

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CITADEL BROADCASTING COMPANY

This radio multiple ownership analysis was prepared on behalf of Citadel Broadcasting Company (“Citadel”) concerning the proposed acquisition of WCXT(FM), Hart, Michigan (Coopersville, MI, Construction Permit), which is located in the Muskegon, Michigan area. This analysis was prepared under the FCC interim contour analysis method.* Considering the stations to be acquired and all other radio stations attributable to Citadel in the region, the following stations were analyzed:

Call Sign	City of License	Facilities
WBBL(AM)	Grand Rapids, MI	1340 kHz, 1 kW, U
WUBR(AM)	Whitehall, MI	1490 kHz, 1 kW, U
WODJ(FM)	Newaygo, MI	Ch 223A, 2.25 kW, 165 m (CP, BMPH-20030609ACU)
WTNR(FM)	Holland, MI	Ch 233B, 50 kW, 152 m
WLAV-FM	Grand Rapids, MI	Ch 245B, 50 kW, 149 m
WEFG-FM	Whitehall, MI	Ch 248A, 1.7 kW, 130 m
WLCS(FM)	North Muskegon, MI	Ch 252A, 1.6 kW, 139 m
WSHN-FM	Holton, MI	Ch 261A, 2.9 kW, 144 m (App. for License Pending)
WCXT(FM)	Hart, MI Coopersville, MI	Ch 287C2, 28 kW, 201 m (License) Ch 287B, 50 kW, 146 m (CP, BPH-20040503AFG)
WKLQ(FM)	Greenville, MI	Ch 297B, 50 kW, 150 m

The principal community contours of all of these stations are depicted on a map included herein as Figure 1. The radio multiple ownership analysis considers only those stations

* See Report and Order and Notice of Proposed Rulemaking, MB Docket 02-277, FCC 03-127, Released July 2, 2003.

with overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations). An ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

Radio Markets

The “radio market” applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. As listed in the table below, there are six defined “radio markets” formed by the subject stations:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	WUBR	WCXT(Lic), WCFG, WLCS, WSHN
Market 2	--	WCXT(Lic), WODJ, WSHN, WLCS
Market 3	WUBR	WCXT(CP), WCFG, WLCS, WSHN
Market 4	--	WCXT(CP), WODJ, WSHN, WLCS
Market 5	--	WCXT(CP), WODJ, WLAV
Market 6	WBBL	WCXT(CP), WLAV, WKLQ, WTNR

Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating stations that have principal community contours that intersect the principal community contours that define the radio market. Only those stations located within 92 km of the perimeter of the mutual overlap area of the defined market area were employed in the count of stations. Commonly owned stations, other than those that form

the market in question, were not considered in the count of stations in the defined markets. The results of the analysis are tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	6 AM; 15 FM; 21 Total
Market 2	9 AM; 19 FM; 28 Total
Market 3	13 AM; 20 FM; 33 Total
Market 4	12 AM; 20 FM; 32 Total
Market 5	15 AM; 24 FM; 39 Total
Market 6	18 AM; 28 FM; 46 Total

Figure 2 is a tabulation of the radio stations identified in the defined radio markets. Only known licensed, operating stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's AM database and the appropriate Ground Wave Field Strength versus Distance Graph described in Section 73.184 of the FCC Rules. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method outlined in Section 73.313 of the FCC Rules. Terrain data were derived from the U.S.G.S. 3-second computer database for each of the FM stations using radials evenly-spaced every 2 degrees of azimuth.

Based on the above, it is concluded that the proposed combination of the stations to be owned complies with Section 73.3555(a) of the FCC Rules.

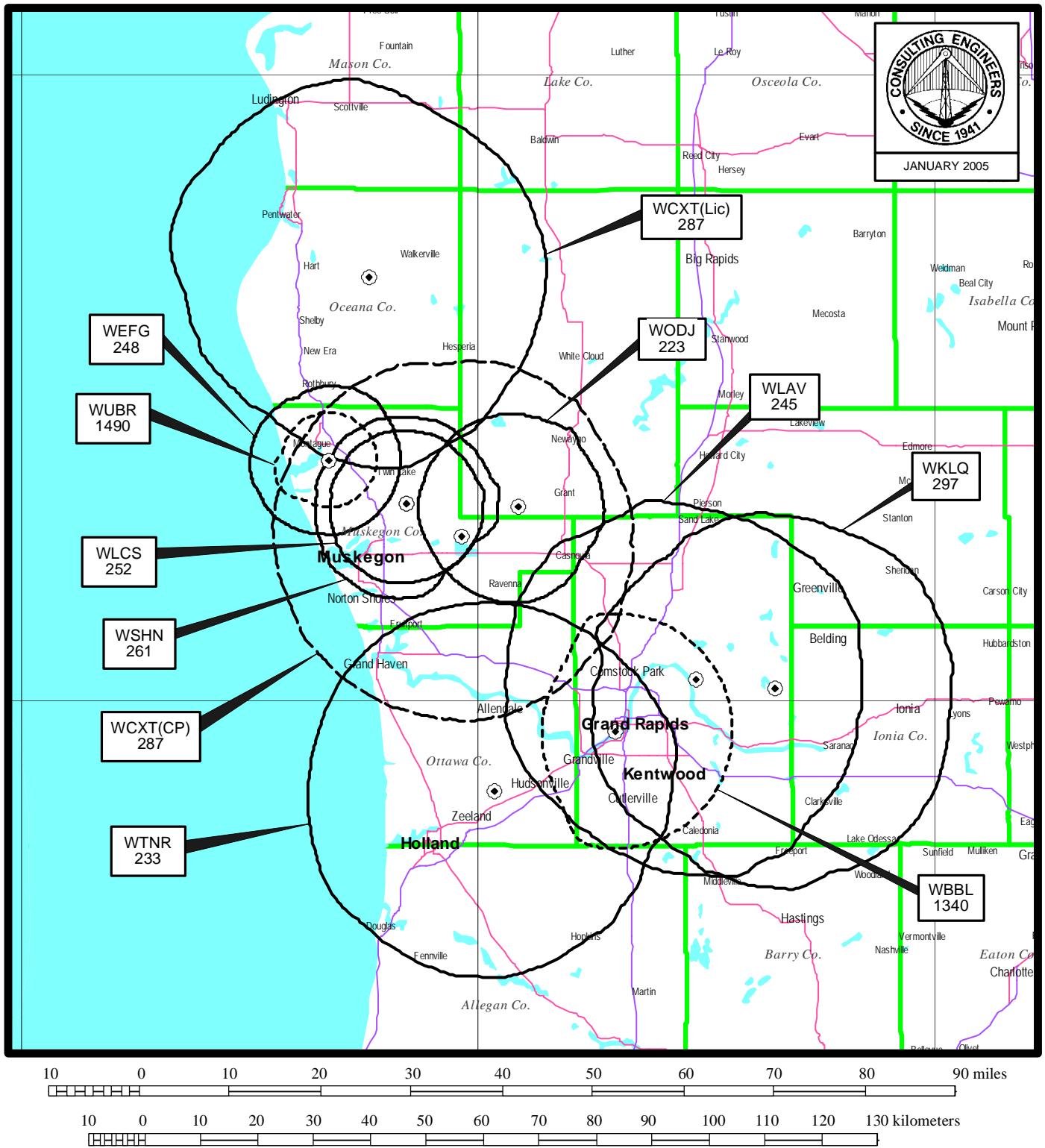


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Figure 1



PREDICTED PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

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Tabulation of Stations in Radio Markets

Market 1	
Number	Station
AM Stations	
1	WGVs, MUSKEGON, MI, 850 kHz
2	WMUS, MUSKEGON, MI, 1090 kHz
3	WKLA, LUDINGTON, MI, 1450 kHz
4	WUBR, WHITEHALL, MI, 1490 kHz
5	WSHN, FREMONT, MI, 1550 kHz
6	WMHG, MUSKEGON, MI, 1600 kHz
FM Stations	
1	WBLV, TWIN LAKE, MI, Channel 212
2	WWKR, PENTWATER, MI, Channel 231
3	WKZC, SCOTTVILLE, MI, Channel 235
4	WGVs-F, WHITEHALL, MI, Channel 237
5	WEFG-F, WHITEHALL, MI, Channel 248
6	WLCS, NORTH MUSKEGON, MI, Channel 252
7	WSHN-F, HOLTON, MI, Channel 261
8	WMRR, MUSKEGON HEIGHTS, MI, Channel 269
9	WYBR, BIG RAPIDS, MI, Channel 272
10	WMOM, PENTWATER, MI, Channel 274
11	WSNX-F, MUSKEGON, MI, Channel 283
12	WCXT, HART, MI, Channel 287
13	WKLA-F, LUDINGTON, MI, Channel 292
14	WMUS-F, MUSKEGON, MI, Channel 295
15	WSHZ, MUSKEGON, MI, Channel 300

Market 2	
Number	Station
AM Stations	
1	WMJH, ROCKFORD, MI, 810 kHz

Market 2	
Number	Station
2	WGVS, MUSKEGON, MI, 850 kHz
3	WMUS, MUSKEGON, MI, 1090 kHz
4	WJNZ, KENTWOOD, MI, 1140 kHz
5	WOOD, GRAND RAPIDS, MI, 1300 kHz
6	WKLA, LUDINGTON, MI, 1450 kHz
7	WUBR, WHITEHALL, MI, 1490 kHz
8	WSHN, FREMONT, MI, 1550 kHz
9	WMHG, MUSKEGON, MI, 1600 kHz
FM Stations	
1	WGVU-F, ALLENDALE, MI, Channel 203
2	WBLV, TWIN LAKE, MI, Channel 212
3	WODJ, NEWAYGO, MI, Channel 223
4	WWKR, PENTWATER, MI, Channel 231
5	WKZC, SCOTTVILLE, MI, Channel 235
6	WGVS-F, WHITEHALL, MI, Channel 237
7	WLHT-F, GRAND RAPIDS, MI, Channel 239
8	WEFG-F, WHITEHALL, MI, Channel 248
9	WLCS, NORTH MUSKEGON, MI, Channel 252
10	WSHN-F, HOLTON, MI, Channel 261
11	WMRR, MUSKEGON HEIGHTS, MI, Channel 269
12	WYBR, BIG RAPIDS, MI, Channel 272
13	WMOM, PENTWATER, MI, Channel 274
14	WFUR-F, GRAND RAPIDS, MI, Channel 275
15	WSNX-F, MUSKEGON, MI, Channel 283
16	WCXT, HART, MI, Channel 287
17	WKLA-F, LUDINGTON, MI, Channel 292
18	WMUS-F, MUSKEGON, MI, Channel 295
19	WSHZ, MUSKEGON, MI, Channel 300

Market 3	
Number	Station
AM Stations	
1	WMFN, ZEELAND, MI, 640 kHz
2	WMJH, ROCKFORD, MI, 810 kHz
3	WGVS, MUSKEGON, MI, 850 kHz
4	WMUS, MUSKEGON, MI, 1090 kHz
5	WJNZ, KENTWOOD, MI, 1140 kHz
6	WTKG, GRAND RAPIDS, MI, 1230 kHz
7	WOOD, GRAND RAPIDS, MI, 1300 kHz
8	WGHN, GRAND HAVEN, MI, 1370 kHz

Market 3	
Number	Station
9	WNWZ, GRAND RAPIDS, MI, 1410 kHz
10	WUBR, WHITEHALL, MI, 1490 kHz
11	WSHN, FREMONT, MI, 1550 kHz
12	WFUR, GRAND RAPIDS, MI, 1570 kHz
13	WMHG, MUSKEGON, MI, 1600 kHz
FM Stations	
1	WGVU-F, ALLENDALE, MI, Channel 203
2	WGNB, ZEELAND, MI, Channel 207
3	WBLV, TWIN LAKE, MI, Channel 212
4	WCSG, GRAND RAPIDS, MI, Channel 217
5	WGHN-F, GRAND HAVEN, MI, Channel 221
6	WGVF-F, WHITEHALL, MI, Channel 237
7	WLHT-F, GRAND RAPIDS, MI, Channel 239
8	WVTI, HOLLAND, MI, Channel 241
9	WFGF-F, WHITEHALL, MI, Channel 248
10	WLCS, NORTH MUSKEGON, MI, Channel 252
11	WFGF, GRAND RAPIDS, MI, Channel 254
12	WSHN-F, HOLTON, MI, Channel 261
13	WTRV, WALKER, MI, Channel 263
14	WBFX, GRAND RAPIDS, MI, Channel 267
15	WMRR, MUSKEGON HEIGHTS, MI, Channel 269
16	WFUR-F, GRAND RAPIDS, MI, Channel 275
17	WSNX-F, MUSKEGON, MI, Channel 283
18	WCXT, COOPERSVILLE, MI, Channel 287
19	WMUS-F, MUSKEGON, MI, Channel 295
20	WSHZ, MUSKEGON, MI, Channel 300

Market 4	
Number	Station
AM Stations	
1	WMFN, ZEELAND, MI, 640 kHz
2	WMJH, ROCKFORD, MI, 810 kHz
3	WGVF, MUSKEGON, MI, 850 kHz
4	WMUS, MUSKEGON, MI, 1090 kHz
5	WJNZ, KENTWOOD, MI, 1140 kHz
6	WTKG, GRAND RAPIDS, MI, 1230 kHz
7	WOOD, GRAND RAPIDS, MI, 1300 kHz
8	WGHN, GRAND HAVEN, MI, 1370 kHz
9	WNWZ, GRAND RAPIDS, MI, 1410 kHz
10	WSHN, FREMONT, MI, 1550 kHz

Market 4	
Number	Station
11	WFUR, GRAND RAPIDS, MI, 1570 kHz
12	WMHG, MUSKEGON, MI, 1600 kHz
FM Stations	
1	WGVU-F, ALLENDALE, MI, Channel 203
2	WGNB, ZEELAND, MI, Channel 207
3	WBLV, TWIN LAKE, MI, Channel 212
4	WCSG, GRAND RAPIDS, MI, Channel 217
5	WGHN-F, GRAND HAVEN, MI, Channel 221
6	WODJ, NEWAYGO, MI, Channel 223
7	WGVF-F, WHITEHALL, MI, Channel 237
8	WLHT-F, GRAND RAPIDS, MI, Channel 239
9	WVTI, HOLLAND, MI, Channel 241
10	WLCS, NORTH MUSKEGON, MI, Channel 252
11	WFGH, GRAND RAPIDS, MI, Channel 254
12	WSHN-F, HOLTON, MI, Channel 261
13	WTRV, WALKER, MI, Channel 263
14	WBFX, GRAND RAPIDS, MI, Channel 267
15	WMRR, MUSKEGON HEIGHTS, MI, Channel 269
16	WFUR-F, GRAND RAPIDS, MI, Channel 275
17	WSNX-F, MUSKEGON, MI, Channel 283
18	WCXT, COOPERSVILLE, MI, Channel 287
19	WMUS-F, MUSKEGON, MI, Channel 295
20	WSHZ, MUSKEGON, MI, Channel 300

Market 5	
Number	Station
AM Stations	
1	WMFN, ZEELAND, MI, 640 kHz
2	WMJH, ROCKFORD, MI, 810 kHz
3	WGVF, MUSKEGON, MI, 850 kHz
4	WMUS, MUSKEGON, MI, 1090 kHz
5	WJNZ, KENTWOOD, MI, 1140 kHz
6	WTKG, GRAND RAPIDS, MI, 1230 kHz
7	WOOD, GRAND RAPIDS, MI, 1300 kHz
8	WGHN, GRAND HAVEN, MI, 1370 kHz
9	WSCG, GREENVILLE, MI, 1380 kHz
10	WNWZ, GRAND RAPIDS, MI, 1410 kHz
11	WGVU, KENTWOOD, MI, 1480 kHz
12	WYGR, WYOMING, MI, 1530 kHz
13	WSHN, FREMONT, MI, 1550 kHz

Market 5	
Number	Station
14	WFUR, GRAND RAPIDS, MI, 1570 kHz
15	WMHG, MUSKEGON, MI, 1600 kHz
FM Stations	
1	WYCE, WYOMING, MI, Channel 201
2	WGVU-F, ALLENDALE, MI, Channel 203
3	WBLU-F, GRAND RAPIDS, MI, Channel 205
4	WGNB, ZEELAND, MI, Channel 207
5	WAYG, GRAND RAPIDS, MI, Channel 210
6	WBLV, TWIN LAKE, MI, Channel 212
7	WCSG, GRAND RAPIDS, MI, Channel 217
8	WGHN-F, GRAND HAVEN, MI, Channel 221
9	WODJ, NEWAYGO, MI, Channel 223
10	WGVF-F, WHITEHALL, MI, Channel 237
11	WLHT-F, GRAND RAPIDS, MI, Channel 239
12	WVTI, HOLLAND, MI, Channel 241
13	WLAV-F, GRAND RAPIDS, MI, Channel 245
14	WGRD-F, GRAND RAPIDS, MI, Channel 250
15	WFGH, GRAND RAPIDS, MI, Channel 254
16	WJQK, ZEELAND, MI, Channel 257
17	WTRV, WALKER, MI, Channel 263
18	WBFX, GRAND RAPIDS, MI, Channel 267
19	WMRR, MUSKEGON HEIGHTS, MI, Channel 269
20	WFUR-F, GRAND RAPIDS, MI, Channel 275
21	WSNX-F, MUSKEGON, MI, Channel 283
22	WCXT, COOPERSVILLE, MI, Channel 287
23	WMUS-F, MUSKEGON, MI, Channel 295
24	WSHZ, MUSKEGON, MI, Channel 300

Market 6	
Number	Station
AM Stations	
1	WMFN, ZEELAND, MI, 640 kHz
2	WMJH, ROCKFORD, MI, 810 kHz
3	WGVF, MUSKEGON, MI, 850 kHz
4	WMUS, MUSKEGON, MI, 1090 kHz
5	WJNZ, KENTWOOD, MI, 1140 kHz
6	WTKG, GRAND RAPIDS, MI, 1230 kHz
7	WPNW, ZEELAND, MI, 1260 kHz
8	WOOD, GRAND RAPIDS, MI, 1300 kHz
9	WBBL, GRAND RAPIDS, MI, 1340 kHz

Market 6	
Number	Station
10	WGHN, GRAND HAVEN, MI, 1370 kHz
11	WSCG, GREENVILLE, MI, 1380 kHz
12	WNWZ, GRAND RAPIDS, MI, 1410 kHz
13	WHTC, HOLLAND, MI, 1450 kHz
14	WGVU, KENTWOOD, MI, 1480 kHz
15	WYGR, WYOMING, MI, 1530 kHz
16	WSHN, FREMONT, MI, 1550 kHz
17	WFUR, GRAND RAPIDS, MI, 1570 kHz
18	WMHG, MUSKEGON, MI, 1600 kHz
FM Stations	
1	WYCE, WYOMING, MI, Channel 201
2	WGVU-F, ALLENDALE, MI, Channel 203
3	WBLU-F, GRAND RAPIDS, MI, Channel 205
4	WGNB, ZEELAND, MI, Channel 207
5	WAYG, GRAND RAPIDS, MI, Channel 210
6	WTHS, HOLLAND, MI, Channel 210
7	WBLV, TWIN LAKE, MI, Channel 212
8	WCSG, GRAND RAPIDS, MI, Channel 217
9	WGHN-F, GRAND HAVEN, MI, Channel 221
10	WYVN, SAUGATUCK, MI, Channel 224
11	WTNR, HOLLAND, MI, Channel 233
12	WGVF-F, WHITEHALL, MI, Channel 237
13	WLHT-F, GRAND RAPIDS, MI, Channel 239
14	WVTI, HOLLAND, MI, Channel 241
15	WLAV-F, GRAND RAPIDS, MI, Channel 245
16	WGRD-F, GRAND RAPIDS, MI, Channel 250
17	WFGF, GRAND RAPIDS, MI, Channel 254
18	WJQK, ZEELAND, MI, Channel 257
19	WTRV, WALKER, MI, Channel 263
20	WBFX, GRAND RAPIDS, MI, Channel 267
21	WMRR, MUSKEGON HEIGHTS, MI, Channel 269
22	WFUR-F, GRAND RAPIDS, MI, Channel 275
23	WSNX-F, MUSKEGON, MI, Channel 283
24	WCXT, COOPERSVILLE, MI, Channel 287
25	WSCG-F, LAKEVIEW, MI, Channel 292
26	WMUS-F, MUSKEGON, MI, Channel 295
27	WKLQ, GREENVILLE, MI, Channel 297
28	WSHZ, MUSKEGON, MI, Channel 300