

**RADIO MARKET ANALYSIS**  
**CUMULUS LICENSING LLC**  
**WDZZ-FM RADIO STATION**  
**FLINT, MICHIGAN**  
**August 2006**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC ("Cumulus"), licensee of WDZZ-FM, Channel 224A, Flint, Michigan. Cumulus is proposing to relocate WDZZ-FM and therefore, an updated Radio Ownership review is needed. Cumulus is also the licensee of WWCK, 1570 kHz, and WWCK-FM, Channel 288B1, Flint, Michigan and WRSR, Channel 280A, Owosso, Michigan. WDZZ-FM, WWCK and WWCK-FM are all licensed to a metro county in the Flint, Michigan Arbitron/BIA Market #12. WRSR is considered "home" to the Flint, Michigan market. As WDZZ-FM has city grade overlap with WRSR, a radio market analysis of a rated and non-rated (contour overlap) market is necessary.

**ARBITRON/BIA MARKET REVIEW**

2. As shown on Exhibit #1, there are 19 AM and FM (commercial and non-commercial) stations listed in the Flint, Michigan Arbitron market. Cumulus is in control of three FM stations and one AM station in the market. The number of stations indicated falls in the 15 to 29 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, this combination of stations is in compliance with the rules for stations in the rated Flint, Michigan Arbitron market.

## REVISED CONTOUR OVERLAP ANALYSIS

3. Since WDZZ-FM, as proposed and licensed, overlaps with the licensed contour of WRSR, a revised contour overlap study has been conducted to verify that the relocation of WDZZ-FM is in compliance with the Commission's multiple ownership rules. The city grade contours of WDZZ-FM, WRSR, WWCK-FM and WWCK all overlap, as shown on Exhibit #2. The contours of these four stations, therefore, define the Radio Market Boundary for analysis. 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 is considered as a market contributor, unless it is a subject station in the pertinent radio market under study.

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; ten stations are shown, including the four subject stations.<sup>1</sup> The number of stations depicted falls in the fourteen or fewer stations tier of 73.3555(a)(1)(iv) of the Commission's rules. At this level, common ownership or control of up to five stations, with no more than three in the same service, is permissible, provided the number of stations to be commonly held does not exceed 50% of the stations in the market. Based on this number of facilities, it has been herein demonstrated that common ownership of WDZZ-FM, WRSR, WWCK-FM and WWCK is in compliance with the Commission's rules for non-rated markets.

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1) While there many are other stations contributing service to the market, they are not considered since there are sufficient stations based on the number of facilities to commonly held.

5. Based on the individual compliance shown in both rated and non-rated markets, the proposed relocation of WDZZ-FM is in compliance with the Commission's rules.

6. The foregoing technical statement was prepared on behalf of Cumulus Licensing LLC 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 in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.0. BIA database. Technical data related to AM and FM facilities was extracted from the Commissions CDBS database. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.



## FCC Geographic Market Definition for Flint, MI

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WAKL	FM	88.9	NC	ChrsContem	Flint, MI	07/02/2003	125	Educational Media Foundation	Flint, MI	Genesee
WCRZ	FM	107.9	C	AC	Flint, MI	07/02/2003	125	Regent Communications, Inc	Flint, MI	Genesee
WCXI	AM	1160	C	Country	Flint, MI	07/02/2003	125	Birach Broadcasting Corporation	Fenton, MI	Genesee
WDZZ	FM	92.7	C	Urban AC	Flint, MI	07/02/2003	125	Cumulus Broadcasting Inc	Flint, MI	Genesee
WFBE	FM	95.1	C	Country	Flint, MI	07/02/2003	125	Citadel Communications	Flint, MI	Genesee
WFLT	AM	1420	C	Gospel	Flint, MI	07/02/2003	125	Christian Evangelical	Flint, MI	Genesee
WFNT	AM	1470	C	Adlt Stndrd	Flint, MI	07/02/2003	125	Regent Communications, Inc	Flint, MI	Genesee
WFUM	FM	91.1	NC	Nws/Tlk/Inf	Flint, MI	07/02/2003	125	University of Michigan	Flint, MI	Genesee
WLSP	AM	1530	C	Adlt Stndrd	Flint, MI	07/02/2003	125	Regent Communications, Inc	Lapeer, MI	Lapeer
WOWE	FM	98.9	C	R&B Oldies	Flint, MI	07/02/2003	125	Shumpert, Michael	Vassar, MI	Tuscola
WQUS	FM	103.1	C	Rock	Flint, MI	07/02/2003	125	Regent Communications, Inc	Lapeer, MI	Lapeer
WRCL	FM	93.7	C	AC	Flint, MI	07/02/2003	125	Regent Communications, Inc	Frankenmuth, MI	Saginaw
WRSR	FM	103.9	C	Clsc Rock	Flint, MI	07/02/2003	125	Cumulus Broadcasting Inc	Owosso, MI	Shiawassee
WSNL	AM	600	C	ChrsContem	Flint, MI	07/02/2003	125	Christian Broadcasting System Ltd	Flint, MI	Genesee
WTAC	FM	89.7	NC	ChrsContem	Flint, MI	07/02/2003	125	Superior Communications	Burton, MI	Genesee
WTRX	AM	1330	C	Sprts/Talk	Flint, MI	07/02/2003	125	Citadel Communications	Flint, MI	Genesee
WWBN	FM	101.5	C	AOR/CIRck	Flint, MI	07/02/2003	125	Regent Communications, Inc	Tuscola, MI	Tuscola
WWCK	AM	1570	C	Talk	Flint, MI	07/02/2003	125	Cumulus Broadcasting Inc	Flint, MI	Genesee
WWCK	FM	105.5	C	Top 40	Flint, MI	07/02/2003	125	Cumulus Broadcasting Inc	Flint, MI	Genesee

Number of Stations in Geographic Market 19

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

"p" indicates pending sale to owner listed

Printed: 08/08/2006 Data: 05/18/2006

(c) BIA Financial Network, Inc.

**EXHIBIT #1**  
**RADIO MARKET ANALYSIS**  
**CUMULUS LICENSING LLC**  
**WDZZ-FM RADIO STATION**  
**FLINT, MICHIGAN**  
**August 2006**

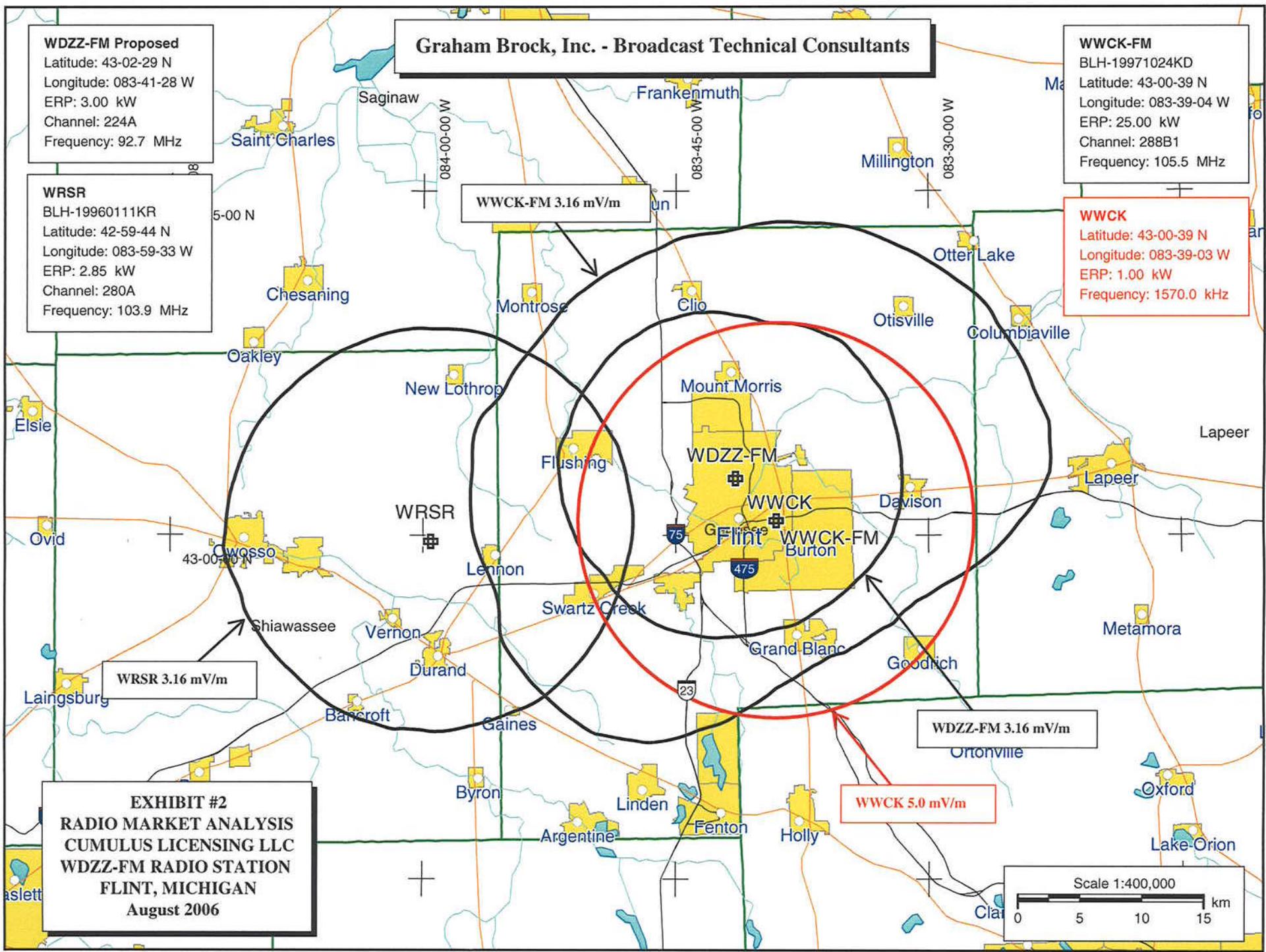
**Graham Brock, Inc. - Broadcast Technical Consultants**

**WDZZ-FM Proposed**  
 Latitude: 43-02-29 N  
 Longitude: 083-41-28 W  
 ERP: 3.00 kW  
 Channel: 224A  
 Frequency: 92.7 MHz

**WRSR**  
 BLH-19960111KR  
 Latitude: 42-59-44 N  
 Longitude: 083-59-33 W  
 ERP: 2.85 kW  
 Channel: 280A  
 Frequency: 103.9 MHz

**WWCK-FM**  
 BLH-19971024KD  
 Latitude: 43-00-39 N  
 Longitude: 083-39-04 W  
 ERP: 25.00 kW  
 Channel: 288B1  
 Frequency: 105.5 MHz

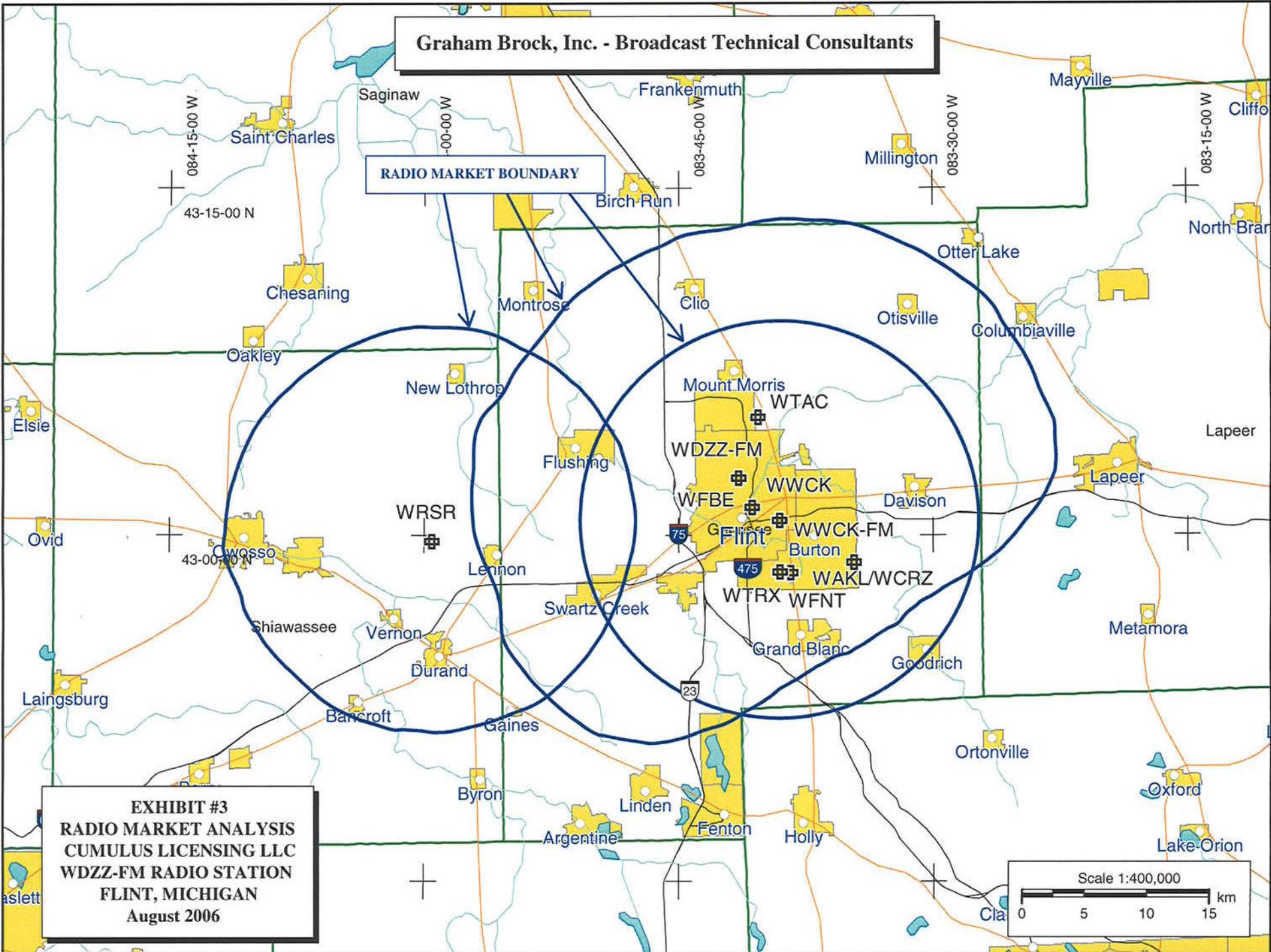
**WWCK**  
 Latitude: 43-00-39 N  
 Longitude: 083-39-03 W  
 ERP: 1.00 kW  
 Frequency: 1570.0 kHz



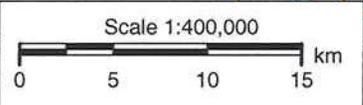
**EXHIBIT #2**  
**RADIO MARKET ANALYSIS**  
**CUMULUS LICENSING LLC**  
**WDZZ-FM RADIO STATION**  
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**Graham Brock, Inc. - Broadcast Technical Consultants**

**RADIO MARKET BOUNDARY**



**EXHIBIT #3**  
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**EXHIBIT #4**

**Tabulation of Stations in Radio Market**

**AM Stations**

WTRX	1330 kHz	Flint, Michigan
WFNT	1470 kHz	Flint, Michigan
* WWCK	1570 kHz	Flint, Michigan

Total AM Stations - 3

**FM Stations**

WAKL	Ch 205A	Flint, Michigan
WTAC	Ch 209A	Flint, Michigan
* WDZZ-FM	Ch 224A	Flint, Michigan
WFBE	Ch 236B	Flint, Michigan
* WRSR	Ch 280A	Owosso, Michigan
* WWCK-FM	Ch 288B1	Flint, Michigan
WCRZ	Ch 300B	Flint, Michigan

Total FM Stations - 7

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 10**

\* Subject station.

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

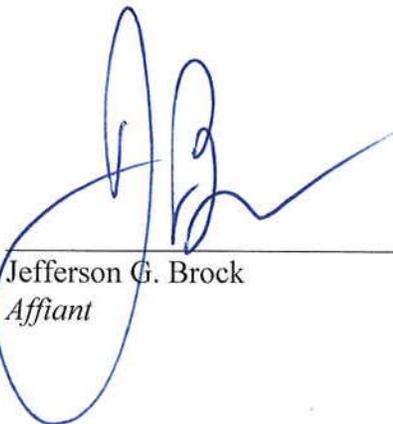
*State of Georgia )*  
*St. Simons Island ) ss:*  
*County of Glynn )*

**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 10<sup>th</sup> day of August 2006.*

  
\_\_\_\_\_  
Jefferson G. Brock  
*Affiant*

*Sworn to and subscribed before me  
this the 10<sup>th</sup> day of August 2006*

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