

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CAPSTAR TX LIMITED PARTNERSHIP

This statement and the attached figures were prepared on behalf of Capstar TX Limited Partnership (“Capstar”). Capstar proposes to modify the facility of KVET-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
WOAI(AM)	San Antonio, TX	1200 kHz, 50 kW, U, ND1
KVET(AM)	Austin, TX	1300 kHz, 5 kW, U, DA2
KPEZ(FM)	Austin, TX	Channel 272C2, 26 kW, 209 m
KVET-FM(PROPOSED)	Austin, TX	Channel 251C1, 49.8 kW, 397 m
KASE-FM	Austin, TX	Channel 264C, 100 kW, 363 m
KHFI-FM	Georgetown, TX	Channel 244C1, 100 kW, 290 m
KFMK(FM)	Round Rock, TX	Channel 290C2, 4.5 kW, 397 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.¹

There are no other principal community coverage contours controlled or proposed to be controlled by Capstar that overlap or intersect the stations proposed to be owned.

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 WOAI(AM), KVET(AM), KVET-FM(PROPOSED), KPEZ(FM), KASE-FM, KHFI-FM and KFMK(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 WOAI(AM), KVET(AM), KVET-FM(PROPOSED), KPEZ(FM), KASE-FM, KHFI-FM and KFMK(FM).

Count of Stations in Defined Markets

The number of radio stations in each “radio market” is determined by counting the operating, commercial stations having principal community contours which overlap or

¹ See Section 73.3555 of the FCC Rules.

intersect the principal community contours which define the radio market, plus the subject co-owned stations.

In Market 1, there are 81 radio stations (39 AM and 42 FM), including the subject co-owned stations, that intersect or overlap the "radio market."

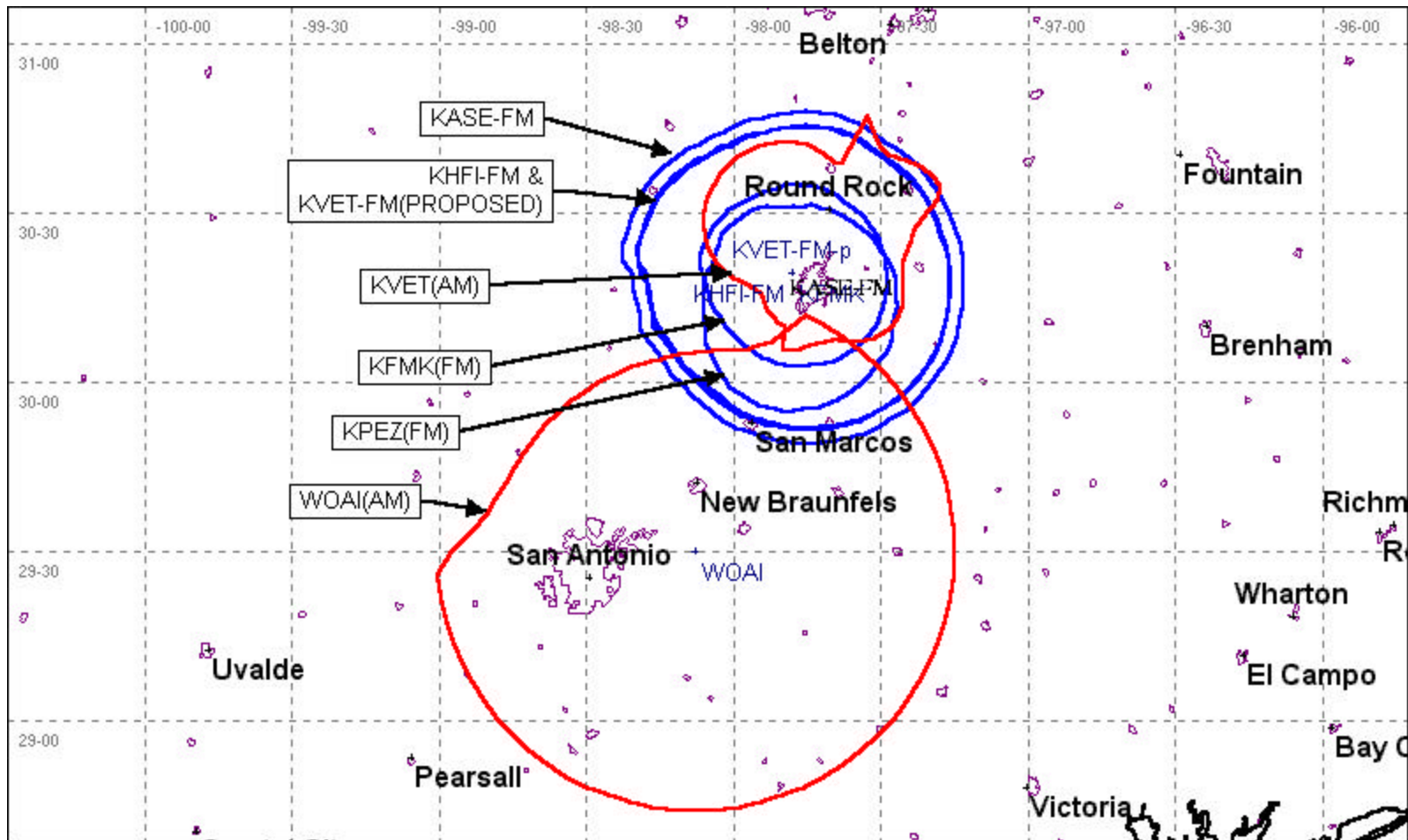
Figure 2 is the tabulation of the other radio stations identified in each of the defined radio market. Only known licensed, operation commercial stations were employed for the study. Distances to contours for AM stations were predicted using the antenna patterns as identified in the Commission's AM database 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 ever 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.



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FIGURE 1
 PRINCIPAL COMMUNITY COVERAGE CONTOURS
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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	KAML	990	KENEDY-KARNES CITY	TX
2	KBIB	1000	MARION	TX
3	KBRN	1500	BOERNE	TX
4	KCHL	1480	SAN ANTONIO	TX
5	KCOR	1350	SAN ANTONIO	TX
6	KCTI	1450	GONZALES	TX
7	KCWM	1460	HONDO	TX
8	KDRY	1100	ALAMO HEIGHTS	TX
9	KEDA	1540	SAN ANTONIO	TX
10	KELG	1440	MANOR	TX
11	KENS	1160	SAN ANTONIO	TX
12	KFIT	1060	LOCKHART	TX
13	KFNI	1380	PLEASANTON	TX
14	KFON	1490	AUSTIN	TX
15	KGNB	1420	NEW BRAUNFELS	TX
16	KHLB	1340	BURNET	TX
17	KIXL	970	DEL VALLE	TX
18	KJCE	1370	ROLLINGWOOD	TX
19	KKYX	680	SAN ANTONIO	TX
20	KLBJ	590	AUSTIN	TX
21	KLUP	930	TERRELL HILLS	TX
22	KOKE	1600	PFLUGERVILLE	TX
23	KONO	860	SAN ANTONIO	TX
24	KQQA	1530	CREEDMOOR	TX
25	KSAH	720	UNIVERSAL CITY	TX
26	KSJL	810	SOMERSET	TX
27	KSLR	630	SAN ANTONIO	TX
28	KTAE	1260	TAYLOR	TX
29	KTEM	1400	TEMPLE	TX
30	KTKR	760	SAN ANTONIO	TX
31	KTMR	1130	EDNA	TX
32	KTSA	550	SAN ANTONIO	TX
33	KTXZ	1560	WEST LAKE HILLS	TX
34	KUOL	1470	SAN MARCOS	TX
35	KVET	1300	AUSTIN	TX
36	KWED	1580	SEGUIN	TX
37	KXTN	1310	SAN ANTONIO	TX
38	KZDC	1250	SAN ANTONIO	TX
39	WOAI	1200	SAN ANTONIO	TX

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	KAJA	97.3	SAN ANTONIO	TX
2	KAMX	94.7	LULING	TX
3	KASE-FM	100.7	AUSTIN	TX
4	KBBT	98.5	SCHERTZ	TX
5	KBUC	95.7	JOURDANTON	TX
6	KCJZ	106.7	TERRELL HILLS	TX
7	KCOR-FM	95.1	COMFORT	TX
8	KCY Y	100.3	SAN ANTONIO	TX
9	KEMA	94.5	THREE RIVERS	TX
10	KEYI-FM	103.5	SAN MARCOS	TX
11	KFAN-FM	107.9	JOHNSON CITY	TX
12	KFMK	105.9	ROUND ROCK	TX
13	KGSR	107.1	BASTROP	TX
14	KHFI-FM	96.7	GEORGETOWN	TX
15	KHHL	98.9	LEANDER	TX
16	KISS-FM	99.5	SAN ANTONIO	TX
17	KKLB	92.7	ELGIN	TX
18	KKMJ-FM	95.5	AUSTIN	TX
19	KLBJ-FM	93.7	AUSTIN	TX
20	KLEY-FM	94.1	FLORESVILLE	TX
21	KLNC	93.3	CEDAR PARK	TX
22	KNBT	92.1	NEW BRAUNFELS	TX
23	KONO-FM	101.1	HELOTES	TX
24	KPEZ	102.3	AUSTIN	TX
25	KQBT	104.3	TAYLOR	TX
26	KQQQ-FM	92.1	HUTTO	TX
27	KQQT	106.3	GONZALES	TX
28	KQXT-FM	101.9	SAN ANTONIO	TX
29	KROM	92.9	SAN ANTONIO	TX
30	KROX-FM	101.5	BUDA	TX
31	KSMG	105.3	SEGUIN	TX
32	KTFM	102.7	SAN ANTONIO	TX
33	KTND	107.7	GEORGETOWN	TX
34	KTNR	92.1	KENEDY	TX
35	KUSJ	105.5	HARKER HEIGHTS	TX
36	KVCQ	97.7	CUERO	TX
37	KVET-FM	98.1	AUSTIN	TX
38	KXTN-FM	107.5	SAN ANTONIO	TX
39	KXXM	96.1	SAN ANTONIO	TX
40	KXXS	104.9	MARBLE FALLS	TX
41	KYKM	92.5	YOAKUM	TX
42	KZEP-FM	104.5	SAN ANTONIO	TX