

**RADIO MARKET ANALYSIS**  
**CUMULUS LICENSING LLC**  
**KGEE RADIO STATION**  
**PECOS, TEXAS**  
**November 2007**

**TECHNICAL STATEMENT**

1. This statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC ("Cumulus"). Cumulus is submitting an application to relocate station KGEE, Pecos, Texas, as such a Radio Market analysis is needed. While KGEE is not located in a metro county in any rated market, it is considered "home" to the Odessa-Midland, Texas market.<sup>1</sup> Cumulus is also the licensee of KBAT, Channel 260C1, Monahans, Texas; KMND, 1510 kHz, Midland, Texas; KNFM, Channel 222C, Midland, Texas; KZBT, Channel 227C1, Midland, Texas; KRIL, 1470 kHz, Odessa, Texas; and KODM, Channel 250C1, Odessa, Texas. KMND, KNFM, KZBT, KRIL and KODM are all licensed to communities in metro counties within the Odessa-Midland, Texas Arbitron/BIA Market. KBAT is considered "home" to the Odessa-Midland, Texas market. As a result, a hybrid ownership analysis is needed with respect to a rated market and a contour overlap review for stations not licensed to metro counties within a rated market.

**ARBITRON/BIA MARKET REVIEW**

2. As shown on Exhibit #1, there are twenty-nine AM and FM (commercial and non-commercial) stations listed in the Odessa-Midland, Texas Market (Market #188). Cumulus will be in control of five FM stations and two AM stations in the market. The number of stations

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1) Cumulus has requested that KGEE no longer be considered "home" to the Odessa-Midland, Texas market. As this request was made less than two years ago, KGEE is considered part of the rated market for this instant review.

indicated falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules. At this level, common ownership or control of up to six stations, with no more than four in the same service, is permissible. This combination of stations owned by Cumulus existed prior to the change in §73.3555 of the rules and, as such, is grandfathered.<sup>1</sup> Further, pursuant to Note 4, §73.3555, since the KGEE minor change will not increase the concentration of stations in the subject Arbitron market, it is believed that KGEE remains grandfathered under the Commission's ownership rules for rated markets.

### **REVISED CONTOUR OVERLAP ANALYSIS**

3. As KGEE is licensed to a non-metro county, a contour overlap analysis has also been conducted for ownership compliance review. A map depicting the city grade contours of the seven subject stations is attached as Exhibit #2. As indicated, the proposed KGEE facility will not have city grade overlap with any of the other Cumulus stations in the Odessa-Midland, Texas market (nor any other Cumulus facility). As such, it is considered a stand-alone station, which is in compliance with the Commission's multiple ownership rules for a non-rated market.

4. Based on the above reviews, the ownership for rated markets remains unchanged as a result of this minor change application for station KGEE (the combination remains grandfathered) and KGEE is also in compliance with the revised contour overlap rules. Therefore, it is believed that this minor change application for KGEE does not cause a violation of the multiple ownership rules and is, therefore, in compliance with §73.1690(c)(7) of the rules.

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1) Under the former contour overlap analysis rules, Cumulus was in compliance with the ownership rules.

5. The foregoing technical statement was prepared on behalf of Cumulus Licensing LLC by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities was extracted from the CDBS database. All data relating to AM and FM facilities in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.2. BIA database. We assume no liability for errors or omissions in that database or program which may be adverse to the information contained herein.





## FCC Geographic Market Definition for Odessa-Midland, TX

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KZBT	FM	93.3	C	HpHop/Rhy	Odessa-Midland, TX	07/02/2003	186	p Cumulus	Midland, TX	Midland
KCRS	AM	550	C	News/Talk	Odessa-Midland, TX	07/02/2003	186	Gap Broadcasting LLC	Midland, TX	Midland
KBAT	FM	99.9	C	Rock	Odessa-Midland, TX	07/02/2003	186	p Cumulus	Monahans, TX	Ward
KTXC	FM	104.7	C	Mexican	Odessa-Midland, TX	07/02/2003	186	Drewry Communications Group	Lamesa, TX	Dawson
KVDG	AM	1150	NC	Chrst/Talk	Odessa-Midland, TX	07/02/2003	186	La Promesa Foundation	Midland, TX	Midland
KLVW	FM	88.7	NC	ChrsContem	Odessa-Midland, TX	07/02/2003	186	Educational Media Foundation	West Odessa, TX	Ector
KMND	AM	1510	C	Sports	Odessa-Midland, TX	07/02/2003	186	p Cumulus	Midland, TX	Midland
KNFM	FM	92.3	C	Country	Odessa-Midland, TX	07/02/2003	186	p Cumulus	Midland, TX	Midland
KOZA	AM	1230	C	Mexican	Odessa-Midland, TX	07/02/2003	186	Stellar Media Inc	Odessa, TX	Ector
KMCM	FM	96.9	C	Oldies	Odessa-Midland, TX	07/02/2003	186	Double O Radio LLC	Odessa, TX	Ector
KRIL	AM	1410	C	Sports	Odessa-Midland, TX	07/02/2003	186	p Cumulus	Odessa, TX	Ector
KWEL	AM	1070	C	Talk	Odessa-Midland, TX	07/02/2003	186	p CDA Broadcasting Inc	Midland, TX	Midland
KFZX	FM	102.1	C	Clsc Rock	Odessa-Midland, TX	07/02/2003	186	Gap Broadcasting LLC	Gardendale, TX	Ward
KCRS	FM	103.3	C	Adult Hits	Odessa-Midland, TX	07/02/2003	186	Gap Broadcasting LLC	Midland, TX	Midland
KXOI	AM	810	C	Span/Relgn	Odessa-Midland, TX	02/09/2004	186	Hispanic Outreach Ministries, Inc.	Crane, TX	Crane
KFLB	AM	920	NC	Inspiration	Odessa-Midland, TX	07/02/2003	186	Family Life Communications Inc	Odessa, TX	Ector
KODM	FM	97.9	C	AC	Odessa-Midland, TX	07/02/2003	186	p Cumulus	Odessa, TX	Ector
KCHX	FM	106.7	C	AC	Odessa-Midland, TX	07/02/2003	186	Gap Broadcasting LLC	Midland, TX	Midland
KMRK	FM	96.1	C	CHR	Odessa-Midland, TX	07/02/2003	186	Gap Broadcasting LLC	Odessa, TX	Ector
KMMZ	FM	101.3	C	Adlt Stndrd	Odessa-Midland, TX	07/02/2003	186	Cook, Don L.	Crane, TX	Crane
KQRX	FM	95.1	C	Alternative	Odessa-Midland, TX	07/02/2003	186	Double O Radio LLC	Midland, TX	Midland
KQLM	FM	107.9	C	Mexican	Odessa-Midland, TX	07/02/2003	186	Stellar Media Inc	Odessa, TX	Ector
KKJW	FM	105.9	C	Country	Odessa-Midland, TX	07/02/2003	186	Unique Broadcasting LLC	Stanton, TX	Martin
KFLB	FM	90.5	NC	Inspiration	Odessa-Midland, TX	07/02/2003	186	Family Life Communications Inc	Odessa, TX	Ector
KOCV	FM	91.3	NC	Nws/Cls/Ecl	Odessa-Midland, TX	07/02/2003	186	Odessa Junior College District	Odessa, TX	Ector
KHKX	FM	99.1	C	Country	Odessa-Midland, TX	07/02/2003	186	Double O Radio LLC	Odessa, TX	Ector
KBMM	FM	89.5	NC	Christian	Odessa-Midland, TX	07/02/2003	186	American Family Association Incorporated	Odessa, TX	Ector
KPBJ	FM	90.1	NC	Span/CCtm	Odessa-Midland, TX		186	La Radio Cristiana Network Inc	Midland, TX	Midland
KAQQ	FM	90.9	NC	AC	Odessa-Midland, TX		186	p La Promesa Foundation	Midland, TX	Midland

**Number of Stations in Geographic Market 29**

### Previous Stations in Geographic Market

KGEE	FM	97.3	C	Country	08/17/2007	0	p Cumulus	Pecos, TX	Reeves
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"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed





**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**


State of Georgia    )  
St. Simons Island    ) ss:  
County of Glynn    )

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Cumulus Licensing LLC to prepare the attached Technical Exhibit.

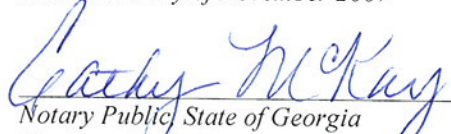
His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 7th day of November 2007*

  
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Jefferson G. Brock  
Affiant

*Sworn to and subscribed before me  
this the 7th day of November 2007*

  
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Notary Public, State of Georgia  
My Commission Expires: March 18, 2011