

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CITICASTERS LICENSES, L.P.

This statement and the attached figures were prepared on behalf of Citicasters Licenses, L.P. ("CLLP"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CLLP proposes to modify the facilities of WCTQ(FM), Sarasota, FL. A multiple ownership analysis was prepared considering the following radio stations under present or proposed common ownership, time brokerage or joint sales.¹

Table 1: Proposed Commonly Owned, Brokered or Jointly-Sold Stations
Studied and Associated Arbitron Metro² Information

Calls	Fac ID	Band	Community	County	State	Geographic Arbitron Market	Declared Arbitron Market
WAMR	3060	AM	Venice	Sarasota	FL	Sarasota-Bradenton, FL	Sarasota-Bradenton, FL
WBTP	41382	FM	Clearwater	Pinellas	FL	Tampa-St. Petersburg-Clearwater, FL	Tampa-St. Petersburg-Clearwater, FL
WCTQ	48672	FM	Sarasota	Sarasota	FL	Sarasota-Bradenton, FL	Sarasota-Bradenton, FL
WDAE	74198	AM	St. Petersburg	Pinellas	FL	Tampa-St. Petersburg-Clearwater, FL	Tampa-St. Petersburg-Clearwater, FL
WDDV	3059	FM	Venice	Sarasota	FL	Sarasota-Bradenton, FL	Sarasota-Bradenton, FL
WFLA	29729	AM	Tampa	Hillsborough	FL	Tampa-St. Petersburg-Clearwater, FL	Tampa-St. Petersburg-Clearwater, FL
WFLZ-FM	29732	FM	Tampa	Hillsborough	FL	Tampa-St. Petersburg-Clearwater, FL	Tampa-St. Petersburg-Clearwater, FL
WHNZ	23077	AM	Tampa	Hillsborough	FL	Tampa-St. Petersburg-Clearwater, FL	Tampa-St. Petersburg-Clearwater, FL
WIKX	28899	FM	Charlotte Harbor	Charlotte	FL	Non- Metro ³	Sarasota-Bradenton, FL
WMTX	23078	FM	Tampa	Hillsborough	FL	Tampa-St. Petersburg-Clearwater, FL	Tampa-St. Petersburg-Clearwater, FL
WSRQ	48671	AM	Sarasota	Sarasota	FL	Sarasota-Bradenton, FL	Sarasota-Bradenton, FL

¹ None of the following stations are attributable by virtue of a time brokerage agreement or joint sales agreement.

² Arbitron data presented herein is obtained from BIA's "Media Access Pro."

³ This station does NOT overlap or intersect with WCTQ.

WSRZ-FM	48673	FM	Coral Cove	Sarasota	FL	Sarasota-Bradenton, FL	Sarasota-Bradenton, FL
WTBT	63984	FM	Bradenton	Manatee	FL	Sarasota-Bradenton, FL	Tampa-St. Petersburg-Clearwater, FL
WTZB	59127	FM	Englewood	Sarasota	FL	Sarasota-Bradenton, FL	Sarasota-Bradenton, FL
WXTB	11274	FM	Clearwater	Pinellas	FL	Tampa-St. Petersburg-Clearwater, FL	Tampa-St. Petersburg-Clearwater, FL

Since certain of these stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations), or are located in, or home to, the same Arbitron Metro Markets, an ownership study has been prepared in accordance with the Federal Communications Commission's local radio ownership rule.⁴

CCC does not have an attributable interest in any other station with a principal community contour that overlaps or intersects the principal community contour of WCTQ(FM) as proposed, or which is located in the same Arbitron Metro⁵ as WCTQ(FM). The community of license of WCTQ(FM) is located within the Sarasota-Bradenton, FL Arbitron Metro, and WCTQ(FM) is reported by BIA as being "Home" to that Metro only. Contour overlap of the station to be modified, as depicted in Figure 1, also occurs with commonly-owned stations whose communities of license are located in the nearby Tampa-St. Petersburg-Clearwater, FL Arbitron Metro market.

Arbitron Market Study

WCTQ(FM) is reported by BIA as being "Home" to the Sarasota-Bradenton, FL Arbitron Metro. This proposal is not in compliance with the local radio ownership rules for that Arbitron Metro, as evidenced by Table 2 below. However, the existing WCTQ(FM) licensed facility was also not in compliance with the Arbitron metro-based rules. This proposal maintains the status-quo in the Sarasota-Bradenton, FL Arbitron Metro: no stations are added to or removed from the metro, nor is WCTQ(FM)'s Arbitron market changed, by virtue of this instant application. Because this modification would not create a "new violation" of the ownership rules, this existing combination of radio stations qualifies for grandfathering. See Note 4 to 47 C.F.R. Section 73.3555 (minor modification applications are subject to ownership restrictions only if implementing a change in an FM radio station's community of license or if new or increased concentration of ownership among commonly-owned media would be created); accord 2002 Biennial Regulatory Review—Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, 18 FCC Rcd 13,620 at fn. 1033 (2003) (modifications of facilities in a grandfathered combination are prohibited if the proposed modification would create a new violation of the ownership rules).

⁴ See 47 C.F.R. § 73.3555(a).

⁵ A station is considered to be "located in an Arbitron Metro" if the station's community of license is located within the boundaries of that Metro, or, the station is listed as "Home" to that Metro by BIA.

Table 2 - Stations Considered to be in the
Sarasota-Bradenton, FL Arbitron Metro⁶

Count	Calls	Fac ID	Band	Owner	Status ⁷	Community	County
1	WAMR	3060	AM	Clear Channel Communications	b	Venice	Sarasota
2	WCTQ	48672	FM	Clear Channel Communications	b	Sarasota	Sarasota
3	WDDV	3059	FM	Clear Channel Communications	b	Venice	Sarasota
4	WIKX	28899	FM	Clear Channel Communications	a	Charlotte Harbor	Charlotte
5	WSRQ	48671	AM	Clear Channel Communications	b	Sarasota	Sarasota
6	WSRZ-FM	48673	FM	Clear Channel Communications	b	Coral Cove	Sarasota
7	WTBT	63984	FM	Clear Channel Communications	g	Bradenton	Manatee
8	WTZB	59127	FM	Clear Channel Communications	b	Englewood	Sarasota
9	WHPT	51986	FM	Cox Broadcasting	g	Sarasota	Sarasota
10	WWPR	60587	AM	Greenrose Broadcasting Services Incorporated	b	Bradenton	Manatee
11	WLLD	18527	FM	Infinity Broadcasting	g	Holmes Beach	Manatee
12	WBRD	63985	AM	Metropolitan Radio Group	b	Palmetto	Manatee
13	WTMY	51440	AM	Metropolitan Radio Group	b	Sarasota	Sarasota
14	WKZM	11037	FM	Moody Bible Institute of Chicago Incorporated	b	Sarasota	Sarasota
15	WSMR	64255	FM	Northwestern College Radio Network	b	Sarasota	Sarasota
16	WIBQ	27663	AM	Nova Broadcasting Co	b	Sarasota	Sarasota
17	WJIS	54857	FM	Radio Training Network Inc	b	Bradenton	Manatee
18	WSEB	63899	FM	Suncoast Educational Broadcasting	b	Englewood	Sarasota
19	WENG	47073	AM	Viper Communications Incorporated	b	Englewood	Sarasota
20	WLSS	59126	AM	WGUL FM Inc	b	Sarasota	Sarasota

Interim Contour-Overlap Analysis

Because the principal community of the station to be modified, and the communities of all commonly-owned or attributable stations with overlapping principal contours with the station to be modified, are located inside an Arbitron Metro, an interim contour-overlap analysis is not required.

Conclusions

In the Arbitron Radio Market studied herein, there are at least 20 radio stations, including the subject commonly-owned 2-AM / 6-FM stations, which are home to the Sarasota-Bradenton, FL Metro. This proposal does not affect the existing number of commonly-owned stations in the subject BIA Metro.

Respectfully submitted,

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FCC Engineering Supervisor
December 14, 2004

⁶ Source: BIA.

⁷ Status: "a" -- the station is reported by BIA as "Home" to this Arbitron Metro; "g" -- the station's community of license is located within the geographic boundaries of this Arbitron Metro; "b" -- the station is both listed by BIA as "Home" to this Arbitron Metro, and its community of license is located in this Arbitron Metro.

Figure 1

