

RADIO MARKET ANALYSIS
TEJAS BROADCASTING LTD, LLP
KOUL (FM) RADIO STATION
REFUGIO, TEXAS
September 2005

TECHNICAL STATEMENT

1. This Technical Statement and attached exhibits were prepared on behalf of Tejas Broadcasting Ltd, LLP ("TBL"), licensee of KOUL, Channel 279C1, Sinton, Texas. TBL is submitting a minor change application to implement a change of community of license for KOUL from Sinton to Refugio, Texas. TBL is also the licensee of KMJR, Channel 288A, Portland, Texas; KLTG, Channel 243C1, Corpus Christi, Texas; and KLHB, Channel 252C2, Odem, Texas. Presently, KOUL is licensed to a metro county within the Corpus Christi, Texas Arbitron/BIA market (Market #137). KMJR, KLTG and KLHB are also all licensed to metro counties. However, as a result of the change in community of license to Refugio, KOUL will move into a non-metro market. However, KOUL will still be considered "home" to the Corpus Christi market. Therefore, an ownership analysis for both a metro market and non-metro market will be conducted to show that the proposed change in community of license is in compliance with the Commission's ownership rules.

METRO MARKET REVIEW

2. Attached as Exhibit #1 is a BIA printout for the Corpus Christi, Texas Arbitron Market. The tabulation shows there are thirty-four stations in the market. 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. Therefore, since TBL would continue to control four FM stations in the same market, it is believed this minor change for KOUL remains in compliance with the Commission's multiple ownership rules for metro markets.

CONTOUR OVERLAP REVIEW

3. As a result of the overlap of the city grade contours of KOUL, KMJR, KLTG and KLHB a single radio market is created, based on the non-metro contour overlap rules (Exhibit #2). A study has, therefore, been conducted to verify the proposed minor change application for KOUL is in compliance with the Commission's multiple ownership rules. The city grade contours of the four subjects will be used to determine the number of other commercial AM or FM stations that either have transmitter sites within, or provide coverage to the defined radio market. No other TLB stations will be considered market contributors, unless they are subject stations in the market under review. Further, no transmitters located more than 92.0 kilometers from the boundary of the common overlap of subject stations will be considered.

4. Exhibit #3 is a depiction of the number of AM and FM stations (commercial and non-commercial) providing service to the radio market. A total of seventeen AM and FM stations provide service to the market, including the four subject stations. Exhibit #4 is a tabulation of the stations providing service to Radio Market. 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.³ At this level, common ownership or control of up to six stations, with no more than four in the same service, is permissible.

5. Since the KOUL facility is in compliance in both the metro market and non-metro market, the proposed minor change application is in compliance with the radio ownership rules.

6. The foregoing technical statement was prepared on behalf of Tejas Broadcasting Ltd, LLP, 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 was extracted from the CDBS database. All market data relating to AM and FM facilities in Arbitron markets was extracted from the BIA Financial Network, Media Access Pro 4.0 computer software. We assume no liability for errors or omissions in that database or program which may be adverse to the information contained herein.

3) There are additional stations in the market, however, they were not considered as there were sufficient stations based on the number of stations to be commonly held.



FCC Geographic Market Definition for Corpus Christi, TX

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KBNJ	FM	91.7	NC	ChrsContem	Corpus Christi, TX	07/02/2003	137	World Radio Network Inc	Corpus Christi, TX	Nueces
KBSO	FM	94.7	C	Americana	Corpus Christi, TX	07/02/2003	137	Davila, Manuel	Corpus Christi, TX	Nueces
KCCT	AM	1150	C	Talk	Corpus Christi, TX	07/02/2003	137	Davila, Manuel	Corpus Christi, TX	Nueces
KCTA	AM	1030	C	Christian	Corpus Christi, TX	07/02/2003	137	Broadcasting Corporation of the Southwest	Corpus Christi, TX	Nueces
KDAE	AM	1590	C	Span/Relgn	Corpus Christi, TX	07/02/2003	137	The Worship Center of Kingsville	Sinton, TX	San Patricio
KEDT	FM	90.3	NC	Variety	Corpus Christi, TX	07/02/2003	137	South Texas Public Bcstg. Systems Inc.	Corpus Christi, TX	Nueces
KEYS	AM	1440	C	Nws/Tlk/Spt	Corpus Christi, TX	07/02/2003	137	Malkan Broadcast Association	Corpus Christi, TX	Nueces
KFTX	FM	97.5	C	Country	Corpus Christi, TX	07/02/2003	137	Dobson, Tom & Grace	Kingsville, TX	Kleberg
KINE	AM	1330	C	Span/Chrst	Corpus Christi, TX	07/02/2003	137	Cotton Broadcasting	Kingsville, TX	Kleberg
KJKE	FM	107.3	C	Clsc Hits	Corpus Christi, TX	07/02/2003	137	Convergent Broadcasting LLC	Ingleside, TX	Nueces
KKBA	FM	92.7	C	AC	Corpus Christi, TX	07/02/2003	137	Malkan Broadcast Association	Kingsville, TX	Kleberg
KKLM	FM	88.7	NC	ChrsContem	Corpus Christi, TX	07/02/2003	137	Educational Media Foundation	Corpus Christi, TX	Nueces
KKPN	FM	102.3	C	Hot AC	Corpus Christi, TX	07/02/2003	137	Convergent Broadcasting LLC	Rockport, TX	Aransas
KKTX	AM	1360	C	News/Talk	Corpus Christi, TX	07/02/2003	137	Clear Channel Communications	Corpus Christi, TX	Nueces
KLHB	FM	98.3	C	Tejano	Corpus Christi, TX	07/02/2003	137	Tejas Broadcasting Ltd LLP	Odem, TX	San Patricio
KLTG	FM	96.5	C	Hot AC	Corpus Christi, TX	07/02/2003	137	Tejas Broadcasting Ltd LLP	Corpus Christi, TX	Nueces
KLUX	FM	89.5	NC	Easy	Corpus Christi, TX	07/02/2003	137	Diocesan Telecommunications Corp	Robstown, TX	Nueces
KMIQ	FM	104.9	C	Span/Tejno	Corpus Christi, TX	07/02/2003	137	Cotton Broadcasting	Robstown, TX	Nueces
KMJR	FM	105.5	C	Span/Mexcn	Corpus Christi, TX	07/02/2003	137	Tejas Broadcasting Ltd LLP	Portland, TX	San Patricio
KMXR	FM	93.9	C	Oldies	Corpus Christi, TX	07/02/2003	137	Clear Channel Communications	Corpus Christi, TX	Nueces
KMZZ	FM	106.9	C	Religion	Corpus Christi, TX	07/02/2003	137	Benavides, Gerald G.	Bishop, TX	Nueces
KNCN	FM	101.3	C	AOR	Corpus Christi, TX	07/02/2003	137	Clear Channel Communications	Sinton, TX	San Patricio
KNDA	FM	102.9	C	HpHop/Top4	Corpus Christi, TX	07/02/2003	137	Guerra Enterprises	Alice, TX	Jim Wells
KOUL	FM	103.7	C	Country	Corpus Christi, TX	07/02/2003	137	Tejas Broadcasting Ltd LLP	Sinton, TX	San Patricio
KPUS	FM	104.5	C	Clsc Rock	Corpus Christi, TX	07/02/2003	137	Convergent Broadcasting LLC	Gregory, TX	San Patricio
KROB	AM	1510	C	Religion	Corpus Christi, TX	07/02/2003	137	B Communications Joint Venture	Robstown, TX	Nueces
KRYS	FM	99.1	C	Country	Corpus Christi, TX	07/02/2003	137	Clear Channel Communications	Corpus Christi, TX	Nueces
KSAB	FM	99.9	C	Span/Tejno	Corpus Christi, TX	07/02/2003	137	Clear Channel Communications	Robstown, TX	Nueces
KSGR	FM	91.1	NC	Religion	Corpus Christi, TX	07/02/2003	137	CSN International	Portland, TX	San Patricio
KSIX	AM	1230	C	Sports	Corpus Christi, TX	07/02/2003	137	Withers Family LP	Corpus Christi, TX	Nueces
KTKY	FM	106.5	C	DARK	Corpus Christi, TX	07/02/2003	137	p Convergent Broadcasting LLC	Taft, TX	San Patricio
KUNO	AM	1400	C	Span/Mexcn	Corpus Christi, TX	07/02/2003	137	Clear Channel Communications	Corpus Christi, TX	Nueces

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

"p" indicates pending sale to owner listed



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Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KXTM	FM	107.7	C	Mexcn/Tejno	Corpus Christi, TX	07/02/2003	137	Lopez, Humberto	Benavides, TX	Nueces
KZFM	FM	95.5	C	CHR	Corpus Christi, TX	07/02/2003	137	Malkan Broadcast Association	Corpus Christi, TX	Nueces

Number of Stations in Geographic Market 34

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

"p" indicates pending sale to owner listed

Graham Brock, Inc. - Broadcast Technical Consultants

KOUL Proposed
 Latitude: 28-02-07 N
 Longitude: 097-26-11 W
 ERP: 100.00 kW
 Channel: 279C1

KLHB
 BLH-19970306KF
 Latitude: 27-47-26 N
 Longitude: 097-27-02 W
 ERP: 50.00 kW
 Channel: 252C2

KLTG
 BLH-19910213KA
 Latitude: 27-44-28 N
 Longitude: 097-36-08 W
 ERP: 100.00 kW
 Channel: 243C1

KMJR
 BLH-19850425KR
 Latitude: 27-47-48 N
 Longitude: 097-23-51 W
 ERP: 1.90 kW
 Channel: 288A

KMJR CP
 BPH-20030430ACA
 Latitude: 27-47-48 N
 Longitude: 097-23-51 W
 ERP: 2.80 kW
 Channel: 288A

KMJR CP 3.16 mV/m

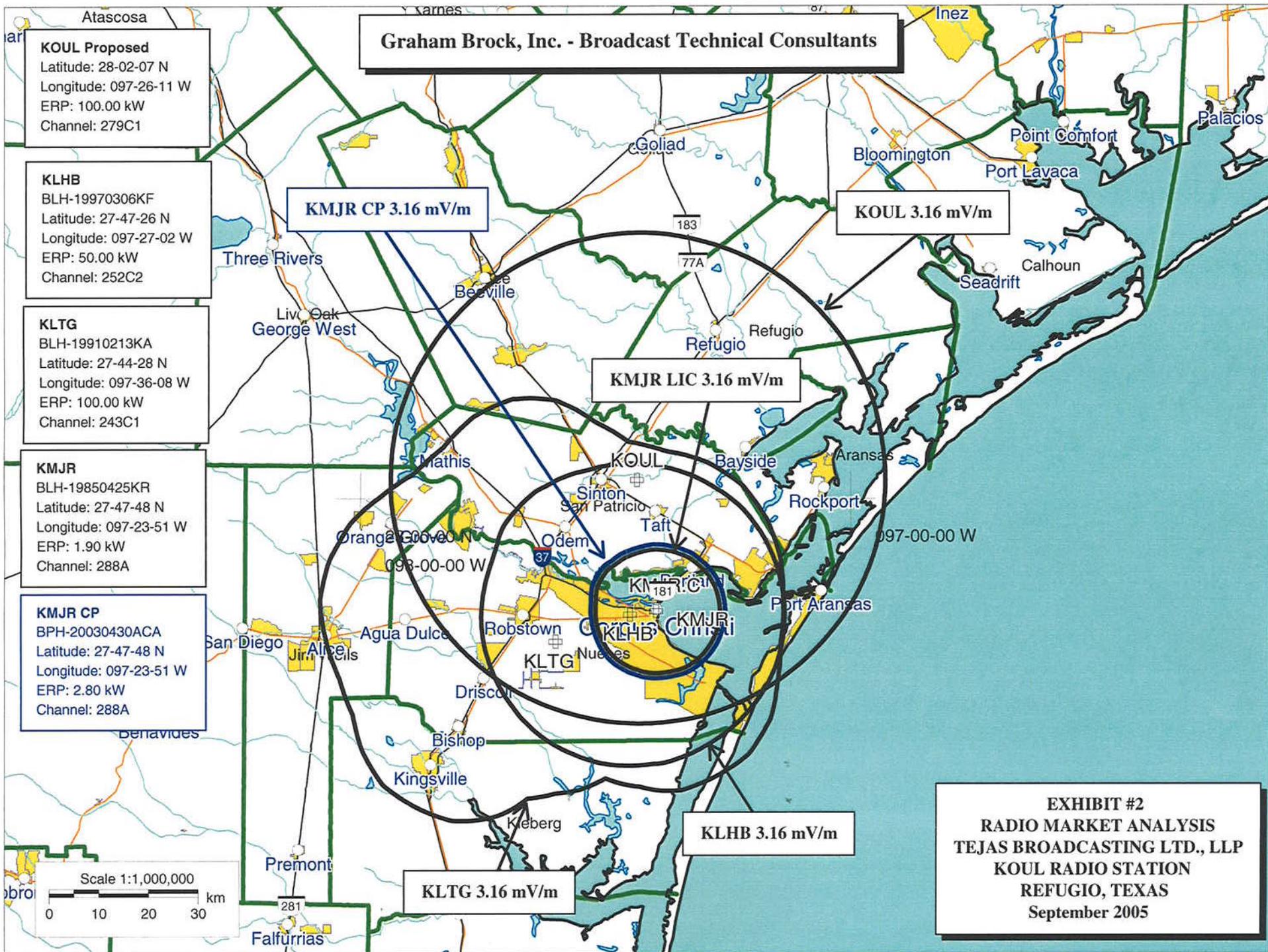
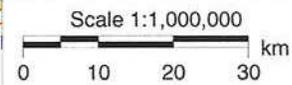
KOUL 3.16 mV/m

KMJR LIC 3.16 mV/m

KLHB 3.16 mV/m

KLTG 3.16 mV/m

EXHIBIT #2
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EXHIBIT #4

Tabulation of Stations in Radio Market

AM Stations

KCCT	1150 kHz	Corpus Christi, Texas
KEYS	1440 kHz	Corpus Christi, Texas
KDAE	1590 kHz	Sinton, Texas

Total AM Stations - 3

FM Stations

KKLM	Ch 204C2	Corpus Christi, Texas
KLUX	Ch 208C1	Robstown, Texas
KMXR	Ch 230C1	Corpus Christi, Texas
KBSO	Ch 234C3	Corpus Christi, Texas
* KLTG	Ch 243C1	Corpus Christi, Texas
KFTX	Ch 248C1	Kingsville, Texas
* KLHB	Ch 252C2	Odem, Texas
KRYS-FM	Ch 256C1	Corpus Christi, Texas
KSAB	Ch 260C1	Robstown, Texas
KKPN	Ch 272C2	Rockport, Texas
* KOUL	Ch 279C1	Refugio, Texas
KPUS	Ch 283C3	Gregory, Texas
* KMJR	Ch 288A	Portland, Texas
KJKE	Ch 297C3	Ingleside, Texas

Total FM Stations - 14

GRAND TOTAL OF STATIONS IN RADIO MARKET - 17

* Subject station.