

MODIFY BLH-5679
CUMULUS LICENSING LLC
WNUQ (FM) RADIO STATION
CH 269A - 101.7 MHZ - 6.0 KW
ALBANY, GEORGIA
September 2006

EXHIBIT C

Multiple Ownership Review

1. Cumulus Licensing LLC has increased the effective radiated power of WNUQ, Channel 269A, Albany, Georgia and is required to show that the increase does not cause a violation of the ownership rules (§73.3555). WNUQ is located within a metro county in the Albany, Georgia Arbitron/BIA market (Market #268). Cumulus is also the licensee or has interests in the licenses of WALG, 1590 kHz, WGPC, 1450 kHz, WKAK, Channel 283C1, Albany, Georgia; WEGC, Channel 299C3, Sasser, Georgia; WJAD, Channel 278C3, Leesburg, Georgia; WQVE, Channel 288A, Camilla, Georgia; and WZBN, Channel 271A, Sylvester, Georgia. WALG, WGPC, WKAK, WJAD are also licensed to communities which are metro counties in the Albany market. WEGC, WQVE and WZBN are not licensed to a metro county, but are designated "home" to the Albany market. As a result of contour overlap between WNUQ and one or more of the "home" stations, a hybrid ownership analysis is needed with respect to both rated markets and non-rated markets.

ARBITRON/BIA MARKET REVIEW

2. As shown on Exhibit C1, there are eighteen AM and FM (commercial and non-commercial) stations listed in the Albany, Georgia Market. Cumulus will remain in control of

six FM stations and two AM stations in the market. The number of stations 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. Further, pursuant to Note 4, §73.3555, since the WNUQ power increase will not change the concentration of stations in the subject Arbitron Market, it is believed that WNUQ remains grandfathered under the Commission's ownership rules for rated markets.

REVISED CONTOUR OVERLAP ANALYSIS

3. While WNUQ is licensed to a metro county, its contour overlaps with two of the "home" to the market FM stations, WZBN and WEGC.¹ As such, a contour overlap analysis has also been conducted for ownership compliance review. A map depicting the city grade contours of the eight above referenced stations is attached as Exhibit C2. Based on the contour overlap of WNUQ with the two stations, two distinct markets exist. Market #1 consists of FM stations WNUQ, WZBN, WJAD, and WKAK, and AM stations WALG and WGPC. Market #2 consists of FM stations WNUQ, WJAD, WEGC and WKAK and AM stations WALG and WGPC.

4. A study has been conducted to verify that the ownership of these facilities, in two separate markets, is in compliance with the Commission's multiple ownership rules. Since WKAK is a subject station in each market, its contour will be used to determine the number of

1) As there is no contour overlap between WNUQ and WQVE, WQVE is not considered further in this study.

other stations providing service to the market. The relevant subject stations in each market will then be added to determine the total number of stations in the respective market. As such, the WKAK contour will be considered the “Radio Market Boundary”. No stations with transmitters located more than 92.0 kilometers from the boundary of the common overlap of subject stations will be considered. Further, no other facility controlled by Cumulus will be considered as a market contributor, unless it is a subject station in the pertinent radio market under study.

5. Exhibit C3 is a depiction of the other AM and FM stations (commercial and non-commercial) providing service to the WKAK Radio Market. Exhibit C4 is a tabulation of the stations in Radio Market #1, which shows a total of twenty-one stations, including the six subject stations.² The number of stations depicted 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. Therefore, Radio Market #1 is in compliance with the rules.

6. Exhibit C5 is a tabulation of the stations in Radio Market #2, which shows a total of twenty-one stations, including the six subject stations.³ The number of stations depicted 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. Therefore, Radio Market #2 is in compliance with the rules.

2) Although there are additional stations providing service to the Radio Market, they are not considered since the number of stations was ample to demonstrate compliance with the rules based on the number of stations proposed to be commonly owned

3) See Footnote 2, *supra*.

7. Based on the above, the ownership for rated markets remains unchanged as a result of this power increase for station WNUQ (the combination remains grandfathered) and, under the revised contour overlap rules, WNUQ is also in compliance with the ownership rules. Therefore, it is believed that the increase of effective radiated power for WNUQ does not cause a violation of the multiple ownership rules and is, therefore, in compliance with §73.1690(c)(7) of the rules.



FCC Geographic Market Definition for Albany, GA

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WALG	AM	1590	C	Nws/Tlk/Spt	Albany, GA	07/02/2003	268	Cumulus Broadcasting Inc	Albany, GA	Dougherty
WEGC	FM	107.7	C	AC	Albany, GA	07/02/2003	268	Cumulus Broadcasting Inc	Sasser, GA	Terrell
WGPC	AM	1450	C	Sports	Albany, GA	07/02/2003	268	Cumulus Broadcasting Inc	Albany, GA	Dougherty
WJAD	FM	103.5	C	Clsc Rock	Albany, GA	07/02/2003	268	Cumulus Broadcasting Inc	Leesburg, GA	Lee
WJIZ	FM	96.3	C	Urban AC	Albany, GA	07/02/2003	268	Clear Channel Communications	Albany, GA	Dougherty
WJYZ	AM	960	C	Inspiration	Albany, GA	07/02/2003	268	Clear Channel Communications	Albany, GA	Dougherty
WKAK	FM	104.5	C	Country	Albany, GA	07/02/2003	268	Cumulus Broadcasting Inc	Albany, GA	Dougherty
WMRZ	FM	98.1	C	Adult Hits	Albany, GA	04/24/2006	268	Clear Channel Communications	Dawson, GA	Terrell
WNUQ	FM	101.7	C	CHR	Albany, GA	07/02/2003	268	Cumulus Broadcasting Inc	Albany, GA	Dougherty
WOBB	FM	100.3	C	Country	Albany, GA	07/02/2003	268	Clear Channel Communications	Tifton, GA	Tift
WQVE	FM	105.5	C	Urban AC	Albany, GA	07/02/2003	268	Cumulus Broadcasting Inc	Camilla, GA	Mitchell
WRAK	FM	97.3	C	Adlt Stndrd	Albany, GA	07/02/2003	268	Clear Channel Communications	Bainbridge, GA	Decatur
WRXZ	FM	106.1	C	UrbAC/HpHo	Albany, GA	07/02/2003	268	On Top Communications	Sylvester, GA	Worth
WSRA	AM	1250	C	Sports	Albany, GA	07/02/2003	268	Agape Life Ministries Inc	Albany, GA	Dougherty
WUNV	FM	91.7	NC	Nws/Cls/Jaz	Albany, GA	07/02/2003	268	Georgia Public Telecommunications Commission	Albany, GA	Dougherty
WWXC	FM	90.7	NC	Religion	Albany, GA	07/02/2003	268	Lamad Ministries Inc	Albany, GA	Dougherty
WZBN	FM	102.1	C	Urban AC	Albany, GA	07/02/2003	268	Cumulus Broadcasting Inc	Sylvester, GA	Worth
WZIQ	FM	106.5	C	Christian	Albany, GA	07/02/2003	268	Barinowski Investment Co A GA LP	Smithville, GA	Lee

Number of Stations in Geographic Market 18

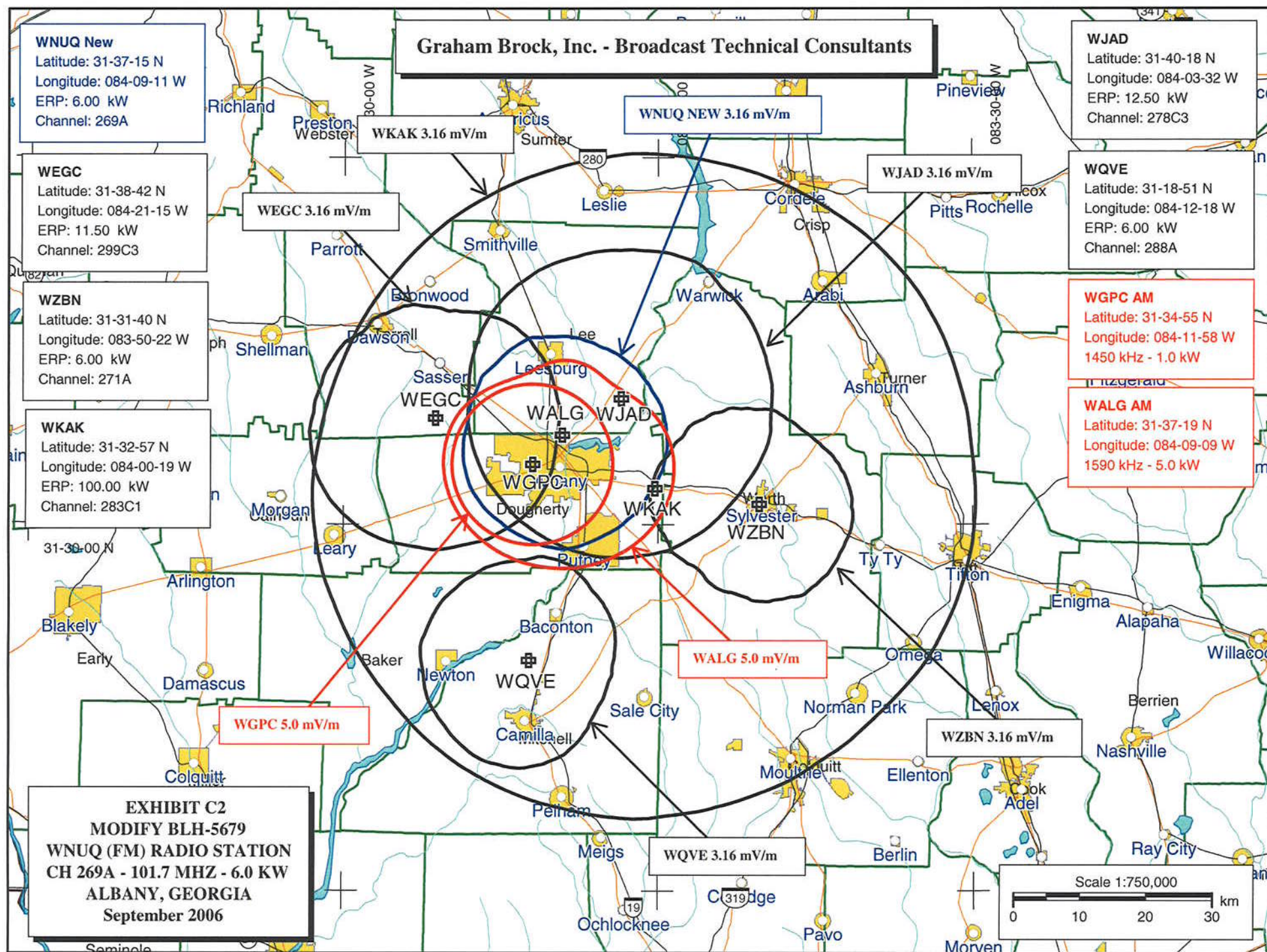
"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

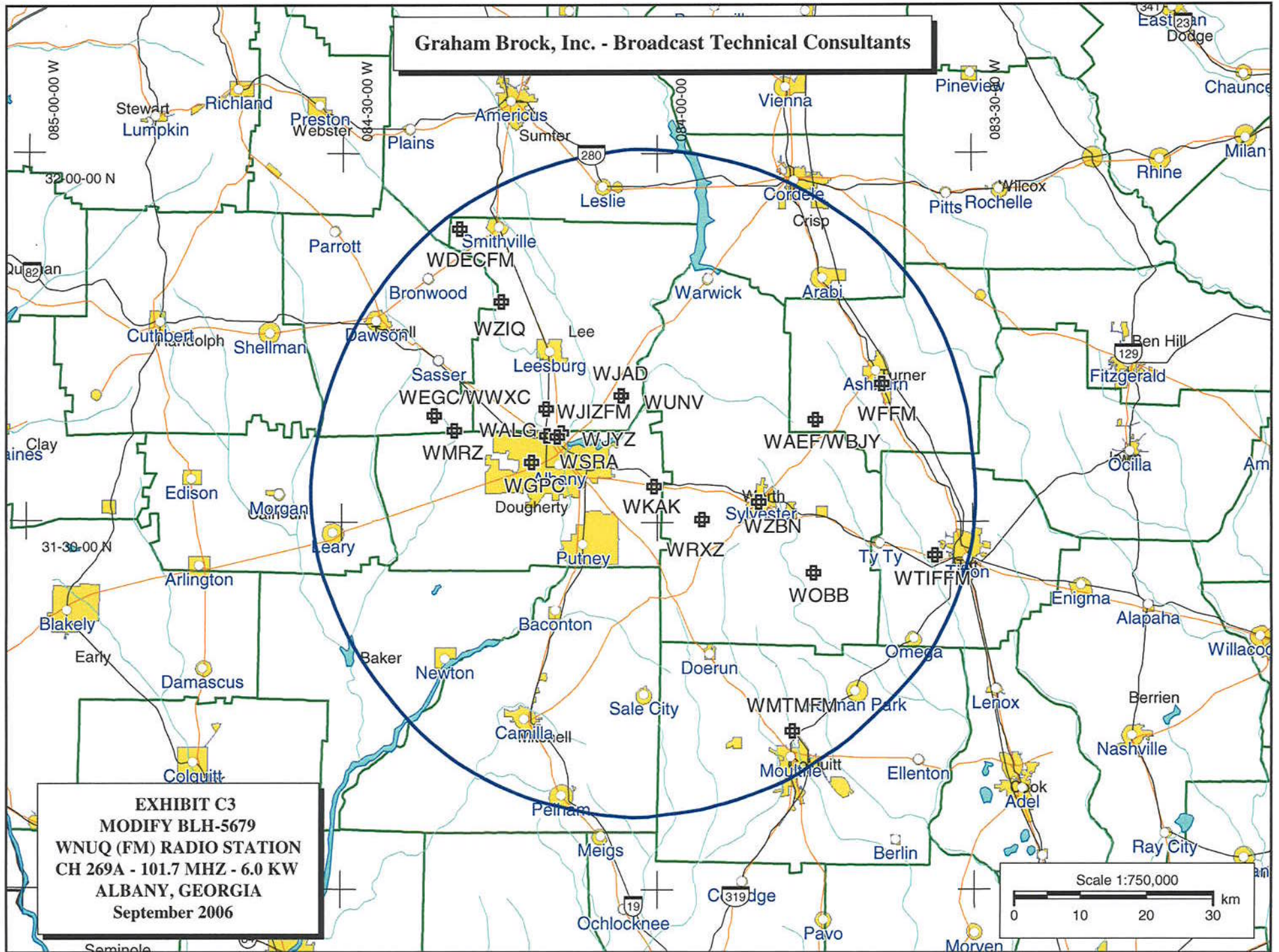
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EXHIBIT C1



Graham Brock, Inc. - Broadcast Technical Consultants



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EXHIBIT C4

Tabulation of Stations in Radio Market #1

AM Stations

WJYZ	960 kHz	Albany, Georgia
WSRA	1250 kHz	Albany, Georgia
* WGPC	1450 kHz	Albany, Georgia
* WALG	1590 kHz	Albany, Georgia

Total AM Stations - 4

FM Stations

WBJY	Ch 207C1	Americus, Georgia
WAEF	Ch 212C2	Cordele, Georgia
WWXC	Ch 214A	Albany, Georgia
WUNV	Ch 219A	Albany, Georgia
WMTM-FM	Ch 230C1	Moultrie, Georgia
WDEC-FM	Ch 234C3	Americus, Georgia
WJIZ-FM	Ch 242C1	Albany, Georgia
WMRZ	Ch 251C3	Dawson, Georgia
WOBB	Ch 262C0	Tifton, Georgia
* WNUQ	Ch 269A	Albany, Georgia
* WZBN	Ch 271A	Sylvester, Georgia
* WJAD	Ch 278C3	Leesburg, Georgia
* WKAK	Ch 283C1	Albany, Georgia
WFFM	Ch 289A	Ashburn, Georgia
WRXZ-FM	Ch 291A	Sylvester, Georgia
WZIQ	Ch 293A	Smithville, Georgia
WTIF-FM	Ch 298A	Omega, Georgia

Total FM Stations - 17

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 21

* Subject station.

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EXHIBIT C5

Tabulation of Stations in Radio Market #2

AM Stations

WJYZ	960 kHz	Albany, Georgia
WSRA	1250 kHz	Albany, Georgia
* WGPC	1450 kHz	Albany, Georgia
* WALG	1590 kHz	Albany, Georgia

Total AM Stations - 4

FM Stations

WBJY	Ch 207C1	Americus, Georgia
WAEF	Ch 212C2	Cordele, Georgia
WWXC	Ch 214A	Albany, Georgia
WUNV	Ch 219A	Albany, Georgia
WMTM-FM	Ch 230C1	Moultrie, Georgia
WDEC-FM	Ch 234C3	Americus, Georgia
WJIZ-FM	Ch 242C1	Albany, Georgia
WMRZ	Ch 251C3	Dawson, Georgia
WOBB	Ch 262C0	Tifton, Georgia
* WNUQ	Ch 269A	Albany, Georgia
* WJAD	Ch 278C3	Leesburg, Georgia
* WKAK	Ch 283C1	Albany, Georgia
WFFM	Ch 289A	Ashburn, Georgia
WRXZ-FM	Ch 291A	Sylvester, Georgia
WZIQ	Ch 293A	Smithville, Georgia
WTIF-FM	Ch 298A	Omega, Georgia
* WEGC	Ch 299C3	Sasser, Georgia

Total FM Stations - 17

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 21

* Subject station.