

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CITICASTERS LICENSES, L.P.

This statement and the attached figures were prepared on behalf of Citicasters Licenses, L.P. ("CLLP"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CLLP proposes to modify the facilities of KSD(FM), St. Louis, Missouri. 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	Service	Community	County	State	Geographic Arbitron Market	Declared Arbitron Market
KATZ (CP)	48968	AM	ST. LOUIS	St. Louis City	MO	St. Louis, MO	St. Louis, MO
KATZ	48968	AM	ST. LOUIS	St. Louis City	MO	St. Louis, MO	St. Louis, MO
KLOU	9626	FM	ST. LOUIS	St. Louis City	MO	St. Louis, MO	St. Louis, MO
KLOU (CP)	9626	FM	ST. LOUIS	St. Louis City	MO	St. Louis, MO	St. Louis, MO
KMJM-FM	13793	FM	COLUMBIA	Monroe	IL	St. Louis, MO	St. Louis, MO
KSD	20360	FM	ST. LOUIS	St. Louis City	MO	St. Louis, MO	St. Louis, MO
KATZ-FM	48958	FM	ALTON	Madison	IL	St. Louis, MO	St. Louis, MO
KSLZ	48960	FM	ST. LOUIS	St. Louis City	MO	St. Louis, MO	St. Louis, MO

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 KSD(FM) as proposed, or which is located in the same Arbitron Metro⁴ as KSD(FM). The community of license of KSD(FM) is located within the St. Louis, MO Arbitron Metro, and KSD(FM) is reported by BIA as being "Home" to that Metro only. Contour overlap of the station to be modified is depicted in Figure 1.

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.

Arbitron Market Study

KSD(FM) is reported by BIA as being "Home" to the St. Louis, MO 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
St. Louis, MO Arbitron Metro⁵

Count	Calls	Fac ID	Band	Owner	Status ⁶	Community	County
1	WSDZ	4622	AM	ABC/Disney	b	Belleville	St Clair
2	KFNS	13505	AM	Big League Broadcasting	b	Wood River	Madison
3	KFNS	29944	FM	Big League Broadcasting	b	Troy	Lincoln
4	KRFT	5281	AM	Big League Broadcasting	b	Desoto	Jefferson
5	WEW	1088	AM	Birach Broadcasting Corporation	b	St. Louis	St Louis City
6	WARH	74577	FM	Bonneville International Corp	b	Granite City	Madison
7	WIL	72391	AM	Bonneville International Corp	b	St. Louis	St Louis City
8	WIL	72390	FM	Bonneville International Corp	b	St. Louis	St Louis City
9	WVRV	56512	FM	Bonneville International Corp	b	East St. Louis	St Clair
10	KSIV	6499	AM	Bott Radio Network	b	Clayton	St Louis
11	KSIV	4276	FM	Bott Radio Network	b	St. Louis	St Louis City
12	KTRS	20359	AM	CH Holdings	b	St. Louis	St Louis City
13	KATZ	48968	AM	Clear Channel Communications	b	St. Louis	St Louis City
14	KATZ	48958	FM	Clear Channel Communications	b	Alton	Madison
15	KLOU	9626	FM	Clear Channel Communications	b	St. Louis	St Louis City
16	KMJM	13793	FM	Clear Channel Communications	b	Columbia	Monroe
17	KSD	20360	FM	Clear Channel Communications	b	St. Louis	St Louis City
18	KSLZ	48960	FM	Clear Channel Communications	b	St. Louis	St Louis City
19	WCXO	12052	FM	Clinton County Bcstg Inc	b	Carlyle	Clinton

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.

20	KSLQ	53550	FM	CompuTraffic Inc	b	Washington	Franklin
21	KWMO	53552	AM	CompuTraffic Inc	b	Washington	Franklin
22	KHOJ	7114	AM	Covenant Network	b	St. Charles	St Charles
23	WRYT	27556	AM	Covenant Network	b	Edwardsville	Madison
24	KJSL	73299	AM	Crawford Broadcasting Company	b	St. Louis	St Louis City
25	KSTL	73300	AM	Crawford Broadcasting Company	b	St. Louis	St Louis City
26	KTBJ	76989	FM	CSN International	b	Festus	Jefferson
27	WJBM	23265	AM	DJ Two Rivers Radio, Inc.	b	Jerseyville	Jersey
28	KDHX	17380	FM	Double Helix Corporation	b	St. Louis	St Louis City
29	WDRS	123332	FM	Educational Media Foundation	b	Dorsey	Madison
30	KFTK	73890	FM	Emmis Communications	b	Florissant	St Louis
31	KIHT	27022	FM	Emmis Communications	b	St. Louis	St Louis City
32	KPNT	56525	FM	Emmis Communications	a	St. Genevieve	Ste Genevieve
33	KSHE	19523	FM	Emmis Communications	b	Crestwood	St Louis
34	WRDA	74578	FM	Emmis Communications	b	Jerseyville	Jersey
35	KTUI	41171	AM	Fidelity Broadcasting Inc	b	Sullivan	Franklin
36	KTUI	22180	FM	Fidelity Broadcasting Inc	b	Sullivan	Franklin
37	KFAV	33465	FM	Kaspar Broadcasting Company	b	Warrenton	Warren
38	KWRE	33467	AM	Kaspar Broadcasting Company	b	Warrenton	Warren
39	WDLJ	78414	FM	KM Communications Inc	b	Breese	Clinton
40	WLCA	37167	FM	Lewis & Clark Community College	b	Godfrey	Madison
41	KCLC	37722	FM	Lindenwood College	b	St. Charles	St Charles
42	KFUO	39258	AM	Lutheran Church- Missouri Synod	b	Clayton	St Louis
43	KFUO	65924	FM	Lutheran Church- Missouri Synod	b	Clayton	St Louis
44	WBGZ	41384	AM	Metroplex Communications	b	Alton	Madison
45	KGNA	2842	FM	Missouri River Christian Broadcasting	b	Arnold	Jefferson
46	KGNV	43220	FM	Missouri River Christian Broadcasting	b	Washington	Franklin
47	KNLH	83445	FM	New Life Evangelistic Center Incorporated	b	Cedar Hill	Jefferson
48	WCBW	72890	AM	New Life Evangelistic Center Incorporated	b	Highland	Madison
49	WCBW	83448	FM	New Life Evangelistic Center Incorporated	b	East St. Louis	St Clair
50	WDID	90598	AM	New Life Evangelistic Center Incorporated	b	Highland	Madison

51	WGNU	49042	AM	Norman Broadcasting	b	Granite City	Madison
52	WTPC	53574	FM	Principia College	b	Elsah	Jersey
53	WFUN	4948	FM	Radio One Inc	b	Bethalto	Madison
54	KXEN	54739	AM	Radio Property Ventures	b	Festus-St. Louis	Jefferson
55	KRHS	56509	FM	Ritenour Consolidated School District	b	Overland	St Louis
56	KDJR	5279	FM	Serendipity Ventures LLC	b	De Soto	Jefferson
57	KJFF	35532	AM	Shepherd Group	b	Festus	Jefferson
58	KSLG	74579	AM	Simmons Media Group Inc	b	St. Louis	St Louis City
59	WESL	72815	AM	Simmons Media Group Inc	b	East St. Louis	St Clair
60	WSIE	6128	FM	Southern Illinois University	b	Edwardsville	Madison
61	KCFV	62138	FM	St Louis Community College	b	Ferguson	St Louis
62	KLPW	70301	FM	Twenty-One Sound Communications	b	Union	Franklin
63	KLPW	70303	AM	Twenty-One Sound Communications	b	Union	Franklin
64	KNSX	68579	FM	Twenty-One Sound Communications	a	Steelville	Crawford
65	KWMU	65585	FM	University of Missouri	b	St. Louis	St Louis City
66	KEZK	13507	FM	Viacom International Inc	b	St. Louis	St Louis City
67	KMOX	9638	AM	Viacom International Inc	b	St. Louis	St Louis City
68	KYKY	20358	FM	Viacom International Inc	b	St. Louis	St Louis City
69	KWUR	66644	FM	Washington University	b	Clayton	St Louis
70	KYMC	66671	FM	YMCA of Greater St. Louis	b	Ballwin	St Louis

Interim Contour-Overlap Analysis

Because the principal community of the station to be modified, and the communities of all commonly-owned or attributable stations with overlapping principal contours with the station to be modified, are located inside an Arbitron Metro, an interim contour-overlap analysis is not required.

Conclusions

In the Arbitron Radio Market studied herein, there are at least 70 radio stations, including the subject commonly-owned 1-AM / 5-FM stations, which are home to the St. Louis, MO Metro. This proposal does not affect the existing number of commonly-owned stations in the subject BIA Metro.

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

