

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"). The licensee proposes to acquire the facilities of WOR(AM), New York, NY. 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	Geographic Arbitron Market	Declared Arbitron Market
WOR	7710	AM	New York	New York, NY	New York, NY
WAXQ	23004	FM	New York	New York, NY	New York, NY
WHTZ	59953	FM	Newark	New York, NY	New York, NY
WKTU	6595	FM	Lake Success	Nassau-Suffolk, NY	New York, NY
WLTW	56571	FM	New York	New York, NY	New York, NY
WWPR-FM	6373	FM	New York	New York, NY	New York, NY
WKCI-FM	11930	FM	Hamden	New Haven, CT	New Haven, CT
WAVZ	11920	AM	New Haven	New Haven, CT	New Haven, CT
WELI	11933	AM	New Haven	New Haven, CT	New Haven, CT
WWYZ	74205	FM	Waterbury	Non-Metro	Hartford-New Britain-Middletown, CT

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 WOR(AM) which is not located in an Arbitron market, or regardless of contour overlap, which is located in the same Arbitron Metro⁴ as WOR(AM). The community of license of WOR(AM) is located within and is reported by BIA as being "Home" to the New York, NY Metro. Contour overlap of the station to be acquired, as depicted in *Figure 2*, also occurs with commonly-owned stations whose communities of license are located in Arbitron

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.

Metro markets, and commonly owned stations whose communities of license are located outside any Arbitron Metro market.

Arbitron Market Study

WOR(AM) is reported by BIA as being "Home" to the New York, NY Metro. This proposal is in compliance with the local radio ownership rules for that Arbitron Metro, as evidenced by *Figure 1* below:

Interim Contour-Overlap Analysis

Because the stations principal community contour overlaps or intersects the principal community contour of an attributable station with a community of license which 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 market" for interim contour-overlap analysis under the Commission's rules as shown below.

Contour Market

Radio Market	
2-FM 3-FM	
WKCI-FM	FM
WWYZ	FM
WOR	AM
WAVZ	AM
WELI	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 count of radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio market." *Figure*

3 and *Figure 4* are a map and tabulation of the radio stations identified in the contour-overlap "radio market".

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 45 radio stations, including the subject commonly-owned 1-AM / 5-FM stations, which are home to the New York, NY Metro. This proposal does not affect the existing number of commonly-owned stations in the subject Arbitron Metro.

In the interim contour-overlap "radio market" studied herein, 45 radio stations, including the subject commonly-owned 2-AM / 3-FM stations.

Based on the above, it is concluded that the proposed modification complies with Section 73.3555(a) of the FCC Rules.

Respectfully submitted,



Troy G. Langham
FCC Engineering Supervisor
August 15, 2012

Figure 1. Stations Considered being in the New York, NY Arbitron Metro⁵

Count	Calls	Facility ID	Licensee	Join Date
1	WEPN	65636	ABC/Disney	7/2/2003
2	WQEW	29024	ABC/Disney	7/2/2003
3	WEPN-FM	63781	Emmis Communications	7/2/2003
4	WWRL	68906	Access.1 Communications	7/2/2003
5	WRCR	64556	Alexander Broadcasting Inc	10/28/2011
6	WALK	10136	Aloha Station Trust LLC	7/2/2003
7	WALK-FM	10137	Aloha Station Trust LLC	7/2/2003
8	WFMU	3249	Auricle Communications	7/2/2003
9	WSNR	61643	Blackstrap Broadcasting LLC	7/2/2003
10	WBRR	5869	Bloomberg Communications Inc	7/2/2003
11	WGCH	65674	Blue Star Media Group	7/2/2003
12	WXBA	6726	Brentwood Union Free School District	7/2/2003
13	WRDR	20485	Bridgelight LLC	7/2/2003
14	WADO	70684	Univision	7/2/2003
15	WQBU-FM	30573	Univision	7/2/2003
16	WXNY-FM	29022	Univision	7/2/2003
17	WBJB-FM	7116	Brookdale Community College	7/2/2003
18	WOR	7710	Buckley Broadcasting Corporation	7/2/2003
19	WCBS	9636	CBS Radio	7/2/2003
20	WCBS-FM	9611	CBS Radio	7/2/2003
21	WFAN	28617	CBS Radio	7/2/2003
22	WINS	25451	CBS Radio	7/2/2003
23	WWFS	25442	CBS Radio	7/2/2003
24	WXRK	58579	CBS Radio	7/2/2003
25	WAXQ	23004	Clear Channel Communications Inc	7/2/2003
26	WHTZ	59953	Clear Channel Communications Inc	7/2/2003
27	WKTU	6595	Clear Channel Communications Inc	7/2/2003
28	WLTW	56571	Clear Channel Communications Inc	7/2/2003
29	WWPR-FM	6373	Clear Channel Communications Inc	7/2/2003
30	WBAZ	52061	Cherry Creek Radio LLC	7/20/2010
31	WBEA	52060	Cherry Creek Radio LLC	7/20/2010
32	WEHM	52059	Cherry Creek Radio LLC	7/15/2010

⁵ Source: BIA.

Count	Calls	Facility ID	Licensee	Join Date
33	WEHN	18218	Cherry Creek Radio LLC	7/20/2010
34	WXMC	29957	Chladek, James	7/2/2003
35	WHCR-FM	11412	City College of New York	7/2/2003
36	WSIA	65557	College of Staten Island	7/2/2003
37	WKCR-FM	68270	Columbia University	7/2/2003
38	WEGB	173215	Community Bible Church	10/31/2011
39	WEDW-FM	13619	Connecticut Public Broadcasting Inc	7/2/2003
40	WRLI-FM	13598	Connecticut Public Broadcasting Inc	7/20/2010
41	WBZO	60245	Connoisseur Media LLC	7/2/2003
42	WHLI	38337	Connoisseur Media LLC	7/2/2003
43	WIGX	29260	Connoisseur Media LLC	7/2/2003
44	WKJY	38338	Connoisseur Media LLC	7/2/2003
45	WBAB	71199	Cox Media Group	7/2/2003
46	WBLI	37235	Cox Media Group	7/2/2003
47	WFOX	14379	Cox Media Group	7/2/2003
48	WHFM	72176	Cox Media Group	7/20/2010
49	WABC	70658	Cumulus Media Holdings Inc	7/2/2003
50	WDBY	67815	Cumulus Media Holdings Inc	7/2/2003
51	WDVY	70274	Cumulus Media Holdings Inc	10/28/2011
52	WEBE	71389	Cumulus Media Holdings Inc	7/2/2003
53	WFAS	14381	Cumulus Media Holdings Inc	10/28/2011
54	WFAS-FM	14380	Cumulus Media Holdings Inc	10/28/2011
55	WPLJ	73887	Cumulus Media Holdings Inc	7/2/2003
56	WPUT	67814	Cumulus Media Holdings Inc	10/28/2011
57	DWMNJ	17592	Drew University	7/2/2003
58	WWTR	6684	EBC Music Inc	7/2/2003
59	WKLV-FM	10659	Educational Media Foundation	10/28/2011
60	WQHT	19615	Emmis Communications	7/2/2003
61	WFDU	20458	Fairleigh Dickinson University	7/2/2003
62	WFME	20886	Family Stations Inc	7/2/2003
63	WFRS	20927	Family Stations Inc	7/2/2003
64	WFTU	18238	Five Towns College	7/20/2010
65	WFUV	22033	Fordham University	7/2/2003
66	WCTC	55180	Greater Media Inc	7/2/2003
67	WDHA-FM	49587	Greater Media Inc	7/2/2003

Count	Calls	Facility ID	Licensee	Join Date
68	WMGQ	55179	Greater Media Inc	7/2/2003
69	WMTR	49586	Greater Media Inc	7/2/2003
70	WRHU	27443	Hofstra University	7/2/2003
71	WDFH	71711	Hudson Valley Community Radio, Inc.	10/28/2011
72	WVIP	28023	Hudson Westchester	10/28/2011
73	WVOX	28024	Hudson Westchester	10/28/2011
74	WBON	57672	JVC Media LLC	7/20/2010
75	WJVC	54519	JVC Media LLC	7/2/2003
76	WPTY	31754	JVC Media LLC	7/20/2010
77	WRCN-FM	18239	JVC Media LLC	7/20/2010
78	WKNJ-FM	33783	Kean University	7/2/2003
79	WKMB	32985	King's Temple Ministry Inc	7/2/2003
80	WKRB	34902	Kingsborough Community College	7/2/2003
81	WELJ	7996	Knoblauch, Scott	7/2/2003
82	WLIR-FM	61089	Livingstone Broadcasting Inc	7/20/2010
83	WCWP	38332	Long Island University Public Radio	7/2/2003
84	WLNG	39640	Main Street Broadcasting Co Inc	7/20/2010
85	WGHT	40078	Mariana Broadcasting Inc	7/2/2003
86	WRXP	67846	Merlin Media LLC	7/2/2003
87	WYGG	19867	Minority Business & Housing Development Inc	7/2/2003
88	WMCX	43482	Monmouth University	7/2/2003
89	WMSC	43579	Montclair State University	7/2/2003
90	WJSV	43849	Morris School District	7/2/2003
91	WJDM	54563	MultiCultural Radio Broadcasting Inc	7/2/2003
92	WKDM	71137	MultiCultural Radio Broadcasting Inc	7/2/2003
93	WNSW	73332	MultiCultural Radio Broadcasting Inc	7/2/2003
94	WPAT	51661	MultiCultural Radio Broadcasting Inc	7/2/2003
95	WWRU	87123	MultiCultural Radio Broadcasting Inc	7/2/2003
96	WZRC	27398	MultiCultural Radio Broadcasting Inc	7/2/2003
97	WRKL	50057	Polnet Communications Ltd	10/28/2011
98	WHPC	47429	Nassau Community College	7/2/2003
99	WNYC	73357	New York Public Radio	7/2/2003
100	WNYC-FM	73355	New York Public Radio	7/2/2003
101	WQXR-FM	46978	New York Public Radio	7/2/2003
102	WNYU-FM	48695	New York University	7/2/2003

Count	Calls	Facility ID	Licensee	Join Date
103	WBGO	48699	Newark Public Radio Inc	7/2/2003
104	WNYK	49883	Nyack College	10/28/2011
105	WNYE	3539	NYC Board of Education	7/2/2003
106	WBAI	51249	Pacifica Foundation	7/2/2003
107	WHUD	54854	Pamal Broadcasting Ltd	10/28/2011
108	WLNA	54852	Pamal Broadcasting Ltd	10/28/2011
109	WXPB	50056	Pamal Broadcasting Ltd	10/28/2011
110	WPPB	38340	Peconic Public Broadcasting	7/20/2010
111	WAWZ	52601	Pillar of Fire	7/2/2003
112	WVPH	52686	Piscataway Board of Education	7/2/2003
113	WPOB	52782	Plainview-Old Bethpage Central School District	7/2/2003
114	WLIM	38333	Polnet Communications Ltd	7/2/2003
115	WHTG	72323	Press Communications LLC	7/2/2003
116	WKMK	72324	Press Communications LLC	7/2/2003
117	WWZY	32983	Press Communications LLC	7/2/2003
118	WLIE	37805	Principle Broadcasting Network LLC	7/2/2003
119	WNYG	5208	Radio Cantico Nuevo Inc	7/2/2003
120	WRVP	70273	Radio Vision Cristiana Management	10/28/2011
121	WWRV	54874	Radio Vision Cristiana Management	7/2/2003
122	WRPR	55029	Ramapo College of New Jersey	7/2/2003
123	WRSU-FM	4277	Rutgers University Board of Governors	7/2/2003
124	WSHR	4169	Sachem Central School District Holbrook	7/2/2003
125	WNLK	14378	Sacred Heart University Incorporated	7/2/2003
126	WSHU	43126	Sacred Heart University Incorporated	7/2/2003
127	WSTC	10660	Sacred Heart University Incorporated	7/2/2003
128	WSUF	58516	Sacred Heart University Incorporated	7/20/2010
129	WMCA	58626	Salem Communications Corporation	7/2/2003
130	WNYM	58635	Salem Communications Corporation	7/2/2003
131	WSOU	59707	Seton Hall University	7/2/2003
132	WPAT-FM	51663	Spanish Broadcasting System	7/2/2003
133	WSKQ-FM	61641	Spanish Broadcasting System	7/2/2003
134	WSLX	62148	St Luke's Foundation Inc	7/2/2003
135	WUSB	63110	State University of New York	7/2/2003
136	WKWZ	64351	Syosset Central School District	7/2/2003
137	WADB	14895	Townsquare Media LLC	7/2/2003
138	WJLK	14907	Townsquare Media LLC	7/2/2003
139	WRIV	14647	Tria, Vincent	7/20/2010
140	WOSS	68811	Union Free School District #1	10/28/2011

Count	Calls	Facility ID	Licensee	Join Date
141	WTHE	68957	Universal Broadcasting	7/2/2003
142	WVNJ	68956	Universal Broadcasting	7/2/2003
143	WWES	176621	WAMC/Northeast Public Radio	10/28/2011
144	WARY	71709	Westchester Community College	10/28/2011
145	WWPT	72035	Westport Board of Education	7/2/2003
146	WGBB	72091	WGBB-AM Inc	7/2/2003
147	WPSC-FM	72703	William Patterson College of New Jersey	7/2/2003
148	WNYH	29259	Win Radio Broadcasting Corporation	7/2/2003
149	WPDI	70644	WVRM Inc	7/2/2003
150	WBLS	28203	YMF Media LLC	7/2/2003
151	WLIB	28204	YMF Media LLC	7/2/2003

Figure 2

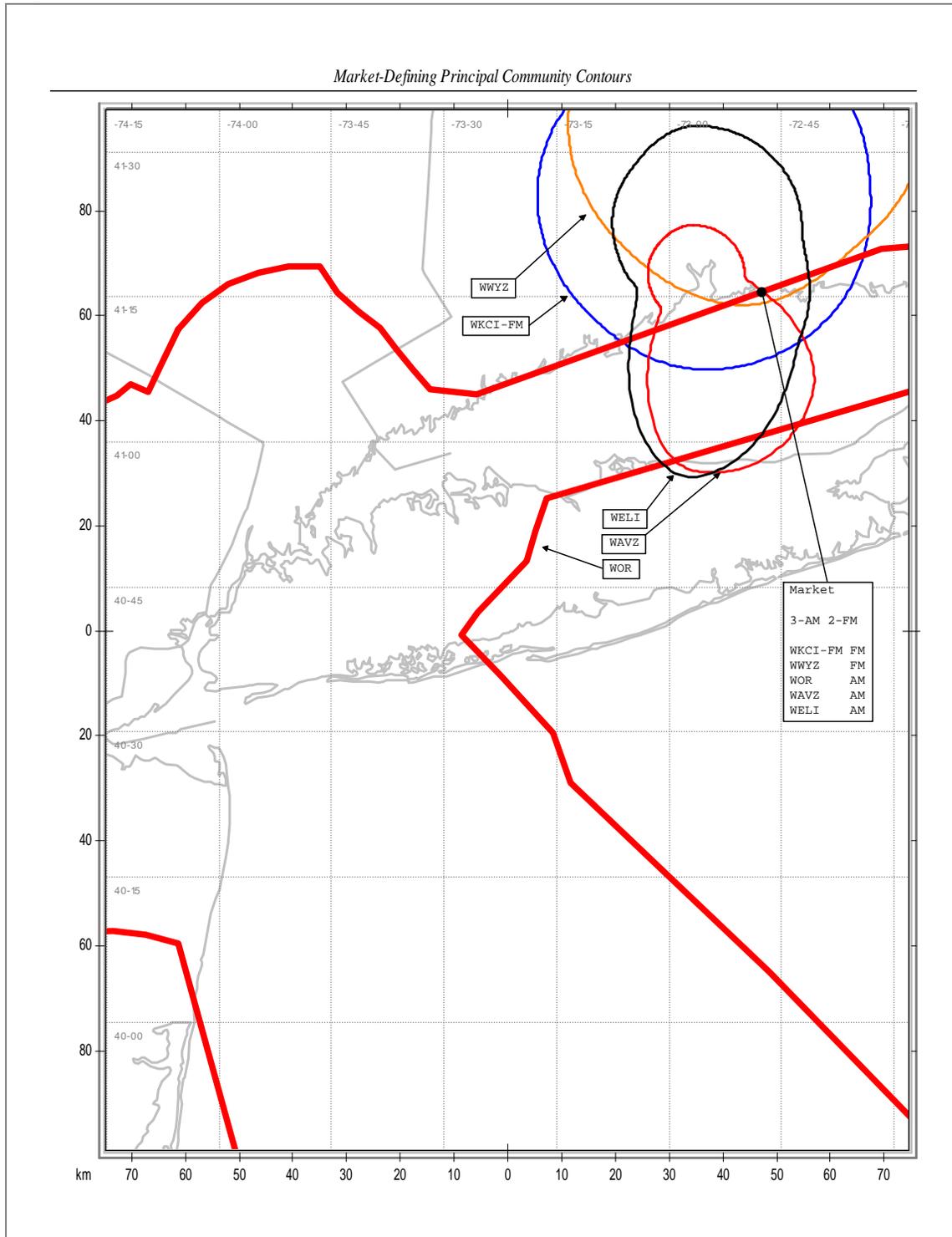


Figure 3

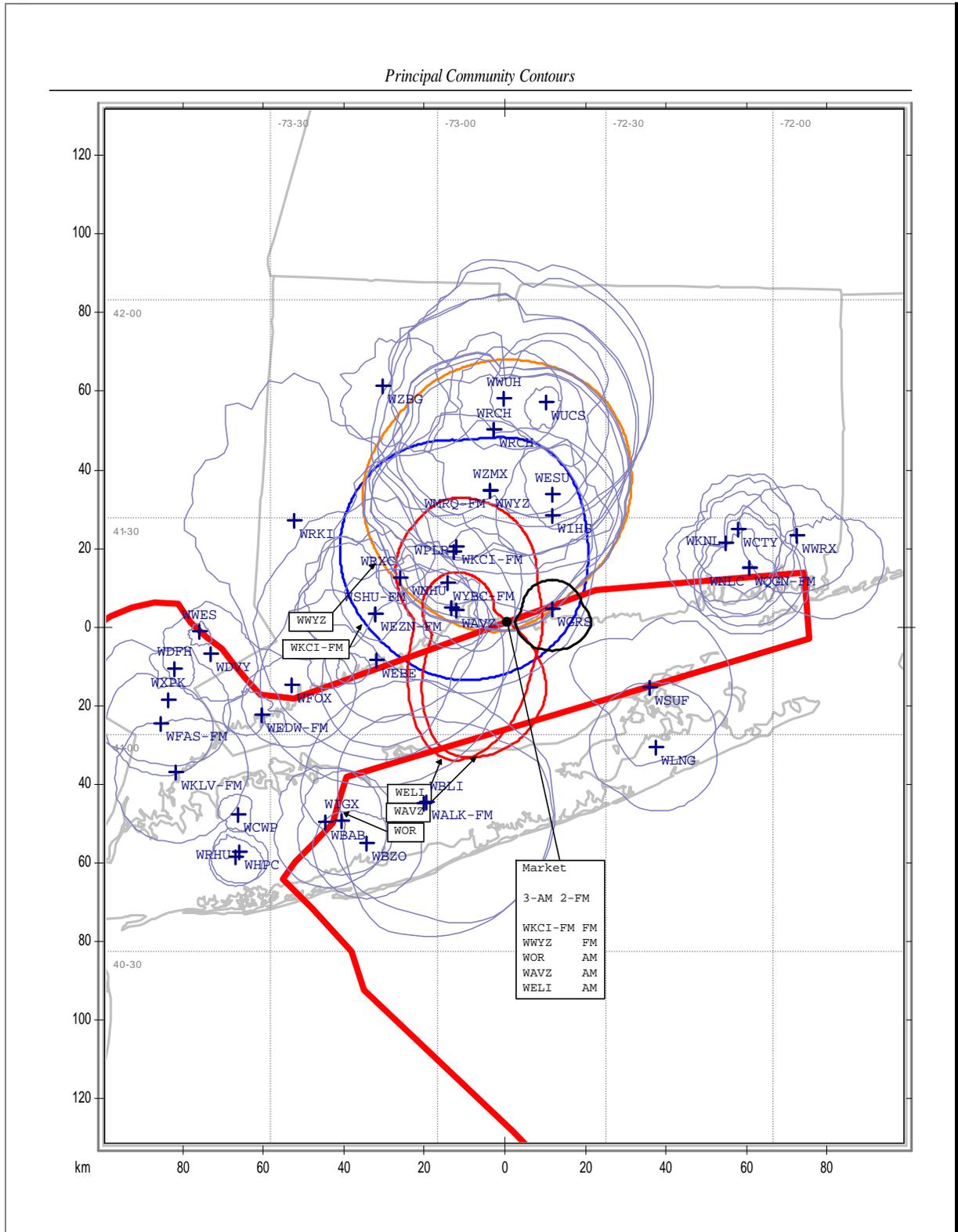


Figure 4 - Tabulation of stations in Radio Market

Count	Call Sign	Fac_id	Licensee	Dist_km
1	WGRS	43527	TOWN OF MONROE, CONNECTICUT	12.75
2	WNHU	69070	UNIVERSITY OF NEW HAVEN	14.04
3	WYBC-FM	74322	YALE BROADCASTING COMPANY, INC.	18.03
4	WPLR	46968	COX RADIO, INC.	22.84
5	WKCI-FM	11930	CC LICENSES, LLC	23.6
6	WRXC	43530	TOWN OF MONROE, CONNECTICUT	28.82
7	WIHS	13634	CONNECTICUT RADIO FELLOWSHIP, INC.	30.7
8	WEZN-FM	48721	COX RADIO, INC.	32.26
9	WPKN	73886	WPKN, INC.	32.26
10	WSHU-FM	58515	SACRED HEART UNIVERSITY, INC.	32.28
11	WMRQ-FM	74279	RED WOLF BROADCASTING CORPORATION	34.72
12	WNPR	13627	CONNECTICUT PUBLIC BROADCASTING, INC	34.72
13	WDRC-FM	7718	BUCKLEY BROADCASTING OF CONNECTICUT, LLC	34.78
14	WDRC-FM	7718	BUCKLEY BROADCASTING OF CONNECTICUT, LLC	34.78
15	WZMX	1900	CBS RADIO STATIONS INC.	34.79
16	WWYZ	74205	CAPSTAR TX LLC	34.88
17	WESU	71537	WESLEYAN UNIVERSITY	35.72
18	WEBE	71389	CUMULUS LICENSING LLC	33.27
19	WSUF	58516	SACRED HEART UNIVERSITY, INC.	39.67
20	WMNR	43531	TOWN OF MONROE, CONNECTICUT	38.55
21	WVOF	20456	FAIRFIELD UNIVERSITY	39.68
22	WWPT	72035	WESTPORT CT. BOARD OF EDUCATION	44.98
23	WLNG	39640	MAIN STREET BROADCASTING CO., INC.	49.12
24	WRCH	1910	CBS RADIO STATIONS INC.	50.37
25	WRCH	1910	CBS RADIO STATIONS INC.	50.37
26	WALK-FM	10137	ALOHA STATION TRUST, LLC	49.09
27	WRCH	1910	CBS RADIO STATIONS INC.	51.7
28	WBLI	37235	COX RADIO, INC.	49.57
29	WRTC-FM	68255	TRUSTEES OF TRINITY COLLEGE	56.41
30	WFOX	14379	COX RADIO, INC.	55.17
31	WUCS	46965	CAPSTAR TX LLC	58.26
32	WTIC-FM	66465	CBS RADIO STATIONS INC.	58.15
33	WWUH	68986	UNIVERSITY OF HARTFORD	58.15
34	WKNL	48547	HALL COMMUNICATIONS, INC.	59.23
35	WKNL	48547	HALL COMMUNICATIONS, INC.	59.23
36	WCNI	13621	CONNECTICUT COLLEGE COMMUNITY RADIO, INC.	59.96
37	WRKI	15391	CUMULUS LICENSING LLC	58.95
38	WCCC-FM	25072	MARLIN BROADCASTING OF HARTFORD, LLC	60.65

Count	Call Sign	Fac_id	Licensee	Dist_km
39	WQGN-FM	10455	RADIO LICENSE HOLDING CBC, LLC	63.09
40	WNLC	25406	HALL COMMUNICATIONS, INC.	63.1
41	WCTY	72346	WICH, INC.	63.52
42	WIGX	29260	CONNOISSEUR MEDIA OF LONG ISLAND, LLC	64.33
43	WEDW-FM	13619	CONNECTICUT PUBLIC BROADCASTING, INC	64.87
44	WBZO	60245	CONNOISSEUR MEDIA OF LONG ISLAND, LLC	65.4
45	WZBG	37906	LOCAL GIRLS AND BOYS BROADCASTING CORP	68.29
46	WBAB	71199	COX RADIO, INC.	67.24
47	WDVY	70274	CUMULUS LICENSING LLC	73.78
48	WWRX	58731	FULLER BROADCASTING INTERNATIONAL, LLC	76.79
49	WWES	176621	WAMC	76.36
50	WMOS	60251	RADIO LICENSE HOLDING CBC, LLC	82.62
51	WCWP	38332	LONG ISLAND UNIVERSITY PUBLIC RADIO NETWORK	82.38
52	WDFH	71711	HUDSON VALLEY COMMUNITY RADIO, INC.	83.23
53	WXPX	50056	6 JOHNSON ROAD LICENSES, INC.	86.42
54	WHPC	47429	NASSAU COMMUNITY COLLEGE	88.13
55	WFAS-FM	14380	CUMULUS LICENSING LLC	89.62
56	WRHU	27443	HOFSTRA UNIVERSITY	89.71
57	WKLV-FM	10659	EDUCATIONAL MEDIA FOUNDATION	90.48