

**RADIO MARKET ANALYSIS**  
**CUMULUS LICENSING, LLC**  
**KUSB RADIO STATION**  
**HAZELTON, NORTH DAKOTA**  
**October 2006**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC ("Cumulus"), licensee of KUSB, Channel 277C1, Hazelton, North Dakota. Cumulus is submitting a minor change application for KUSB, as such, a Radio Market Analysis is required. Cumulus is also the licensee of KLXX, 1270 kHz, Bismarck-Mandan, North Dakota; and KBYZ, Channel 243C, KACL, Channel 254C1 and KKCT, Channel 248C1, Bismarck, North Dakota.<sup>1</sup> KUSB is not licensed to a community within a metro county in any Arbitron/BIA Market, nor is it considered "home" to any rated market. KLXX, KBYZ, KACL and KKCT are all licensed to communities within the Bismarck, North Dakota Arbitron/BIA Market (Market #285). The city grade contour of the proposed KUSB overlaps with the city grade contours of KKCT, KBYZ, KACL and all four FM stations have a common area of overlap with the 5.0 mV/m contour of KLXX. As such, a revised contour overlap study is needed to show compliance with the Commission's rules. Exhibit #1 is a map depicting the city grade contours of the subject stations.

**REVISED CONTOUR OVERLAP ANALYSIS**

2. Since the contours of all four FM stations and the one AM station have a common area of overlap, a study has been conducted to verify that the ownership of these facilities is in

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1) KBYZ, KKCT and KACL each have an application on file to upgrade to Class C0 at their existing site. The applications for these stations will be considered in this Radio Market Analysis as worst case.

compliance with the Commission's multiple ownership rules. The contours of the subject stations will be used to define the market boundary. No stations with transmitters located more than 92.0 kilometers from the boundary of the common overlap of subject stations will be considered. Further, no other facility controlled by Cumulus will be considered as a market contributor, unless it is a subject station in the pertinent radio market under study.

3. Exhibit #2 is a depiction of the AM and FM stations (commercial and non-commercial) providing service to the Radio Market. Exhibit #3 is a tabulation of the stations in the Radio Market, showing a total of seventeen, including the five subject stations. The number of stations depicted 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. Based on the above, the application for KUSB is in compliance with the Commission's rules.

4. The foregoing technical statement was prepared for Cumulus Licensing LLC by Graham Brock, Inc, its Technical Consultant. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities was extracted from the Commission's CDBS database. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.

**Graham Brock, Inc. - Broadcast Technical Consultants**

**KUSB - Proposed**  
Latitude: 46-35-24 N  
Longitude: 100-47-46 W  
ERP: 100.00 kW  
Channel: 277C0  
Frequency: 103.3 MHz  
AMSL Height: 884.9 m

**KBYZ Appl**  
BPH-20060329AMN  
Latitude: 46-35-25 N  
Longitude: 100-47-47 W  
ERP: 100.00 kW  
Channel: 243C0  
Frequency: 96.5 MHz  
AMSL Height: 884.9 m

**KACL Appl**  
BPH-20060329AMK  
Latitude: 46-35-25 N  
Longitude: 100-47-47 W  
ERP: 100.00 kW  
Channel: 254C0  
Frequency: 98.7 MHz  
AMSL Height: 884.9 m

**KKCT - Appl**  
BPH020060329AMR  
Latitude: 46-35-25 N  
Longitude: 100-47-47 W  
ERP: 100.00 kW  
Channel: 248C0  
Frequency: 97.5 MHz  
AMSL Height: 884.9 m

**KLXX**  
Latitude: 46-48-37 N  
Longitude: 100-50-10 W  
ERP: 1.00 kW  
Frequency: 1270.0 kHz

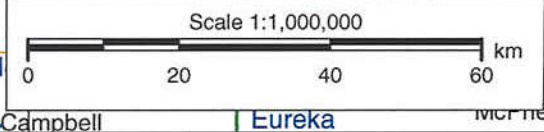
KLXX 5.0 mV/m

Proposed KUSB 3.16 mV/m

KBYZ/KACL/KKCT CP 3.16 mV/m

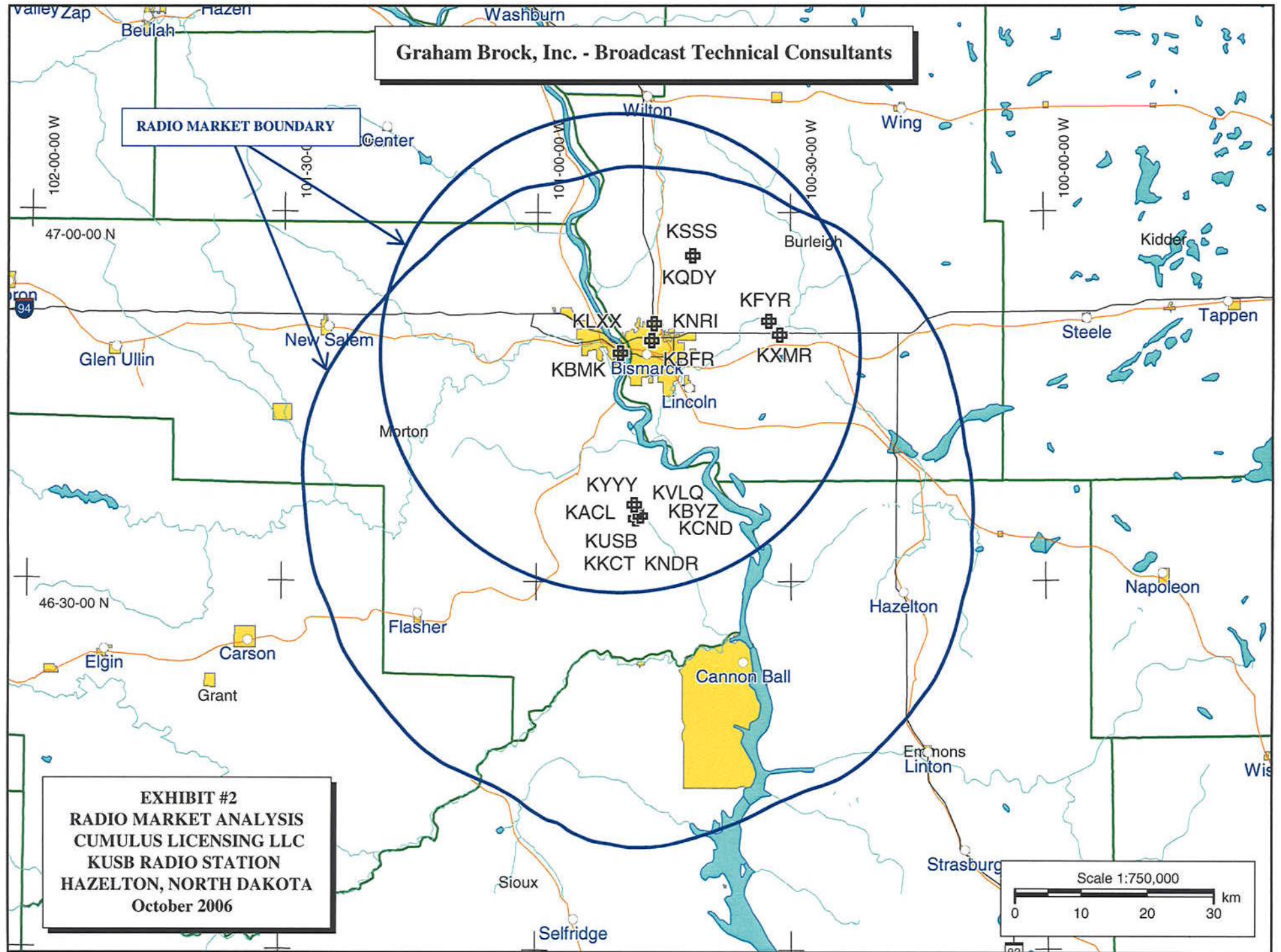
KKCT  
KACL  
KBYZ  
KUSB

**EXHIBIT #1**  
**RADIO MARKET ANALYSIS**  
**CUMULUS LICENSING LLC**  
**KUSB RADIO STATION**  
**HAZELTON, NORTH DAKOTA**  
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**Graham Brock, Inc. - Broadcast Technical Consultants**

**RADIO MARKET BOUNDARY**



**EXHIBIT #2**  
**RADIO MARKET ANALYSIS**  
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**EXHIBIT #3**

**Tabulation of Stations in Radio Market**

**AM Stations**

KFYR	550 kHz	Bismarck, North Dakota
KXMR	710 kHz	Bismarck, North Dakota
KBMR	1130 kHz	Bismarck, North Dakota
* KLXX	1270 kHz	Bismarck-Mandan, North Dakota

Total AM Stations - 4

**FM Stations**

KBMK	Ch 202C3	Bismarck, North Dakota
KVLQ	Ch 206A	Bismarck, North Dakota
KNRI	Ch 209A	Bismarck, North Dakota
KCND	Ch 213C1	Bismarck, North Dakota
KBFR	Ch 219A	Bismarck, North Dakota
KYYY	Ch 225C	Bismarck, North Dakota
KQDY	Ch 233C	Bismarck, North Dakota
* KBYZ	Ch 243C	Bismarck, North Dakota
* KKCT	Ch 248C1	Bismarck, North Dakota
* KACL	Ch 254C1	Bismarck, North Dakota
KSSS	Ch 268C	Bismarck, North Dakota
* KUSB	Ch 277C0	Hazelton, North Dakota
KNDR	Ch 284C1	Mandan, North Dakota

Total FM Stations - 13

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 17**

\* Subject station.

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

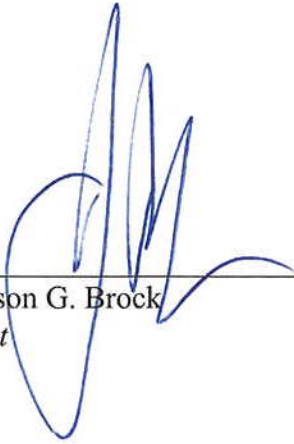
State of Georgia    )  
St. Simons Island    ) ss:  
County of Glynn    )

**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 11th day of October 2006.*

  
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Jefferson G. Brock  
Affiant

*Sworn to and subscribed before me  
this the 11th day of October 2006*

  
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Notary Public, State of Georgia  
My Commission Expires: September 3, 2007