

RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
KKCT/KACL/KBYZ RADIO STATIONS
BISMARCK, NORTH DAKOTA
March 2006

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC ("Cumulus"), licensee of KKCT, Channel 248C1, KACL, Channel 254C1, and KBYZ, Channel 243C1, Bismarck, North Dakota.¹ Cumulus is submitting a minor change application to correct data on the licenses of KKCT, KACL and KBYZ, as such a Radio Market Analysis is needed. Cumulus is also the licensee of KLXX, 1270 kHz, Bismarck-Mandan, North Dakota and is an applicant for a New FM at Hazelton, North Dakota.² KKCT, KACL, KBYZ, and KLXX are all licensed to communities within the Bismarck, North Dakota Arbitron/BIA Market (Market #285). The New FM station at Hazelton, North Dakota is not allotted/authorized to a community within a metro county in any Arbitron/BIA market, nor is it considered "home" to any rated market. The 3.16 mV/m city grade contours of the proposed KKCT, KACL and KBYZ overlap with the New FM contour, and all four FM stations have a common area of overlap with the 5.0 mV/m contour of KLXX. As such, a hybrid analysis for ownership needs to be conducted for stations both in and out of a rated market.

1) The class of KBZY was changed from Channel 243C to Channel 243C1 as a result of a correction of coordinates application, which also corrected the height of the station.

2) Cumulus is submitting applications to correct tower coordinates and height data for stations KKCT, KACL and KBYZ. Therefore, the corrected city grade contours for KKCT, KACL and KBYZ are shown, in lieu of the licensed contours.

ARBITRON/BIA MARKET REVIEW

2. As shown on Exhibit #1, there are sixteen AM and FM (commercial and non-commercial) stations listed in the Bismarck, North Dakota Arbitron Market. Cumulus would be in control of three FM stations and one AM station in the rated market (the New FM station at Hazelton is not designated home). 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, control of KKCT, KBYZ, KACL and KLXX in the Bismarck, North Dakota market is believed to be in compliance with the Commission's radio ownership rules for rated markets.

REVISED CONTOUR OVERLAP ANALYSIS

3. 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 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 radio market under study. A map of the subject stations is attached as Exhibit #2.

4. Exhibit #3 is a depiction of the AM and FM stations (commercial and non-commercial) providing service to the Radio Market. Exhibit #4 is a tabulation of the stations in the Radio Market, showing a total of seventeen, including the five subject stations.³ 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. As such, control of four FM stations and one AM station, based on the revised contour overlap method, is in compliance with the Commission's rules.

5. Based on the compliance of the radio ownership rules in both rated and non-rated markets, the individual applications for KKCT, KACL and KBYZ at Bismarck, North Dakota are in compliance with the Commission's rules.

6. 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 in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.0. BIA database. 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.

3) Non-commercial stations KBMK, Channel 202C3, Bismarck, North Dakota (BLED-20060127ARK); KNRI, Channel 209A, Bismarck, North Dakota (BLED-20060127ARN); and KVLQ, Channel 206A, Lincoln, North Dakota (BLED-20060127ARJ) are all operational in the Bismarck area and are considered contributing stations to the instant market.



FCC Geographic Market Definition for Bismarck, ND

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KACL	FM	98.7	C	Oldies	Bismarck, ND	07/02/2003	285	Cumulus Broadcasting Inc	Bismarck, ND	Burleigh
KBFR	FM	91.7	NC	Religion	Bismarck, ND	10/30/2003	285	Family Stations Inc	Bismarck, ND	Burleigh
KBMK	FM	88.3	NC	CP - NOA	Bismarck, ND	05/25/2005	285	Educational Media Foundation	Bismarck, ND	Burleigh
KBMR	AM	1130	C	Country	Bismarck, ND	07/02/2003	285	Clear Channel Communications	Bismarck, ND	Burleigh
KBYZ	FM	96.5	C	Clsc Rock	Bismarck, ND	07/02/2003	285	Cumulus Broadcasting Inc	Bismarck, ND	Burleigh
KCND	FM	90.5	NC	Variety	Bismarck, ND	07/02/2003	285	Prairie Public Broadcasting	Bismarck, ND	Burleigh
KFYR	AM	550	C	News/Talk	Bismarck, ND	07/02/2003	285	Clear Channel Communications	Bismarck, ND	Burleigh
KKCT	FM	97.5	C	Top 40	Bismarck, ND	07/02/2003	285	Cumulus Broadcasting Inc	Bismarck, ND	Burleigh
KLXX	AM	1270	C	Talk	Bismarck, ND	07/02/2003	285	Cumulus Broadcasting Inc	Bismarck-Mandan, ND	Burleigh
KNDR	FM	104.7	C	ChrsContem	Bismarck, ND	07/02/2003	285	Central Dakota Enterprises	Mandan, ND	Morton
KNRI	FM	89.7	NC	ChrsContem	Bismarck, ND		285	Educational Media Foundation	Bismarck, ND	Burleigh
KQDY	FM	94.5	C	Country	Bismarck, ND	07/02/2003	285	Clear Channel Communications	Bismarck, ND	Burleigh
KSSS	FM	101.5	C	Clsc Rock	Bismarck, ND	07/02/2003	285	Clear Channel Communications	Bismarck, ND	Burleigh
KVLQ	FM	89.1	NC	ChrsContem	Bismarck, ND		285	Educational Media Foundation	Lincoln, ND	Burleigh
KXMR	AM	710	C	News/Talk	Bismarck, ND	07/02/2003	285	Clear Channel Communications	Bismarck, ND	Burleigh
KYYY	FM	92.9	C	Hot AC	Bismarck, ND	07/02/2003	285	Clear Channel Communications	Bismarck, ND	Burleigh

Number of Stations in Geographic Market 16

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

"p" indicates pending sale to owner listed

Printed: 03/15/2006 Data: 03/15/2006

(c) BIA Financial Network, Inc.

EXHIBIT #1

Graham Brock, Inc. - Broadcast Technical Consultants

Hazelton APP
BNPH-20041217AXY
Latitude: 46-35-24 N
Longitude: 100-47-46 W
ERP: 100.00 kW
Channel: 277C1
Frequency: 103.3 MHz
AMSL Height: 873.0 m

KBYZ - Corrected
BLH-19850617KL
Latitude: 46-35-24 N
Longitude: 100-47-46 W
ERP: 100.00 kW
Channel: 243C1
Frequency: 96.5 MHz
AMSL Height: 873.3 m

KACL - Corrected
BLH-19971017KD
Latitude: 46-35-24 N
Longitude: 100-47-46 W
ERP: 100.00 kW
Channel: 254C1
Frequency: 98.7 MHz
AMSL Height: 834.9 m

KKCT - Corrected
BLH-19931105KB
Latitude: 46-35-24 N
Longitude: 100-47-46 W
ERP: 100.00 kW
Channel: 248C1
Frequency: 97.5 MHz
AMSL Height: 834.9 m

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

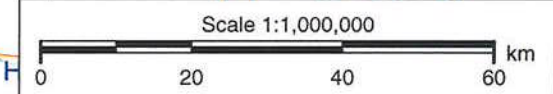
KLXX
KKCT - Corrected
KACL - Corrected
KBYZ - Corrected
Hazelton APP

HAZELTON/KBYZ 3.16 mV/m

KACL/KKCT 3.16 mV/m

KLXX 5.0 mV/m

EXHIBIT #2
RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
KBYZ/KACL/KKCT FM RADIO STATIONS
BISMARCK, NORTH DAKOTA
March 2006



Graham Brock, Inc. - Broadcast Technical Consultants

RADIO MARKET BOUNDARY

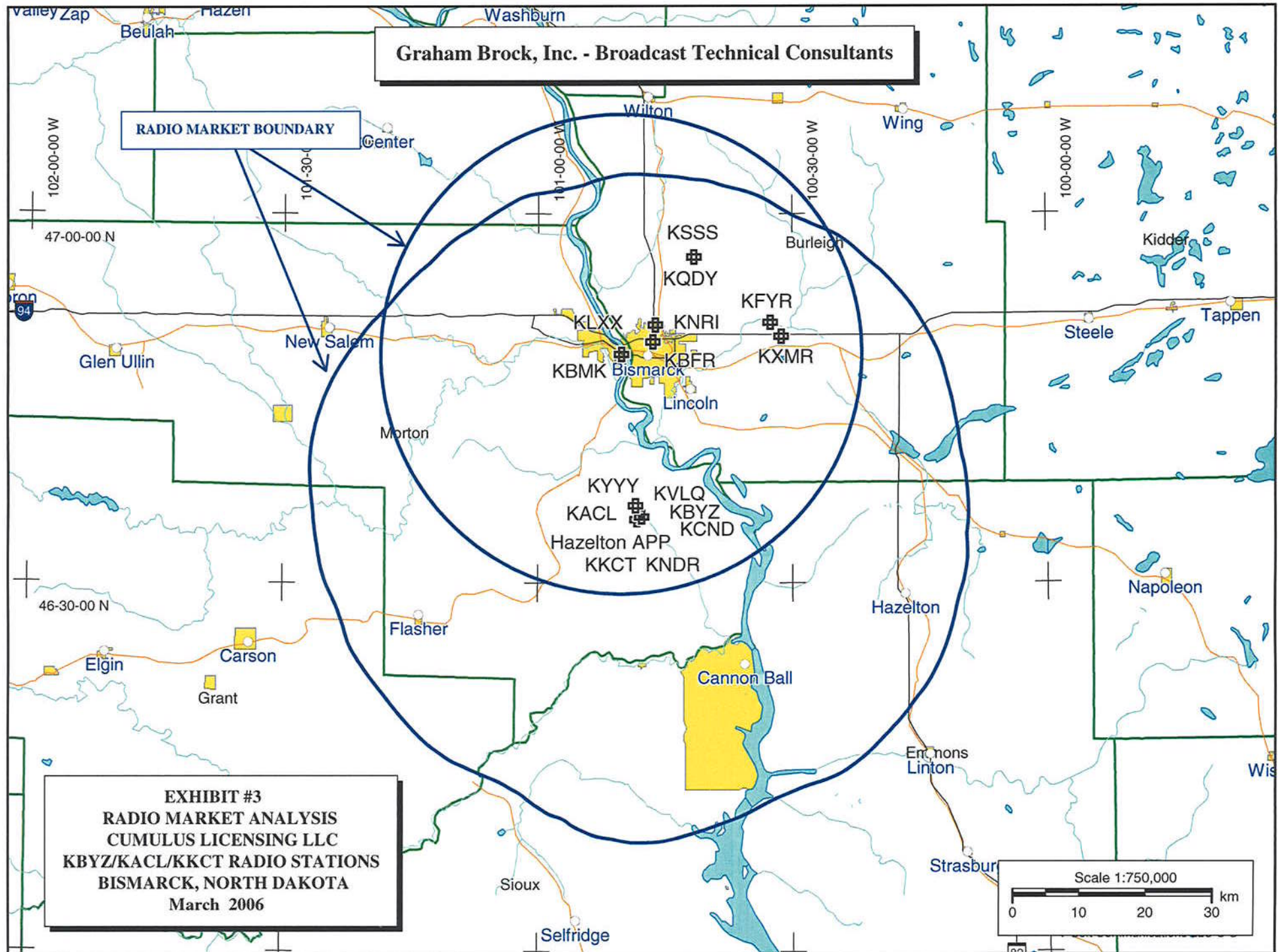


EXHIBIT #3
RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
KBYZ/KACL/KKCT RADIO STATIONS
BISMARCK, NORTH DAKOTA
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RADIO MARKET ANALYSIS
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KKCT/KACL/KBYZ RADIO STATIONS
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EXHIBIT #4

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 243C0	Bismarck, North Dakota
* KKCT	Ch 248C0	Bismarck, North Dakota
* KACL	Ch 254C0	Bismarck, North Dakota
KSSS	Ch 268C	Bismarck, North Dakota
* NEW	Ch 277C1	Hazleton, 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

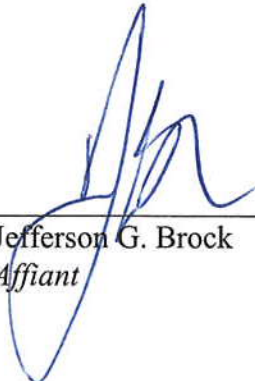
State of Georgia)
St. Simons Island) ss:
County of Glynn)

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 20th day of March 2006.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 20th day of March 2006*



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