

Transferee's Exhibit 17
Multiple Ownership

FCC Form 315, Section IV, Item 8(a)

Certain documents to which Cumulus Media Inc.'s subsidiary, Cumulus Licensing Corp. ("CLC"), is party purport to create a security interest in Federal Communications Commission ("FCC") authorizations held by CLC, but only to the extent and at such times as such a security interest may be permitted by FCC rules and policies. Also, see Transferee's Exhibit 15.

FCC Form 315, Section IV, Item 8(b)

See attached Multiple Ownership Exhibit.

RADIO MARKET ANALYSIS
CUMULUS MEDIA
VARIOUS AM AND FM STATIONS
NEW YORK AND CONNECTICUT
November 2001

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared on behalf of Cumulus Media ("Cumulus"), proposed transferee of radio station WALL, 1340 kHz, and WRRV, Channel 224A, Middletown, New York; WZAD, Channel 247A, Wurtsboro, New York; WPDA, Channel 291A, Jeffersonville, New York; WKNY, 1490 kHz, Kingston, New York; WEOK, 1390 kHz, and WPDH, Channel 268B, Poughkeepsie, New York; WRRB, Channel 245A, Arlington, New York; WCZX, Channel 249A, Hyde Park, New York; WINE, 940 kHz, and WRKI, Channel 236B, Brookfield, Connecticut; WPUT, 1510 kHz, Brewster, New York; WAXB, Channel 288A, Patterson, New York; WICC, 600 kHz, Bridgeport, Connecticut; WEBE, Channel 300B, Westport, Connecticut; WFAS, 1230 kHz, and WFAS-FM, Channel 280A, White Plains, New York; and WFAF, Channel 292A, Mount Kisco, New York. Exhibit #1 is a map depicting the stations being proposed for transfer to Cumulus.

2. A study has, therefore, been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission's rules. Due to the locations where the respective city grade contours of the stations overlap, ten distinct markets are created; Market #1 - WZAD/WPDA; Market #2 - WZAD/WRRV/WALL; Market #3 - WPDH/WRBB/WKNY/WEOK/WCZX; Market #4 - WPDH/WRRB/WCZX/WEOK; Market #5 - WPDH/WAXB/WRKI; Market #6 - WRKI/WINE/WAXB; Market #7 - WRKI/WAXB/WPUT; Market #8 - WRKI/WFAF; Market #9 - WRKI/WICC/WEBE; and Market #10 - WFAS/WFAS-FM/WFAF.

3. Since WZAD is a subject station in both Markets #1 and #2; WPDH is a subject station in Markets #3 through #5; WRKI is a subject station in Markets #6 through #9; and WFAS-FM is a subject station in Market #10, these individual stations will be used to determine the number of other stations contributing to the subject markets.¹ This study will, therefore, determine the number of other commercial AM and FM stations that either have transmitter sites within the Radio Market Boundary, or have principal community contour overlap with the Radio Market Boundary.

4. Exhibit #2 is the depiction of the WZAD Radio Market with the transmitter sites or city grade contours of five commercial AM and FM stations, excluding the subject stations. Exhibits #3 and #4 are tabulations of the stations in the Radio Market #1 and #2. The total number of stations depicted in both Radio Markets falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules.² At the fourteen or fewer stations 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). Therefore, Cumulus's interests in two FM stations in Market #1 and two FM stations and one AM station in Market #2 are in compliance with the Commission's rules.

5. Exhibit #5 is the depiction of the WPDH Radio Market with the transmitter sites or city grade contours of fourteen commercial AM and FM stations, excluding the subject stations. Exhibits #6 through #8 are tabulations of the stations in Radio Markets #3, #4 and #5. The total

1) Only stations in which Cumulus does not have attributable interests will be used as market contributors.

2) There are additional stations which contribute to this market, however they were not considered since there were sufficient stations to demonstrate compliance with the Commission's rules, based on the number of stations to be commonly held.

number of stations depicted in all three Radio Markets falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.³ At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service, is permissible. Therefore, Cumulus's interests in three FM stations and two AM stations in Market #3, three FM stations and one AM station in Market #4 and three FM stations in Market #5 are in compliance with the Commission's rules.

6. Exhibit #9 is the depiction of the WRKI Radio Market with the transmitter sites or city grade contours of thirteen commercial AM and FM stations, excluding the subject stations. Exhibits #10 through #13 are tabulations of the stations in Radio Markets #6, #7, #8 and #9. The total number of stations depicted in all three Radio Markets falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.⁴ At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service, is permissible. Therefore, Cumulus's interests in two FM stations and one AM station in Market #6, two FM stations and one AM station in Market #7, two FM stations in Market #8 and two FM stations and one AM station in Market #9 are in compliance with the Commission's rules.

7. Exhibit #14 is the depiction of the WFAS-FM Radio Market with the transmitter sites or city grade contours of six commercial AM and FM stations, excluding the subject stations. Exhibits #15 is the tabulations of the stations in the Radio Market #10. The total number of

3) See Footnote 2 supra.

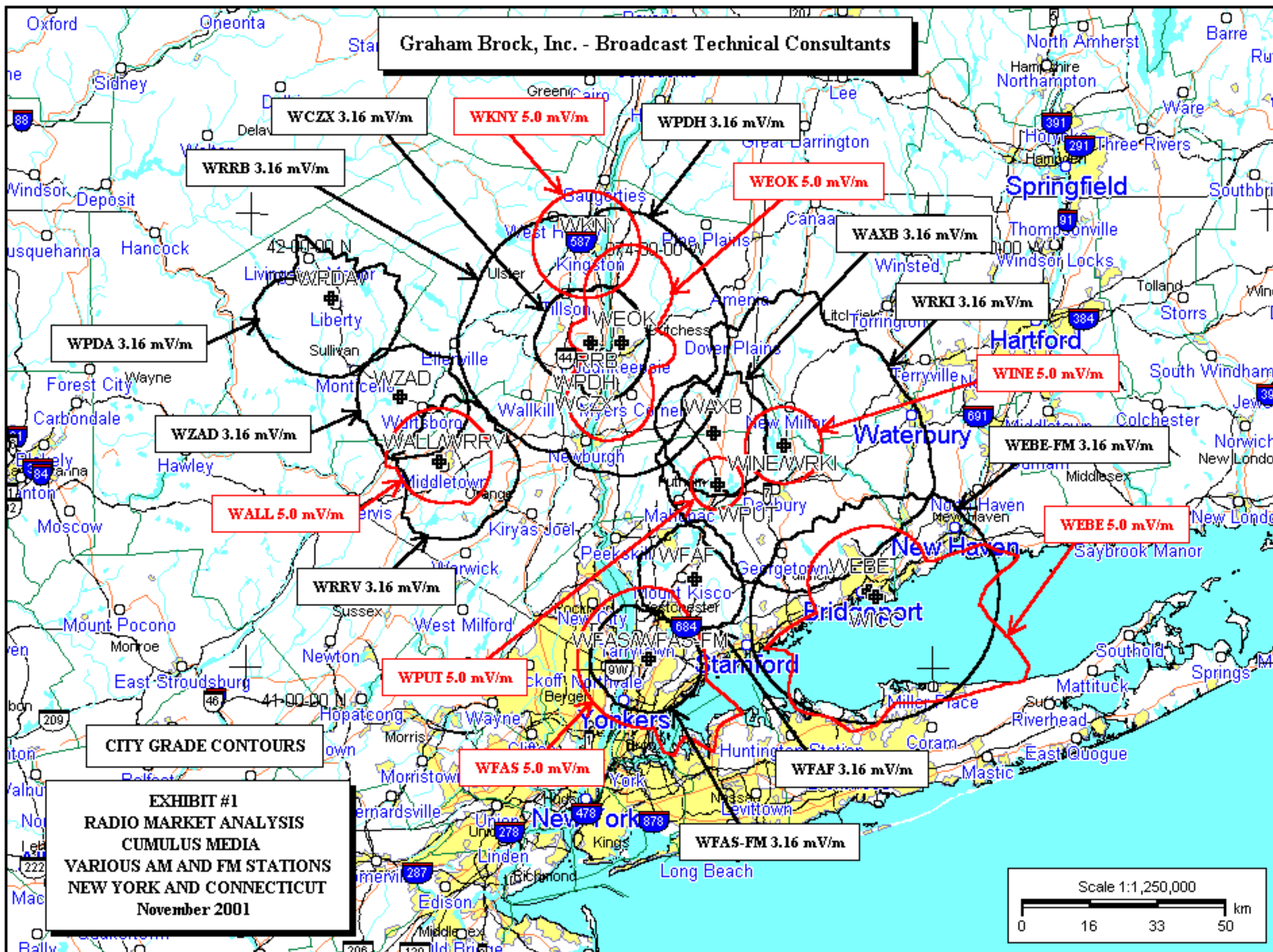
4) See Footnote 2 supra.

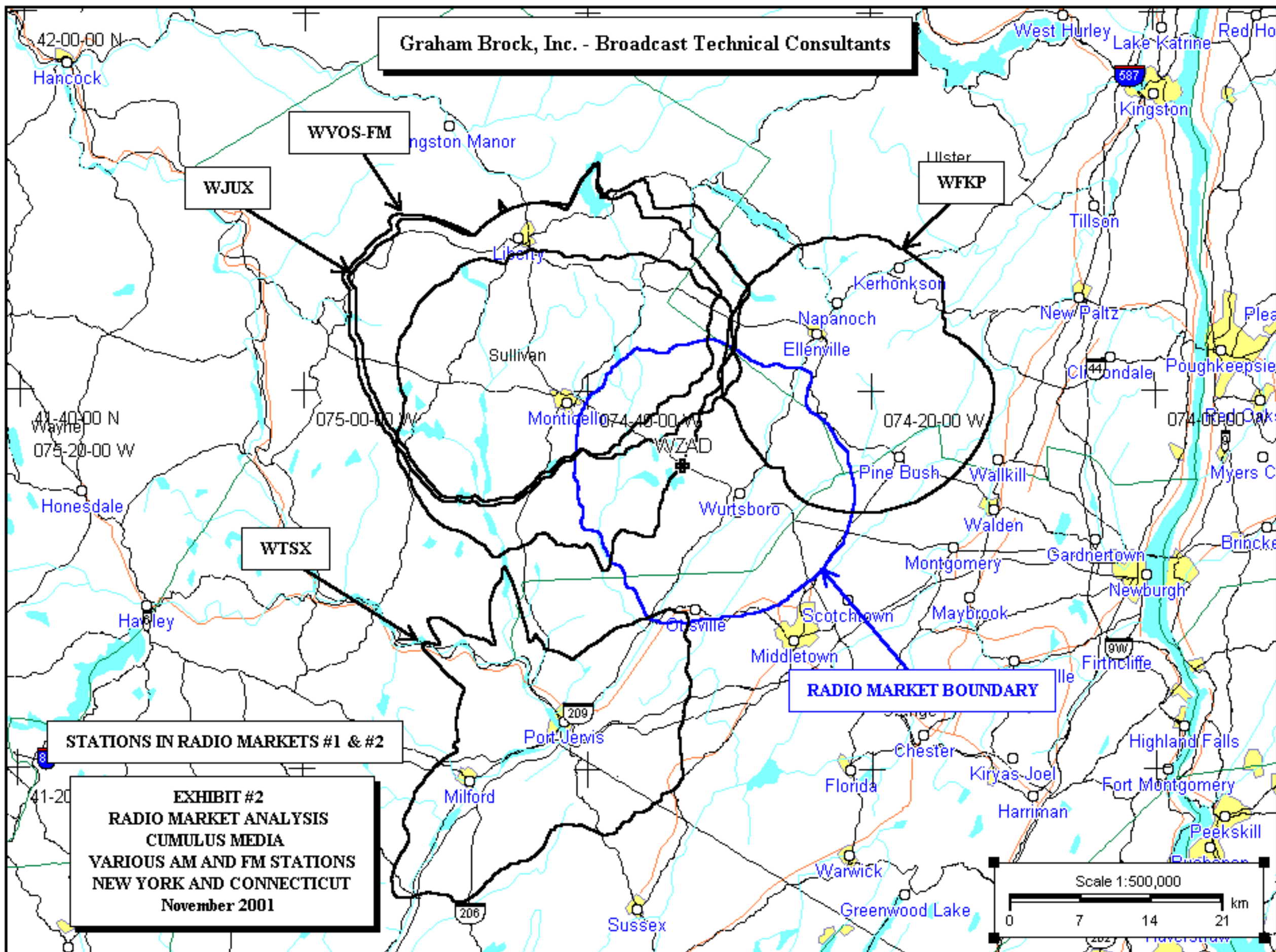
stations depicted in the Radio Market falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules.⁵ At the fourteen or fewer stations level, common ownership or control of up to five stations, with no more than three in the same service, is permissible (provided the number of stations to be commonly held does not exceed 50% of the stations in the market). Therefore, Cumulus's interests in two FM stations and one AM station in Market #10 are in compliance with the Commission's rules.

8. Based on the individual compliance of each of the ten markets reviewed, the transfer of the above eighteen radio stations to Cumulus is in compliance with §73.3555 of the Commission's rules.

9. The foregoing technical statement was prepared on behalf of Cumulus Media., 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 was extracted from the pertinent CDBS database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.

5) See Footnote 2 supra.





RADIO MARKET ANALYSIS
CUMULUS MEDIA
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EXHIBIT #3

Tabulation of Stations in Market #1

FM Stations

+	WVOS-FM	Ch 240A	Liberty, NY
+	WTSX	Ch 244A	Port Jervis, NY
*	WZAD	Ch 247A	Wurtsboro, NY
+	WSUL	Ch 252A	Monticello, NY
+	WFKP	Ch 257A	Ellenville, NY
+	WJUX	Ch 259A	Monticello, NY
*	WPDA	Ch 291A	Jeffersonville, NY

Total FM Stations - 7

GRAND TOTAL OF STATIONS CONSIDERED IN MARKET #1 - 7

- * Subject station.
- + Station has contour overlap with a subject station.

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EXHIBIT #4

Tabulation of Stations in Market #2

AM Stations

* WALL	1340 kHz	Middletown, NY
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Total AM Stations - 1

FM Stations

* WRRV	Ch 224A	Middletown, NY
+ WVOS-FM	Ch 240A	Liberty, NY
+ WTSX	Ch 244A	Port Jervis, NY
* WZAD	Ch 247A	Wurtsboro, NY
+ WSUL	Ch 252A	Monticello, NY
+ WFKP	Ch 257A	Ellenville, NY
+ WJUX	Ch 259A	Monticello, NY

Total FM Stations - 7

GRAND TOTAL OF STATIONS CONSIDERED IN MARKET #2 - 8

- * Subject station.
- + Station has contour overlap with a subject station.

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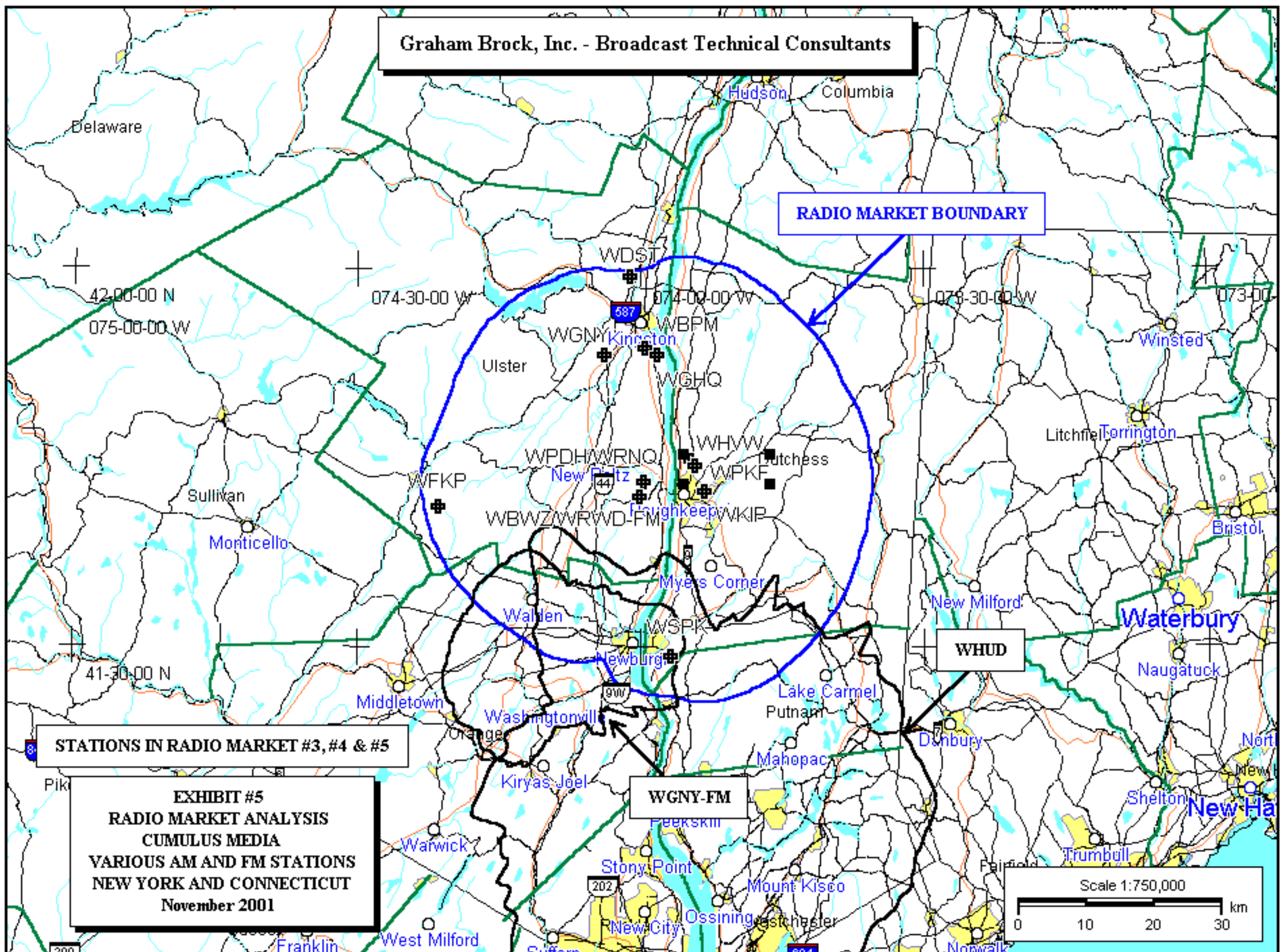
RADIO MARKET BOUNDARY

STATIONS IN RADIO MARKET #3, #4 & #5

EXHIBIT #5
RADIO MARKET ANALYSIS
CUMULUS MEDIA
VARIOUS AM AND FM STATIONS
NEW YORK AND CONNECTICUT
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Scale 1:750,000

0 10 20 30 km



RADIO MARKET ANALYSIS
CUMULUS MEDIA
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EXHIBIT #6

Tabulation of Stations in Market #3

AM Stations

WGHQ	920 kHz	Kingston, NY
WHVW	950 kHz	Hyde Park, NY
WGNV	1220 kHz	Newburgh, NY
* WEOK	1390 kHz	Poughkeepsie, NY
WKIP	1450 kHz	Poughkeepsie, NY
* WKNY	1490 kHz	Kingston, NY

Total AM Stations - 6

FM Stations

WRNQ	Ch 221A	Poughkeepsie, NY
WBWZ	Ch 227A	New Paltz, NY
WBPM	Ch 232A	Kingston, NY
WPKF	Ch 241A	Poughkeepsie, NY
* WRRB	Ch 245A	Arlington, NY
* WCZX	Ch 249A	Hyde Park, NY
WFKP	Ch 257A	Ellenville, NY
WDST	Ch 261A	Woodstock, NY
+ WHUD	Ch 264B	Peekskill, NY
* WPDH	Ch 268B	Poughkeepsie, NY
+ WGNV-FM	Ch 276A	Newburgh, NY
WSPK	Ch 284B	Poughkeepsie, NY
WRWD-FM	Ch 297A	Highland, NY

Total FM Stations - 13

GRAND TOTAL OF STATIONS CONSIDERED IN MARKET #3 - 19

- * Subject station.
- + Station has contour overlap with a subject station.

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EXHIBIT #7

Tabulation of Stations in Market #4

AM Stations

WGHQ	920 kHz	Kingston, NY
WHVW	950 kHz	Hyde Park, NY
WGNY	1220 kHz	Newburgh, NY
* WEOK	1390 kHz	Poughkeepsie, NY
WKIP	1450 kHz	Poughkeepsie, NY

Total AM Stations - 5

FM Stations

WRNQ	Ch 221A	Poughkeepsie, NY
WBWZ	Ch 227A	New Paltz, NY
WBPM	Ch 232A	Kingston, NY
WPKF	Ch 241A	Poughkeepsie, NY
* WRRB	Ch 245A	Arlington, NY
* WCZX	Ch 249A	Hyde Park, NY
WFKP	Ch 257A	Ellenville, NY
WDST	Ch 261A	Woodstock, NY
+ WHUD	Ch 264B	Peekskill, NY
* WPDH	Ch 268B	Poughkeepsie, NY
+ WGNY-FM	Ch 276A	Newburgh, NY
WSPK	Ch 284B	Poughkeepsie, NY
WRWD-FM	Ch 297A	Highland, NY

Total FM Stations - 13

GRAND TOTAL OF STATIONS CONSIDERED IN MARKET #4 - 18

* Subject station.

+ Station has contour overlap with a subject station.

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EXHIBIT #8

Tabulation of Stations in Market #5

AM Stations

WGHQ	920 kHz	Kingston, NY
WHVW	950 kHz	Hyde Park, NY
WGNY	1220 kHz	Newburgh, NY
WKIP	1450 kHz	Poughkeepsie, NY

Total AM Stations - 4

FM Stations

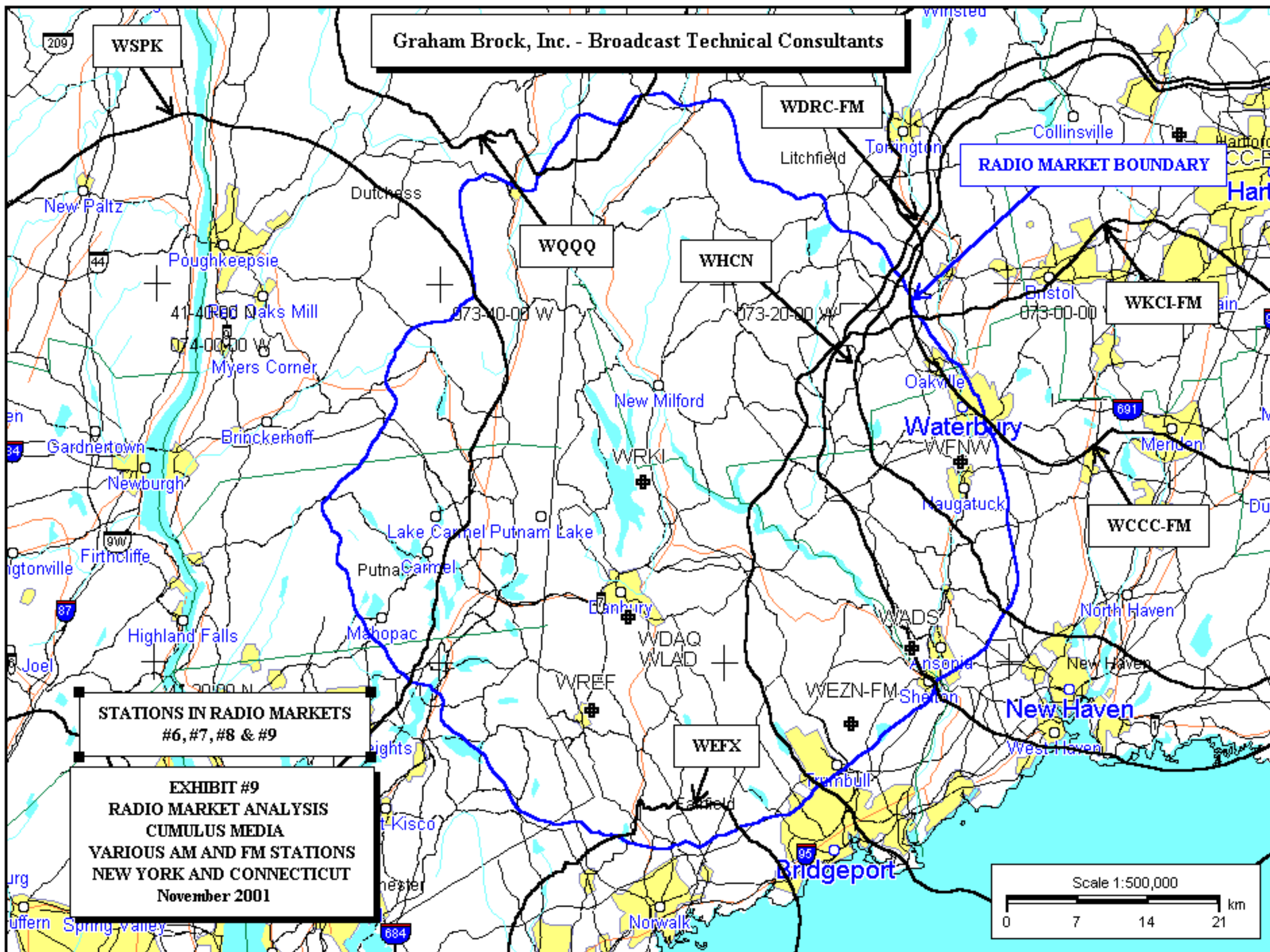
	WRNQ	Ch 221A	Poughkeepsie, NY
	WBWZ	Ch 227A	New Paltz, NY
	WBPM	Ch 232A	Kingston, NY
*	WRKI	Ch 236B	Brookfield, CT
	WPKF	Ch 241A	Poughkeepsie, NY
	WFKP	Ch 257A	Ellenville, NY
	WDST	Ch 261A	Woodstock, NY
+	WHUD	Ch 264B	Peekskill, NY
*	WPDH	Ch 268B	Poughkeepsie, NY
+	WGNY-FM	Ch 276A	Newburgh, NY
	WSPK	Ch 284B	Poughkeepsie, NY
*	WAXB	Ch 288A	Patterson, NY
	WRWD-FM	Ch 297A	Highland, NY

Total FM Stations - 13

GRAND TOTAL OF STATIONS CONSIDERED IN MARKET #5 - 17

* Subject station.

+ Station has contour overlap with a subject station.



RADIO MARKET ANALYSIS
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EXHIBIT #10

Tabulation of Stations in Market #6

AM Stations

	WADS	690 kHz	Ansonia, CT
	WLAD	800 kHz	Danbury, CT
	WREF	850 kHz	Ridgefield, CT
*	WINE	940 kHz	Brookfield, CT
	WFNW	1380 kHz	Naugatuck, CT

Total AM Stations - 5

FM Stations

*	WRKI	Ch 236B	Brookfield, CT
+	WEFX	Ch 240A	Norwalk, CT
	WDAQ	Ch 252A	Danbury, CT
	WEZN-FM	Ch 260B	Bridgeport, CT
+	WKCI-FM	Ch 267B	Hamden, CT
+	WDRC-FM	Ch 275B	Hartford, CT
+	WQQQ	Ch 277A	Sharon, CT
+	WSPK	Ch 284B	Poughkeepsie, NY
*	WAXB	Ch 288A	Patterson, NY
+	WHCN	Ch 290B	Hartford, CT
+	WCCC-FM	Ch 295B	Hartford, CT

Total FM Stations - 11

GRAND TOTAL OF STATIONS CONSIDERED IN MARKET #6 - 16

- * Subject station.
- + Station has contour overlap with a subject station.

RADIO MARKET ANALYSIS
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EXHIBIT #11

Tabulation of Stations in Market #7

AM Stations

WADS	690 kHz	Ansonia, CT
WLAD	800 kHz	Danbury, CT
WREF	850 kHz	Ridgefield, CT
WFNW	1380 kHz	Naugatuck, CT
* WPUT	1510 kHz	Brewster, NY

Total AM Stations - 5

FM Stations

* WRKI	Ch 236B	Brookfield, CT
+ WEFX	Ch 240A	Norwalk, CT
WDAQ	Ch 252A	Danbury, CT
WEZN-FM	Ch 260B	Bridgeport, CT
+ WKCI-FM	Ch 267B	Hamden, CT
+ WDRC-FM	Ch 275B	Hartford, CT
+ WQQQ	Ch 277A	Sharon, CT
+ WSPK	Ch 284B	Poughkeepsie, NY
* WAXB	Ch 288A	Patterson, NY
+ WHCN	Ch 290B	Hartford, CT
+ WCCC-FM	Ch 295B	Hartford, CT

Total FM Stations - 11

GRAND TOTAL OF STATIONS CONSIDERED IN MARKET #7 - 16

- * Subject station.
- + Station has contour overlap with a subject station.

RADIO MARKET ANALYSIS
CUMULUS MEDIA
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EXHIBIT #12

Tabulation of Stations in Market #8

AM Stations

WADS	690 kHz	Ansonia, CT
WLAD	800 kHz	Danbury, CT
WREF	850 kHz	Ridgefield, CT
WFNW	1380 kHz	Naugatuck, CT

Total AM Stations - 4

FM Stations

* WRKI	Ch 236B	Brookfield, CT
+ WEFX	Ch 240A	Norwalk, CT
WDAQ	Ch 252A	Danbury, CT
WEZN-FM	Ch 260B	Bridgeport, CT
+ WKCI-FM	Ch 267B	Hamden, CT
+ WDRC-FM	Ch 275B	Hartford, CT
+ WQQQ	Ch 277A	Sharon, CT
+ WSPK	Ch 284B	Poughkeepsie, NY
+ WHCN	Ch 290B	Hartford, CT
* WFAF	Ch 292A	Mount Kisco, NY
+ WCCC-FM	Ch 295B	Hartford, CT

Total FM Stations - 11

GRAND TOTAL OF STATIONS CONSIDERED IN MARKET #8 - 15

- * Subject station.
- + Station has contour overlap with a subject station.

RADIO MARKET ANALYSIS
CUMULUS MEDIA
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EXHIBIT #13

Tabulation of Stations in Market #9

AM Stations

* WICC	600 kHz	Bridgeport, CT
WADS	690 kHz	Ansonia, CT
WLAD	800 kHz	Danbury, CT
WREF	850 kHz	Ridgefield, CT
WFNW	1380 kHz	Naugatuck, CT

Total AM Stations - 5

FM Stations

* WRKI	Ch 236B	Brookfield, CT
+ WEFX	Ch 240A	Norwalk, CT
WDAQ	Ch 252A	Danbury, CT
WEZN-FM	Ch 260B	Bridgeport, CT
+ WKCI-FM	Ch 267B	Hamden, CT
+ WDRC-FM	Ch 275B	Hartford, CT
+ WQQQ	Ch 277A	Sharon, CT
+ WSPK	Ch 284B	Poughkeepsie, NY
+ WHCN	Ch 290B	Hartford, CT
+ WCCC-FM	Ch 295B	Hartford, CT
* WEBE	Ch 300B	Westport, CT

Total FM Stations - 11

GRAND TOTAL OF STATIONS CONSIDERED IN MARKET #9 - 16

- * Subject station.
- + Station has contour overlap with a subject station.

Graham Brock, Inc. - Broadcast Technical Consultants

RADIO MARKET BOUNDARY

WRCR

WGCH

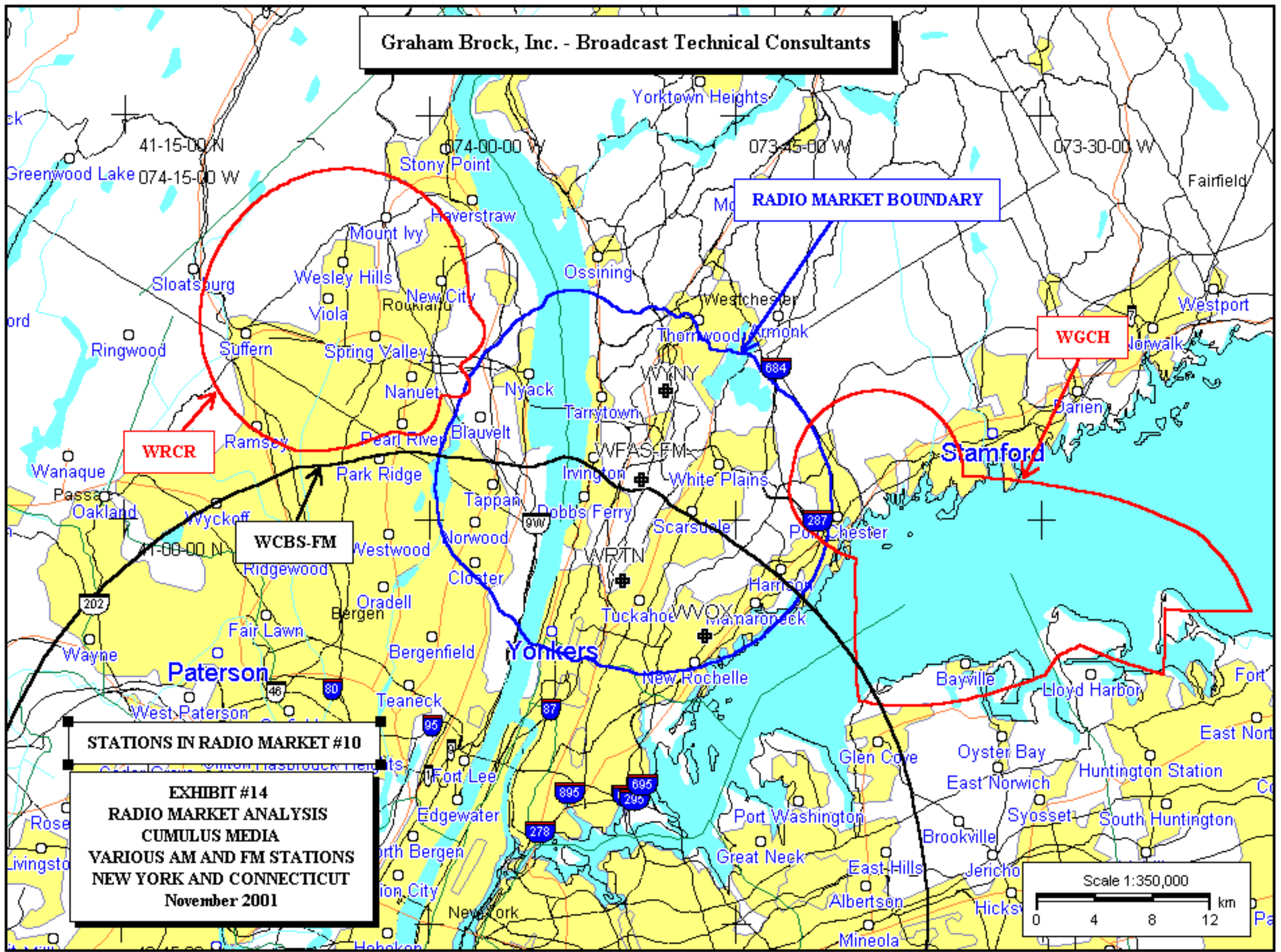
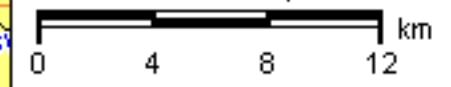
WCBS-FM

Stamford

STATIONS IN RADIO MARKET #10

EXHIBIT #14
RADIO MARKET ANALYSIS
CUMULUS MEDIA
VARIOUS AM AND FM STATIONS
NEW YORK AND CONNECTICUT
November 2001

Scale 1:350,000



RADIO MARKET ANALYSIS
CUMULUS MEDIA
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EXHIBIT #15

Tabulation of Stations in Market #10

AM Stations

* WFAS	1230 kHz	White Plains, NY
+ WRCR	1300 kHz	Spring Valley, NY
WVOX	1460 kHz	New Rochelle, NY
+ WGCH	1490 kHz	Greenwich, CT

Total AM Stations - 4

FM Stations

WRTN	Ch 228A	New Rochelle, NY
+ WCBS-FM	Ch 266B	New York, NY
* WFAS-FM	Ch 280A	White Plains, NY
* WFAF	Ch 292A	Mount Kisco, NY
WYNY	Ch 296A	Briarcliffe Manor, NY

Total FM Stations - 5

GRAND TOTAL OF STATIONS CONSIDERED IN MARKET #10 - 9

- * Subject station.
- + Station has contour overlap with a subject station.