

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CAPSTAR TX LIMITED PARTNERSHIP

This statement and the attached figures were prepared on behalf of Capstar TX Limited Partnership ("CTLTP"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CTLTP proposes to modify the facilities of WMAD(FM), and specify Cross Plains, Wisconsin as its principal community in lieu of Sauk City, Wisconsin, and to modify WIBA-FM to change its principal community from Madison, Wisconsin to Sauk City, Wisconsin. 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	Geographic Arbitron Market	Declared Arbitron Market
WIBA	17384	AM	Madison	Dane	Madison, WI	Madison, WI
WTSO	41973	AM	Madison	Dane	Madison, WI	Madison, WI
WXXM	17383	FM	Sun Prairie	Dane	Madison, WI	Madison, WI
WIBA-FM-PRP	17385	FM	Sauk City from Madison	Sauk from Dane	Non-metro from Madison, WI	Madison, WI
WZEE	41980	FM	Madison	Dane	Madison, WI	Madison, WI
WMAD-PRP	17385	FM	Cross Plains from Sauk City	Dane from Sauk	Madison, WI from Non-metro	Madison, WI from Non-metro

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 market, an ownership study has been prepared in accordance with the Federal Communications Commission's local radio ownership rule.³

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 WIMA-FM or WMAD(FM) as proposed, or which is located in the same Arbitron Metro⁴ as WMAD(FM) or WIBA-FM. The proposed community of license of WMAD(FM) is located within the Madison, WI Arbitron Metro, and at present WMAD(FM) is reported by BIA as being "Home" to that Metro. The proposed community of license of WIBA-FM is located outside any Arbitron Metro, but WIBA-FM is now and is assumed will continue to be reported as "Home" to the Madison, WI Arbitron Metro. Contour overlap of the stations to be modified, as depicted in Figure 1, also occurs with commonly-owned

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 See 47 C.F.R. § 73.3555(a).

⁴ 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.

stations whose communities of license are located in the Madison, WI Arbitron Metro market.

Arbitron Market Study

At present, both WMAD(FM) and WIBA-FM are reported by BIA as being "Home" to the Madison, WI Metro, and it is assumed that will continue to be the case following the proposed modifications. This proposal is in compliance with the local radio ownership rules for that Arbitron Metro, as evidenced by Table 2 below:

Table 2 - Stations Considered to be in the
Madison, WI Arbitron Metro⁵

Count	Calls	Fac ID	Band	Owner	Status ⁶	Community	County
1	WORT	3596	FM	Back Porch Radio Broadcasting Inc	b	Madison	Dane
2	WIBA	17384	AM	Clear Channel	b	Madison	Dane
3	WIBA-FM	17385	FM	Clear Channel	b	Madison	Dane
4	WMAD	50055	FM	Clear Channel	a	Sauk City	Sauk
5	WTSO	41973	AM	Clear Channel	b	Madison	Dane
6	WXXM	17383	FM	Clear Channel	b	Sun Prairie	Dane
7	WZEE	41980	FM	Clear Channel	b	Madison	Dane
8	WJWD	93445	FM	CSN International	b	Marshall	Dane
9	WDMP	17054	AM	Dodge Point Broadcasting Co	b	Dodgeville	Iowa
10	WDMP-FM	17056	FM	Dodge Point Broadcasting Co	b	Dodgeville	Iowa
11	WCHY	73655	FM	Entercom	b	Waunakee	Dane
12	WMMM-FM	73663	FM	Entercom	b	Verona	Dane
13	WOLX-FM	60236	FM	Entercom	a	Baraboo	Sauk
14	WTLX	4477	FM	Good Karma Broadcasting LLC	b	Columbus	Columbia
15	WTTN	71092	AM	Good Karma Broadcasting LLC	a	Watertown	Jefferson
16	WWHG	59612	FM	Good Karma Broadcasting LLC	a	Evansville	Rock
17	WBKY	39625	FM	Magnum Radio Group	b	Portage	Columbia
18	WDLS	2807	AM	Magnum Radio Group	b	Wisconsin Dells	Columbia
19	WNNO-FM	2806	FM	Magnum Radio Group	b	Wisconsin Dells	Columbia

⁵ Source: BIA.

⁶ 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.

Count	Calls	Fac ID	Band	Owner	Status ⁶	Community	County
20	WHLK	78226	FM	Mid-West Family Broadcast Group	b	De Forest	Dane
21	WJJO	73142	FM	Mid-West Family Broadcast Group	a	Watertown	Jefferson
22	WJQM	89056	FM	Mid-West Family Broadcast Group	b	Mount Horeb	Dane
23	WLMV	41901	AM	Mid-West Family Broadcast Group	b	Madison	Dane
24	WMGN	41900	FM	Mid-West Family Broadcast Group	b	Madison	Dane
25	WTDY	87154	AM	Mid-West Family Broadcast Group	b	Madison	Dane
26	WTUX	19622	AM	Mid-West Family Broadcast Group	b	Madison	Dane
27	WWQM-FM	19623	FM	Mid-West Family Broadcast Group	b	Middleton	Dane
28	WNWC	17381	AM	Northwestern College Radio Network	b	Sun Prairie	Dane
29	WNWC-FM	49781	FM	Northwestern College Radio Network	b	Madison	Dane
30	WSJY	24442	FM	NRG Media LLC	a	Fort Atkinson	Jefferson
31	WHFA	54617	AM	Starboard Media Foundation Inc D/B/A Relevant Radio	b	Poynette	Columbia
32	WSUM	79040	FM	University of Wisconsin	b	Madison	Dane
33	WERN	63030	FM	State of Wisconsin - Educational Communications Bd	b	Madison	Dane
34	WHHI	63056	FM	State of Wisconsin - Educational Communications Bd	b	Highland	Iowa
35	WHA	6139	AM	University of Wisconsin	b	Madison	Dane
36	WDDC	35515	FM	Zoe Communications	b	Portage	Columbia
37	WPDR	35516	AM	Zoe Communications	b	Portage	Columbia

Interim Contour-Overlap Analysis

Because the proposed principal community contour of the station(s) to be modified intersects the principal community contour of a station under common ownership or attribution whose community of license is located outside any Arbitron Metro, an interim contour-overlap analysis is also set forth in this statement.

Interim Contour-Based Radio Markets

A "radio market" under the interim contour-overlap method is the area encompassed by the mutually overlapping principal community contours of the stations under common-ownership or attribution. Here, such mutually overlapping contours form one "radio market" for interim contour-overlap analysis under the Commission's rules.

The "radio market" is defined by the mutually overlapping principal community contours of WMAD(FM), WIBA-FM, WXXM(FM), WZEE(FM), WIBA(AM) and WTSO(AM). The predicted principal community contours of these stations (2 AM / 4 FM), as well as other stations whose principal community contours overlap this combination, are shown in *Figure 2*. *Figure 3* is the tabulation of some of the radio stations identified in the contour-overlap "radio market."

Count of Stations in Defined Markets

The number of radio stations in a contour-overlap "radio market" is determined by counting the operating stations having principal community contours which overlap or intersect the principal community contours which define the radio market, plus the subject commonly owned or attributable stations, excluding any stations whose transmitter sites are further than 92 kilometers from the perimeter of mutual overlap, and excluding any commonly owned or attributable stations that do not serve to define the market.

In the interim contour-overlap "radio market" studied herein, there are at least 28 radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio market." *Figure 3* is the tabulation of some of the radio stations identified in the contour-overlap "radio market".

Only known licensed, operating radio stations were included in this tabulation. Distances to contours for AM stations were predicted using the antenna patterns as identified in the Commission's AM database and the appropriate Ground Wave Field Strength versus Distance Graph of 47 C.F.R. § 73.184. Ground conductivities were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 C.F.R. § 73.313. Terrain data was derived from the N.G.D.C. 30 second computer database for each of the FM stations using radials spaced every 45 degrees of azimuth.

Conclusions

In the Arbitron Metro market studied herein, there are at least 37 radio stations, including the subject commonly-owned 2-AM / 4-FM stations, which are considered home to the Madison, WI Metro.

In the interim contour-overlap "radio market" studied herein, there are at least 40 stations, including the commonly-owned 2-AM / 4-FM stations.

Based on the above, it is concluded that the proposed modification complies with Section 73.3555(a) of the FCC Rules.

Respectfully submitted,

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Figure 01 - Market-Defining Principal Community Contours

Radio Market

2-AM 4-FM

WIBA AM
WTSO AM
WXXM FM
WIBA-FM
WZEE FM
WMAD-PRP FM

43-30
43-15
43-00
42-45

-90-00 -89-45 -89-30 -89-15 -89-00

50
40
30
20
10
0
10
20
30
40
50

km

40 30 20 10 0 10 20 30 40

WMAD-PRP
WIBA-FM
WXXM
WIBA
WTSO
WZEE

[illegible]

Figure 3 - Tabulation of stations in Radio Market 1

Count	Call Sign	Facility_id	Licensee	Dist_km
1	WIBA	17384	CAPSTAR TX LIMITED PARTNERSHIP	6.94
2	WTSO	41973	CAPSTAR TX LIMITED PARTNERSHIP	11.31
3	WXXM	17383	CAPSTAR TX LIMITED PARTNERSHIP	17.66
4	WIBA-FM	17385	CAPSTAR TX LIMITED PARTNERSHIP	9.4
5	WZEE	41980	CAPSTAR TX LIMITED PARTNERSHIP	5.59
6	WMAD-PRP	50055	CAPSTAR TX LIMITED PARTNERSHIP STATE OF WISCONSIN - EDUCATIONAL COMMUNICATIONS BOARD	9.4
7	WHHI	63056	STATE OF WISCONSIN - EDUCATIONAL COMMUNICATIONS BOARD	77.35
8	WEKZ-FM	25132	RONALD M.SPIELMAN & SCOTT THOMPSON	58.34
9	WSJY	24442	NRG LICENSE SUB, LLC	41.6
10	WMMM-FM	73663	ENTERCOM MADISON LICENSE, LLC.	12.77
11	WMGN	41900	MID-WEST MANAGEMENT, INC.	11.45
12	WSUM	79040	BOARD OF REGENTS, UNIVERSITY OF WISCONSIN SYSTEM	20.66
13	WJVL	61391	SOUTHERN WISCONSIN BROADCASTING, L.L.C.	42.16
14	WWHG	59612	GOOD KARMA BROADCASTING, L.L.C. STATE OF WISCONSIN - EDUCATIONAL COMMUNICATIONS BOARD	39.63
15	WERN	63030	STATE OF WISCONSIN - EDUCATIONAL COMMUNICATIONS BOARD	9.4
16	WCHY	73655	ENTERCOM MADISON LICENSE, LLC.	20.33
17	WDDC	35515	ZOE COMMUNICATIONS, INC.	51.87
18	WJQM	89056	MID-WEST MANAGEMENT, INC.	37.5
19	WTLX	4477	GOOD KARMA BROADCASTING, L.L.C.	36.68
20	WHLK	78226	MID-WEST MANAGEMENT, INC.	19.89
21	WJWD	93445	CSN INTERNATIONAL	40.65
22	WJJO	73142	MID-WEST MANAGEMENT, INC.	29.12
23	WOLX-FM	60236	ENTERCOM MADISON LICENSE, LLC.	44.91
24	WORT	3596	BACK PORCH RADIO BROADCASTING, INC.	5.59
25	WWQM-FM	19623	MID-WEST MANAGEMENT, INC.	5.59
26	WNWC-FM	49781	MID-WEST MANAGEMENT, INC.	7.66
27	WCLO	61390	NORTHWESTERN COLLEGE	54.27
28	WEKZ	25131	SOUTHERN WISCONSIN BROADCASTING, LLC.	53.78
29	WHFA	54617	RONALD M. SPIELMAN & SCOTT THOMPSON	33.25
30	WLMV	41901	STARBOARD MEDIA FOUNDATION, INC.	4.48
31	WRPQ	3712	MID-WEST MANAGEMENT, INC.	51.46
32	WPDR	35516	BARABOO BROADCASTING CORP.	51.87
33	WNWC	17381	ZOE COMMUNICATIONS, INC.	19.93
34	WTDY	87154	NORTHWESTERN COLLEGE	4.47
35	WTUX	19622	MID-WEST MANAGEMENT, INC.	7.16
36	WHA	6139	MID-WEST MANAGEMENT, INC.	2.39
37	WTMJ	74096	BOARD REGENTS OF UNIV OF WI SYSTEM	117.4
38	WFAW	24446	JOURNAL BROADCAST CORPORATION	57.16
39	WTTN	71092	NRG LICENSE SUB, LLC	56.13
40	WBEV	4475	GOOD KARMA BROADCASTING, LLC GOOD KARMA BROADCASTING, L.L.C.	58.07