

RADIO MARKET ANALYSIS
KRBE RADIO STATION
HOUSTON, TEXAS
KIOL RADIO STATION
LA PORTE, TEXAS
KFNC RADIO STATION
BEAUMONT, TEXAS
November 2005

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared in conjunction with an assignment and a transfer of control application (“transfers”) for stations KRBE, Channel 281C, Houston, Texas; KIOL, Channel 279C, La Porte, Texas and KFNC, Channel 248C, Beaumont, Texas. KRBE and KIOL are authorized in communities within metro counties in the Houston-Galveston, Texas Arbitron Market (Market #7). Further, KFNC is licensed to a community within a metro county in the Beaumont-Port Arthur, Texas Arbitron market (Market #133), but is considered “home” to the Houston-Galveston, Texas market. As such, a review of each market will be conducted to show the proposed combination of KRBE, KIOL and KFNC is in compliance with the rules.

HOUSTON-GALVESTON, TEXAS MARKET

2. As shown on Exhibit #1, there are sixty-nine AM and FM (commercial and non-commercial) stations listed in the Houston-Galveston, Texas Arbitron Market. The Transferee would be in control of three FM stations in the market. The number of stations indicated falls in the forty-five or more stations tier of §73.3555(a)(1)(i) of the Commission's rules. At this level,

common ownership or control of up to eight stations, with no more than five in the same service, is permissible. Therefore, the transfer of control of KRBE, KIOL and KFNC, in the Houston-Galveston, Texas market, is believed to be in compliance with the Commission's radio ownership rules.

BEAUMONT-PORT ARTHUR, TEXAS MARKET

3. Only station KFNC is considered a metro station, based on its county of license, in the Beaumont-Port Arthur, Texas market. However, principals of the Transferee have interests in the licensees of KBED, 1510 kHz, Nederland, Texas; KIKR, 1450 kHz, Beaumont, Texas; KQXY, Channel 231C1, Beaumont, Texas; and KTCX, Channel 273C2, Beaumont, Texas. The same licensee is operating station KAYD-FM, Channel 269C3, Silsbee, Texas under a LMA. Each of these additional five stations are licensed to counties within the Beaumont-Port Arthur, Texas market. As shown on Exhibit #2, there are twenty-five AM and FM (commercial and non-commercial) stations listed in the Beaumont-Port Arthur, Texas Arbitron Market. The transferee would be in control of four FM and two AM stations in the market. 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, the transfer of control of station KFNC, in the Beaumont-Port Arthur, Texas market, is believed to be in compliance with the Commission's radio ownership rules.

4. Based on the compliance with each combination of stations in the two separate markets, the transfer of control of stations of KRBE, KIOL and KFNC is in compliance with the Commission's rules.

5. The foregoing technical statement was prepared by Graham Brock, Inc. 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. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.



FCC Geographic Market Definition for Houston-Galveston, TX

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KACC	FM	89.7	NC	AOR	Houston-Galveston, TX	07/02/2003	7	Alvin Community College	Alvin, TX	Brazoria
KAJR	FM	88.3	NC	ChrsContem	Houston-Galveston, TX	07/02/2003	7	American Family Association Incorporated	Conroe, TX	Montgomery
KBME	AM	790	C	Sports	Houston-Galveston, TX	07/02/2003	7	Clear Channel Communications	Houston, TX	Harris
KBRZ	AM	1460	C	Span/CCtmp	Houston-Galveston, TX	07/02/2003	7	Aleluya Christian Broadcasting	Freeport, TX	Brazoria
KBXX	FM	97.9	C	R&BOd/HpH	Houston-Galveston, TX	07/02/2003	7	Radio One Inc	Houston, TX	Harris
KCHN	AM	1050	C	Ethnic	Houston-Galveston, TX	07/02/2003	7	Multicultural Radio Broadcasting Inc	Brookshire, TX	Waller
KCOH	AM	1430	C	Urban	Houston-Galveston, TX	07/02/2003	7	KCOH Inc	Houston, TX	Harris
KEYH	AM	850	C	Span/Mexcn	Houston-Galveston, TX	07/02/2003	7	Liberman Broadcasting Inc	Houston, TX	Harris
KEZB	FM	105.3	C	Soft AC	Houston-Galveston, TX	11/07/2003	7	Henderson, Roy E	Hempstead, TX	Waller
KFNC	FM	97.5	C	News/Talk	Houston-Galveston, TX	07/02/2003	7	Cumulus Broadcasting Inc	Beaumont, TX	Jefferson
KFTG	FM	88.1	NC	Gospel	Houston-Galveston, TX	07/02/2003	7	Aleluya Christian Broadcasting	Pasadena, TX	Harris
KGBC	AM	1540	C	Religion	Houston-Galveston, TX	07/02/2003	7	SIGA Broadcasting Corp	Galveston, TX	Galveston
KGOL	AM	1180	C	Asian	Houston-Galveston, TX	07/02/2003	7	Entravision Holdings LLC	Humble, TX	Harris
KHCB	FM	105.7	NC	Christian	Houston-Galveston, TX	07/02/2003	7	Houston Christian Broadcasters Inc	Houston, TX	Harris
KHCB	AM	1400	NC	Span/Chrst	Houston-Galveston, TX	07/02/2003	7	Houston Christian Broadcasters Inc	Galveston, TX	Galveston
KHJZ	FM	95.7	C	Smooth Jazz	Houston-Galveston, TX	07/02/2003	7	Infinity Broadcasting	Houston, TX	Harris
KHMX	FM	96.5	C	Hot AC	Houston-Galveston, TX	07/02/2003	7	Clear Channel Communications	Houston, TX	Harris
KHPT	FM	106.9	C	80s Hits	Houston-Galveston, TX	07/02/2003	7	Cox Radio Inc	Conroe, TX	Montgomery
KIKK	AM	650	C	Bus News	Houston-Galveston, TX	07/02/2003	7	Infinity Broadcasting	Pasadena, TX	Harris
KILE	AM	1560	C	Ethnic	Houston-Galveston, TX	07/02/2003	7	SkyWave Broadcasting Inc	Bellaire, TX	Harris
KILT	AM	610	C	Sports	Houston-Galveston, TX	07/02/2003	7	Infinity Broadcasting	Houston, TX	Harris
KILT	FM	100.3	C	Country	Houston-Galveston, TX	07/02/2003	7	Infinity Broadcasting	Houston, TX	Harris
KIOL	FM	103.7	C	Rock	Houston-Galveston, TX	07/02/2003	7	Cumulus Broadcasting Inc	La Porte, TX	Harris
KIOX	FM	96.9	C	Span/CHR	Houston-Galveston, TX	07/02/2003	7	Liberman Broadcasting Inc	El Campo, TX	Wharton
KJIC	FM	90.5	NC	Gospel	Houston-Galveston, TX	07/02/2003	7	Community Radio Inc	Santa Fe, TX	Galveston
KJOJ	AM	880	C	Asian	Houston-Galveston, TX	07/02/2003	7	Liberman Broadcasting Inc	Conroe, TX	Montgomery
KJOJ	FM	103.3	C	Mexican	Houston-Galveston, TX	07/02/2003	7	Liberman Broadcasting Inc	Freeport, TX	Brazoria
KKBQ	FM	92.9	C	Country	Houston-Galveston, TX	07/02/2003	7	Cox Radio Inc	Pasadena, TX	Harris
KKHT	FM	100.7	C	Chrst/Talk	Houston-Galveston, TX	07/02/2003	7	Salem Communications Corporation	Winnie, TX	Chambers
KKRW	FM	93.7	C	Clsc Rock	Houston-Galveston, TX	07/02/2003	7	Clear Channel Communications	Houston, TX	Harris
KLAT	AM	1010	C	Spn/Nws/Tlk	Houston-Galveston, TX	07/02/2003	7	Univision Communications Inc	Houston, TX	Harris
KLDE	FM	107.5	C	Oldies	Houston-Galveston, TX	07/02/2003	7	Cox Radio Inc	Lake Jackson, TX	Brazoria

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

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for Houston-Galveston, TX

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KLOL	FM	101.1	C	Spanish	Houston-Galveston, TX	07/02/2003	7	Clear Channel Communications	Houston, TX	Harris
KLTN	FM	102.9	C	Span/Mexcn	Houston-Galveston, TX	07/02/2003	7	Univision Communications Inc	Houston, TX	Harris
KLVL	AM	1480	C	Span/Varty	Houston-Galveston, TX	07/02/2003	7	SIGA Broadcasting Corp	Pasadena, TX	Harris
KMIC	AM	1590	C	Kids/Top40	Houston-Galveston, TX	07/02/2003	7	ABC/Disney	Houston, TX	Harris
KMJQ	FM	102.1	C	Urban	Houston-Galveston, TX	07/02/2003	7	Radio One Inc	Houston, TX	Harris
KNTH	AM	1070	C	Nws/Tlk/Inf	Houston-Galveston, TX	07/02/2003	7	Salem Communications Corporation	Houston, TX	Harris
KODA	FM	99.1	C	Soft AC	Houston-Galveston, TX	08/22/2003	7	Clear Channel Communications	Houston, TX	Harris
KOVE	FM	106.5	C	Span/AdCH	Houston-Galveston, TX	07/02/2003	7	Univision Communications Inc	Galveston, TX	Galveston
KPFT	FM	90.1	NC	Ecltc/Talk	Houston-Galveston, TX	07/02/2003	7	Pacifica Foundation	Houston, TX	Harris
KPRC	AM	950	C	Talk	Houston-Galveston, TX	07/02/2003	7	Clear Channel Communications	Houston, TX	Harris
KPTI	FM	105.3	C	Hip Hop	Houston-Galveston, TX	07/02/2003	7	Univision Communications Inc	Crystal Beach, TX	Galveston
KPTY	FM	104.9	C	Hip Hop	Houston-Galveston, TX	07/02/2003	7	Univision Communications Inc	Missouri City, TX	Fort Bend
KPVU	FM	91.3	NC	NPR/SJz/Gs	Houston-Galveston, TX	07/02/2003	7	Prairie View A&M University	Prairie View, TX	Waller
KQQK	FM	107.9	C	Span/CHR	Houston-Galveston, TX	07/02/2003	7	Liberman Broadcasting Inc	Beaumont, TX	Jefferson
KQUE	AM	1230	C	Ranchera	Houston-Galveston, TX	07/02/2003	7	Liberman Broadcasting Inc	Houston, TX	Harris
KRBE	FM	104.1	C	CHR	Houston-Galveston, TX	07/02/2003	7	p Cumulus Media Partners LLC	Houston, TX	Harris
KROI	FM	92.1	C	Mexican	Houston-Galveston, TX	07/02/2003	7	Radio One Inc	Seabrook, TX	Harris
KRTX	AM	980	C	Tejano	Houston-Galveston, TX	07/02/2003	7	Univision Communications Inc	Rosenburg/Richmond, TX	Fort Bend
KSBJ	FM	89.3	NC	ChrsContem	Houston-Galveston, TX	07/02/2003	7	KSBJ Educational Foundation	Humble, TX	Harris
KSEV	AM	700	C	Talk	Houston-Galveston, TX	07/02/2003	7	Liberman Broadcasting Inc	Tomball, TX	Harris
KSHN	FM	99.9	C	AC/Old/Cty	Houston-Galveston, TX	07/02/2003	7	Trinity River Valley Broacasting Company	Liberty, TX	Liberty
KSTB	FM	101.5	C	Country	Houston-Galveston, TX	07/02/2003	7	Cumulus Broadcasting Inc	Crystal Beach, TX	Galveston
KTBZ	FM	94.5	C	Modern Rock	Houston-Galveston, TX	07/02/2003	7	Clear Channel Communications	Houston, TX	Harris
KTEK	AM	1110	C	Cst/Tlk/Eth	Houston-Galveston, TX	07/02/2003	7	Salem Communications Corporation	Alvin, TX	Brazoria
KTHT	FM	97.1	C	Country	Houston-Galveston, TX	07/02/2003	7	Cox Radio Inc	Cleveland, TX	Liberty
KTJM	FM	98.5	C	Mexican	Houston-Galveston, TX	07/02/2003	7	Liberman Broadcasting Inc	Port Arthur, TX	Jefferson
KTRH	AM	740	C	News/Sprts	Houston-Galveston, TX	07/02/2003	7	Clear Channel Communications	Houston, TX	Harris
KTRU	FM	91.7	NC	Variety	Houston-Galveston, TX	07/02/2003	7	Rice University	Houston, TX	Harris
KTSU	FM	90.9	NC	Jaz/Old/BGs	Houston-Galveston, TX	07/02/2003	7	Texas Southern University	Houston, TX	Harris
KUHF	FM	88.7	NC	Classical	Houston-Galveston, TX	07/02/2003	7	University of Houston	Houston, TX	Harris
KVST	FM	99.7	C	Country	Houston-Galveston, TX	07/02/2003	7	New Wavo Communications Group	Willis, TX	Montgomery
KWWJ	AM	1360	C	Gospl/Chrst	Houston-Galveston, TX	07/02/2003	7	Salt of Earth Broadcasting	Baytown, TX	Harris

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FCC Geographic Market Definition for Houston-Galveston, TX

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KXYZ	AM	1320	C	Span/Intnl	Houston-Galveston, TX	07/02/2003	7	Multicultural Radio Broadcasting Inc	Houston, TX	Harris
KYBJ	FM	91.1	NC	ChrsContem	Houston-Galveston, TX	07/02/2003	7	KSBJ Educational Foundation	Lake Jackson, TX	Brazoria
KYND	AM	1520	C	Ethnic	Houston-Galveston, TX	07/02/2003	7	Provenzano, Matthew	Cypress, TX	Harris
KYOK	AM	1140	C	Gosp/CCtm	Houston-Galveston, TX	07/02/2003	7	Martin Broadcasting	Conroe, TX	Montgomery
KYST	AM	920	C	Spn/Nws/Tlk	Houston-Galveston, TX	07/02/2003	7	Hispanic Broadcasting Inc	Texas City, TX	Galveston

Number of Stations in Geographic Market 69

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

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FCC Geographic Market Definition for Beaumont-Port Arthur, TX

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KAYD	FM	101.7	C	Country	Beaumont-Port Arthur, TX	07/02/2003	133	Cumulus Broadcasting Inc	Silsbee, TX	Hardin
KBED	AM	1510	C	Black Gospl	Beaumont-Port Arthur, TX	07/02/2003	133	Cumulus Broadcasting Inc	Nederland, TX	Jefferson
KCOL	FM	92.5	C	Oldies	Beaumont-Port Arthur, TX	07/02/2003	133	Clear Channel Communications	Groves, TX	Jefferson
KDEI	AM	1250	NC	Christian	Beaumont-Port Arthur, TX	07/02/2003	133	Radio Maria Inc	Port Arthur, TX	Jefferson
KFNC	FM	97.5	C	News/Talk	Houston-Galveston, TX	07/02/2003	7	Cumulus Broadcasting Inc	Beaumont, TX	Jefferson
KIKR	AM	1450	C	Sprts/Talk	Beaumont-Port Arthur, TX	07/02/2003	133	Cumulus Broadcasting Inc	Beaumont, TX	Jefferson
KIOC	FM	106.1	C	Rock	Beaumont-Port Arthur, TX	07/02/2003	133	Clear Channel Communications	Orange, TX	Orange
KKMY	FM	104.5	C	AC	Beaumont-Port Arthur, TX	07/02/2003	133	Clear Channel Communications	Orange, TX	Orange
KLBT	FM	88.1	NC	cp - NOA	Beaumont-Port Arthur, TX	08/26/2005	133	King's Musician Educational Foundation Inc	Beaumont, TX	Jefferson
KLVI	AM	560	C	News/Talk	Beaumont-Port Arthur, TX	07/02/2003	133	Clear Channel Communications	Beaumont, TX	Jefferson
KOGT	AM	1600	C	Cntry/Talk	Beaumont-Port Arthur, TX	07/02/2003	133	G-CAP Communications	Orange, TX	Orange
KOLE	AM	1340	C	Talk	Beaumont-Port Arthur, TX	07/02/2003	133	Voice in the Wilderness Broadcasting Inc	Port Arthur, TX	Jefferson
KQBU	FM	93.3	C	Span/Mexcn	Beaumont-Port Arthur, TX	10/23/2003	133	Univision Communications Inc	Port Arthur, TX	Jefferson
KQQK	FM	107.9	C	Span/CHR	Houston-Galveston, TX	07/02/2003	7	Liberman Broadcasting Inc	Beaumont, TX	Jefferson
KQXY	FM	94.1	C	CHR	Beaumont-Port Arthur, TX	07/02/2003	133	Cumulus Broadcasting Inc	Beaumont, TX	Jefferson
KRCM	AM	1380	C	Talk	Beaumont-Port Arthur, TX	07/02/2003	133	Voice in the Wilderness Broadcasting Inc	Beaumont, TX	Jefferson
KSET	AM	1300	C	Sprts/Talk	Beaumont-Port Arthur, TX	07/02/2003	133	Hill, William G.	Silsbee, TX	Hardin
KTCX	FM	102.5	C	Urban	Beaumont-Port Arthur, TX	07/02/2003	133	Cumulus Broadcasting Inc	Beaumont, TX	Jefferson
KTJM	FM	98.5	C	Mexican	Houston-Galveston, TX	07/02/2003	7	Liberman Broadcasting Inc	Port Arthur, TX	Jefferson
KTXB	FM	89.7	NC	Religion	Beaumont-Port Arthur, TX	07/02/2003	133	Family Stations Inc	Beaumont, TX	Jefferson
KUHD	AM	1150	C	Spn/Cst/Nws	Beaumont-Port Arthur, TX	07/02/2003	133	Vision Latina Broadcasting Inc	Port Neches, TX	Jefferson
KVLU	FM	91.3	NC	Clsci/Varty	Beaumont-Port Arthur, TX	07/02/2003	133	Lamar University	Beaumont, TX	Jefferson
KYKR	FM	95.1	C	Country	Beaumont-Port Arthur, TX	07/02/2003	133	Clear Channel Communications	Beaumont, TX	Jefferson
KZFT	FM	90.5	NC	Christian	Beaumont-Port Arthur, TX	09/14/2004	133	American Family Association Incorporated	Fannett, TX	Jefferson
KZZB	AM	990	C	Gospel	Beaumont-Port Arthur, TX	07/02/2003	133	Martin Broadcasting	Beaumont, TX	Jefferson

Number of Stations in Geographic Market 25

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

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AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

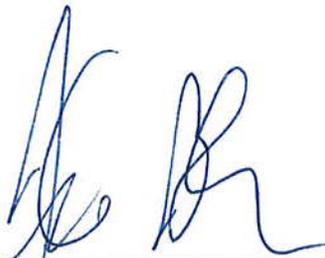
State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged 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 10th day of November, 2005.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 10th day of November, 2005*



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