

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 ("CTLTP"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CTLTP proposes to modify the facilities of KEZL(FM), Fowler, CA. 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

Calls	Fac ID	Band	Community	County	State	Geographic Arbitron Market	Declared Arbitron Market
KCBL	9749	AM	Fresno	Fresno	CA	Fresno, CA	Fresno, CA
KRDU	54559	AM	Dinuba	Tulare	CA	Visalia-Tulare-Hanford, CA	Fresno, CA
KVBL	2096	AM	Visalia	Tulare	CA	Visalia-Tulare-Hanford, CA	Fresno, CA
KALZ	48777	FM	Fresno	Fresno	CA	Fresno, CA	Fresno, CA
KBOS-FM	9748	FM	Tulare	Tulare	CA	Visalia-Tulare-Hanford, CA	Fresno, CA
KEZL	2097	FM	Fowler	Fresno	CA	Fresno, CA	Fresno, CA
KFSO-FM	2099	FM	Visalia	Tulare	CA	Visalia-Tulare-Hanford, CA	Fresno, CA
KRZR	48776	FM	Hanford	Kings	CA	Visalia-Tulare-Hanford, CA	Fresno, CA
KSOB	54560	FM	Dinuba	Tulare	CA	Visalia-Tulare-Hanford, CA	Fresno, CA

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 KEZL(FM) as proposed, or which is located in the same Arbitron Metro<sup>4</sup> as KEZL(FM). The community of license of KEZL(FM) is located within the Fresno, CA Arbitron Metro, and KEZL(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 in the nearby Visalia-Tulare-Hanford, CA 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

KEZL(FM) is reported by BIA as being "Home" to the Fresno, CA Arbitron Metro. This proposal is not in compliance with the local radio ownership rules for that Arbitron Metro, as evidenced by Table 2 below. However, the existing KEZL(FM) licensed facility was also not in compliance with the Arbitron metro-based rules. This proposal maintains the status-quo in the Fresno, CA Arbitron Metro: no stations are added to or removed from the metro, nor is KEZL(FM)'s Arbitron market changed, by virtue of this instant application. Because this 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  
Fresno, CA Arbitron Metro<sup>5</sup>

Count	Calls	Fac ID	Band	Owner	Status <sup>6</sup>	Community	County
1	KEYQ	2098	AM	Association for Community Education	b	Fresno	Fresno
2	KOKO-FM	3970	FM	Big Broadcast of Arizona LLC	b	Kerman	Fresno
3	KAAT	8341	FM	California Sierra Corporation	a	Oakhurst	Madera
4	KFSR	8349	FM	California State University	b	Fresno	Fresno
5	KALZ	48777	FM	Clear Channel Communications	b	Fresno	Fresno
6	KBOS-FM	9748	FM	Clear Channel Communications	a	Tulare	Tulare
7	KCBL	9749	AM	Clear Channel Communications	b	Fresno	Fresno
8	KEZL	2097	FM	Clear Channel Communications	b	Fowler	Fresno
9	KFSO-FM	2099	FM	Clear Channel Communications	a	Visalia	Tulare
10	KRDU	54559	AM	Clear Channel Communications	a	Dinuba	Tulare
11	KRZR	48776	FM	Clear Channel Communications	a	Hanford	Kings
12	KSOF	54560	FM	Clear Channel Communications	a	Dinuba	Tulare
13	KVBL	2096	AM	Clear Channel Communications	a	Visalia	Tulare
14	KDKL	85850	FM	Educational Media Foundation	b	Coalinga	Fresno
15	KFNO	20924	FM	Family Stations Inc	b	Fresno	Fresno
16	KFCF	22641	FM	Fresno Free College Foundation	b	Fresno	Fresno
17	KBIF	9226	AM	Gore-Overgaard Broadcasting, Inc.	b	Fresno	Fresno
18	KIRV	48513	AM	Gore-Overgaard Broadcasting, Inc.	b	Fresno	Fresno
19	KMGV	18409	FM	Infinity Broadcasting	b	Fresno	Fresno

<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.

20	KMJ	26923	AM	Infinity Broadcasting	b	Fresno	Fresno
21	KOOR	29429	AM	Infinity Broadcasting	b	Clovis	Fresno
22	KOQO-FM	29296	FM	Infinity Broadcasting	b	Fresno	Fresno
23	KRNC	26933	FM	Infinity Broadcasting	b	Fresno	Fresno
24	KSKS	26924	FM	Infinity Broadcasting	b	Fresno	Fresno
25	KWYE	18406	FM	Infinity Broadcasting	b	Fresno	Fresno
26	KJWL	31538	FM	JSA Broadcasting	b	Fresno	Fresno
27	KAJP	9993	FM	Lazer Broadcasting Corporation	b	Firebaugh	Fresno
28	KNGS	72672	FM	Lazer Broadcasting Corporation	b	Coalinga	Fresno
29	KGST	38453	AM	Lotus Communications Corporation	b	Fresno	Fresno
30	KLBN	38455	FM	Lotus Communications Corporation	b	Auberry	Fresno
31	KMMM	51845	FM	Lotus Communications Corporation	a	Madera	Madera
32	KFYE	18860	FM	Mapleton Communications LLC	b	Kingsburg	Fresno
33	KFRR	29051	FM	Mondosphere Broadcasting	a	Woodlake	Tulare
34	KJFX	65773	FM	Mondosphere Broadcasting	b	Fresno	Fresno
35	KWOL	64144	FM	Mondosphere Broadcasting	b	San Joaquin	Fresno
36	KMEN	88205	FM	Moon Broadcasting Corp	b	Mendota	Fresno
37	KWRU	18407	AM	Multicultural Radio Broadcasting Inc	b	Fresno	Fresno
38	KIGS	51122	AM	P&C Broadcasting	a	Hanford	Kings
39	KMPH-FM	26266	FM	Pappas Telecasting Companies	a	Hanford	Kings
40	KSJV	54496	FM	Radio Bilingue Inc	b	Fresno	Fresno
41	KBHH	82085	FM	Radio Campesina Inc	b	Kerman	Fresno
42	KFIG	26592	AM	Radio Central LLC	b	Fresno	Fresno
43	KAVT	87176	AM	RAK Communications Inc	b	Fresno	Fresno
44	KQEQ	33252	AM	RAK Communications Inc	b	Fowler	Fresno
45	KXEX	54960	AM	RAK Communications Inc	b	Fresno	Fresno
46	KMAK	56145	FM	Smith, Richard B.	b	Orange Cove	Fresno
47	KYNO	65774	AM	Spanish Catholic Radio	b	Fresno	Fresno
48	KOND	39567	FM	Univision Communications Inc	b	Clovis	Fresno
49	KZOL	31716	FM	Univision Communications Inc	a	North Fork	Madera
50	KVPR	72188	FM	White Ash Broadcasting Inc	b	Fresno	Fresno

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 50 radio stations, including the subject commonly-owned 3-AM / 6-FM stations, which are home to the Fresno, CA Metro. This proposal does not affect the existing number of commonly-owned stations in the subject BIA Metro.

Respectfully submitted,

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 December 10, 2004