

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS

This statement and the attached figures were prepared on behalf of a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CCC proposes to modify the facilities of KUUL(FM), East Moline, IL. 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	Band	Fac ID	Community	County	Geographic Arbitron Market	Declared Arbitron Market
KCQQ	FM	32987	Davenport	Scott	Quad Cities, IA-IL	Quad Cities, IA-IL
KMXG	FM	60359	Clinton	Clinton	Non-Metro	Quad Cities, IA-IL
KUUL	FM	43208	East Moline	Rock Island	Quad Cities, IA-IL	Quad Cities, IA-IL
WFXN	AM	43199	Moline	Rock Island	Quad Cities, IA-IL	Quad Cities, IA-IL
WLLR	FM	60361	Davenport	Scott	Quad Cities, IA-IL	Quad Cities, IA-IL
WOC	AM	60360	Davenport	Scott	Quad Cities, IA-IL	Quad Cities, IA-IL

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 market, 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 KUUL(FM), as proposed, which is not located in an Arbitron market, or regardless of contour overlap, which is located in the same Arbitron Metro⁴ as KUUL(FM). The community of license of KUUL(FM) is located within and the station is reported by BIA as being "Home" to the Quad Cities, IA-IL Metro. 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 Quad Cities, IA-IL Arbitron Metro market, and commonly owned stations whose communities of license are located outside any Arbitron Metro market.

Arbitron Market Study

KUUL(FM) is reported by BIA as being "Home" to the Quad Cities, IA-IL Metro. This proposal is in compliance with the local radio ownership rules for that Arbitron Metro, as evidenced by *Table 2* below:

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.

Table 2 – Stations Considered to be in the
Quad Cities, IA-IL Arbitron Metro⁵

Count.	Call	Band	Owner	Geo In
1	WAXR	FM	American Family Association Incorporated	No
2	WVIK	FM	Augustana College	No
3	KCQQ	FM	Clear Channel Communications Inc	No
4	KMXG	FM	Clear Channel Communications Inc	Yes
5	KUUL	FM	Clear Channel Communications Inc	No
6	WFXN	AM	Clear Channel Communications Inc	No
7	WLLR	FM	Clear Channel Communications Inc	No
8	WOC	AM	Clear Channel Communications Inc	No
9	WLKU	FM	Educational Media Foundation	No
10	WKBF	AM	La Jefa Latino Broadcasting LLC	No
11	WJRE	FM	Viriden Broadcasting Corp	No
12	WKEI	AM	Viriden Broadcasting Corp	No
13	WYEC	FM	Viriden Broadcasting Corp	No
14	WDLM	AM	Moody Bible Institute of Chicago Incorporated	No
15	WDLM	FM	Moody Bible Institute of Chicago Incorporated	No
16	KALA	FM	St Ambrose University	No
17	KBEA	FM	Townsquare Media LLC	Yes
18	KBOB	FM	Townsquare Media LLC	Yes
19	KJOC	AM	Townsquare Media LLC	No
20	KQCS	FM	Townsquare Media LLC	No
21	WXLN	FM	Townsquare Media LLC	No
22	KNSB	FM	University of Northern Iowa	No
23	WRMJ	FM	Western Illinois Broadcasting Inc	Yes

Interim Contour-Overlap Analysis

Because the overlapping stations 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 (1) "radio markets" for interim contour-overlap analysis under the Commission's rules as shown below in *Table 3*.

⁵ Source: BIA.

Table 3, Table of Contour Market

Radio Market	
2- AM 4-FM	
KCQQ	FM
KMXG	FM
KUUL	FM
WFXN	AM
WLLR	FM
WOC	AM

Count of Stations in Defined 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" studied herein, there are the required counts of radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio market." *Figure 3* is a tabulation of the radio stations identified in the contour-overlap "radio market", and Table 4 is a summary of that data.

Table 4, Table of Market Station Count

Market 1	
Count	39

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 2-AM / 4-FM stations, which are home to the Quad Cities, IA-IL Metro. This proposal does not affect the existing number of commonly-owned stations in the subject Arbitron Metro.

In each interim contour-overlap "radio markets" studied herein, there is at least the minimum required count, including the commonly-owned stations.

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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FCC Engineering Supervisor
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Figure 1

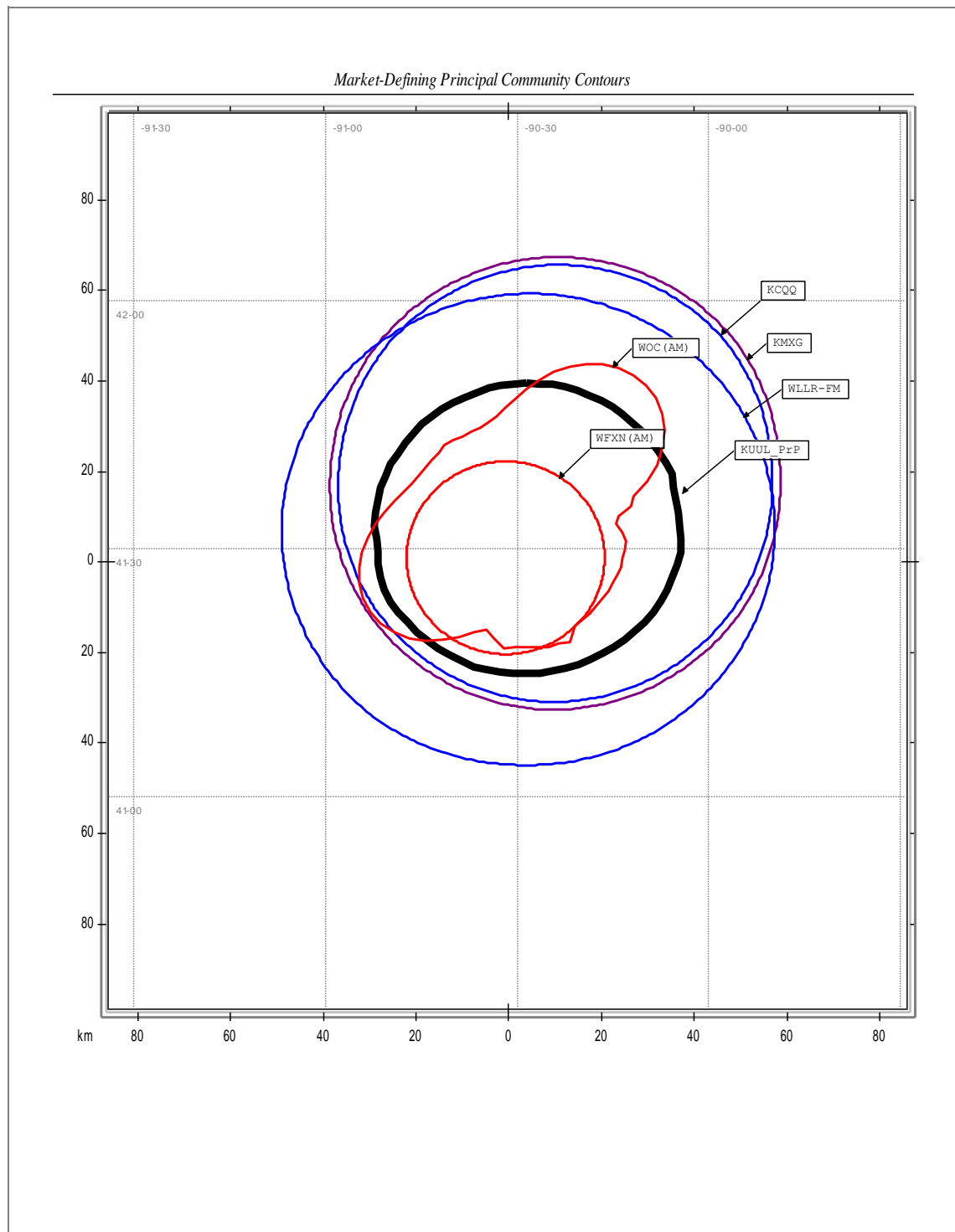


Figure 2

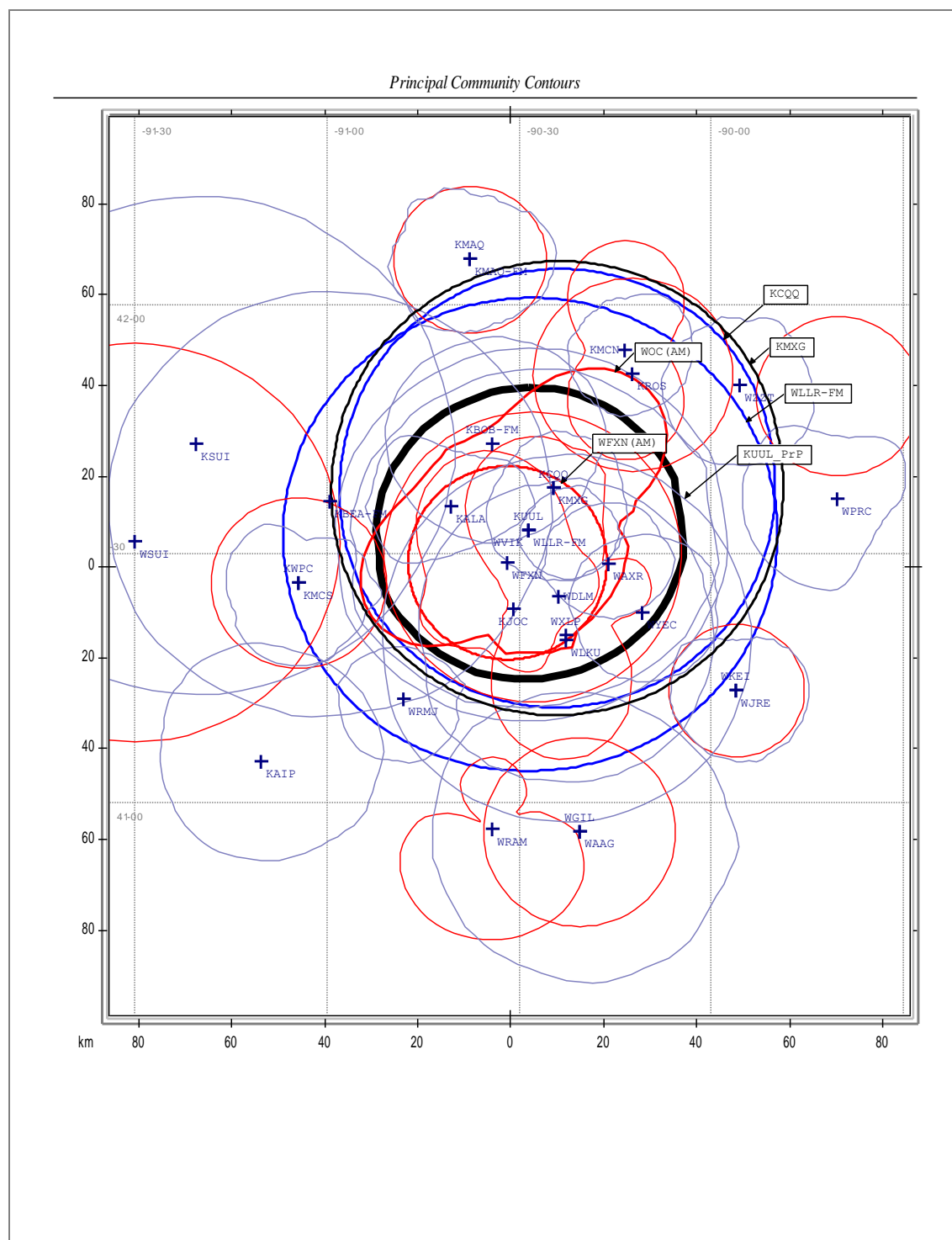


Figure 3 - Tabulation of stations in Radio Market

Count	Call Sign	Fac_id	Licensee	Dist_km
1	KCQQ	32987	CITICASTERS LICENSES, INC.	19.53
2	KMXG	60359	CITICASTERS LICENSES, INC.	19.53
3	WLLR-FM	60361	CITICASTERS LICENSES, INC.	8.53
4	WFXN	43199	CITICASTERS LICENSES, INC.	0
5	KUUL	43208	CITICASTERS LICENSES, INC.	8.53
6	WOC	60360	CITICASTERS LICENSES, INC.	8.8
7	WSUI	63119	THE UNIVERSITY OF IOWA	81.36
8	KWPC	47085	WPW BROADCASTING, INC.	45.78
9	WGIL	23039	GALESBURG BROADCASTING COMPANY	61.85
10	WRAM	33712	WPW BROADCASTING, INC.	59.18
11	KROS	35557	KROS BROADCASTING, INC.	49.99
12	WKBF	8593	LA JEFA LATINO BROADCASTING, LLC	5.5
13	WDLM	66005	THE MOODY BIBLE INSTITUTE OF CHICAGO	
14	KJOC	13662	TOWNSQUARE MEDIA QUAD CITIES LICENSE, LLC	10.34
15	KCLN	33055	WPW BROADCASTING, INC.	53.9
16	KMAQ	39858	MAQUOKETA BROADCASTING CO.	68.12
17	WSDR	37207	WITHERS BROADCASTING COMPANY OF ROCK RIVER, LLC	80.71
18	WKEI	70276	VIRDEN BROADCASTING CORP.	57.32
19	KMCS	47086	WPW BROADCASTING, INC.	45.78
20	KAIP	122025	EDUCATIONAL MEDIA FOUNDATION	69.62
21	KSUI	66626	THE UNIVERSITY OF IOWA	72.67
22	WAAG	23038	GALESBURG BROADCASTING COMPANY	61.85
23	KMCN	33054	WPW BROADCASTING, INC.	53.9
24	KQCS	19791	TOWNSQUARE MEDIA QUAD CITIES LICENSE, LLC	16.79
25	WAXR	86861	AMERICAN FAMILY ASSOCIATION	21.83
26	WVIK	3242	AUGUSTANA COLLEGE	8.53
27	WXLN	13663	TOWNSQUARE MEDIA QUAD CITIES LICENSE, LLC	20.36
28	KBEA-FM	13666	TOWNSQUARE MEDIA QUAD CITIES LICENSE, LLC	41.01
29	WYEC	70277	VIRDEN BROADCASTING CORP.	31.31
30	WRMJ	71790	WESTERN ILLINOIS BROADCASTING, INC.	37.99
31	KALA	62090	ST. AMBROSE COLLEGE	17.7
32	WLKU	8590	EDUCATIONAL MEDIA FOUNDATION	21.27
33	KBOB-FM	12234	TOWNSQUARE MEDIA QUAD CITIES LICENSE, LLC	26.65
34	WDLN-FM	43691	THE MOODY BIBLE INSTITUTE OF CHICAGO	8.67
35	KNSB	83540	UNIVERSITY OF NORTHERN IOWA	14.91
36	KMAQ-FM	39857	MAQUOKETA BROADCASTING COMPANY	68.12
37	WZZT	37209	WITHERS BROADCASTING COMPANY OF ROCK RIVER, LLC	64.1
38	WJRE	12236	VIRDEN BROADCASTING CORP.	57.32
39	WPRC	173264	ILLINOIS BIBLE INSTITUTE, INC.	73.02