

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 KSBL(FM), Carpinteria, CA. 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	Band	Community	County	State	Geographic Arbitron Market	Declared Arbitron Market
KFI	34425	AM	Los Angeles	Los Angeles	CA	Los Angeles, CA	Los Angeles, CA
KDB	51169	FM	Santa Barbara	Santa Barbara	CA	Santa Barbara, CA	Santa Barbara, CA
KBKO	61712	AM	Santa Barbara	Santa Barbara	CA	Santa Barbara, CA	Santa Barbara, CA
KIST	10327	AM	Santa Barbara	Santa Barbara	CA	Santa Barbara, CA	Santa Barbara, CA
KIST-FM	31434	FM	Santa Barbara	Santa Barbara	CA	Santa Barbara, CA	Santa Barbara, CA
KSBL	35592	FM	Carpinteria	Santa Barbara	CA	Santa Barbara, CA	Santa Barbara, CA
KSPE-FM	61058	FM	Ellwood	Santa Barbara	CA	Santa Barbara, CA	Santa Barbara, CA
KTMS	14529	AM	Santa Barbara	Santa Barbara	CA	Santa Barbara, CA	Santa Barbara, CA
KTYD	14528	FM	Santa Barbara	Santa Barbara	CA	Santa Barbara, CA	Santa Barbara, 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.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 KSBL(FM) as proposed, or which is located in the same Arbitron Metro⁴ as KSBL(FM). The community of license of KSBL(FM) is located within the Santa Barbara, CA Arbitron Metro, and KSBL(FM) is reported by BIA as being "Home" to that Metro only. Contour overlap of the station to be

¹ KDB(FM) is attributable by virtue of a 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.

modified, as depicted in Figure 1, also occurs with a commonly-owned station whose community of license is located in the nearby Los Angeles, CA Arbitron Metro market.

Arbitron Market Study

KSBL(FM) is reported by BIA as being "Home" to the Santa Barbara, 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 KSBL(FM) licensed facility was also not in compliance with the Arbitron metro-based rules. This proposal maintains the status-quo in the Santa Barbara, CA Arbitron Metro: no stations are added to or removed from the metro, nor is KSBL(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
Santa Barbara, CA Arbitron Metro⁵

Count	Calls	Fac ID	Band	Owner	Status ⁶	Community	County
1	KBKO	61712	AM	Clear Channel Communications	b	Santa Barbara	Santa Barbara
2	KIST	10327	AM	Clear Channel Communications	b	Santa Barbara	Santa Barbara
3	KIST-FM	31434	FM	Clear Channel Communications	b	Santa Barbara	Santa Barbara
4	KSBL	35592	FM	Clear Channel Communications	b	Carpinteria	Santa Barbara
5	KSPE-FM	61058	FM	Clear Channel Communications	b	Ellwood	Santa Barbara
6	KTMS	14529	AM	Clear Channel Communications	b	Santa Barbara	Santa Barbara

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.

7	KTYD	14528	FM	Clear Channel Communications	b	Santa Barbara	Santa Barbara
8	KMGQ	10329	FM	Cumulus Media Inc	b	Goleta	Santa Barbara
9	KRUZ	3159	FM	Cumulus Media Inc	b	Santa Barbara	Santa Barbara
10	KVYB	8853	FM	Cumulus Media Inc	b	Santa Barbara	Santa Barbara
11	KSBX	33708	FM	KCBX Inc	b	Santa Barbara	Santa Barbara
12	KRAZ	33439	FM	Knight Broadcasting Inc	a	Santa Ynez	Santa Barbara
13	KZER	3156	AM	Lazer Broadcasting Corporation	b	Santa Barbara	Santa Barbara
14	KJEE	43589	FM	Montecito FM Inc	b	Montecito	Santa Barbara
15	KDB	51169	FM	Pacific Broadcasting Company	b	Santa Barbara	Santa Barbara
16	KCSB-FM	69081	FM	Regents of the University of California	b	Santa Barbara	Santa Barbara
17	KZSB	57731	AM	Santa Barbara Broadcasting Inc	b	Santa Barbara	Santa Barbara
18	KQSC	69085	FM	University of Southern California	b	Santa Barbara	Santa Barbara

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 Metro Market studied herein, there are at least 18 radio stations, including the subject commonly-owned or attributable 3-AM / 5-FM stations, which are home to the Santa Barbara, CA Metro. This proposal does not affect the existing number of commonly-owned stations in the subject Arbitron Metro.

Respectfully submitted,

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Figure 1

