

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CLEAR CHANNEL BROADCASTING LICENSES, INC.

This statement and the attached figures were prepared on behalf of Clear Channel Broadcasting Licenses, Inc. ("CCBL"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CCBL proposes to modify the facilities of KEFM(FM), Omaha, NE. 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
KFAB	26931	AM	Omaha	Sarpy	NE	Omaha-Council Bluffs, NE-IA	Omaha-Council Bluffs, NE-IA
KHUS	163	FM	Bennington	Douglas	NE	Omaha-Council Bluffs, NE-IA	Omaha-Council Bluffs, NE-IA
KGOR	26928	FM	Omaha	Sarpy	NE	Omaha-Council Bluffs, NE-IA	Omaha-Council Bluffs, NE-IA
KZKX	53143	FM	Seward	Seward	NE	Non-metro	Lincoln, NE
KLMY	57287	FM	Lincoln	Lancaster	NE	Lincoln, NE	Lincoln, NE
KXKT	69686	FM	Glenwood	Cass	IA	Non-metro	Omaha-Council Bluffs, NE-IA
KEFM	71411	FM	Omaha	Sarpy	NE	Omaha-Council Bluffs, NE-IA	Omaha-Council Bluffs, NE-IA

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.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 KEFM(FM) as proposed, or which is located in the same Arbitron Metro⁴ as KEFM(FM). The community of license of KEFM(FM) is located within the Omaha-Council Bluffs, NE-IA Arbitron Metro, and KEFM(FM) is reported by BIA as being "Home" to that Metro. 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 or are reported as home to the nearby Lincoln, NE Arbitron Metro market, and 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 outside any Arbitron Metro market.

Arbitron Market Study

KEFM(FM) is reported by BIA as being "Home" to the Omaha-Council Bluffs, NE-IA Arbitron Metro. 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
Omaha-Council Bluffs, NE-IA Arbitron Metro⁵

Count	Calls	Fac ID	Band	Owner	Status ⁶	Community	County
1	KVSS	50311	FM	Catholic Communications Inc	b	Omaha	Douglas
2	KEFM	71411	FM	Clear Channel Communications	b	Omaha	Sarpy
3	KFAB	26931	AM	Clear Channel Communications	b	Omaha	Sarpy
4	KGOR	26928	FM	Clear Channel Communications	b	Omaha	Sarpy
5	KHUS	163	FM	Clear Channel Communications	b	Bennington	Douglas
6	KXKT	69686	FM	Clear Channel Communications	a	Glenwood	Cass
7	KDCV	15376	FM	Dana College	b	Blair	Washington
8	KIOS	17416	FM	Douglas County School District 001	b	Omaha	Douglas
9	KMLV	85846	FM	Educational Media Foundation	b	Ralston	Douglas
10	KIWR	29126	FM	Iowa Western Community College	b	Council Bluffs	Pottawattamie
11	KBBX	47957	FM	Journal Communications Inc.	a	Nebraska City	Otoe
12	KEZO	74105	FM	Journal Communications Inc.	b	Omaha	Sarpy
13	KKCD	74103	FM	Journal Communications Inc.	b	Omaha	Sarpy
14	KOMJ	74104	AM	Journal Communications Inc.	b	Omaha	Sarpy

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.

15	KQCH	50314	FM	Journal Communications Inc.	b	Omaha	Douglas
16	KSRZ	50308	FM	Journal Communications Inc.	b	Omaha	Sarpy
17	KXSP	50313	AM	Journal Communications Inc.	b	Omaha	Sarpy
18	KBLR	87840	FM	NRG Media LLC	b	Blair	Washington
19	KCTY	52801	FM	NRG Media LLC	a	Plattsmouth	Cass
20	KKAR	542	AM	NRG Media LLC	b	Omaha	Sarpy
21	KLTO	35067	FM	NRG Media LLC	a	Lincoln	Lancaster
22	KOIL	52802	AM	NRG Media LLC	a	Plattsmouth	Cass
23	KOZN	87182	AM	NRG Media LLC	b	Bellevue	Sarpy
24	KQKQ	43238	FM	NRG Media LLC	b	Council Bluffs	Pottawattamie
25	KYDZ	43237	AM	NRG Media LLC	b	Bellevue	Sarpy
26	KCRO	54902	AM	Salem Communications Corporation	b	Omaha	Sarpy
27	KGBI	24713	FM	Salem Communications Corporation	b	Omaha	Sarpy
28	KHLP	50307	AM	Salem Communications Corporation	b	Omaha	Sarpy
29	KVNO	69395	FM	University of Nebraska	b	Omaha	Douglas
30	KLNG	72464	AM	Wilkins Communications Network Inc	b	Council Bluffs	Pottawattamie

Interim Contour-Overlap Analysis

Because the proposed principal community contour of the station 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 two "radio market(s)" for interim contour-overlap analysis under the Commission's rules.

The "radio market" is defined by the mutually overlapping principal community contours of:

Market 1	Market 2
1- AM 4- FM	1- AM 5- FM
KEFM-md	KEFM-md
KFAB	KFAB
KGOR	KGOR
KHUS	KXKT
KXKT	KLMY
	KZKX

The predicted principal community contours of these stations as well as other stations whose principal community contours overlap this combination, are shown in *Figure 2*. *Figure 3 and Figure 4* is the tabulation of some of the FM 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 45 radio stations, including the subject co-owned stations, which overlap or intersect with the defined "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 5 degrees of azimuth.

Conclusions

In the Arbitron Metro Market studied herein, there are at least 30 radio stations, including the subject commonly-owned 1-AM / 4-FM stations, which are home to the Omaha-Council Bluffs, NE-IA Metro. This proposal does not affect the existing number of commonly-owned stations in the subject Arbitron Metro.

In the interim contour-overlap "radio market(s)" studied herein, there are at least 45 stations, including the commonly-owned 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 1 - Market Overview

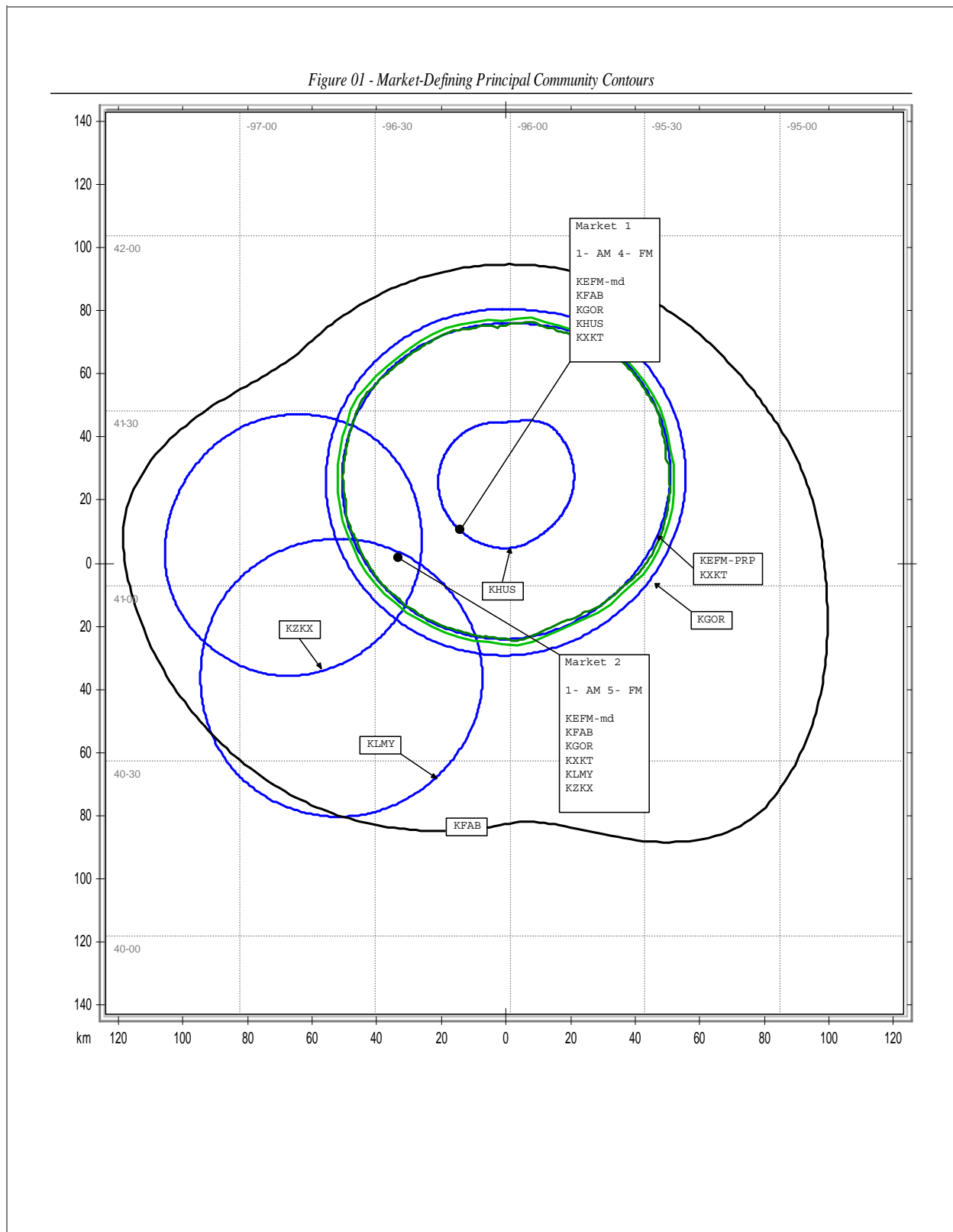


Figure 2 - Interim Contour Method Station Count

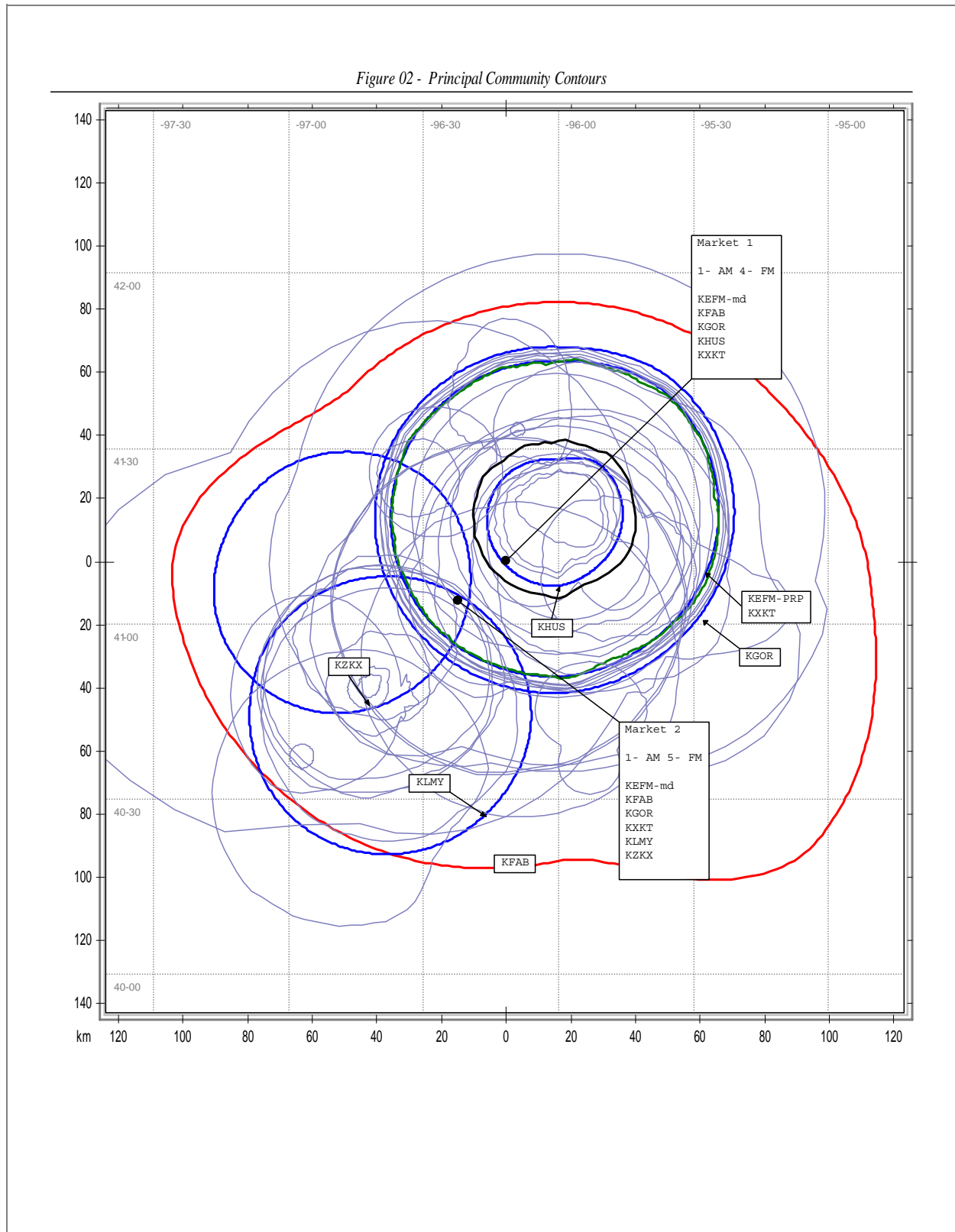


Figure 3 - Table of Selected FM Stations in Market 1
Market 1

Count	Call Sign	Facility_id	Licensee	Dist_km
1	KNCY	63941	ARBOR DAY BROADCASTING, INC.	61.74
2	KFAB	26931	CAPSTAR TX LIMITED PARTNERSHIP	17.72
3	KHUS	163	CAPSTAR TX LIMITED PARTNERSHIP	20.14
4	KGOR	26928	CAPSTAR TX LIMITED PARTNERSHIP	20.51
5	KXKT	69686	CAPSTAR TX LIMITED PARTNERSHIP	20.73
6	KEFM-md	71411	CLEAR CHANNEL BROADCASTING LICENSES, INC.	20.62
7	KDCV-FM	15376	DANA COLLEGE	41.82
8	KDNE	17043	DOANE COLLEGE BOARD OF TRUSTEES	88.47
9	KIOS-FM	17416	DOUGLAS COUNTY SCHOOL DISTRICT 001	21.14
10	KMLV	85846	EDUCATIONAL MEDIA FOUNDATION	20.73
11	KCRO	54902	ETERNAL BROADCASTING, LLC	21.89
12	KIWR	29126	IOWA WESTERN COMMUNITY COLLEGE	20.73
13	KSRZ	50308	JOURNAL BROADCAST CORPORATION	20.14
14	KKCD	74103	JOURNAL BROADCAST CORPORATION	20.14
15	KQCH	50314	JOURNAL BROADCAST CORPORATION	20.14
16	KOMJ	74104	JOURNAL BROADCAST CORPORATION	20.58
17	KEZO-FM	74105	JOURNAL BROADCAST CORPORATION	20.73
18	KKCD	74103	JOURNAL BROADCAST CORPORATION	20.77
19	KXSP	50313	JOURNAL BROADCAST CORPORATION	22.91
20	KHLP	50307	JOURNAL BROADCAST CORPORATION	24.41
21	KBBX-FM	47957	JOURNAL BROADCAST CORPORATION	31.87
22	KLIN	35064	MONTEREY LICENSES, LLC	54.16
23	KKUL	58730	MONTEREY LICENSES, LLC	55.35
24	KBBK	35063	MONTEREY LICENSES, LLC	60.96
25	KUCV	47966	NEBRASKA EDUCATIONAL TELECOMMUNICATIONS COMM.	87.49
26	KGBI-FM	24713	PENNSYLVANIA MEDIA ASSOCIATES, INC.	13.78
27	KZUM	63955	SUNRISE COMMUNICATIONS, INC.	58.81
28	KVNO	69395	THE BOARD OF REGENTS OF UNIV. OF NEBRASKA	20.4
29	KRKR	54707	THREE EAGLES OF LINCOLN, INC.	47.13
30	KLMS	54708	THREE EAGLES OF LINCOLN, INC.	53.16
31	KFOR	34436	THREE EAGLES OF LINCOLN, INC.	55.35
32	KFRX	34435	THREE EAGLES OF LINCOLN, INC.	55.35
33	KRNU	69268	UNIVERSITY OF NEBRASKA	58.08
34	KVSS	50311	VSS CATHOLIC COMMUNICATIONS, INC.	21.89
35	KLTQ	35067	WAITT OMAHA, LLC	14.06
36	KKAR	542	WAITT OMAHA, LLC	16.24
37	KOZN	87182	WAITT OMAHA, LLC	16.29
38	KQKQ-FM	43238	WAITT OMAHA, LLC	20.4
39	KYDZ	43237	WAITT OMAHA, LLC	36.12
40	KCTY-FM	52801	WAITT OMAHA, LLC	36.76
41	KOIL	52802	WAITT OMAHA, LLC	42.02
42	KBLR-FM	87840	WAITT OMAHA, LLC	51.36
43	KHUB	34550	WAITT RADIO, INC.	35.59
44	KFMT-FM	34549	WAITT RADIO, INC.	38.12
45	KLNG	72464	WILKINS COMMUNICATIONS NETWORK, INC.	24.75

Figure 4 - Table of Selected FM Stations in Market 2

Market 2				
Count	Call Sign	Facility_id	Licensee	Dist_km
1	KNCY	63941	ARBOR DAY BROADCASTING, INC.	59.83
2	KFAB	26931	CAPSTAR TX LIMITED PARTNERSHIP	31.09
3	KGOR	26928	CAPSTAR TX LIMITED PARTNERSHIP	38.79
4	KZKX	53143	CAPSTAR TX LIMITED PARTNERSHIP	39.78
5	KLMY	57287	CAPSTAR TX LIMITED PARTNERSHIP	43.44
6	KXKT	69686	CAPSTAR TX LIMITED PARTNERSHIP	39
7	KEFM-md	71411	CLEAR CHANNEL BROADCASTING LICENSES, INC.	38.9
8	KDCV-FM	15376	DANA COLLEGE	56.27
9	KDNE	17043	DOANE COLLEGE BOARD OF TRUSTEES	70.2
10	KIOS-FM	17416	DOUGLAS COUNTY SCHOOL DISTRICT 001	39.44
11	KMLV	85846	EDUCATIONAL MEDIA FOUNDATION	39
12	KCRO	54902	ETERNAL BROADCASTING, LLC	40.2
13	KIWR	29126	IOWA WESTERN COMMUNITY COLLEGE	39
14	KOMJ	74104	JOURNAL BROADCAST CORPORATION	38.22
15	KXSP	50313	JOURNAL BROADCAST CORPORATION	41.23
16	KHLP	50307	JOURNAL BROADCAST CORPORATION	40.92
17	KBBX-FM	47957	JOURNAL BROADCAST CORPORATION	26.76
18	KSRZ	50308	JOURNAL BROADCAST CORPORATION	38.43
19	KEZO-FM	74105	JOURNAL BROADCAST CORPORATION	39
20	KKCD	74103	JOURNAL BROADCAST CORPORATION	38.43
21	KQCH	50314	JOURNAL BROADCAST CORPORATION	38.43
22	KKCD	74103	JOURNAL BROADCAST CORPORATION	37.55
23	KLIN	35064	MONTEREY LICENSES, LLC	35.86
24	KBBK	35063	MONTEREY LICENSES, LLC	43.51
25	KKUL	58730	MONTEREY LICENSES, LLC	37.16
26	KUCV	47966	NEBRASKA EDUCATIONAL TELECOMMUNICATIONS COMM.	70.12
27	KGBI-FM	24713	PENNSYLVANIA MEDIA ASSOCIATES, INC.	14.67
28	KZUM	63955	SUNRISE COMMUNICATIONS, INC.	40.52
29	KVNO	69395	THE BOARD OF REGENTS OF UNIV. OF NEBRASKA	38.69
30	KFOR	34436	THREE EAGLES OF LINCOLN, INC.	37.16
31	KLMS	54708	THREE EAGLES OF LINCOLN, INC.	35.5
32	KFRX	34435	THREE EAGLES OF LINCOLN, INC.	37.16
33	KRKR	54707	THREE EAGLES OF LINCOLN, INC.	29.51
34	KRNU	69268	UNIVERSITY OF NEBRASKA	39.79
35	KVSS	50311	VSS CATHOLIC COMMUNICATIONS, INC.	40.2
36	KOZN	87182	WAITT OMAHA, LLC	33.02
37	KKAR	542	WAITT OMAHA, LLC	32.96
38	KOIL	52802	WAITT OMAHA, LLC	54.92
39	KYDZ	43237	WAITT OMAHA, LLC	53.46
40	KBLR-FM	87840	WAITT OMAHA, LLC	64.48
41	KQKQ-FM	43238	WAITT OMAHA, LLC	38.69
42	KLTQ	35067	WAITT OMAHA, LLC	14.76
43	KCTY-FM	52801	WAITT OMAHA, LLC	51.61
44	KHUB	34550	WAITT RADIO, INC.	40.88
45	KFMT-FM	34549	WAITT RADIO, INC.	40.26
46	KLNG	72464	WILKINS COMMUNICATIONS NETWORK, INC.	41.46