

**RADIO MARKET ANALYSIS**  
**CUMULUS LICENSING LLC**  
**WBXX RADIO STATION**  
**BATTLE CREEK, MICHIGAN**  
**WRCC RADIO STATION**  
**MARSHALL, MICHIGAN**  
**August 2007**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC (“Cumulus”), proposed assignee of WBXX, Channel 237A, Battle Creek, Michigan, and WRCC (formerly WWKN), Channel 285A, Marshall, Michigan. Cumulus is also the licensee of WKFR, Channel 277B, Battle Creek, Michigan. All of these facilities are licensed to metro counties in the Battle Creek, Michigan Arbitron market.<sup>1</sup> It is also noted that WKFR is considered “home” in the Kalamazoo, Michigan market.

2. As shown on Exhibit #1, there are seven AM and FM (commercial and non-commercial) stations listed in the Battle Creek, Michigan Arbitron Market (Market #258). Cumulus would be in control of three FM stations in the same market. The number of stations indicated falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules. At this level, common ownership or control of up to five stations, with no more than three in the same service, is permissible, provided the number to be held does not exceed 50% of the stations in the market. As there are seven stations, Cumulus' ownership of three FM stations would not exceed the 50% threshold. As such, this combination of stations is in compliance with §73.3555 of the rules.

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1) No other Cumulus station, located in any non-rated markets, or considered “home” to a rated market, has contour overlap with any of these to-be-acquired stations.

3. Since WKFR is considered “home” to the Kalamazoo, Michigan market (as well as being a metro station in Battle Creek), a review of the Kalamazoo market was also undertaken. As shown on Exhibit #2, there are seventeen AM and FM (commercial and non-commercial) stations listed in the Kalamazoo, Michigan Arbitron Market (Market #184). Cumulus would be in control of two FM stations and one AM station in the same market.<sup>2</sup> The number of stations indicated falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules. At this level, common ownership or control of up to six stations, with no more than four in the same service, is permissible. Therefore, Cumulus’ ownership of two FM stations and one AM station in the Kalamazoo, Michigan market is in compliance with the ownership rules.

4. The foregoing technical statement was prepared on behalf of Cumulus Licensing LLC by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.2 BIA database. We assume no liability for errors or omissions in the database which may be adverse to the information contained herein.

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2) In addition to WKFR, Cumulus is also the licensee of WKMI, 1360 kHz, Kalamazoo, Michigan and WRKR, Channel 299B, Portage, Michigan.



# FCC Geographic Market Definition for Battle Creek, MI

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WBCK	AM	930	C	News/Talk	Battle Creek, MI	07/02/2003	261	p Cumulus	Battle Creek, MI	Calhoun
WBXX	FM	95.3	C	Soft Rock	Battle Creek, MI	07/02/2003	261	p Cumulus	Battle Creek, MI	Calhoun
WRCC	FM	104.9	C	Clsc Hits	Battle Creek, MI	07/02/2003	261	p Cumulus	Marshall, MI	Calhoun
WKFR	FM	103.3	C	Top 40	Kalamazoo, MI	07/02/2003	184	p Cumulus	Battle Creek, MI	Calhoun
WBFN	AM	1400	C	Sports	Battle Creek, MI	07/02/2003	261	p Family Life Communications Inc	Battle Creek, MI	Calhoun
WUFN	FM	96.7	NC	Inspiration	Battle Creek, MI	07/02/2003	261	Family Life Communications Inc	Albion, MI	Calhoun
WOLY	AM	1500	C	CCtmp/Talk	Battle Creek, MI	01/15/2007	261	Christian Family Network	Battle Creek, MI	Calhoun

Number of Stations in Geographic Market 7

Previous Stations in Geographic Market

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

"p" indicates pending sale to owner listed

**EXHIBIT #1**



# FCC Geographic Market Definition for Kalamazoo, MI

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WQXC	FM	100.9	C	Oldies	Kalamazoo, MI	07/02/2003	184	Forum Communications Incorporated	Allegan, MI	Allegan
WNWN	AM	1560	C	Urban AC	Kalamazoo, MI	07/02/2003	184	Midwest Communications Incorporated	Portage, MI	Kalamazoo
WKFR	FM	103.3	C	Top 40	Kalamazoo, MI	07/02/2003	184	p Cumulus	Battle Creek, MI	Calhoun
WKMI	AM	1360	C	Talk	Kalamazoo, MI	07/02/2003	184	p Cumulus	Kalamazoo, MI	Kalamazoo
WKPR	AM	1420	C	Religion	Kalamazoo, MI	07/02/2003	184	Kuiper Stations	Kalamazoo, MI	Kalamazoo
WKZO	AM	590	C	News/Talk	Kalamazoo, MI	07/02/2003	184	Midwest Communications Incorporated	Kalamazoo, MI	Kalamazoo
WNWN	FM	98.5	C	Country	Kalamazoo, MI	07/02/2003	184	Midwest Communications Incorporated	Coldwater, MI	Branch
WVFM	FM	106.5	C	AC	Kalamazoo, MI	07/02/2003	184	Midwest Communications Incorporated	Kalamazoo, MI	Kalamazoo
WRKR	FM	107.7	C	AOR/CIRck	Kalamazoo, MI	07/02/2003	184	p Cumulus	Portage, MI	Kalamazoo
WZUU	FM	92.5	C	Clsc Rock	Kalamazoo, MI	07/02/2003	184	Forum Communications Incorporated	Mattawan, MI	Van Buren
WFAT	FM	96.5	C	Clsc Rock	Kalamazoo, MI	07/02/2003	184	Midwest Communications Incorporated	Portage, MI	Kalamazoo
WQLR	AM	1660	C	Sports	Kalamazoo, MI	07/02/2003	184	Midwest Communications Incorporated	Kalamazoo, MI	Kalamazoo
WAYK	FM	88.3	NC	ChrsContem	Kalamazoo, MI	07/02/2003	184	Cornerstone University	Kalamazoo, MI	Kalamazoo
WIDR	FM	89.1	NC	Variety	Kalamazoo, MI	07/02/2003	184	Western Michigan University	Kalamazoo, MI	Kalamazoo
WKDS	FM	89.9	NC	Variety	Kalamazoo, MI	07/02/2003	184	Kalamazoo Board of Education	Kalamazoo, MI	Kalamazoo
WMUK	FM	102.1	NC	Classical	Kalamazoo, MI	07/02/2003	184	Western Michigan University	Kalamazoo, MI	Kalamazoo
WOFR	FM	89.5	NC	Religion	Kalamazoo, MI	07/02/2003	184	Family Stations Inc	Schoolcraft, MI	Kalamazoo

Number of Stations in Geographic Market 17

### Previous Stations in Geographic Market

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

"p" indicates pending sale to owner listed

**EXHIBIT #2**

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

State of Georgia )  
St. Simons Island ) ss:  
County of Glynn )

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Cumulus Licensing LLC to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 16th day of August 2007.*



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Jefferson G. Brock  
*Affiant*

*Sworn to and subscribed before me  
this the 16th day of August 2007*



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Notary Public, State of Georgia  
My Commission Expires: September 7, 2007