

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
CLEAR CHANNEL BROADCASTING LICENSES, INC.

This statement and the attached figures were prepared on behalf of CC Licenses, LLC("CCL"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CCL proposes to modify the facilities of WZLD(FM), Petal, MS. A multiple ownership analysis was prepared considering the following radio stations under present or proposed common ownership, time brokerage or joint sales.<sup>1</sup>

Table 1: Proposed Commonly Owned, Brokered or Jointly-Sold Stations Studied and Associated Arbitron Metro<sup>2</sup> Information

| Count | Calls | Fac ID | Band | Community   | County  | State | Geographic Arbitron Market | Declared Arbitron Market |
|-------|-------|--------|------|-------------|---------|-------|----------------------------|--------------------------|
| 1     | WEEZ  | 16785  | AM   | Laurel      | Jones   | MS    | Laurel-Hattiesburg, MS     | Laurel-Hattiesburg, MS   |
| 2     | WFOR  | 54612  | AM   | Hattiesburg | Forrest | MS    | Laurel-Hattiesburg, MS     | Laurel-Hattiesburg, MS   |
| 3     | WHER  | 52618  | FM   | Heidelberg  | Jasper  | MS    | Non-Metro                  | Laurel-Hattiesburg, MS   |
| 4     | WJKX  | 61116  | FM   | Ellisville  | Jones   | MS    | Laurel-Hattiesburg, MS     | Laurel-Hattiesburg, MS   |
| 5     | WNSL  | 16784  | FM   | Laurel      | Jones   | MS    | Laurel-Hattiesburg, MS     | Laurel-Hattiesburg, MS   |
| 6     | WUSW  | 54611  | FM   | Hattiesburg | Forrest | MS    | Laurel-Hattiesburg, MS     | Laurel-Hattiesburg, MS   |
| 7     | WZLD  | 66954  | FM   | Petal       | Forrest | MS    | Laurel-Hattiesburg, MS     | Laurel-Hattiesburg, MS   |

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.<sup>3</sup>

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 WZLD(FM) as proposed, or which is located in the same Arbitron Metro<sup>4</sup> as WZLD(FM). The community of license of WZLD(FM) is located within the Laurel-Hattiesburg, MS Arbitron Metro, and WZLD(FM) is reported by BIA as being "Home" to that Metro only. Contour overlap of the station to be modified, as depicted in Figure 1, also occurs with commonly-owned stations whose communities of license are located outside any Arbitron Metro market.

<sup>1</sup> None of the following stations are attributable by virtue of a time brokerage agreement or joint sales agreement.

<sup>2</sup> Arbitron data presented herein is obtained from BIA's "Media Access Pro."

<sup>3</sup> See 47 C.F.R. § 73.3555(a).

<sup>4</sup> 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

WZLD(FM) is reported by BIA as being "Home" to the Laurel-Hattiesburg, MS Arbitron Metro. The number of stations attributable to CCC in this Arbitron Metro does not comply with the local radio ownership rules, as evidenced by Table 2 below. However, the existing combination of attributable stations, including WZLD(FM) as currently licensed, is also not in compliance with the Arbitron Metro-based rules. This proposed modification maintains the *status quo* in the Laurel-Hattiesburg, MS Arbitron Metro -- no stations are added to or removed from the Metro, nor is WZLD(FM)'s "Home" Arbitron Metro changed, by virtue of this instant application. Because the proposed modification would not create a "new violation" of the ownership rules, this existing combination of radio stations qualifies for grandfathering. See Note 4 to 47 C.F.R. Section 73.3555 (minor modification applications are subject to ownership restrictions only if implementing a change in an FM radio station's community of license or if new or increased concentration of ownership among commonly-owned media would be created); accord 2002 Biennial Regulatory Review--Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, 18 FCC Rcd 13,620 at fn. 1033 (2003) (modifications of facilities in a grandfathered combination are prohibited if the proposed modification would create a new violation of the ownership rules).

Table 2 - Stations Considered to be in the  
Laurel-Hattiesburg, MS Arbitron Metro<sup>5</sup>

| Count | Calls | Fac ID | Band | Owner                                    | Status <sup>6</sup> | Community   | County  |
|-------|-------|--------|------|--|---------------------|-------------|---------|
| 1     | WEEZ  | 16785  | AM   | CC LICENSES                              | b                   | Laurel      | Jones   |
| 2     | WFOR  | 54612  | AM   | CC LICENSES                              | b                   | Hattiesburg | Forrest |
| 3     | WHER  | 52618  | FM   | CC LICENSES                              | a                   | Heidelberg  | Jasper  |
| 4     | WJKX  | 61116  | FM   | CC LICENSES                              | b                   | Ellisville  | Jones   |
| 5     | WNSL  | 16784  | FM   | CC LICENSES                              | b                   | Laurel      | Jones   |
| 6     | WUSW  | 54611  | FM   | CC LICENSES                              | b                   | Hattiesburg | Forrest |
| 7     | WZLD  | 66954  | FM   | CC LICENSES                              | b                   | Petal       | Forrest |
| 8     | WAI1  | 78264  | FM   | American Family Association Incorporated | b                   | Hattiesburg | Forrest |
| 9     | WATP  | 82443  | FM   | American Family Association Incorporated | b                   | Laurel      | Jones   |
| 10    | WBBN  | 71207  | FM   | Blakeney Communications Incorporated     | a                   | Taylorville | Smith   |

<sup>5</sup> Source: BIA.

<sup>6</sup> 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.

|    |         |       |    |                                      |   |              |           |
|----|---------|-------|----|--------------------------------------|---|--------------|-----------|
| 11 | WKZW    | 14021 | FM | Blakeney Communications Incorporated | b | Sandersville | Jones     |
| 12 | WXRR    | 29549 | FM | Blakeney Communications Incorporated | b | Hattiesburg  | Forrest   |
| 13 | WHSY    | 61237 | AM | C.W.H. Broadcasting Inc              | b | Hattiesburg  | Forrest   |
| 14 | WZNF    | 63486 | FM | Dowdy & Dowdy                        | g | Lumberton    | Lamar     |
| 15 | WLVZ    | 63847 | FM | Educational Media Foundation         | a | Collins      | Covington |
| 16 | WJMG    | 11226 | FM | Floyd, Vernon C                      | b | Hattiesburg  | Forrest   |
| 17 | WORV    | 11227 | AM | Floyd, Vernon C                      | b | Hattiesburg  | Forrest   |
| 18 | WMXI    | 54655 | FM | Rainey Broadcasting Inc              | b | Laurel       | Jones     |
| 19 | WFMM    | 36617 | FM | TeleSouth Communications Inc         | b | Sumrall      | Lamar     |
| 20 | WGDQ    | 68907 | FM | Unity Broadcasters                   | b | Hattiesburg  | Forrest   |
| 21 | WUSM-FM | 69214 | FM | University of Southern Mississippi   | b | Hattiesburg  | Forrest   |
| 22 | WAML    | 52617 | AM | Walking by Faith Ministries Inc      | b | Laurel       | Jones     |

Interim Contour-Overlap Analysis

Because the proposed principal community contour of the station to be modified intersects the principal community contour of a station under common ownership or attribution whose community of license is located outside any Arbitron Metro, an interim contour-overlap analysis is also set forth in this statement.

Interim Contour-Based Radio Markets

A "radio market" under the interim contour-overlap method is the area encompassed by the mutually overlapping principal community contours of the stations under common-ownership or attribution. Here, such mutually overlapping contours form one "radio market" for interim contour-overlap analysis under the Commission's rules. This is illustrated in *Figure 2*.

"Radio Market 1" is defined by the mutually overlapping principal community contours of WEEZ(AM), WNSL(FM), WUSW(FM), WJKX(FM), WZLD(FM) and WHER(FM). The predicted principal community contours of these stations (1 AM / 5 FM), as well as other stations whose principal community contours overlap this combination, are shown in *Figure 3*. *Figure 4* is the tabulation of some of the radio stations identified in the contour-overlap "radio market."

Count of Stations in Defined Interim Contour-Overlap Markets

The number of radio stations in a contour-overlap "radio market" is determined by counting the operating stations having principal community contours which overlap or intersect the principal community contours which define the radio market, plus the subject commonly owned or attributable stations, excluding any stations whose transmitter sites are further than 92 kilometers from the perimeter of mutual overlap, and excluding any

commonly owned or attributable stations that do not serve to define the market.

In the interim contour-overlap "Radio Market 1" studied herein, there are a maximum of 38 radio stations, including the subject co-owned or attributable stations, which overlap or intersect with the defined "radio market." *Figure 4* is the tabulation of some of the radio stations identified in this contour-overlap "radio market".

Only known licensed, operating radio stations were included in this tabulation. 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 C.F.R. § 73.184. Ground conductivities were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 C.F.R. § 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 45 degrees of azimuth.

### Conclusions

In the Arbitron Metro Market studied herein, there are at least 23 radio stations, including the subject commonly-owned or attributable 2-AM / 5-FM stations, which are home to the Laurel-Hattiesburg, MS Arbitron Metro. This proposal does not affect the existing number of attributable stations in the subject Arbitron Metro.

In interim contour-overlap "radio market 1" studied herein, only 38 qualifying stations were found to have principal community contours which overlap or intersect the principal community contours which define the radio market, including the commonly-owned or attributable 1-AM / 5-FM stations.

Therefore, this proposal is not in compliance with FCC 73.3555(a)(ii). This proposal does not affect the existing number of attributable stations in the subject Arbitron Metro.

Figure 1

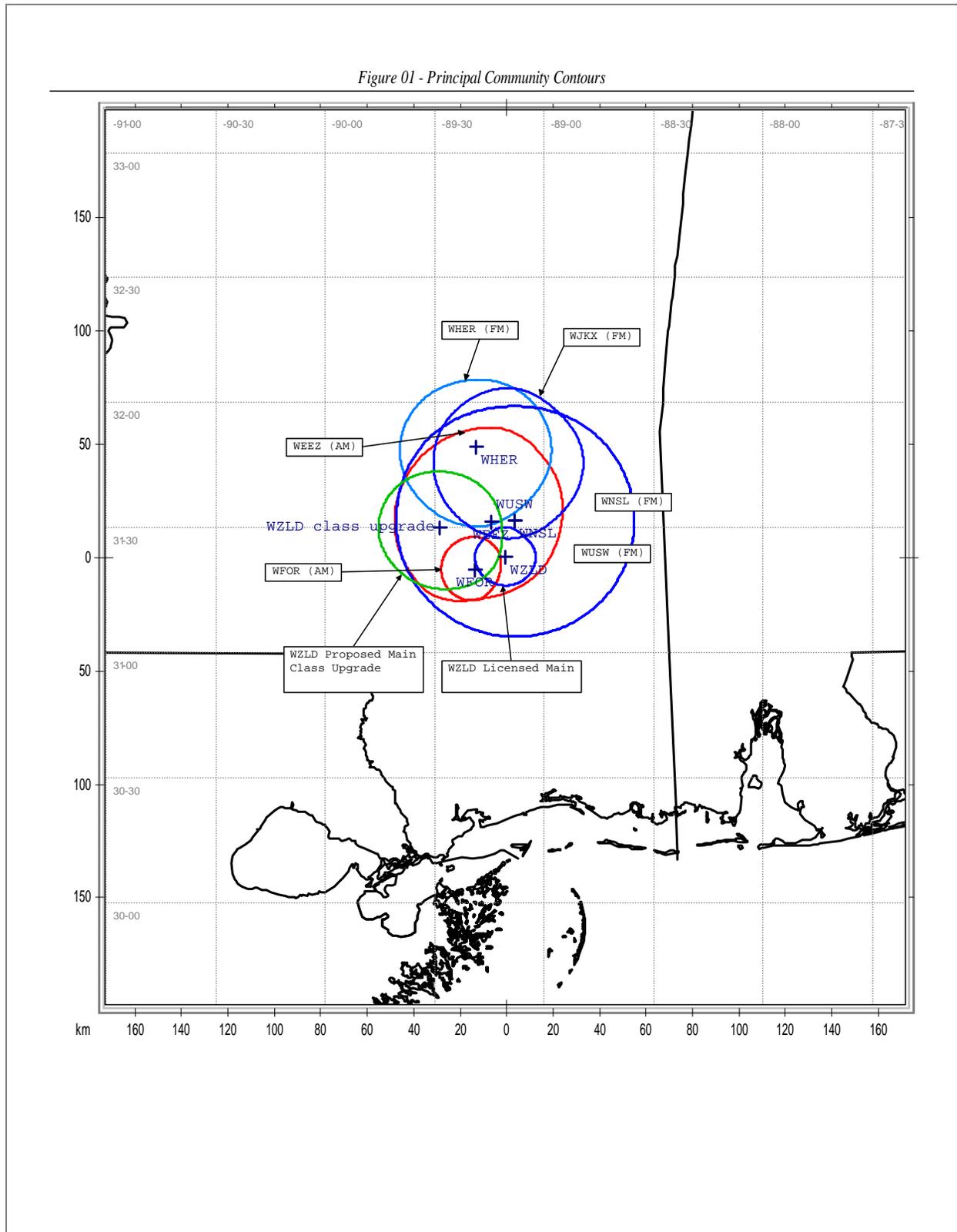


Figure 2

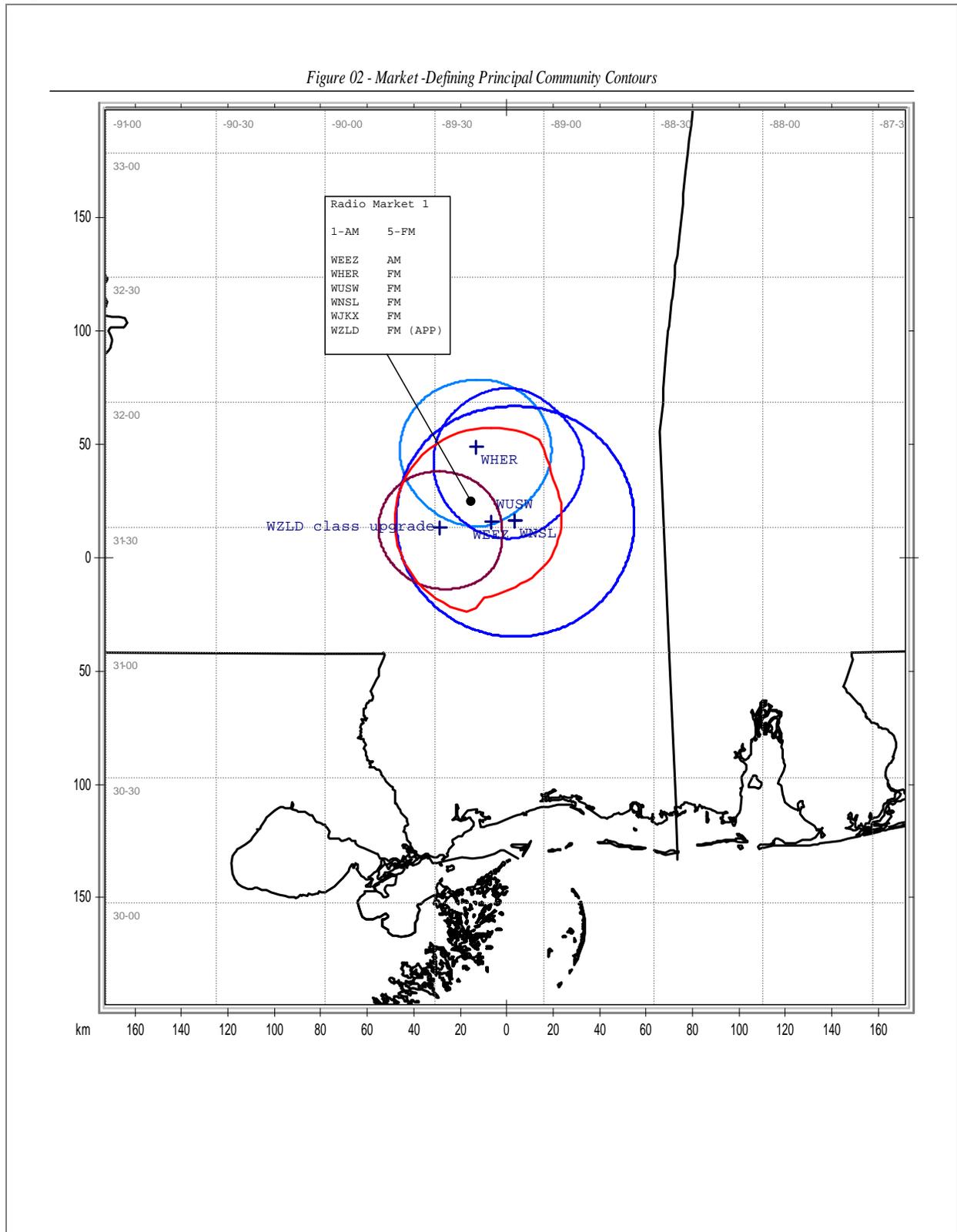


Figure 3 - Radio Market 1, Principal Community Contours

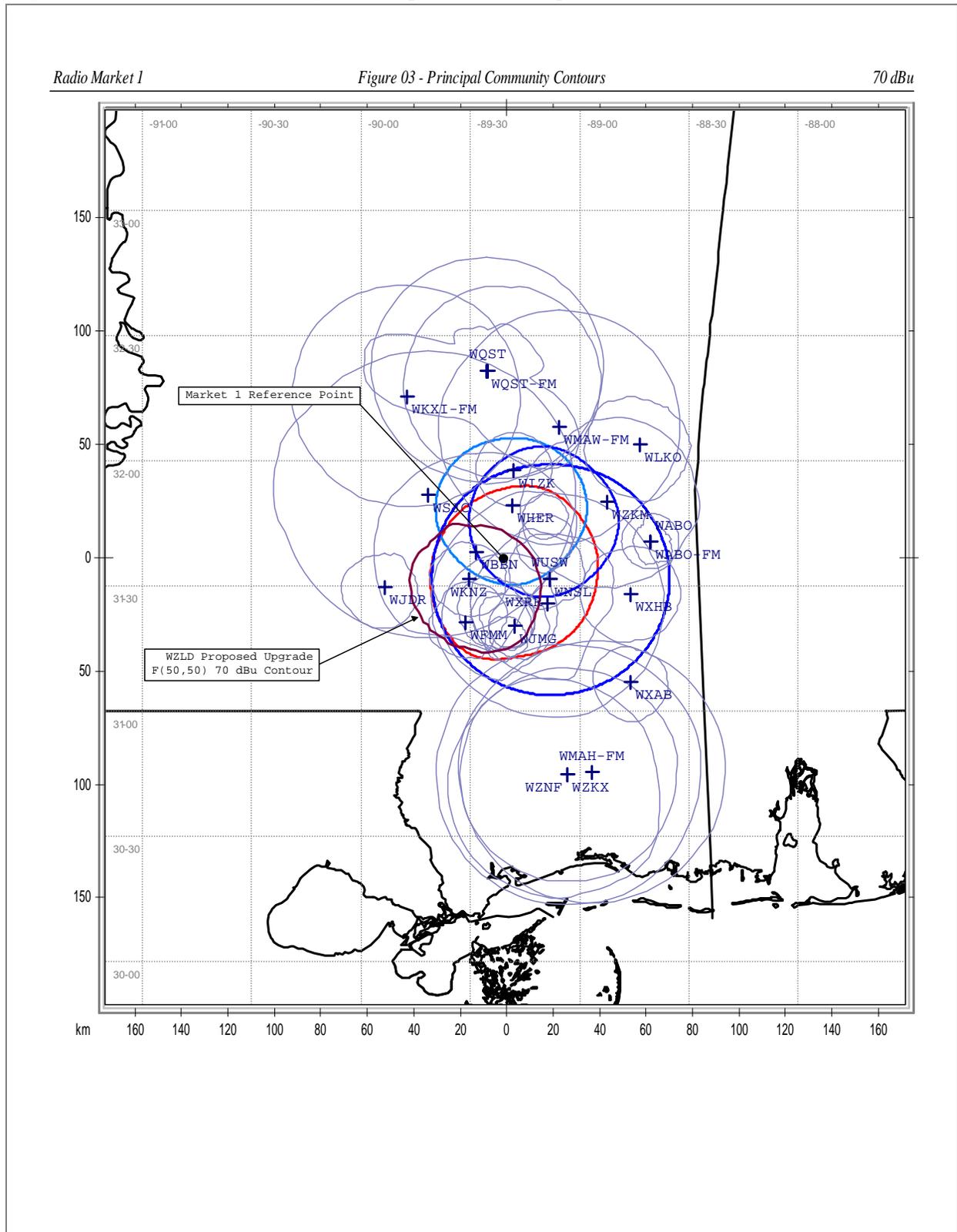


Figure 4 - Tabulation of Selected Radio Stations in Radio Market 1

| Count | Call Sign | Fac ID | Licensee  | Dist_km |
|-------|-----------|--------|---|---------|
| 1     | WEEZ      | 16785  | CC LICENSES, LLC  | 14.22   |
| 2     | WHER      | 52618  | CC LICENSES, LLC  | 22.96   |
| 3     | WNSL      | 16784  | CC LICENSES, LLC  | 22.38   |
| 4     | WUSW      | 54611  | CC LICENSES, LLC  | 22.38   |
| 5     | WJKX      | 61116  | CC LICENSES, LLC  | 23.71   |
| 6     | WZLD      | 66954  | CC LICENSES, LLC  | 30.32   |
| 7     | WHSY      | 61237  | SOUTHERN AIR COMMUNICATIONS, INC.   | 26.74   |
| 8     | WIZK      | 14022  | M. JEROME HUGHEY  | 38.93   |
| 9     | WSJC      | 74003  | FAMILY TALK RADIO   | 42.98   |
| 10    | WAML      | 52617  | WALKING BY FAITH MINISTRIES, INC.   | 19.48   |
| 11    | WORV      | 11227  | CIRCUIT BROADCASTING CO.  | 30.74   |
| 12    | WQST      | 1652   | ACE BROADCASTING, INC.  | 83.02   |
| 13    | WABO      | 40488  | MARTIN BROADCASTING COMPANY   | 63.98   |
| 14    | WZKX      | 17477  | DOWDY & DOWDY PARTNERSHIP   | 100.28  |
| 15    | WZNF      | 63486  | JMD, INC.   | 100.28  |
| 16    | WAOY      | 1533   | AMERICAN FAMILY ASSOCIATION   | 103.77  |
| 17    | WATP      | 82443  | AMERICAN FAMILY ASSOCIATION<br>CIRCUIT BROADCASTING COMPANY OF<br>HATTIESBURG | 25.54   |
| 18    | WJMG      | 11226  | HATTIESBURG   | 30.74   |
| 19    | WUSM-FM   | 69214  | UNIVERSITY OF SOUTHERN MISSISSIPPI  | 29.58   |
| 20    | WXRR      | 29549  | BLAKENEY COMMUNICATIONS, INC.   | 27.93   |
| 21    | WKNZ      | 63847  | EDUCATIONAL MEDIA FOUNDATION  | 18.13   |
| 22    | WBBN      | 71207  | BLAKENEY COMMUNICATIONS, INC  | 12.48   |
| 23    | WFMM      | 36617  | TELESOUTH COMMUNICATIONS, INC   | 33.45   |
| 24    | WMXI      | 54655  | RAINEY BROADCASTING, INC.   | 19.6    |
| 25    | WJDR      | 63792  | SUN BELT BROADCASTING CORPORATION   | 53.6    |
| 26    | WGDQ      | 68907  | UNITY BROADCASTERS  | 26.34   |
| 27    | WKZW      | 14021  | BLAKENEY COMMUNICATIONS, INC.   | 27.98   |
| 28    | WAI       | 78264  | AMERICAN FAMILY ASSOCIATION   | 36.98   |
| 29    | WQST-FM   | 1626   | AMERICAN FAMILY ASSOCIATION   | 83.13   |
| 30    | WKXI-FM   | 50407  | URBAN RADIO II, L.L.C.  | 82.54   |
| 31    | WMAW-FM   | 43188  | MISSISSIPPI AUTHORITY FOR EDUCATIONAL TV                                      | 62.61   |
| 32    | WMBU      | 9926   | THE MOODY BIBLE INSTITUTE OF CHICAGO  | 77.44   |
| 33    | WMAH-FM   | 43198  | MISSISSIPPI AUTHORITY FOR EDUCATIONAL TV                                      | 102.89  |
| 34    | WZKM      | 90975  | AMERICAN FAMILY ASSOCIATION   | 51.08   |
| 35    | WABO-FM   | 40489  | MARTIN BROADCASTING COMPANY   | 63.98   |
| 36    | WXHB      | 70409  | BLAKENEY COMMUNICATIONS, INC.   | 57.61   |
| 37    | WXAB      | 12815  | COMMUNITY BROADCASTING CO., INC.  | 78.36   |
| 38    | WLKO      | 54324  | EDUCATIONAL MEDIA FOUNDATION  | 77.03   |