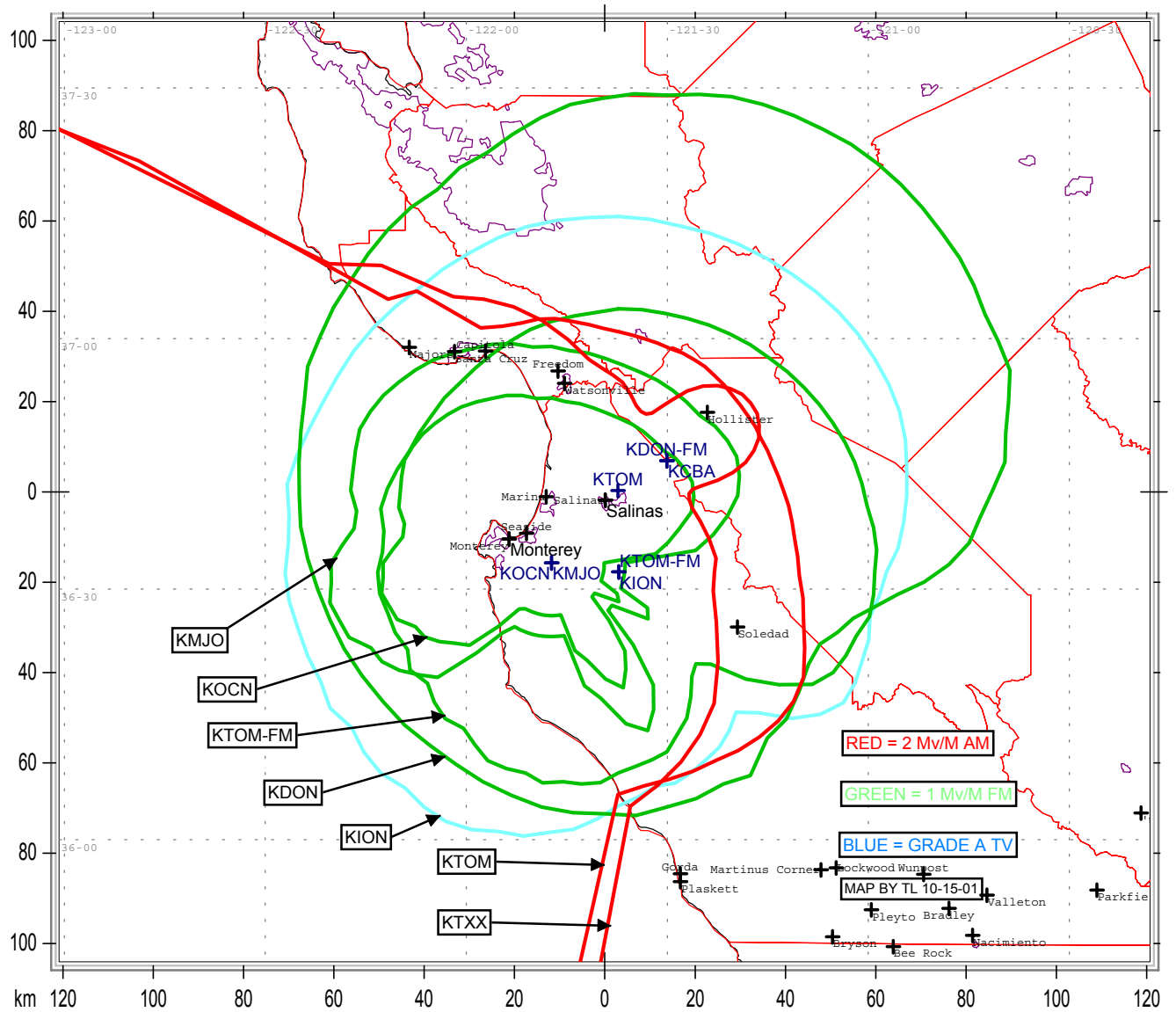
\* These stations have a reportable share in the Fresno, California Radio Metro according to Arbitron or BIA

NEWSPAPER VOICES			
NAME	CIRCULATION	>5% OF DMA	PUBLICATION FREQUENCY
The Fresno Bee	156,466	Yes	M-Sat; S
Visalia Times-Delta	29,513	Yes	M-Sat

1 CABLE VOICE
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## ATTACHMENT 13



ATTACHMENT 14

MONTEREY - SALINAS, CA TELEVISION DMA <sup>1</sup>				
CALL	COMMUNITY OF LICENSE	COUNTY	CHANNEL	OWNER
ION	Monterey, CA	Monterey	46	Clear Channel Communications, Inc. (proposed)
SMS	Monterey, CA	Monterey	67	Entravision Holdings, L.L.C.
SBW	Salinas, CA	Monterey	8	Hearst-Argyle Stations, Inc.
CAH	Watsonville, CA	Santa Cruz	25	KTEH-TV Foundation
CBA	Salinas, CA	Monterey	35	Seal Rock Broadcasters, L.L.C.

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<sup>1</sup> The Monterey - Salinas, California television DMA consists of the following counties: In California; Monterey, San Benito, Santa Cruz.

**MONTEREY – SALINAS – SANTA CRUZ, CA RADIO METRO<sup>2</sup>**

CALL SIGN	FREQUENCY	COMMUNITY OF LICENSE	COUNTY	OWNER
KTEE	103.9	Seaside, CA	Monterey	Bi-Coastal Media LLC
KIDD	630	Monterey, CA	Monterey	Buckley Broadcasting Corporation
KWAV	96.9	Monterey, CA	Monterey	Buckley Broadcasting Corporation
KMJO	92.7	Marina, CA	Monterey	Clear Channel Communications
KOCN	105.1	Pacific Grove, CA	Monterey	Clear Channel Communications
KDON	102.5	Salinas, CA	Monterey	Clear Channel Communications
KTOM	100.7	Salinas, CA	Monterey	Clear Channel Communications
KTOM	1380	Salinas, CA	Monterey	Clear Channel Communications
KTXS	1460	Salinas, CA	Monterey	Clear Channel Communications
KLOK	99.5	Greenfield, CA	Monterey	Entravision Communications Company LLC
KSES	107.1	Seaside, CA	Monterey	Entravision Communications Company LLC
KSES	700	Soledad, CA	Monterey	Entravision Communications Company LLC
KFRS	89.9	Soledad, CA	Monterey	Family Station, Inc.
KAZU	90.3	Pacific Grove, CA	Monterey	Foundation of CA State Univ. Monterey Bay
KBOQ	95.5	Carmel, CA	Monterey	J & M Broadcasting Inc
KKMC	880	Salinas, CA	Monterey	Monterey County Broadcasters
KBTU	101.7	Carmel, CA	Monterey	New Wave Broadcasting LP
KMBY	104.3	Gonzales, CA	Monterey	New Wave Broadcasting LP
KCDU	93.5	Hollister, CA	San Benito*	New Wave Broadcasting LP
KHIP	93.7	Felton, CA	Santa Cruz	New Wave Broadcasting LP
KPIG	107.5	Freedom, CA	Santa Cruz	New Wave Broadcasting LP
KUSP	88.9	Santa Cruz, CA	Santa Cruz	Pataphysical Broadcasting Foundation, Inc.
KSRK	540	Carmel Valley, CA	Monterey	People's Radio Inc
KNRY	1240	Monterey, CA	Monterey	People's Radio Inc
KLVM	89.7	Prunedale, CA	Monterey	Prunedale Educational Association
KHDC	90.9	Chualar, CA	Monterey	Radio Bilingue, Inc.
KSEA	107.9	Greenfield, CA	Monterey	Radio Campesina Inc
KRKC	102.1	King City, CA	Monterey	Radio Del Rey Inc
KRKC	1490	King City, CA	Monterey	Radio Del Rey Inc
KSPB	91.9	Pebble Beach, CA	Monterey	Robert Louis Stevenson School
KRML	1410	Carmel, CA	Monterey	Wisdom Broadcasting
KZSL	93.9	King City, CA	Monterey	Wolfhouse Radio Group Inc
KCTY	980	Salinas, CA	Monterey	Wolfhouse Radio Group Inc
KHMZ	97.9	Salinas, CA	Monterey	Wolfhouse Radio Group Inc
KRAY	103.5	Salinas, CA	Monterey	Wolfhouse Radio Group Inc
KTGE	1570	Salinas, CA	Monterey	Wolfhouse Radio Group Inc
KHNZ	106.3	Soledad, CA	Monterey	Wolfhouse Radio Group Inc
KOMY	1340	La Selva Beach, CA	Santa Cruz	Zwerling Broadcasting Systems
KSCO	1080	Santa Cruz, CA	Santa Cruz	Zwerling Broadcasting Systems

<sup>2</sup> The Monterey – Salinas – Santa Cruz, California radio metro consists of the following counties in California; Monterey, Santa Cruz.

\* These stations have a reportable share in the Monterey-Salinas-Santa Cruz, California Radio Metro according to Arbitron or BIA.

NEWSPAPER VOICES			
NAME	CIRCULATION	% OF DMA	PUBLICATION FREQUENCY
The Monterey County	35,077	Yes	M-Sat; S
Salinas Californian	19,409	Yes	M-Sat

1 CABLE VOICE
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ATTACHMENT 15





ATTACHMENT 16

**SAN FRANCISCO – OAKLAND – SAN JOSE, CA TELEVISION DMA<sup>1</sup>**

CALL	COMMUNITY OF LICENSE	COUNTY	CHANNEL	OWNER
PIX	San Francisco, CA	San Francisco	5	CBS Broadcasting, Inc.
TLN	Novato, CA	Marin	68	Christian Communications Chicagoland
FTY	Santa Rosa, CA	Sonoma	50	Clear Channel Communications, Inc. (proposed)
PST	Vallejo, CA	Solano	66	Golden Link TV, Inc.
DTV	San Francisco, CA	San Francisco	14	KDTV License Partnership, G.P.
GO	San Francisco, CA	San Francisco	7	KGO Television, Inc.
NTV	San Jose, CA	Santa Clara	11	KNTV License, Inc.
BWB	San Francisco, CA	San Francisco	20	KOFY-TV License, Inc.
QED	San Francisco, CA	San Francisco	9	KQED, Inc.
TEH	San Jose, CA	Santa Clara	54	KTEH-TV Foundation
TVU	Oakland, CA	Alameda	2	KTVU Partnership
ICU	San Jose, CA	Santa Clara	36	KTVU Partnership
TSF	San Francisco, CA	San Francisco	26	Lincoln Broadcasting Co., A Cal. Ltd Partner
MTP	San Francisco, CA	San Francisco	32	Minority Television Project
TNC	Concord, CA	Contra Costa	42	Pappas Concord Partners
FWU	Fort Bragg, CA	Mendocino	8	Pappas Concord Partners
RCB	Cotati, CA	Sonoma	22	Rural California Broadcasting Corp.
CNS	San Francisco, CA	San Francisco	38	SAH Acquisition Corporation II
CSM	San Mateo, CA	San Mateo	60	San Mateo County Community College District
STS	San Jose, CA	Santa Clara	48	Telemundo of Northern CA Lic. Corp.
RON	San Francisco, CA	San Francisco	4	Young Broadcasting of San Francisco, Inc.

<sup>1</sup> The San Francisco – Oakland – San Jose, California television DMA consists of the following counties: In California; Alameda, Contra Costa, Lake, Marin, Mendocino, Napa, San Francisco, San Mateo, Santa Clara, Solano, Sonoma.

SAN FRANCISCO, CA RADIO METRO <sup>2</sup>				
CALL SIGN	FREQUENCY	COMMUNITY OF LICENSE	COUNTY	OWNER
KMKY	1310	Oakland, CA	Alameda	ABC Radio Incorporated
KGO	810	San Francisco, CA	San Francisco	ABC Radio Incorporated
KSFO	560	San Francisco, CA	San Francisco	ABC Radio Incorporated
KKIQ	101.7	Livermore, CA	Alameda	Alta Broadcasting Company
KUIC	95.3	Vacaville, CA	Solano	Alta Broadcasting Company
KCKC	1480	Concord, CA	Contra Costa	American Radio Brokers Inc/SFO
KDYA	1190	Vallejo, CA	Solano	Baybridge Communications LLC
KBBF	89.1	Santa Rosa, CA	Sonoma	Bilingual Broadcasting Foundation, Inc.
KDFC	102.1	San Francisco, CA	San Francisco	Bonneville International Corporation
KOIT	96.5	San Francisco, CA	San Francisco	Bonneville International Corporation
KOIT	1260	San Francisco, CA	San Francisco	Bonneville International Corporation
KZQZ	95.7	San Francisco, CA	San Francisco	Bonneville International Corporation
KDIA	1640	Vallejo, CA	Solano	Catholic Radio Network LLC
KCNL	104.9	Fremont, CA	Alameda	Clear Channel Communications
KABL	960	Oakland, CA	Alameda	Clear Channel Communications
KNEW	910	Oakland, CA	Alameda	Clear Channel Communications
KFJO	92.1	Walnut Creek, CA	Contra Costa	Clear Channel Communications
KIOI	101.3	San Francisco, CA	San Francisco	Clear Channel Communications
KISQ	98.1	San Francisco, CA	San Francisco	Clear Channel Communications
KKSF	103.7	San Francisco, CA	San Francisco	Clear Channel Communications
KMEL	106.1	San Francisco, CA	San Francisco	Clear Channel Communications
KYLD	94.9	San Francisco, CA	San Francisco	Clear Channel Communications
KSJO	92.3	San Jose, CA	Santa Clara	Clear Channel Communications
KLVR	91.9	Santa Rosa, CA	Sonoma	Educational Media Foundation
KEAR	106.9	San Francisco, CA	San Francisco	Family Stations Inc
KSOL	98.9	San Francisco, CA	San Francisco	Hispanic Broadcasting Corporation
KZOL	99.1	Santa Cruz, CA	Santa Cruz*	Hispanic Broadcasting Corporation
KBLX	102.9	Berkeley, CA	Alameda	Inner City Broadcasting Corporation
KVTO	1400	Berkeley, CA	Alameda	Inner City Broadcasting Corporation
KJQI	1510	San Rafael, CA	Marin	Mt Wilson FM Broadcasters
KEST	1450	San Francisco, CA	San Francisco	Multicultural Radio Broadcasting Incorporated
KATD	990	Pittsburg, CA	Contra Costa	Radio Unica
KIQI	1010	San Francisco, CA	San Francisco	Radio Unica
KSFB	100.7	San Rafael, CA	Marin	Salem Communications Corporation
KFAX	1100	San Francisco, CA	San Francisco	Salem Communications Corporation
KXJO	92.7	Alameda, CA	Alameda	Spanish Broadcasting System
KFOG	104.5	San Francisco, CA	San Francisco	Susquehanna Radio Corporation
KNBR	680	San Francisco, CA	San Francisco	Susquehanna Radio Corporation
KSAN	107.7	San Mateo, CA	San Mateo	Susquehanna Radio Corporation
KTCT	1050	San Mateo, CA	San Mateo	Susquehanna Radio Corporation
KFFG	97.7	Los Altos, CA	Santa Clara	Susquehanna Radio Corporation

<sup>2</sup> The San Francisco, California Radio Metro consists of the following counties: In California; Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, Sonoma.

\* These stations have a reportable share in the San Francisco, California Radio Metro according to Arbitron or BIA.

SAN FRANCISCO, CA RADIO METRO <sup>3</sup>				
CALL SIGN	FREQUENCY	COMMUNITY OF LICENSE	COUNTY	OWNER
KCBS	740	San Francisco, CA	San Francisco	Viacom International Inc
KFRC	99.7	San Francisco, CA	San Francisco	Viacom International Inc
KFRC	610	San Francisco, CA	San Francisco	Viacom International Inc
KITS	105.3	San Francisco, CA	San Francisco	Viacom International Inc
KLLC	97.3	San Francisco, CA	San Francisco	Viacom International Inc
KYCY	1550	San Francisco, CA	San Francisco	Viacom International Inc
KYCY	93.3	San Francisco, CA	San Francisco	Viacom International Inc
KRCB	91.1	Santa Rosa, CA	Sonoma	Rural California Broadcasting Corp.

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<sup>3</sup> The San Francisco, California Radio Metro consists of the following counties: In California; Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, Sonoma.

SACRAMENTO, CA RADIO METRO <sup>4</sup>				
CALL SIGN	FREQUENCY	COMMUNITY OF LICENSE	COUNTY	OWNER
CFBK	1530	Sacramento, CA	Sacramento	Clear Channel Communications, Inc.
CGBY	92.5	Sacramento, CA	Sacramento	Clear Channel Communications, Inc.
CHYL	101.1	Auburn, CA	Placer	Clear Channel Communications, Inc.
CSTE	650	Rancho Cordova, CA	Sacramento	Clear Channel Communications, Inc.
COWL	1490	S. Lake Tahoe, CA	El Dorado	Commonwealth
CRLT	93.9	S. Lake Tahoe, CA	El Dorado	Commonwealth
CBMB	103.5	Sacramento, CA	Sacramento	Diamond Radio
CLVS	99.3	Grass Valley, CA	Nevada	Educational Media
CCTC	1320	Sacramento, CA	Sacramento	Entercom
CDND	107.9	Sacramento, CA	Sacramento	Entercom
CRXQ	98.5	Sacramento, CA	Sacramento	Entercom
CSEG	96.9	Sacramento, CA	Sacramento	Entercom
CSSJ	94.7	Fair Oaks	Sacramento	Entercom
CHHZ	104.3	Davis, CA	Yolo	Entravision Communications
CRCX	99.9	Marysville, CA	Yuba*	Entravision Communications
CRRE	101.9	Shingle Springs, CA	El Dorado	Entravision Communications
CSQR	1240	Sacramento, CA	Sacramento	Entravision Communications
CZSA	92.1	Placerville, CA	El Dorado	Entravision Communications
CMYC	1410	Marysville, CA	Yuba*	Huth, Tom
CAHI	950	Auburn, CA	Placer	Immaculate Heart
CSMH	1620	Auburn, CA	Placer	Immaculate Heart
CHTK	1140	Sacramento, CA	Sacramento	Infinity Broadcasting
CNCI	105.1	Sacramento, CA	Sacramento	Infinity Broadcasting
CRAK	1470	Sacramento, CA	Sacramento	Infinity Broadcasting
CSFM	102.5	Woodland, CA	Yolo	Infinity Broadcasting
CXOA	93.7	Roseville, CA	Placer	Infinity Broadcasting
CYMX	96.1	Sacramento, CA	Sacramento	Infinity Broadcasting
CZZO	100.5	Sacramento, CA	Sacramento	Infinity Broadcasting
CTHO	590	S. Lake Tahoe, CA	El Dorado	KIDD
CJAY	1430	Sacramento, CA	Sacramento	KJAY LLC
CLIB	1110	Roseville, CA	Placer	Multicultural Broadcasting
CSXX	1690	Roseville, CA	Placer	Multicultural Broadcasting
CNCO	830	Grass Valley, CA	Nevada	Nevada Country
CLNA	105.5	Dunnigan, CA	Yolo	Pacific Spanish Network
CTTA	97.9	Esparto, CA	Yolo	Pacific Spanish Network
CIOQ	1030	Folsom, CA	Sacramento	Royce International Broadcasting
CWOD	106.5	Sacramento, CA	Sacramento	Royce International Broadcasting
CFIA	710	Carmichael, CA	Sacramento	Salem Communications Corp.
CTKZ	1380	Sacramento, CA	Sacramento	Salem Communications Corp.

<sup>4</sup> The Sacramento, California Radio Metro consists of the following counties: In California; El Dorado, Nevada, Placer, Sacramento, Yolo.

\* These stations have a reportable share in the Sacramento, California Radio Metro according to Arbitron or BIA.

SANTA ROSA, CA RADIO METRO <sup>5</sup>				
CALL SIGN	FREQUENCY	COMMUNITY OF LICENSE	COUNTY	OWNER
KFGY	92.9	Healdsburg, CA	Sonoma	Emerald City Radio
KMGG	97.7	Monte Rio, CA	Sonoma	Emerald City Radio
KSRO	1350	Santa Rosa, CA	Sonoma	Emerald City Radio
KXFX	101.7	Santa Rosa, CA	Sonoma	Emerald City Radio
KRSH	98.7	Middletown, CA	Lake*	Independent Broadcasting
KSXY	95.9	Healdsburg, CA	Sonoma	Independent Broadcasting
KTOB	1490	Petaluma, CA	Sonoma	Kim Broadcasting Corp.
KRRS	1460	Santa Rosa, CA	Sonoma	Moon Broadcasting Corp.
KGRP	100.9	Calistoga, CA	Napa*	Moonbeam Inc.
KJZY	93.7	Sebastapol, CA	Sonoma	Redwood Empire
KZST	100.1	Santa Rosa, CA	Sonoma	Redwood Empire
KMHX	104.1	Windsor, CA	Sonoma	Results Radio
KRPQ	104.9	Rohnert Park, CA	Sonoma	Results Radio

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<sup>5</sup> The Santa Rosa, California Radio Metro consists of the following counties: In California; Sonoma.

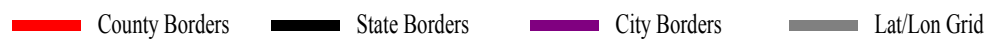
\* These stations have a reportable share in the Santa Rosa, California Radio Metro according to Arbitron or BIA.

NEWSPAPER VOICES			
NAME	CIRCULATION	% OF DMA	PUBLICATION FREQUENCY
San Francisco Examiner & Chronicle	420,685	Yes	M-Sat; S

1 CABLE VOICE
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ATTACHMENT 17





ATTACHMENT 18

BINGHAMTON, NY TELEVISION DMA <sup>1</sup>				
CALL	COMMUNITY OF LICENSE	COUNTY	CHANNEL	OWNER
/IVT	Binghamton, NY	Broome	34	Clear Channel Communications, Inc. (proposed)
/BNG	Binghamton, NY	Broome	12	Gateway Communications, Inc.
/ICZ	Binghamton, NY	Broome	40	Stainless Broadcasting, L.P.
/SKG	Binghamton, NY	Broome	46	WSKG Pub. Telecommunications Council

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<sup>1</sup> The Binghamton, New York television DMA consists of the following counties: In New York; Broome, Chenango, Delaware, Tioga.

BINGHAMTON, NY RADIO METRO <sup>2</sup>				
CALL SIGN	FREQUENCY	COMMUNITY OF LICENSE	COUNTY	OWNER
VTYN	94.7	Deposit, NY	Broome	BanJo Communications Group
VAAL	99.1	Binghamton, NY	Broome	Citadel Communications Corporation
VHWK	98.1	Binghamton, NY	Broome	Citadel Communications Corporation
VKOP	1360	Binghamton, NY	Broome	Citadel Communications Corporation
VNBF	1290	Binghamton, NY	Broome	Citadel Communications Corporation
VYOS	104.1	Chenango Bridge, NY	Broome	Citadel Communications Corporation
VINR	680	Binghamton, NY	Broome	Clear Channel Communications
VEVE	1430	Endicott, NY	Broome	Clear Channel Communications
VMRV	105.7	Endicott, NY	Broome	Clear Channel Communications
VBBT	107.5	Endwell, NY	Broome	Clear Channel Communications
VMXW	103.3	Vestal, NY	Broome	Clear Channel Communications
VKGB	92.5	Susquehanna, NY	Chenango*	Clear Channel Communications
VYXL	97.3	Ithaca, NY	Tompkins*	Eagle Communications
VCDW	100.5	Conklin, NY	Broome	Equinox Broadcasting Corp
VCII	88.5	Spencer, NY	Tioga	Family Life Ministries, Inc.
VIFF	90.1	Binghamton, NY	Broome	Jesus is King Communications, Inc.
VHRW	90.5	Binghamton, NY	Broome	State University of NY at Binghamton
VEBO	1330	Owego, NY	Oswego*	Tioga Media
VATS	960	Sayre, PA	Bradford*	WATS Broadcasting Inc
VAVR	102.1	Waverly, NY	Westchester*	WATS Broadcasting Inc
VLTB	101.7	Johnson City, NY	Broome	WEBO Radio Inc
VSKG	89.3	Binghamton, NY	Broome	WSKG Pub. Telecommunications Council
VSQX	91.5	Binghamton, NY	Broome	WSKG Pub. Telecommunications Council

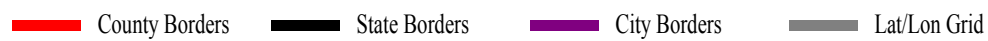
<sup>2</sup> The Binghamton, New York Radio Metro consists of the following counties: In New York; Broome, Tioga.

\* These stations have a reportable share in the Binghamton, New York Radio Metro according to Arbitron or BIA

NEWSPAPER VOICES			
NAME	CIRCULATION	>5% OF DMA	PUBLICATION FREQUENCY
Binghamton Press & Sun-Bulletin	62,830	Yes	M-Sat; S

1 CABLE VOICE
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## ATTACHMENT 19



ATTACHMENT 20



ROCHESTER, NEW YORK TELEVISION DMA <sup>1</sup>				
CALL	COMMUNITY OF LICENSE	COUNTY	CHANNEL	OWNER
WHUF	Rochester, NY	Monroe	31	BS&L Broadcasting, Inc.
WOKR	Rochester, NY	Monroe	13	Clear Channel Communications, Inc. (proposed)
WHEC	Rochester, NY	Monroe	10	Hubbard Broadcasting, Inc.
WROC	Rochester, NY	Monroe	8	Nexstar Broadcasting Council of Rochester, L.L.C.
WXXI	Rochester, NY	Monroe	21	WXXI Public Broadcasting Council

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<sup>1</sup> The Rochester, New York Television DMA consists of the following counties in New York: Livingston, Monroe, Ontario, Wayne.

ROCHESTER, NEW YORK RADIO METRO <sup>2</sup>				
CALL SIGN	FREQUENCY	COMMUNITY OF LICENSE	COUNTY	OWNER
WZXV	99.7	Palmyra, NY	Wayne	Calvary Chapel - Finger Lakes
WNVE	95.1	Honeoye Falls, NY	Monroe	Clear Channel Communications
WKGS	106.7	Irondequoit, NY	Monroe	Clear Channel Communications
WHAM	1180	Rochester, NY	Monroe	Clear Channel Communications
WHTK	1280	Rochester, NY	Monroe	Clear Channel Communications
WVOR	100.5	Rochester, NY	Monroe	Clear Channel Communications
WISY	102.3	Canandaigua, NY	Ontario	Clear Channel Communications
WLCL	107.3	South Bristol Township, NY	Ontario	Clear Channel Communications
WLGZ	990	Rochester, NY	Monroe	Crawford Broadcasting Company
WDCZ	102.7	Webster, NY	Monroe	Crawford Broadcasting Company
WBTA	1490	Batavia, NY	Genesee	Doran, Kevin
WBBF	93.3	Avon, NY	Livingston	Entercom
WBBF	950	Rochester, NY	Monroe	Entercom
WBEE	92.5	Rochester, NY	Monroe	Entercom
WBZA	98.9	Rochester, NY	Monroe	Entercom
WCIY	88.9	Canandaigua, NY	Ontario	Family Life Ministries, Inc.
WFRW	88.1	Webster, NY	Monroe	Family Stations, Inc.
WGCC	90.7	Batavia, NY	Genesee	Genesee Community College
WGMC	90.1	Greece, NY	Monroe	Greece Central School District
WXXI	91.5	Rochester	Monroe	Greece Central School District
WWWG	1460	Rochester, NY	Monroe	HHH Broadcasting
WLOF	101.7	Attica, NY	Wyoming*	Holy Family Communications
WFLK	101.7	Geneva, NY	Ontario	M.B. Communications Inc
WMHN	89.3	Webster, NY	Monroe	Mars Hill Broadcasting Company, Inc.
WDNY	93.9	Dansville, NY	Livingston	Miller Media Inc
WDNY	1400	Dansville, NY	Livingston	Miller Media Inc
WBER	90.5	Rochester, NY	Monroe	Monroe B.O.C.E.S. #1
WDKX	103.9	Rochester, NY	Monroe	Monroe County Broadcasting Co., LTD
WJZR	105.9	Rochester, NY	Monroe	R B Lee Rust
WYSL	1040	Avon, NY	Livingston	Radio Livingston Ltd
WITR	89.7	Henrietta, NY	Monroe	Rochester Institute of Technology
WGSU	89.3	Geneseo, NY	Livingston	State University of New York
WBSU	89.1	Brockport, NY	Monroe	State University of New York
WCGR	1550	Canandaigua, NY	Ontario	The Radio Group
WGVA	1240	Geneva, NY	Ontario	The Radio Group
WLLW	99.3	Seneca Falls, NY	Seneca*	The Radio Group
WNYR	98.5	Waterloo, NY	Seneca*	The Radio Group
WRUR	88.5	Rochester, NY	Monroe	University of Rochester Broadcast Corporation
WZNE	94.1	Brighton, NY	Monroe	Viacom International Inc
WCMF	96.5	Rochester, NY	Monroe	Viacom International Inc
WPXY	97.9	Rochester, NY	Monroe	Viacom International Inc
WRMM	101.3	Rochester, NY	Monroe	Viacom International Inc
WNNR	103.5	Sodus, NY	Wayne	Waynco Radio Inc
WASB	1590	Brockport, NY	Monroe	Wolfe, David L.
WMJQ	105.5	Brockport, NY	Monroe	Wolfe, David L.
WRSB	1310	Canandaigua, NY	Ontario	Wolfe, David L.

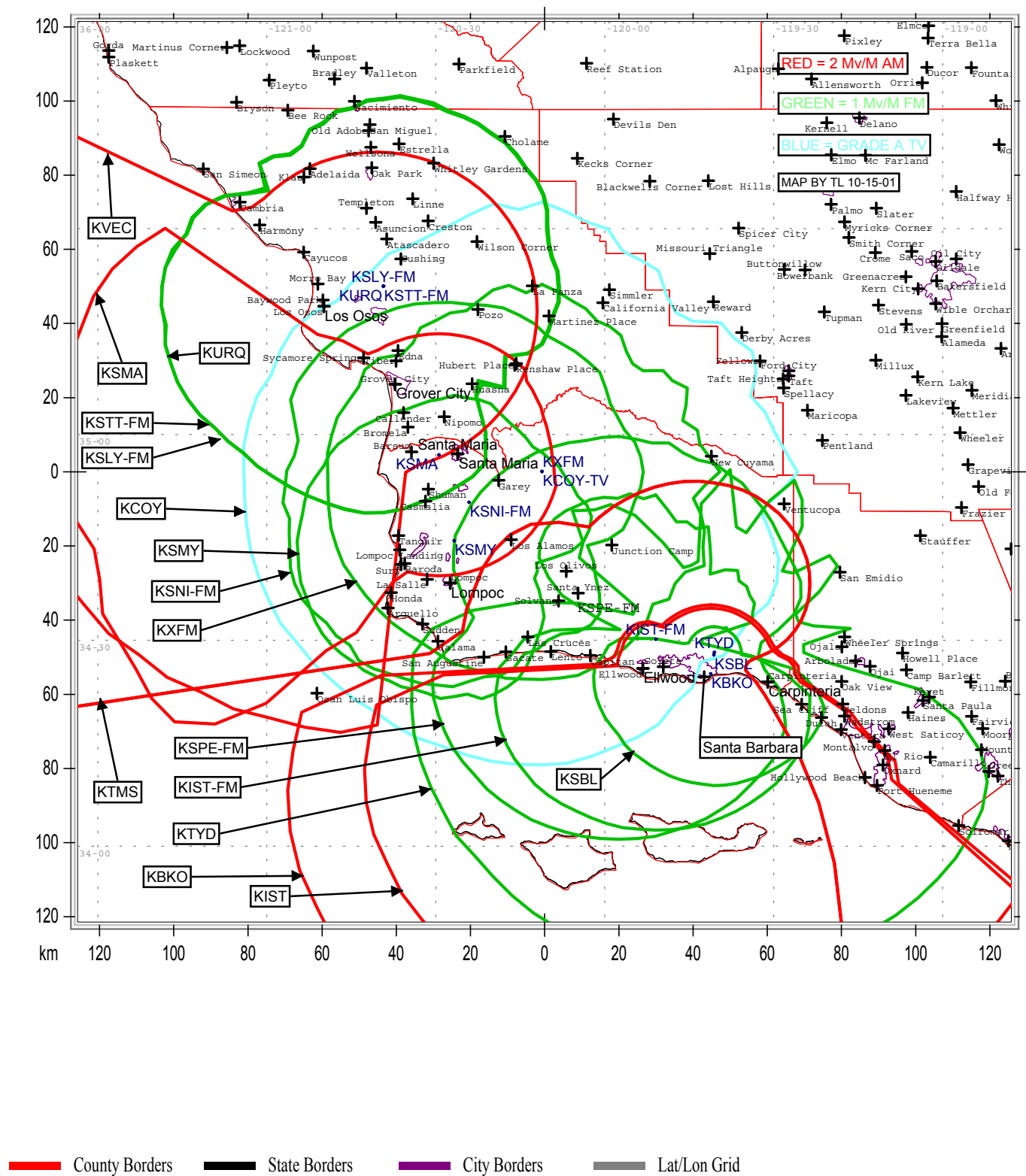
<sup>2</sup> The Rochester, New York Radio Metro consists of the following counties in New York: Genesee, Livingston, Monroe, Ontario, Orleans, and Wayne.

\* These stations have a reportable share in the Rochester, New York Radio Metro according to Arbitron or BIA.

NEWSPAPER VOICES			
NAME	CIRCULATION	>5% OF DMA	PUBLICATION FREQUENCY
Rochester Democrat and Chronicle	203,992	Yes	Mon-Sat; S

1 CABLE VOICE
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ATTACHMENT 21



ATTACHMENT 22

SANTA BARBARA – SANTA MARIA – SAN LUIS OBISPO, CALIFORNIA - TELEVISION DMA <sup>1</sup>				
CALL	COMMUNITY OF LICENSE	COUNTY	CHANNEL	OWNER
COY	Santa Maria, CA	Santa Barbara	12	Clear Channel Communications, Inc. (proposed)
PMR	Santa Barbara, CA	Santa Barbara	38	Coast TV
TAS	San Luis Obispo, CA	San Luis Obispo	33	Raul & Consuelo Palazuelos
SBY	San Luis Obispo, CA	San Luis Obispo	6	SJL of California
EYT	Santa Barbara, CA	Santa Barbara	3	Smith Broadcasting of Santa Barbara, Ltd

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<sup>1</sup> The Santa Barbara-Santa Maria-San Luis Obispo, California television DMA consists of the following counties: In California; Santa Barbara and San Luis Obispo.

SANTA MARIA - LOMPOC, CALIFORNIA - RADIO METRO <sup>2</sup>				
CALL SIGN	FREQUENCY	COMMUNITY OF LICENSE	COUNTY	OWNER
KDIS	710	Los Angeles	Los Angeles*	ABC
KBOX	104.1	Lompoc, CA	Santa Barbara	American General Media
KPAT	95.7	Orcutt, CA	Santa Barbara	American General Media
KRQK	100.3	Lompoc, CA	Santa Barbara	American General Media
KTME	1410	Lompoc, CA	Santa Barbara	Blackhawk Communications Incorporated
KUHL	1440	Santa Maria, CA	Santa Barbara	Blackhawk Communications Incorporated
KSMA	1240	Santa Maria, CA	Santa Barbara	Clear Channel Communications
KSMY	106.7	Lompoc, CA	Santa Barbara	Clear Channel Communications
KSNL	102.5	Santa Maria, CA	Santa Barbara	Clear Channel Communications
KXFM	99.1	Santa Maria, CA	Santa Barbara	Clear Channel Communications
KRUZ	103.3	Santa Barbara	Santa Barbara*	Cumulus Licensing Corp.
KMGQ	87.5	Santa Barbara	Santa Barbara*	Eagles Enterprises, Inc.
KIDI	105.5	Guadalupe, CA	Santa Barbara	Emerald Wave Media
KTAP	1600	Santa Maria, CA	Santa Barbara	Emerald Wave Media
KNX	1070	Los Angeles, CA	Los Angeles*	Infinity Radio
KWSR	92.5	Paso Robles, CA	San Luis Obispo*	Lagniappe Broadcasting, Inc.
KSBQ	1480	Santa Maria, CA	Santa Barbara	Lazer Broadcasting Corporation
KWSZ	105.1	Lompoc, CA	Santa Barbara	New Century AZ LLC
KSYV	96.7	Solvang, CA	Santa Barbara	Pacific Coast Broadcasting
KGDP	660	Orcutt, CA	Santa Barbara	Radio Reps Inc
KWWV	106.1	Santa Margarita, CA	San Luis Obispo*	Salisbury Radio, LLC
KXTZ	95.3	Pismo Beach, CA	San Luis Obispo*	Winsum Media, LLC

<sup>2</sup> The Santa Maria - Lompoc, California radio metro consists of the following counties: In California; Santa Barbara.

\*These stations have a reportable share in the Santa Maria-Lompoc, California Radio Metro according to Arbitron or BIA.



SAN LUIS OBISPO, CALIFORNIA - RADIO METRO <sup>3</sup>				
CALL SIGN	FREQUENCY	COMMUNITY OF LICENSE	COUNTY	OWNER
IQO	104.5	Atascadero, CA	San Luis Obispo	American General Media
KJG	98.1	San Luis Obispo, CA	San Luis Obispo	American General Media
WSR	92.5	Paso Robles, CA	San Luis Obispo	American General Media
WWV	106.1	Santa Margarita, CA	San Luis Obispo	American General Media
ZOZ	93.3	San Luis Obispo, CA	San Luis Obispo	American General Media
SLY	96.1	San Luis Obispo, CA	San Luis Obispo	Clear Channel Communications
STT	101.3	Los Osos, CA	San Luis Obispo	Clear Channel Communications
URQ	107.3	Grover Beach, CA	San Luis Obispo	Clear Channel Communications
VEC	920	San Luis Obispo, CA	San Luis Obispo	Clear Channel Communications
PRL	1230	Paso Robles, CA	San Luis Obispo	Dellar Survivor Trust
LRM	97.1	San Luis Obispo, CA	San Luis Obispo	GT Media LLC
OTR	94.9	Cambria, CA	San Luis Obispo	Howard, Bruce
WSR	92.5	Paso Robles, CA	San Luis Obispo*	Lagniappe Broadcasting, Inc.
LMM	94.1	Morro Bay, CA	San Luis Obispo	Lazer Broadcasting Corporation
LUN	103.1	Paso Robles, CA	San Luis Obispo	Lazer Broadcasting Corporation
JDJ	1030	San Luis Obispo, CA	San Luis Obispo	Pacific Spanish Network
KOM	1280	Arroyo Grande, CA	San Luis Obispo	Pamplin Communications Corporation
GLW	1340	San Luis Obispo, CA	San Luis Obispo	RocGlo Communications
KAL	99.7	Morro Bay, CA	San Luis Obispo	Salisbury Broadcasting Corporation
KJL	1400	San Luis Obispo, CA	San Luis Obispo	San Luis Obispo Bcg
XDZ	100.5	Templeton, CA	San Luis Obispo	Winsum Media LLC
XTZ	95.3	Pismo Beach, CA	San Luis Obispo	Winsun Media LLC

<sup>3</sup> The San Luis Obispo, California radio metro consists of the following counties: In California; San Luis Obispo.

\* These stations have a reportable share in the San Luis Obispo, California Radio Metro according to Arbitron or BIA.

NEWSPAPER VOICES			
NAME	CIRCULATION	>5% OF DMA	PUBLICATION FREQUENCY
San Luis Obispo Tribune	42,866	Yes	M-Sat; S
Santa Barbara News-Press	44,869	Yes	M-Sat; S
Santa Maria Times	19,490	Yes	M-Sat; S

1 CABLE VOICE
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ATTACHMENT 23



ATTACHMENT 24

SYRACUSE, NEW YORK - TELEVISION DMA <sup>1</sup>				
CALL	COMMUNITY OF LICENSE	COUNTY	CHANNEL	OWNER
/IXT	Syracuse, NY	Onondaga	9	Clear Channel Communications, Inc. (proposed)
/CNY	Syracuse, NY	Onondaga	24	Public BC Council of Central NY
/NYS	Syracuse, NY	Onondaga	43	RKM Media, Inc.
/STM	Syracuse, NY	Onondaga	3	WSTM License Subsidiary, Inc.
/SYT	Syracuse, NY	Onondaga	68	WSYT Licensee L.P.
/TVH	Syracuse, NY	Onondaga	5	WTVH License, Inc.

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<sup>1</sup> The Syracuse, New York television DMA consists of the following counties: In New York; Cayuga, Cortland, Madison, Oneida West, Onondaga, Oswego, Seneca, Tompkins, Yates.

SYRACUSE, NEW YORK - RADIO METRO <sup>2</sup>				
CALL SIGN	FREQUENCY	COMMUNITY OF LICENSE	COUNTY	OWNER
VBXL	90.5	Baldwinsville, NY	Onondaga	Baldwinsville Central School District
VFBL	1050	Baldwinsville, NY	Onondaga	Buckley Broadcasting Corporation
VSEN	92.1	Baldwinsville, NY	Onondaga	Buckley Broadcasting Corporation
VITC	88.9	Cazenovia, NY	Madison	Cazenovia College
VAQX	95.7	Manlius, NY	Onondaga	Citadel Communications Corporation
VLTI	105.9	Syracuse, NY	Onondaga	Citadel Communications Corporation
VNSS	1260	Syracuse, NY	Onondaga	Citadel Communications Corporation
VNTQ	93.1	Syracuse, NY	Onondaga	Citadel Communications Corporation
VPHR	106.9	Auburn, NY	Cayuga*	Clear Channel Communications
VXBB	105.1	DeRuyter, NY	Madison	Clear Channel Communications
VHEN	620	Syracuse, NY	Onondaga	Clear Channel Communications
VSyr	570	Syracuse, NY	Onondaga	Clear Channel Communications
VWHT	107.9	Syracuse, NY	Onondaga	Clear Channel Communications
VYYY	94.5	Syracuse, NY	Onondaga	Clear Channel Communications
VBBS	104.7	Fulton, NY	Oswego	Clear Channel Communications
VRCU	90.1	Hamilton, NY	Madison	Colgate University
VDCW	1390	Syracuse, NY	Onondaga	Crawford Broadcasting Company
VSIV	1540	E. Syracuse, NY	Onondaga	Fox, Craig
VOLF	1490	Syracuse, NY	Onondaga	Fox, Craig
VVOA	103.9	Mexico, NY	Oswego	Fox, Craig
VOLF	96.7	Oswego, NY	Oswego	Fox, Craig
VTKW	99.5	Bridgeport, NY	Madison	Galaxy Communications
VKRL	100.9	N. Syracuse, NY	Onondaga	Galaxy Communications
VTLA	1200	N. Syracuse, NY	Onondaga	Galaxy Communications
VKRH	106.5	Minetto, NY	Oswego	Galaxy Communications
VSGO	1440	Oswego, NY	Oswego	Galaxy Communications
VTKV	105.5	Oswego, NY	Oswego	Galaxy Communications
VZUN	102.1	Phoenix, NY	Oswego	Galaxy Communications
VSCP	101.7	Pulaski, NY	Oswego	Galaxy Communications
VSCP	1070	Sandy Creek, NY	Oswego	Galaxy Communications
VCNY	91.3	Syracuse, NY	Onondaga	Public Broadcasting Council of Central NY
VFRG	104.3	Utica, NY	Oneida*	Regent Communications
VLZW	98.7	Utica, NY	Oneida*	Regent Communications
VSUC	90.5	Cortland, NY	Cortland*	State University of New York
VRVD	90.3	Syracuse, NY	Onondaga	State University of New York
VXXE	90.5	Fenner, NY	Madison	Syracuse Community Radio, Inc.
VAER	88.3	Syracuse, NY	Onondaga	Syracuse University
VMCR	106.3	Oneida, NY	Madison	Warren Broadcasting Co Inc
VMCR	1600	Oneida, NY	Madison	Warren Broadcasting Co Inc
VJPZ	89.1	Syracuse, NY	Onondaga	WJPZ Radio, Inc.
VZZZ	1300	Fulton, NY	Oswego	Zinkhann, David

<sup>2</sup> The Syracuse, New York Radio Metro consists of the following counties: In New York; Madison, Onondaga, Oswego.

\* These stations have a reportable share in the Syracuse, New York Radio Metro according to Arbitron or BIA.

UTICA - ROME, NY RADIO METRO <sup>3</sup>				
CALL SIGN	FREQUENCY	COMMUNITY OF LICENSE	COUNTY	OWNER
VNRS	1420	Herkimer, NY	Herkimer	Arjuna Broadcasting Corp
VXUR	92.7	Herkimer, NY	Herkimer	Arjuna Broadcasting Corp
VAQX	95.7	Manlius, NY	Onondaga*	Citadel
VNTQ	93.1	Syracuse, NY	Onondaga*	Citadel
VADR	1480	Remsen, NY	Oneida	Clear Channel Communications
VLFH	1230	Little Falls, NY	Herkimer	Clear Channel Communications
VOUR	96.9	Utica, NY	Oneida	Clear Channel Communications
VOWB	105.5	Little Falls, NY	Herkimer	Clear Channel Communications
VOWZ	97.9	Whitesboro, NY	Oneida	Clear Channel Communications
VRFM	93.5	Remsen, NY	Oneida	Clear Channel Communications
VRNY	1350	Rome, NY	Oneida	Clear Channel Communications
VSKS	102.5	Rome, NY	Oneida	Clear Channel Communications
VUTQ	1550	Utica, NY	Oneida	Clear Channel Communications
VVVC	100.7	Utica, NY	Oneida	Educational Media Foundation
VBRV	101.3	Boonville, NY	Oneida	Flack Broadcasting Group LLC
VBRV	900	Boonville, NY	Oneida	Flack Broadcasting Group LLC
VKLL	94.9	Frankfort, NY	Herkimer	Galaxy Communications
VRCK	107.3	Utica, NY	Oneida	Galaxy Communications
VTLB	1310	Utica, NY	Oneida	Galaxy Communications
VVHC	91.5	Herkimer, NY	Herkimer	Herkimer County Community College
VJIV	101.9	Cherry Valley, NY	Otsego*	Midwest Broadcasting
VUNY	89.5	Utica, NY	Oneida	Public BC Council of Central NY, Inc.
VFRG	104.3	Utica, NY	Oneida	Regent Communications, Inc.
VIBX	950	Utica, NY	Oneida	Regent Communications, Inc.
VLZW	98.7	Utica, NY	Oneida	Regent Communications, Inc.
VODZ	96.1	Rome, NY	Oneida	Regent Communications, Inc.
VRUN	1150	Utica, NY	Oneida	Regent Communications, Inc.
VBGK	99.7	Newport Village, NY	Herkimer	Roser Communications
VBUG	1570	Amsterdam, NY	Montgomery*	Roser Communications
VBUG	101.1	Fort Plain, NY	Montgomery*	Roser Communications
VRVN	91.9	Utica, NY	Oneida	State University of New York
VHCL	88.7	Clinton, NY	Oneida	Trustees of Hamilton College
VPNR	90.7	Utica, NY	Oneida	Utica College
VMCR	1600	Oneida, NY	Madison*	Warren Broadcasting
VMCR	106.3	Oneida, NY	Madison*	Warren Broadcasting

<sup>3</sup> The Utica – Rome, New York Radio Metro consists of the following counties: In New York; Herkimer, Oneida.

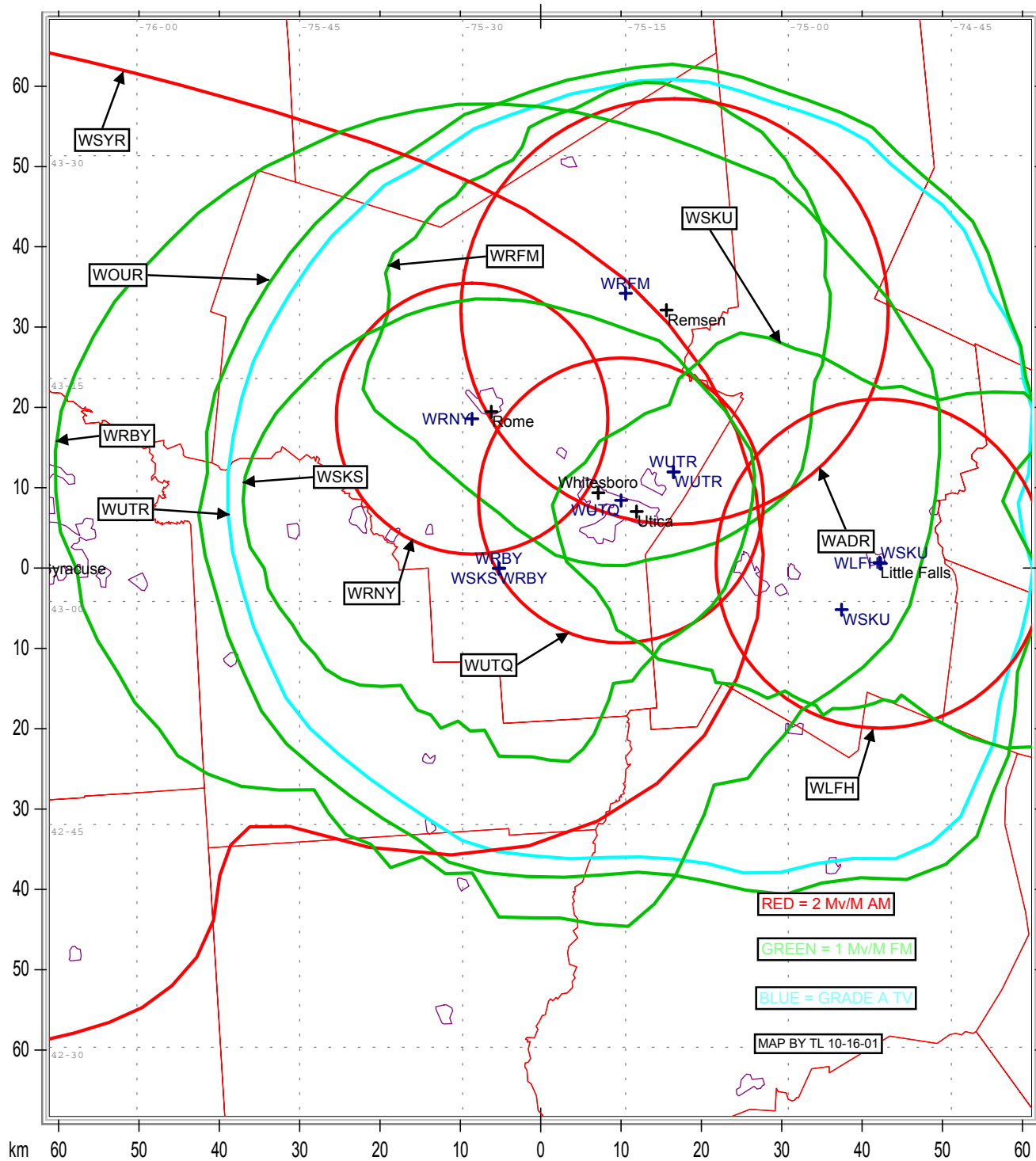
\* These stations have a reportable share in the Utica-Rome, New York Radio Metro according to Arbitron or BIA.



NEWSPAPER VOICES			
NAME	CIRCULATION	>5% OF DMA	PUBLICATION FREQUENCY
Syracuse Post-Standard/Herald Journal/Herald American	92,812 M-Sat; 188922 S	Yes	M-Sat; S

1 CABLE VOICE
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ATTACHMENT 25



ATTACHMENT 26

UTICA, NY TELEVISION DMA <sup>1</sup>				
CALL	COMMUNITY OF LICENSE	COUNTY	CHANNEL	OWNER
/UTR	Utica, NY	Oneida	20	Clear Channel Communications, Inc. (proposed)
/FXV	Utica, NY	Oneida	33	Quorum Broadcasting Company
/KTV	Utica, NY	Oneida	2	Smith Broadcasting Group, Inc.

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<sup>1</sup> The Utica, New York television DMA consists of the following counties: In New York; Herkimer, Oneida, Otsego.

UTICA - ROME, NY RADIO METRO <sup>2</sup>				
CALL SIGN	FREQUENCY	COMMUNITY OF LICENSE	COUNTY	OWNER
VNRS	1420	Herkimer, NY	Herkimer	Arjuna Broadcasting Corp
VXUR	92.7	Herkimer, NY	Herkimer	Arjuna Broadcasting Corp
VAQX	95.7	Manlius, NY	Onondaga*	Citadel
VNTQ	93.1	Syracuse, NY	Onondaga*	Citadel
VADR	1480	Remsen, NY	Oneida	Clear Channel Communications
VLFH	1230	Little Falls, NY	Herkimer	Clear Channel Communications
VOUR	96.9	Utica, NY	Oneida	Clear Channel Communications
VOWB	105.5	Little Falls, NY	Herkimer	Clear Channel Communications
VOWZ	97.9	Whitesboro, NY	Oneida	Clear Channel Communications
VRFM	93.5	Remsen, NY	Oneida	Clear Channel Communications
VRNY	1350	Rome, NY	Oneida	Clear Channel Communications
VSKS	102.5	Rome, NY	Oneida	Clear Channel Communications
VUTQ	1550	Utica, NY	Oneida	Clear Channel Communications
VVVC	100.7	Utica, NY	Oneida	Educational Media Foundation
VBRV	101.3	Boonville, NY	Oneida	Flack Broadcasting Group LLC
VBRV	900	Boonville, NY	Oneida	Flack Broadcasting Group LLC
VKLL	94.9	Frankfort, NY	Herkimer	Galaxy Communications
VRCK	107.3	Utica, NY	Oneida	Galaxy Communications
VTLB	1310	Utica, NY	Oneida	Galaxy Communications
VVHC	91.5	Herkimer, NY	Herkimer	Herkimer County Community College
VJIV	101.9	Cherry Valley, NY	Otsego*	Midwest Broadcasting
VUNY	89.5	Utica, NY	Oneida	Public BC Council of Central NY, Inc.
VFRG	104.3	Utica, NY	Oneida	Regent Communications, Inc.
VIBX	950	Utica, NY	Oneida	Regent Communications, Inc.
VLZW	98.7	Utica, NY	Oneida	Regent Communications, Inc.
VODZ	96.1	Rome, NY	Oneida	Regent Communications, Inc.
VRUN	1150	Utica, NY	Oneida	Regent Communications, Inc.
VBGK	99.7	Newport Village, NY	Herkimer	Roser Communications
VBUG	1570	Amsterdam, NY	Montgomery*	Roser Communications
VBUG	101.1	Fort Plain, NY	Montgomery*	Roser Communications
VRVN	91.9	Utica, NY	Oneida	State University of New York
VHCL	88.7	Clinton, NY	Oneida	Trustees of Hamilton College
VPNR	90.7	Utica, NY	Oneida	Utica College
VMCR	1600	Oneida, NY	Madison*	Warren Broadcasting
VMCR	106.3	Oneida, NY	Madison*	Warren Broadcasting

<sup>2</sup> The Utica – Rome, New York Radio Metro consists of the following counties: In New York; Herkimer, Oneida.

\* These stations have a reportable share in the Utica-Rome, New York Radio Metro according to Arbitron or BIA.

SYRACUSE, NEW YORK - RADIO METRO <sup>3</sup>				
CALL SIGN	FREQUENCY	COMMUNITY OF LICENSE	COUNTY	OWNER
VBXL	90.5	Baldwinsville, NY	Onondaga	Baldwinsville Central School District
VFBL	1050	Baldwinsville, NY	Onondaga	Buckley Broadcasting Corporation
VSEN	92.1	Baldwinsville, NY	Onondaga	Buckley Broadcasting Corporation
VITC	88.9	Cazenovia, NY	Madison	Cazenovia College
VAQX	95.7	Manlius, NY	Onondaga	Citadel Communications Corporation
VLTI	105.9	Syracuse, NY	Onondaga	Citadel Communications Corporation
VNSS	1260	Syracuse, NY	Onondaga	Citadel Communications Corporation
VNTQ	93.1	Syracuse, NY	Onondaga	Citadel Communications Corporation
VPHR	106.9	Auburn, NY	Cayuga*	Clear Channel Communications
VXBB	105.1	DeRuyter, NY	Madison	Clear Channel Communications
VHEN	620	Syracuse, NY	Onondaga	Clear Channel Communications
VSyr	570	Syracuse, NY	Onondaga	Clear Channel Communications
VWHT	107.9	Syracuse, NY	Onondaga	Clear Channel Communications
VYYY	94.5	Syracuse, NY	Onondaga	Clear Channel Communications
VBBS	104.7	Fulton, NY	Oswego	Clear Channel Communications
VRCU	90.1	Hamilton, NY	Madison	Colgate University
VDCW	1390	Syracuse, NY	Onondaga	Crawford Broadcasting Company
VSIV	1540	E. Syracuse, NY	Onondaga	Fox, Craig
VOLF	1490	Syracuse, NY	Onondaga	Fox, Craig
VVOA	103.9	Mexico, NY	Oswego	Fox, Craig
VOLF	96.7	Oswego, NY	Oswego	Fox, Craig
VTKW	99.5	Bridgeport, NY	Madison	Galaxy Communications
VKRL	100.9	N. Syracuse, NY	Onondaga	Galaxy Communications
VTLA	1200	N. Syracuse, NY	Onondaga	Galaxy Communications
VKRH	106.5	Minetto, NY	Oswego	Galaxy Communications
VSGO	1440	Oswego, NY	Oswego	Galaxy Communications
VTKV	105.5	Oswego, NY	Oswego	Galaxy Communications
VZUN	102.1	Phoenix, NY	Oswego	Galaxy Communications
VSCP	101.7	Pulaski, NY	Oswego	Galaxy Communications
VSCP	1070	Sandy Creek, NY	Oswego	Galaxy Communications
VCNY	91.3	Syracuse, NY	Onondaga	Public Broadcasting Council of Central NY
VFRG	104.3	Utica, NY	Oneida*	Regent Communications
VLZW	98.7	Utica, NY	Oneida*	Regent Communications
VSUC	90.5	Cortland, NY	Cortland*	State University of New York
VRVD	90.3	Syracuse, NY	Onondaga	State University of New York
VXXE	90.5	Fenner, NY	Madison	Syracuse Community Radio, Inc.
VAER	88.3	Syracuse, NY	Onondaga	Syracuse University
VMCR	106.3	Oneida, NY	Madison	Warren Broadcasting Co Inc
VMCR	1600	Oneida, NY	Madison	Warren Broadcasting Co Inc
VJPZ	89.1	Syracuse, NY	Onondaga	WJPZ Radio, Inc.
VZZZ	1300	Fulton, NY	Oswego	Zinkhann, David

<sup>3</sup> The Syracuse, New York Radio Metro consists of the following counties: In New York; Madison, Onondaga, Oswego.

\* These stations have a reportable share in the Syracuse, New York Radio Metro according to Arbitron or BIA.

NEWSPAPER VOICES			
NAME	CIRCULATION	>5% OF DMA	PUBLICATION FREQUENCY
Herkimer Evening Telegram	6,271	Yes	M-Sat
Oneonta Daily Star	19,312	Yes	M-Sat
Utica Observer-Dispatch	53,762	Yes	M-Sat; S

1 CABLE VOICE
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ATTACHMENT 27

The Present Difficulty  
In Selling  
Radio and Television Stations

Mark R. Fratrik, Ph.D.

Vice President

BIA Financial Network

October 17, 2001



# **The Present Difficulty in Selling**

## **Radio and Television Stations**

### **Introduction**

At the start of 2000 and continuing for the first three quarters of that year, the radio and television industries were showing strong growth, mirroring, at least, the growth in the overall economy. In fact, the growth in radio industry's revenues was noticeably exceeding the growth in the economy and its advertising media competitors. As a result, the buying and selling of especially radio stations, and television stations to a lesser extent, was very vibrant with stations selling for high prices. Groups, having ready access to financing, were all eager to grow and take advantage of potential efficiencies.

That optimism about the future in both radio and television soon turned to concern at the end of 2000, when advertising growth slowed markedly. The radio industry saw their first negative month of revenue growth in December of 2000, and the television industry also saw weakening in their revenue streams. The television industry is also confronted by a slow acceptance of digital television receivers, leading to great apprehension and concern by broadcasters as to their required investments to convert to this new technology. As a result, the enthusiasm of buying radio and television stations waned and the number and total value of the stations sold noticeably decreased.

Then came the devastating effects on September 11<sup>th</sup> and the subsequent military actions. With the general negative economic effects brought on by those events, the advertising marketplace almost disappeared. Concern about consumer spending led to many advertisers immediately stopping or slowing up planned campaigns. Coupled with the complete lack of advertising in the days following the events, and the additional costs

associated with reporting those events, many radio and television groups experienced a significant blow to their profitability.

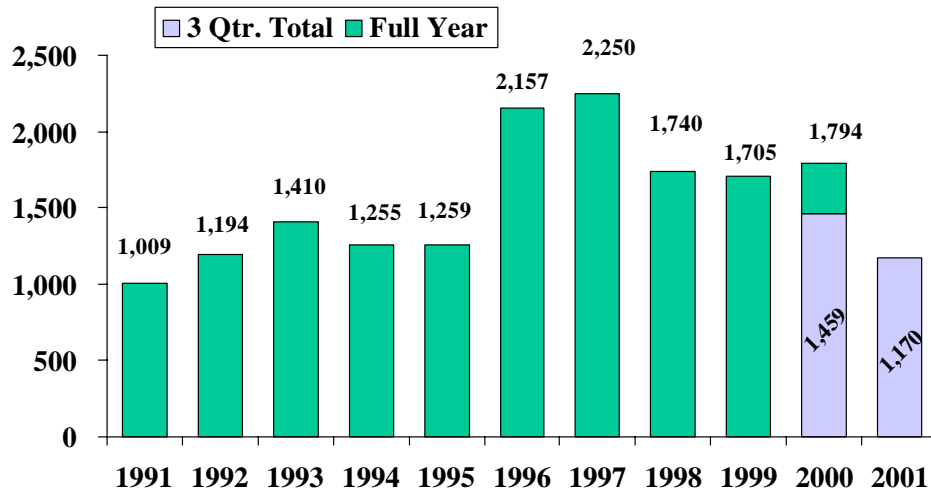
As a result, the outlook for buying and selling radio and television stations in the near future is very bleak, as there remains a cloud over these industries. Until the economy and advertising marketplace rebounds for a sustained period, not likely until the end of 2002, that cloud will not be lifted.

The purpose of this paper is to review the present status of the radio and television station-trading marketplace. We will first review the most recent history of the number and value of these sales. We then examine the advertising marketplace and its prospects for growth in the near term, for these expectations play a central role in the buying and selling of these stations. Similarly important, and discussed next, is the available financing for these acquisitions, also very tied to the overall economic growth and health of the advertising marketplace. From that foundation, we can then conclude with our thoughts on the station transaction marketplace for the next few years.

### **Level of Transactions**

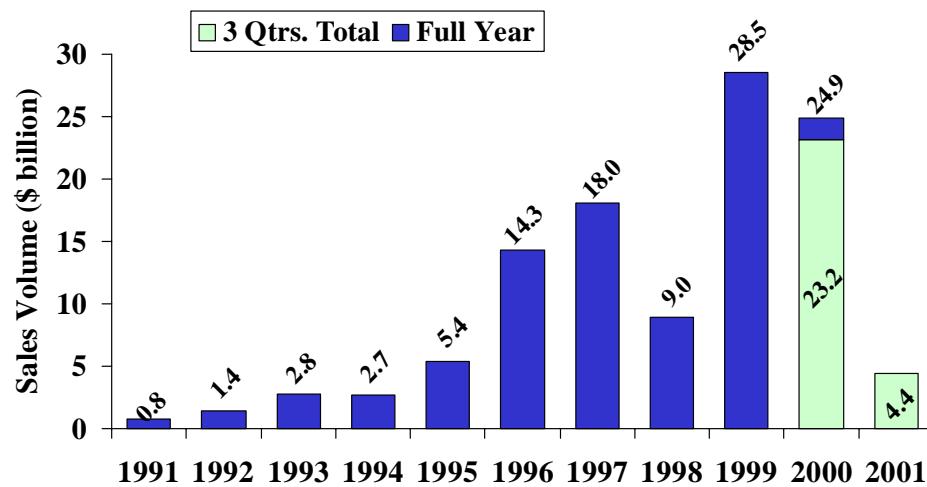
While the number and value of radio stations sold increased steadily during the early 1990s, nobody expected the tremendous surge in radio station activity brought on by the Telecommunications Act of 1996. That frenzied pace continued through most of 2000 as the economy continued to show strong growth and radio advertising grew even faster. **Figure 1** shows the number of stations sold from 1991 through the 3<sup>rd</sup> quarter of 2001. For comparison purpose we also include the total number of stations during the first three quarters of 2000. **Figure 2** shows the value of the stations sold for each of these years, along with the totals for the first three-quarters of 2000 and 2001.

Figure 1  
# of Radio Stations Sold  
1991 – 3<sup>rd</sup> Qtr. 2001



Source: BIA Media Access Pro™.

Figure 2  
Radio Station Transaction Volume  
1991 – 3<sup>rd</sup> Qtr. 2001



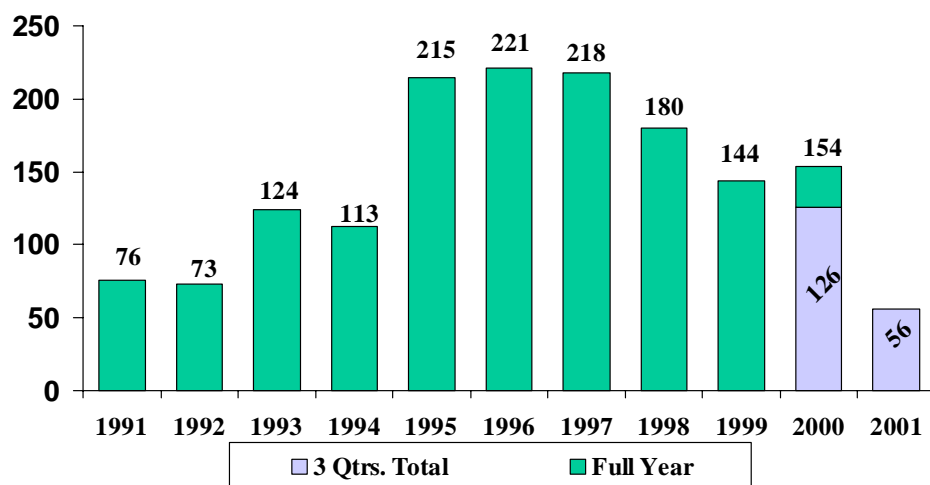
Source: BIA Media Access Pro™.

As shown above, there has been a significant downturn in the number and values of radio stations sold in the present year. Where in the past three years, there has been no less than 1,700 radio stations sold each year, the number of radio stations sold in the first three-quarters in 2001 has been less than two-thirds of that level, and almost 20% less than the corresponding number of radio stations sold during the first three-quarters of last year.

The decline is even more pronounced when the total value is compared with previous years. So far, the value of the radio stations sold is 17.6% of the value sold in all of 2000, and 15.4% of the value sold in all of 1999. Even when compared to just the first three-quarters of 2000, this year's three-quarters total value is only 18.9% of the total for the corresponding period for last year. Clearly, potential buyers of radio stations are holding back until the economy and advertising marketplace shows some life for a sustained period.

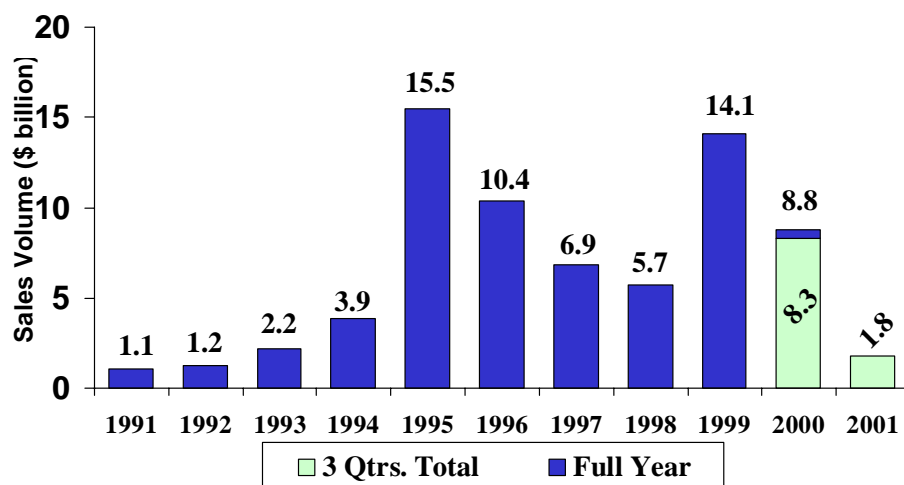
Turning now to the sales of television stations, **Figure 3** shows the number of television stations sold from 1991 through the first three quarters of 2001, while **Figure 4** shows the total values of these sales during that time span.

Figure 3  
# of Television Station Sold  
1991 – 3<sup>rd</sup> Qtr. 2001



Source: BIA Media Access Pro™.

Television Station Transaction Volume  
1991 – 3<sup>rd</sup> Qtr. 2001



Source: BIA Media Access Pro™.

Here again, there is a pronounced decrease in the number and value of television stations sold so far in 2001 as compared to the numbers and values sold in the most recent years. For the past two years, the number of television stations sold hovered around the 150-station level. So far the 56 stations sold this year only corresponds to less than 40% of that level. The decrease in value is even more pronounced as the total value for the first three-quarters of 2001 only represents about one-fifth the value of all of last year, with most of last year's value originating in the first three quarters.

Another indicator of the ailing station trading marketplace is the estimated multiples at which stations are trading. These are the commonly used benchmarks of a station's sales price to its existing cash flow and are used to evaluate proposed and consummated transactions. A recent Kagan World Media newsletter reported that the multiples for radio and television station deals so far this year is at a five-year low.<sup>1</sup> As they conclude, "[S]luggish ad revenue have led to buyers' lack of confidence in aggressive deal forecasts and an unwillingness to pay the deal multiples of years past."<sup>2</sup> While the decline in multiples was most pronounced in the larger markets, the smaller markets still continue to have consistently lower multiples.<sup>3</sup>

### **Advertising Growth (Decline)**

As the above quote notes, the prospects for advertising growth has had a tremendous impact on the lack of attractiveness in purchasing radio and television stations. Even before the September 11<sup>th</sup> events, the radio and television stations were

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<sup>1</sup> "Radio, TV Deal Multiples at Five-Year Low," *Kagan B-Stats*, Volume 5, N. 7, October 5, 2001.

<sup>2</sup> Ibid.

<sup>3</sup> Ibid.



experiencing a slowdown in revenues. Through the first eight months the radio industry saw their revenues decrease 7%.<sup>4</sup> Television was seeing similar conditions, with one indicator being the decrease in the amount of sales in the network up-front marketplace concluded in the summer of 2001.

This decrease in advertising sales revenues was even more pronounced than the contraction in the overall economy, which in the second quarter of this year eked out a small real growth rate. Advertisers, seeing profits shrink and the outlook for consumer spending to follow downward, started to cut back on their advertising expenditures. For television stations this was especially troubling as automobile advertising was severely decreased<sup>5</sup>, and this segment of advertising being the most significant area. Decreases in other consumer based advertising budgets also hit television and radio stations hard.

Given this reliance on automobile and other consumer based advertisers, it is hard to imagine a quick rebound given the poor state of the economy, the events of September 11<sup>th</sup>, and the subsequent military actions. Unemployment is expected to increase over the next few months, and as a result, consumer spending is expected to be curtailed. The 2001 Christmas buying season was expected to be disappointing and now that expectation is even more likely. Hence, many do not expect a meaningful rebound in consumer spending until at least the 2<sup>nd</sup> quarter of next year. Advertisers, very wary of these dire prospects for consumer spending, will be very hesitant to start new campaigns.

Many other analysts have already made their own predictions on the expected sluggishness of the radio and television advertising marketplace. Jack Meyers recently

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<sup>4</sup> Radio Advertising Bureau, October 10, 2001 news release.

<sup>5</sup> See Kevin Downey, "Detroit pulling \$s out of network upfront," [www.medialifemagazine.com](http://www.medialifemagazine.com), June 1, 2001.

announced that he expects a 7.4% decrease in total advertising, with television seeing a 9% decrease.<sup>6</sup> Morgan Stanley Dean Witter's analyst, Richard Bilotti, sees a 4% decline in television station advertising revenue for all of 2002.<sup>7</sup> The lack of any growth in advertising will dissuade many buyers of radio and television stations.

### **Financing Marketplace**

Tied to the uncertainty in the advertising marketplace is the reluctance of lending institutions and other capital sources to provide funding for further acquisitions. One method used to finance acquisitions in recent years was to trade stock of a public company. With the decrease in values in the stock market, this method is much less attractive, and thus, less available for acquisition purposes.

Also less forthcoming are senior debt sources, especially banks. Many of these banks that have been active in lending for broadcast acquisitions now hold loans that are technically in default due to the recent downturns in the economy and advertising marketplace. Consequently, these and other lending institutions have to be more cautious in providing new financing. One indicator of that added caution is the fact that banks now are only lending up to five times the station's cash flows where previously that maximum amount was six times. Banks do not want to jeopardize as much with any one acquisition.

Where this lack of funding is most problematic is the funding of new companies, some headed by minorities and women, which do not have the "track record" of success. Without some examples of successfully acquiring and running stations, these individuals

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<sup>6</sup> Ken Liebeskind, "Long Term Outlook Brightens for Ad Sales" *Media Daily News*, MediaPost, October 3, 2001.

<sup>7</sup> Diane Mermigas, "Q4 Scatter: All Bets are Off," *Electronic Media*, October 8, 2001.

will have the most difficulty in securing needed financing during this period of added uncertainty.

### **Station Transaction Marketplace**

With the lack of funding and the general malaise surrounding the advertising marketplace, it is no wonder that the level of station activity has slowed considerably. To make the needed investment in acquiring new stations, operators and their lenders must feel comfortable that they can grow their revenues or find substantial cost savings. With the economic conditions present before September 11<sup>th</sup> and the aftermath of those events, the likelihood of strong revenue growth in the near future (six to twelve months) is quite remote.

In addition to the uncertainty surrounding the economy, there is additional uncertainty surrounding the digital transition for television stations. For many reasons, there has not been a strong acceptance of digital receivers by consumers even in areas where there are many digital stations on the air. Consequently, there is a considerable amount of anxiety of broadcasters that have not yet built out or turned on their digital facilities. Many of these broadcasters, especially in the mid-sized and smaller markets (ranked 51 and above), are facing investments that represent a large portion of their overall value. Moreover, these broadcasters do not see any additional revenues from these considerable investments, at least in the next few years until there are enough households that are able to view these signals.

What this all results in is a marketplace with very little activity and very little expectation that the activity will pick up soon. Everyone involved in the acquisition of radio and television stations will need to see a consistent recovery for a period of time in

the economy as a whole, and especially in the advertising marketplace, before they are willing to take new chances. While this conclusion is true for radio and television stations in markets of all sizes, it is especially true for television stations in the mid-sized and smaller markets facing the digital transition.

Assuming that the resilient American economy does rebound by the middle of 2002, and that advertisers soon follow, it is possible that the buying and selling of radio and television stations will also subsequently recover. There may be opportunities at that time, in the fall and winter of 2002, for potential buyers to take advantage of local and national combinations of radio and television stations, in part, created by expected relaxations of FCC ownership rules. Concurrently, as the banks and other lending institutions work through their troubled portfolios, they too may be interested in financing certain acquisitions. Buying and selling radio and television stations could be an active undertaking by the end of 2002, but certainly not before then.

# Curriculum Vitae

## Mark R. Fratrik

Vice President  
BIA Financial Network  
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Chantilly, VA 20151  
703-818-2425  
[Mfratrik@bia.com](mailto:Mfratrik@bia.com)

### Education

Ph.D., 1981, Economics, Texas A&M University, College Station, TX  
M.S., 1978, Economics, Texas A&M University, College Station, TX  
B.A., 1976, Mathematics and Economics (honors), State University of New York at Binghamton

### Professional experience

2001 – Present

BIA Financial Network

Vice President

- Consulting in litigation and tax-related cases
- Developing of new broadcasting and related industry research offerings
- Speaking at industry forums

1985 – 2000

National Association of Broadcasters

Vice President/Economist      1991 – 2000

- Supervised the Research and Planning Department.
- Conducted primary research about the broadcasting and related industries, used for testimony before the Congress and in filings at the FCC and other governmental agencies.
- Conducted research and studies included in publications and reports distributed by NAB.
- Presented results of primary research and other analyses at industry forums.

Director of Financial and Economic Research      1985 -- 1991

- Supervised the collection and dissemination of the annual industries financial reports

1980 – 1985

Federal Trade Commission

Bureau of Economics

Staff Economist

- Conducted analysis of proposed mergers and other arrangements.
- Conducted analyses of industry practices to evaluate economic impact.
- Participated in litigation support in several antitrust cases.

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### Professional activities

American Economic Association – member  
Southern Economic Association – member  
Journal of Media Economics – reviewer  
Journal of Broadcasting and Electronic Media - reviewer

### Articles

“The Party’s Not Over, The Band is Just Taking a Break: How Radio Will Fare,” *The Financial Manager*, April-May 2001, pp. 29- 31.

“Broadcasting Industry Responses to New Technologies (with Rick Ducey), *Journal of Media Economics*, Fall 1989, Vol. 2, No. 2, pp. 67-86.

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“The Television Audience-Revenue Relationship Revisited,” Presented at the Broadcast Education Association Conference, April 28, 1986.

“How Important is Local Advertising to Today’s Television Station,” *Broadcast Financial Journal*, April 1986, pp. 12 –15.

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### Books and Reports

*State of The Radio Industry:*

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*FM Subcarrier Market Report/Technology Guide* (with David Layer), 1997, National Association of Broadcasters.

*These Taxing Times: A Tax Guide for Broadcasters* (editor), 1996, National Association of Broadcasters.

*Strategic Planning Handbook for Broadcasters* (with Richard Ducey), 1994, National Association of Broadcasters.

*1994 FM Subcarrier Market Report*, (with Kenneth Springer), 1994, National Association of Broadcasters.

*The 1993 Tax Act: What it Means* (editor), 1993, National Association of Broadcasters.

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*Fair Market Value of Radio Stations: A Buyer's Guide*, 2<sup>nd</sup> edition (with Bruce Bishop Cheen), National Association of Broadcasters, 1990.

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*Targeting Radio's Future: Radio '87*, (with John Abel & Richard Ducey), September 1987, National Association of Broadcasters.

*The Small Market Television Manager's Guide* (editor), 1987, National Association of Broadcasters.

*Tax Reform: Effects on Broadcasters and Broadcasting* (editor), 1987, National Association of Broadcasters.

"The New Audio Marketplace: Challenges and Opportunities for Broadcasters," (with Richard Ducey) NAB Special Report, September 1985.

"The New Audio Marketplace: Challenges and Opportunities for Broadcasters," NAB Special Report, September 1985.

### Policy Research

"Television Web Site Activity," Attachment 1, NAB Comments in re FCC examination of Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations, December 2000.

"Independent Radio Voices in Radio Markets," "Format Availability after Consolidation," & "Interference from Low Power FM Stations to Existing Stations" (with David Wilson), Attachments A, B, and Volume 3, respectively, NAB Comments in re FCC examination of the Creation of a Low Power Radio Service, August 1999.

"Media Outlets by Market – Update," "A Financial Analysis of the UHF Handicap," Appendices A and C, respectively, NAB Comments in re FCC 1998 Biennial Review of Commission Ownership Rules, July 1998.

"The Television Industry's Provision of Closed Captioning Services in 1996," Attachment 1 NAB Comments in re FCC examination of Closed Captioning and Video Description of Video Programming, March 1996.

"Radio Station Financial Picture," Attachment 13, NAB Comments in re FCC Establishment of Rules and Policies for the Digital Audio Radio Satellite Service, November 1995.

"The 1990 Children's Television Act: A Second Look at Its Impact" (with Richard V. Ducey), Attachment 1, NAB Reply Comments in re FCC examination of Children's Television Programming Rules, October 1995.

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"Minimum Number of Owners under NAB Proposed Ownership Rules," Appendix D, NAB Comments in re FCC examination of Revision of Radio Rules and Policies, May 1992.

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“National Ownership Concentration of Television Stations,” Appendix A, NAB Comments in re FCC Review of the Policy Implications of the Changing Video Marketplace, November 21, 1991.

“AB Switch Availability and Use,” Attachment 1, NAB Comments in re FCC Examination of Carriage of Television Broadcast Signals by Cable Television Systems, September 23, 1991.

“FM Station Financial Picture,” Appendix B, NAB Request for Temporary Suspension of New Commercial FM Stations Allotment and Application Processing, February 10, 1991.

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“Programming Aspects of the Territorial Exclusivity Rule,” “Financial Condition of Small Market Network Affiliated Television Stations,” Appendices A and E, respectively, NAB Comments in re FCC examination of Program Exclusivity Rules, January 1989.

“License Renewal/Transfer Study,” (with Michael Fitzmaurice), Appendix A in re FCC examination of Formulation of Policies & Rules Relating to Broadcast Renewal Applications, October 14, 1988.

“An Updated Examination of Market Concentration in Radio Markets,” Appendix E, NAB Comments in re FCC examination of Broadcast Multiple Ownership Rules, June 1987.

Testimony at the Environmental Protection Agency: In the Matter of Public Hearing on Federal Radiation on Protection Guidance: Proposed Alternatives for Controlling Public Exposure to Radio Frequency Protection, September 22, 1986.

“FM Facilities Reclassification Survey: Class B and Class C FM Stations,” (with Rick Ducey) Appendix A, NAB Comments in re FCC examination of FM Station Reclassification, August 1986.

“Financial Information on Commercial Radio Stations for AM Band Expansion Report,” Report V, submission of the Subgroup of Radio Spectrum Allocations on the Advisory Committee on Radio Broadcasting, May 1985.