

RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
WWKL (FM) RADIO STATION
PALMYRA, PENNSYLVANIA
October 2005

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC ("Cumulus"), licensee of WWKL, Channel 221A, Palmyra, Pennsylvania. Cumulus is submitting a minor change application to relocate WWKL, as such a radio market analysis is necessary. Palmyra is located in a metro county in the Harrisburg-Lebanon-Carlisle, Pennsylvania Arbitron/BIA Market (Market #79). Cumulus also has interests in stations WNNK, Channel 281B, Harrisburg, Pennsylvania; WTCY, 1400 kHz, Harrisburg, Pennsylvania and WTPA, Channel 228A, Mechanicsburg, Pennsylvania. Each of these stations is also licensed to a community located in a metro county within the Harrisburg-Lebanon-Carlisle, Pennsylvania. This results in Cumulus having attributable interests in four stations (three FM and one AM) in the same market. As such, a review under the Arbitron/BIA rules is necessary.

2. Attached as Exhibit #1 is a BIA printout for the Harrisburg-Lebanon-Carlisle, Pennsylvania Arbitron Market. The tabulation shows there are thirty stations in the market. The number of stations depicted falls in the thirty to forty-four stations tier of §73.3555(a)(1)(ii) of the Commission's rules. At this level, common ownership or control of up to seven stations, with no more than four in the same service, is permissible. As such, ownership of three FM stations

and one AM station in the Harrisburg-Lebanon-Carlisle, Pennsylvania Arbitron Market is in compliance with the Arbitron/BIA market ownership rules. Therefore, it has been herein demonstrated that the proposed minor change application for WWKL is in compliance with §73.3555 of the Commission's rules.

3. 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 market data relating to AM and FM facilities in Arbitron markets was extracted from the BIA Financial Network, Media Access Pro 4.0 computer software. 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

| Call Letters | AM/FM | Freq | Type Station | Format | Home Market | Market Designtn Date | Home Mkt Rank | Owner | City & State of License | County of License |
|--------------|-------|-------|--------------|------------|----------------------------------|----------------------|---------------|---|-------------------------|-------------------|
| WADV | AM | 940 | C | Gsp/BGs/Ct | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | WADV Radio Incorporated | Lebanon, PA | Lebanon |
| WCAT | FM | 102.3 | C | Country | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Citadel Broadcasting Corp | Carlisle, PA | Cumberland |
| WDCV | FM | 88.3 | NC | Variety | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Dickinson College | Carlisle, PA | Cumberland |
| WEEO | AM | 1480 | C | CHR | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | p Shippensburg Broadcasting Inc | Shippensburg, PA | Cumberland |
| WHKF | FM | 99.3 | C | Urban | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Clear Channel Communications | Harrisburg, PA | Dauphin |
| WHP | AM | 580 | C | News/Talk | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Clear Channel Communications | Harrisburg, PA | Dauphin |
| WHYL | AM | 960 | C | Talk | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Route 81 Radio LLC | Carlisle, PA | Cumberland |
| WIOO | AM | 1000 | C | Country | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | WIOO Radio Inc | Carlisle, PA | Cumberland |
| WITF | FM | 89.5 | NC | Classical | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | WITF Inc | Harrisburg, PA | Dauphin |
| WJAZ | FM | 91.7 | NC | Clsc/Jazz | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Temple University of Cornwlth System of Higher Ed | Summerdale, PA | Cumberland |
| WKBO | AM | 1230 | C | Christian | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Clear Channel Communications | Harrisburg, PA | Dauphin |
| WLBR | AM | 1270 | C | FuSvc/Talk | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Lebanon Broadcasting Company | Lebanon, PA | Lebanon |
| WMHX | FM | 106.7 | C | Adult Hits | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Citadel Broadcasting Corp | Hershey, PA | Dauphin |
| WMSS | FM | 91.1 | NC | New Rock | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Middletown Area School District | Middletown, PA | Dauphin |
| WNNK | FM | 104.1 | C | Hot AC | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Cumulus Broadcasting Inc | Harrisburg, PA | Dauphin |
| WQIC | FM | 100.1 | C | Soft Rock | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Lebanon Broadcasting Company | Lebanon, PA | Lebanon |
| WQLV | FM | 98.9 | C | Lite AC | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Hepco Communications Inc | Millersburg, PA | Dauphin |
| WQXA | FM | 105.7 | C | AOR | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Citadel Broadcasting Corp | York, PA | York |
| WRBT | FM | 94.9 | C | Country | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Clear Channel Communications | Harrisburg, PA | Dauphin |
| WRVV | FM | 97.3 | C | Rock AC | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Clear Channel Communications | Harrisburg, PA | Dauphin |
| WSYC | FM | 88.7 | NC | Variety | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Shippensburg University of PA | Shippensburg, PA | Cumberland |
| WTCY | AM | 1400 | C | Urban AC | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Cumulus Broadcasting Inc | Harrisburg, PA | Dauphin |
| WTKT | AM | 1460 | C | Sports | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Clear Channel Communications | Harrisburg, PA | Dauphin |
| WTPA | FM | 93.5 | C | Clsc Rock | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Cumulus Broadcasting Inc | Mechanicsburg, PA | Cumberland |
| WVMM | FM | 90.7 | NC | ChrsContem | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Messiah College | Grantham, PA | Cumberland |
| WWII | AM | 720 | C | ChrsContem | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Hensley Broadcasting Inc | Shiremanstown, PA | Cumberland |
| WWKL | FM | 92.1 | C | CHR/Rhymc | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Cumulus Broadcasting Inc | Palmyra, PA | Lebanon |
| WWSM | AM | 1510 | C | Country | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | Sickafus, Patrick H. | Annyville-Cleona, PA | Lebanon |
| WXPH | FM | 88.1 | NC | AAA | Harrisburg-Lebanon-Carlisle, PA | 07/02/2003 | 79 | University of Pennsylvania | Harrisburg, PA | Dauphin |
| WYGL | FM | 100.5 | C | Country | Sunbury-Selinsgrove-Lewsbury, PA | 07/26/2005 | 211 | Max Media LLC | Elizabethville, PA | Dauphin |

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

"p" indicates pending sale to owner listed

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(c) BIA Financial Network, Inc.

EXHIBIT #1

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

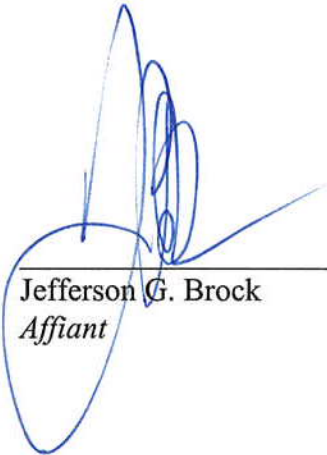
State of Georgia)
St. Simons Island) ss:
County of Glynn)

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 5th day of October, 2005.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 5th day of October, 2005*



Notary Public, State of Georgia
My Commission Expires: September 3, 2007