

**Radio Market Analysis**

**Cumulus Licensing Corp.**

**WTWR-FM, Luna Pier, Michigan**

**Toledo, Ohio Area**

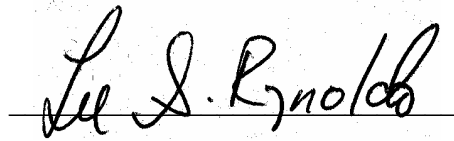
**Technical Statement**

1. Cumulus Licensing Corp. (“Cumulus”) is the licensee of radio stations WKKO(FM), Toledo, OH; WRQN(FM), Bowling Green, OH; WWWW(FM), Sylvania, OH; WXKR(FM), Port Clinton, OH; WRWK(FM), Delta, OH; WLQR(AM), Toledo, OH; and WTOD(AM), Toledo, OH. (WRWK has an application pending that changes the station’s coverage, but it does not affect the instant market analysis/ownership study.) Cumulus is also the licensee of WTWR-FM, which in a recent Report and Order (MM Docket 02-115) changed its community of license from Monroe, Michigan to Luna Pier, Michigan. WTWR was required to file a FCC Form 301 in order to bring it into compliance with the Report and Order. The instant study addresses ownership concentrations brought forth by that filing. This market analysis/ownership study is conducted to show that the proposed modifications of station WTWR-FM keep Cumulus in compliance with §73.3555(a)(1)(iii).
2. Exhibit 1 shows the principal community contours for each of the aforementioned stations. Coverage over unpopulated areas (i.e. water) is ignored when determining the Radio Market boundary. Because the proposed WTWR-FM city-grade contour does not overlap the city-grade contours of WRQN and WRWK (both license and application), those stations do not contribute to the boundaries of the definable Radio Market.

3. By examining Exhibit 1 it is possible to determine the boundaries of the Radio Market. This boundary is determined by the extent of coverage of WKKO(FM), WXKR(FM), and WLQR(AM). The market boundary is truncated over water. This boundary is shown in map form in Exhibit 2.
4. Section 73.3555(a)(1)(iii) states that in a radio market with between 15 and 29 commercial radio stations, it is allowable for a party to own up to 6 stations, with no more than 4 in the same service. Exhibit 3 is a map showing the principal community contours in this Radio Market. According to this analysis there are 28 stations in this market. Exhibit 4 is a listing of the stations in the market, showing not only the stations in the market, but also the stations that Cumulus owns in this market. Exhibits 3 and 4 prove conclusively that Cumulus will not exceed the Commission's ownership limits with this modification of WTWR-FM, since there will be four overlapping FM facilities and two AM facilities.

5. The foregoing technical statement was prepared on behalf of Cumulus by Reynolds Technical Associates, 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. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.

For Cumulus:

A handwritten signature in black ink, reading "Lee S. Reynolds", is written over a horizontal line.

Lee S. Reynolds  
Reynolds Technical Associates  
12585 Old Highway 280 East, Suite 102  
Chelsea, AL 35043  
205.618.2020