

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"). CCBL proposes the acquisition of WDLC(AM) and WTSX-FM. A multiple ownership analysis was prepared considering the following radio stations under present or proposed common ownership or time brokerage:

Call Sign	City of License	Facilities
WDLC(AM)	Port Jervis, NJ	1490 kHz, 1 kW, U, ND1
WTSX(FM)	Port Jervis, NJ	Channel 244A, 0.65 kW, 50 m
WNNJ-FM	Newton, NJ	Channel 279B1, 2.3 kW, 272 m

Since certain of these stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations), an ownership study has been prepared in accordance with the Federal Communications Commission multiple ownership rules.<sup>1</sup>

Clear Channel does not have or currently propose to have an attributable interest in any other radio station with a principal community coverage contour that overlaps or intersects the principal community coverage contour of WDLC(AM) or WTSX(FM).

Radio Markets

The "radio market" applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the commonly owned stations. The predicted principal contours of WDLC(AM), WTSX(FM) and WNNJ-FM are shown in Figure 1 herein. There is one "radio market" for analysis under the Commission's Rules.

Market 1 is defined by the principal community contours of WDLC(AM), WTSX(FM) and WNNJ-FM.

Count of Stations in Defined Markets

The number of radio stations in the "radio market" is determined by counting the operating, commercial stations having principal community contours which overlap or intersect the principal community contours which define the radio market, plus the subject co-owned stations.

In Market 1, there are 7 radio stations (3 AM and 4 FM), including the subject co-owned stations, that intersect or overlap the "radio market."

Figure 2 is the tabulation of the other radio stations identified in each of the defined radio market. Only known licensed, operation commercial stations were employed for the study.

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<sup>1</sup> See Section 73.3555 of the FCC Rules.

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 CFR 73.184. Ground conductivities were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR 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 10 degrees of azimuth.

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

A handwritten signature in black ink, appearing to read "Robert M. Gates, Jr.", written in a cursive style.

Robert M. Gates, Jr., E.I.T  
August 22, 2001  
(703) 250-3496

FIGURE 1

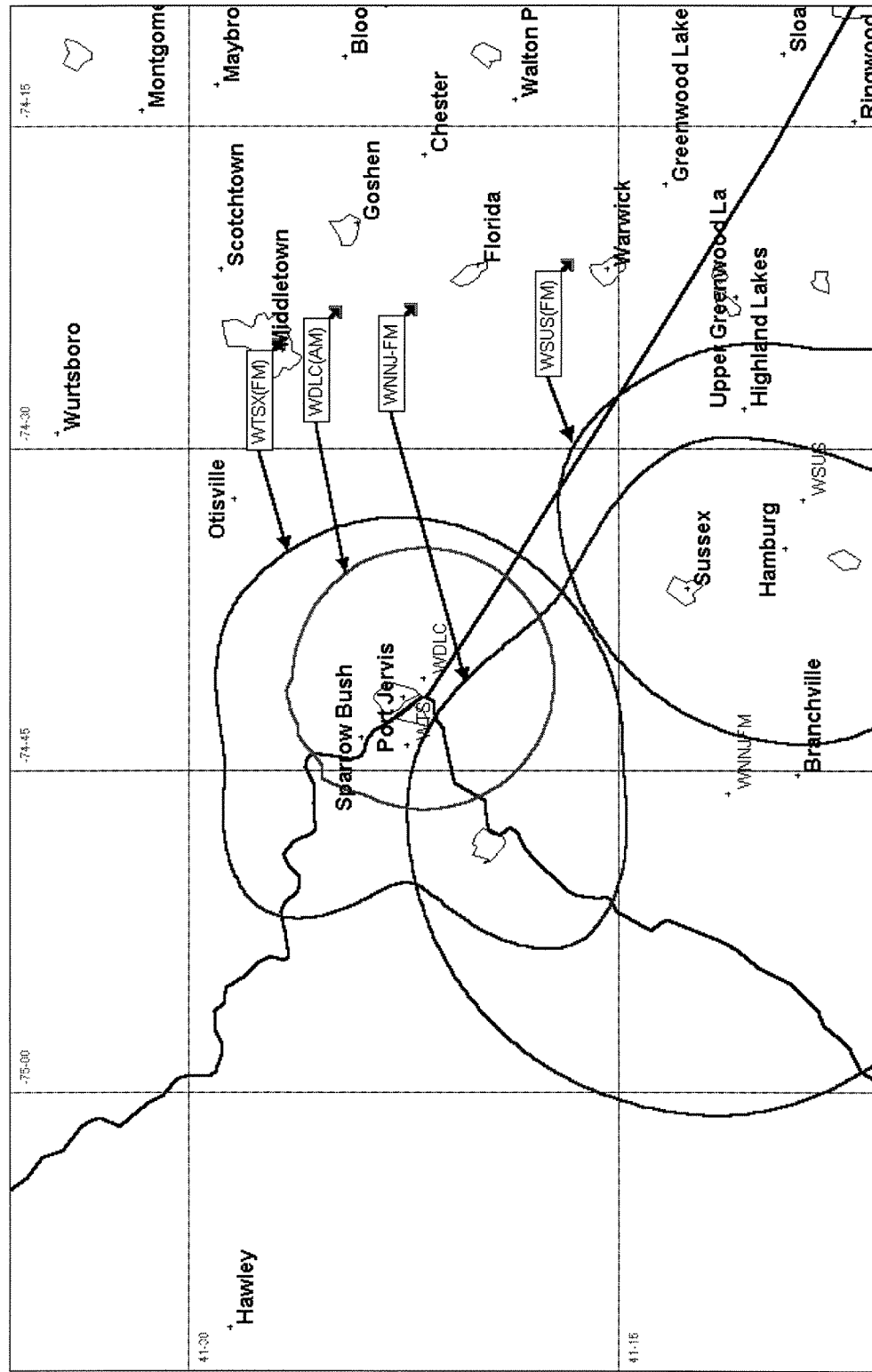


Figure 2

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Tabulation of AM Stations in Defined Radio Market 1

<u>COUNT</u>	<u>STATION</u>	<u>FREQUENCY</u>	<u>CITY</u>	<u>STATE</u>
1	WABC	770	NEW YORK	NY
2	WDLC	1490	PORT JERVIS	NY
3	WNNJ	1360	NEWTON	NJ

Tabulation of FM Stations in Defined Radio Market 1

<u>COUNT</u>	<u>STATION</u>	<u>FREQUENCY</u>	<u>CITY</u>	<u>STATE</u>
1	WTSX	96.7	Port Jervis	NY
2	WNNJ-FM	103.7	NEWTON	NJ
3	WHCY	106.3	BLAIRSTOWN	NJ
4	WSUS	102.3	FRANKLIN	NJ