

AMENDED RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
KDVV(FM) RADIO STATION
TOPEKA, KANSAS
November 2010

TECHNICAL STATEMENT

1. This Technical Statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC ("Cumulus"), licensee of radio station KDVV, Channel 262C0, Topeka, Kansas. Cumulus is submitting an application to make upgrade KDVV, as such, a Radio Market Analysis is needed. Cumulus is also the licensee of KTOP-FM, Channel 275C2, St. Marys, Kansas; KWIC, Channel 257C3, KTOP, 1490 kHz, and KMAJ, 1440 kHz, Topeka, Kansas; KDVB¹, Channel 244A, Effingham, Kansas; and KMAJ-FM, Channel 299C1, Carbondale, Kansas. Principals² of Cumulus have an attributable interest in KCHZ, Channel 239C1, Ottawa, Kansas.³ KDVV, KWIC, KTOP-FM, KTOP, KMAJ and KMAJ-FM are all licensed to communities in a metro county in the Topeka, Kansas Arbitron Market (Market #198). KCHZ and KDVB are not licensed to communities in any metro county in any Arbitron Market nor are they designated "home" to the Topeka, Kansas Market.⁴ As a result, a hybrid ownership analysis is necessary to demonstrate compliance in both a rated and non-rated market.

ARBITRON/BIA MARKET REVIEW

2. As shown on Exhibit #1, there are sixteen AM and FM (commercial and non-commercial) stations listed in the Topeka, Kansas Market. Cumulus would be in control of four

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- 1) KDVB has an outstanding permit to upgrade to Class C2 (BPH-20080321ACL). Although the KDVB license contour does not overlap with KDVV, the KDVB permit does and, as such, it is considered herein.
 - 2) Principals of Cumulus have an interest in CMP KC Licensing, LLC.
 - 3) No other non-metro station in which Cumulus has an interest overlaps with KDVV.
 - 4) KCHZ is designated "home" to the Kansas City, Missouri/Kansas Arbitron Market.

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. Therefore, control of KDVV, KWIC, KTOP-FM, KTOP, KMAJ and KMAJ-FM in the Topeka, Kansas Market is believed to be in compliance with the Commission's radio ownership rules for rated markets.

REVISED CONTOUR OVERLAP ANALYSIS

3. Since KDVV has contour overlap with KDVB and KCHZ, as well as KWIC, KTOP, KTOP-FM, KMAJ and KMAJ-FM, a study has been conducted to verify that the proposed application for KDVV is also in compliance with the Commission's revised contour overlap rules. The city grade contours of these eight stations are shown on Exhibit #2. As shown, the locations of the city grade contours of these stations create two distinct radio markets. Market #1 is comprised of FM stations KDVV, KTOP-FM, KWIC, KMAJ-FM and KCHZ and AM stations KTOP and KMAJ. Market #2 is comprised of FM stations KDVB, KTOP-FM, KCHZ and KDVB and AM stations KTOP and KMAJ.

4. A study, therefore, has been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission's rules. The city grade contours of KDVV and KCHZ will be used to define the boundary for the Radio Markets. We will determine the number of contributing stations which have sites within, or provide city grade service to, the

Radio Market. To this total, we will then add the subject stations in each market to demonstrate compliance with the rules. Only those stations with transmitter sites within 92.0 kilometers of the common area of overlap of the contours of the subject stations will be considered as contributors to the market. No other station in which Cumulus has an interest will be considered, unless it is a subject station in the market under review.

5. Exhibit #3 is a depiction of the AM and FM stations serving Radio Market #1. A total of forty stations are depicted. Exhibit #4 is a tabulation of the stations in Radio Market #1. Forty-seven stations are shown, including the seven subject stations. Cumulus will control five FM stations and two AM stations in the market. The number of stations depicted falls in the forty-five or more stations tier of §73.3555(a)(1)(i) of the Commission's rules.⁵ At the forty-five or more stations level, common ownership or control of up to eight stations is allowed, with no more than five in the same service. As such, based on its control of AM stations KMAJ and KTOP and FM stations KMAJ-FM, KWIC, KCHZ, KTOP-FM and KDVV, Cumulus is in compliance in the non-rated Market #1.

6. Exhibit #5 is a tabulation of the stations in Radio Market #2, which totals forty-six when the six subject stations are added⁶. The number of stations depicted falls in the forty-five or more stations tier of §73.3555(a)(1)(i) of the Commission's rules. At the forty-five or more stations level, common ownership or control of up eight stations, with no more than five in the same service, is permissible. As such, based on its control of AM stations KMAJ and KTOP and

5) There are additional stations, but they were not considered as the stations identified are sufficient to allow for common control of the stations which will be commonly owned.

6) See Footnote #5, *supra*.

FM stations KDVB, KCHZ, KTOP-FM and KDVV, Cumulus is in compliance in the non-rated Market #2. Therefore, Cumulus's interests in the above referenced stations, in two distinct contour overlap markets, has been shown to be in compliance with the revised contour overlap rules.

7. Therefore, control of KDVV, KWIC, KTOP-FM, KCHZ, KDVB, KMAJ-FM, KTOP and KMAJ, in the pertinent rated and non-rated markets, is in compliance with §73.3555 of the rules. As such, the minor change application for KDVV is in compliance with the rules.

8. 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 in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.5. BIA database. All other data was extracted from the CDBS database. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.

FCC Geographic Market Definition for Topeka, KS

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KANV	FM	91.3	NC	NPR/Cls/Jaz	Topeka, KS	11/05/2004	198	University of Kansas	Olsburg, KS	Pottawatomie
KBUZ	FM	90.3	NC	CCtmp/Talk	Topeka, KS	07/02/2003	198	American Family Association Incorporated	Topeka, KS	Shawnee
KCVT	FM	92.5	C	Relgn/Talk	Topeka, KS	07/02/2003	198	Bott Radio Network	Silver Lake, KS	Shawnee
KDVV	FM	100.3	C	Clsc Rock	Topeka, KS	07/02/2003	198	Cumulus Broadcasting Inc	Topeka, KS	Shawnee
KJTY	FM	88.1	NC	Inspr/Chrst	Topeka, KS	07/02/2003	198	Family Life Communications Inc	Topeka, KS	Shawnee
KLZR	FM	105.9	C	Hot AC	Topeka, KS	07/02/2003	198	Great Plains Media Inc	Lawrence, KS	Douglas
KMAJ	FM	107.7	C	AC	Topeka, KS	07/02/2003	198	Cumulus Broadcasting Inc	Carbondale, KS	Osage
KMAJ	AM	1440	C	Nws/Tlk/Spt	Topeka, KS	07/02/2003	198	Cumulus Broadcasting Inc	Topeka, KS	Shawnee
KMKF	FM	101.5	C	Rock	Topeka, KS	07/02/2003	198	Manhattan Broadcasting Company Inc	Manhattan, KS	Riley
KMXN	FM	92.9	C	Country	Topeka, KS	07/02/2003	198	Great Plains Media Inc	Osage City, KS	Osage
KTOP	AM	1490	C	Sports	Topeka, KS	07/02/2003	198	Cumulus Broadcasting Inc	Topeka, KS	Shawnee
KTOP	FM	102.9	C	Country	Topeka, KS	07/02/2003	198	Cumulus Broadcasting Inc	St. Marys, KS	Pottawatomie
KTPK	FM	106.9	C	Country	Topeka, KS	07/02/2003	198	JMJ Broadcasting Co Inc	Topeka, KS	Shawnee
KWIC	FM	99.3	C	Clsc Hits	Topeka, KS	07/02/2003	198	Cumulus Broadcasting Inc	Topeka, KS	Shawnee
WIBW	AM	580	C	Nws/Tlk/Spt	Topeka, KS	07/02/2003	198	MCC Radio LLC	Topeka, KS	Shawnee
WIBW	FM	94.5	C	Country	Topeka, KS	07/02/2003	198	MCC Radio LLC	Topeka, KS	Shawnee

Number of Stations in Geographic Market 16

Previous Stations in Geographic Market

Graham Brock, Inc. - Broadcast Technical Consultants

KDVB

Latitude: 38-57-15 N
Longitude: 095-54-43 W
ERP: 100.00 kW
Channel: 262C
AMSL Height: 790.6 m

KWIC

BLH-20040603ABL
Latitude: 39-03-50 N
Longitude: 095-45-49 W
ERP: 6.80 kW
Channel: 257C3
AMSL Height: 465.0 m

KDVB

BLH-20080314ACK
Latitude: 39-33-07 N
Longitude: 095-25-23 W
ERP: 0.12 kW
Channel: 245A
AMSL Height: 395.6 m

KDVB.C

BPH-20080321ACL
Latitude: 39-24-12 N
Longitude: 095-26-18 W
ERP: 8.10 kW
Channel: 245C2
AMSL Height: 502.9 m

KMAJ-FM

BLH-20090618ABH
Latitude: 38-57-15 N
Longitude: 095-54-43 W
ERP: 53.00 kW
Channel: 299C1
AMSL Height: 575.0 m

RADIO MARKET #2

KTOP-FM 3.16 mV/m

KDVB 3.16 mV/m

KTOP-FM

BLH-20030326AHX
Latitude: 39-03-50 N
Longitude: 095-45-49 W
ERP: 30.00 kW
Channel: 275C2
AMSL Height: 480.5 m

KCHZ

BMLH-20031103ADD
Latitude: 39-00-45 N
Longitude: 095-01-46 W
ERP: 98.00 kW
Channel: 239C1
AMSL Height: 566.0 m

KTOP

Latitude: 39-04-39 N
Longitude: 095-40-46 W
ERP: 1.0 kW
Frequency: 1490 kHz

KMAJ

Latitude: 39-01-17 N
Longitude: 095-34-15 W
ERP: 5.0 kW
Frequency: 1440 kHz

KTOP 5.0 mV/m

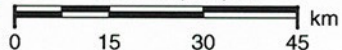
KMAJ 5.0 mV/m

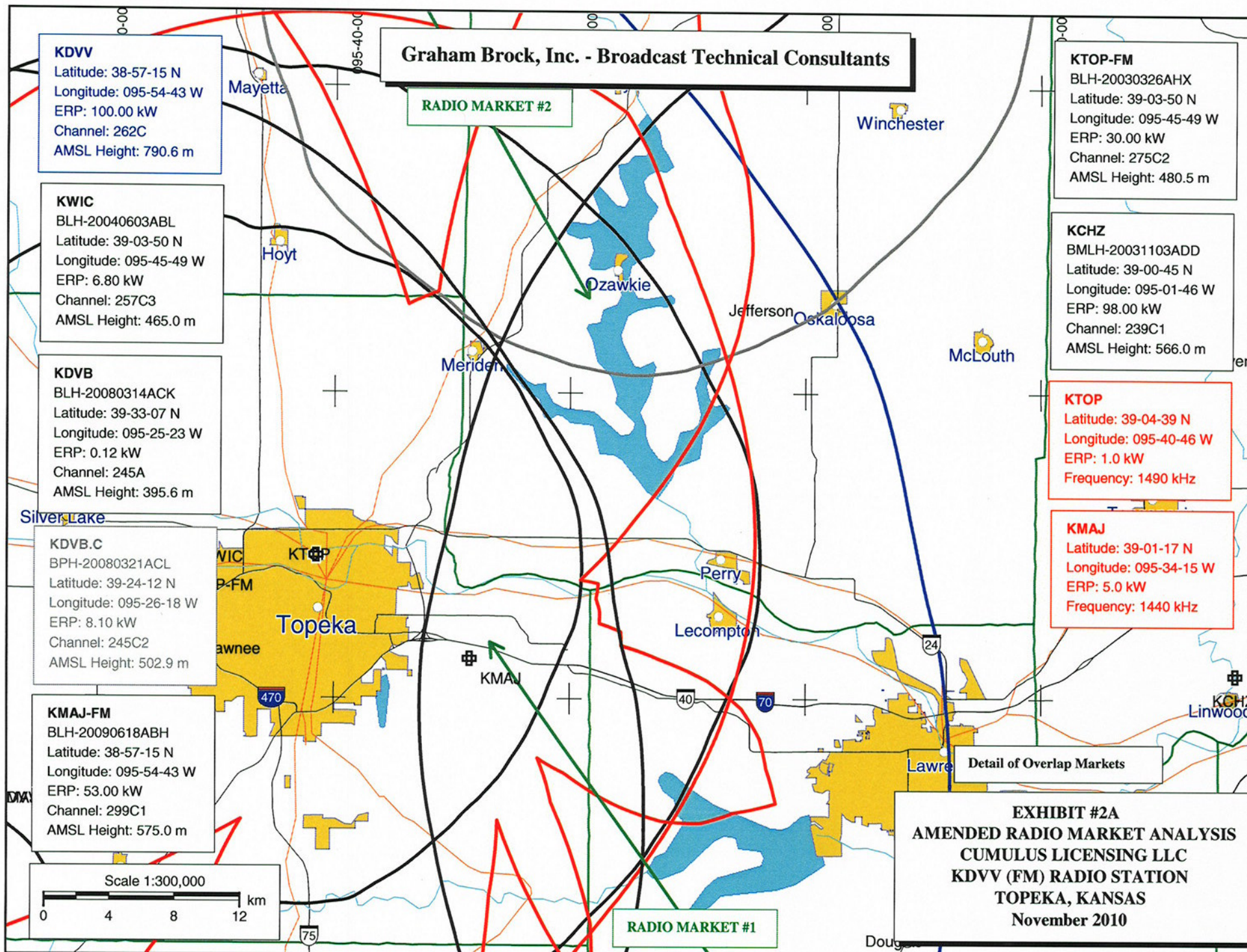
KMAJ-FM 3.16 mV/m

KDVB 3.16 mV/m

EXHIBIT #2
AMENDED RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
KDVB (FM) RADIO STATION
TOPEKA, KANSAS
November 2010

Scale 1:1,200,000





Graham Brock, Inc. - Broadcast Technical Consultants

Radio Market Boundary

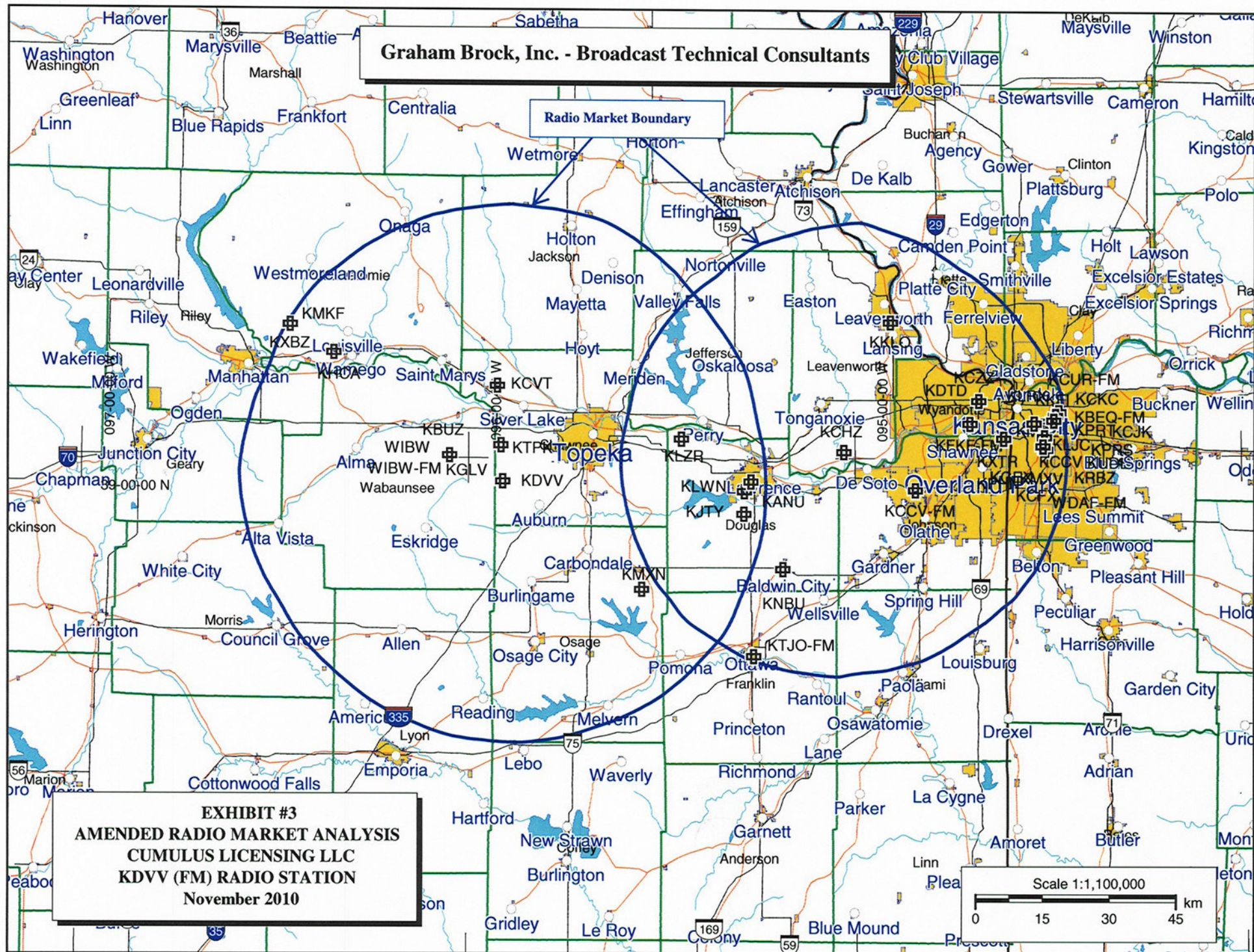


EXHIBIT #3
AMENDED RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
KDVV (FM) RADIO STATION
November 2010

AMENDED RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
KDVV(FM) RADIO STATION
TOPEKA, KANSAS
November 2010

EXHIBIT #4

Tabulation of Stations in Radio Market #1

AM Stations

WIBW	580 kHz	Topeka, Kansas
KCCV	760 kHz	Overland Park, Kansas
KMBZ	980 kHz	Kansas City, Missouri
KLWN	1320 kHz	Lawrence, Kansas
KPHN	1190 kHz	Kansas City, Missouri
KDTD	1340 kHz	Kansas City, Kansas
KKLO	1410 kHz	Leavenworth, Kansas
* KMAJ	1440 kHz	Topeka, Kansas
KCZZ	1480 kHz	Mission, Kansas
* KTOP	1490 kHz	Topeka, Kansas
KPRT	1590 kHz	Kansas City, Missouri
KXTR	1660 kHz	Kansas City, Kansas

Total AM Stations - 12

FM Stations

KJTY	Ch 201C1	Topeka, Kansas
KLJC	Ch 203C1	Kansas City, Missouri
KGLV	Ch 205C2	Manhattan, Kansas
KTJO-FM	Ch 205A	Ottawa, Kansas
KCUR-FM	Ch 207C1	Kansas City, Missouri
KNBU	Ch 209A	Baldwin City, Kansas
KKFI	Ch 211C1	Kansas City, Missouri
KBUZ	Ch 212C2	Topeka, Kansas
KANU	Ch 218C1	Lawrence, Kansas
KCCV-FM	Ch 222C3	Olathe, Kansas
KCVT	Ch 223C3	Silver Lake, Kansas
KMXN	Ch 225C2	Osage City, Kansas
KMXV	Ch 227C0	Kansas City, Missouri

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EXHIBIT #4 (continued)

Tabulation of Stations in Radio Market #1

KFKF-FM	Ch 231C0	Kansas City, Kansas
WIBW-FM	Ch 233C0	Topeka, Kansas
KHCA	Ch 237A	Wamego, Kansas
* KCHZ	Ch 239C1	Ottawa, Kansas
KRBZ	Ch 243C0	Kansas City, Missouri
KLRX	Ch 247C1	Lee's Summit, Missouri
KUDL	Ch 251C0	Kansas City, Kansas
* KWIC	Ch 257C3	Topeka, Kansas
KGEX	Ch 259C0	Kansas City, Missouri
* KDVV	Ch 262C	Topeka, Kansas
KCFX	Ch 266C0	Harrisonville, Missouri
KMKF	Ch 268C2	Manhattan, Kansas
KCKC	Ch 271C0	Kansas City, Missouri
* KTOP-FM	Ch 275C2	St. Marys, Kansas
KPRS	Ch 277C	Kansas City, Missouri
KBEQ-FM	Ch 282C0	Kansas City, Missouri
KXBZ	Ch 284C2	Manhattan, Kansas
KCJK	Ch 286C1	Garden City, Missouri
KLZR	Ch 290C1	Lawrence, Kansas
WDAF-FM	Ch 293C1	Liberty, Missouri
KTPK	Ch 295C	Topeka, Kansas
* KMAJ-FM	Ch 299C1	Carbondale, Kansas

Total FM Stations - 35

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 47

* Subject station.

AMENDED RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
KDVV(FM) RADIO STATION
TOPEKA, KANSAS
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EXHIBIT #5

Tabulation of Stations in Radio Market #2

AM Stations

WIBW	580 kHz	Topeka, Kansas
KCCV	760 kHz	Overland Park, Kansas
KMBZ	980 kHz	Kansas City, Missouri
KLWN	1320 kHz	Lawrence, Kansas
KPHN	1190 kHz	Kansas City, Missouri
KDTD	1340 kHz	Kansas City, Kansas
KKLO	1410 kHz	Leavenworth, Kansas
* KMAJ	1440 kHz	Topeka, Kansas
KCZZ	1480 kHz	Mission, Kansas
* KTOP	1490 kHz	Topeka, Kansas
KPRT	1590 kHz	Kansas City, Missouri
KXTR	1660 kHz	Kansas City, Kansas

Total AM Stations - 12

FM Stations

KJTY	Ch 201C1	Topeka, Kansas
KLJC	Ch 203C1	Kansas City, Missouri
KGLV	Ch 205C2	Manhattan, Kansas
KTJO-FM	Ch 205A	Ottawa, Kansas
KCUR-FM	Ch 207C1	Kansas City, Missouri
KNBU	Ch 209A	Baldwin City, Kansas
KKFI	Ch 211C1	Kansas City, Missouri
KBUZ	Ch 212C2	Topeka, Kansas
KANU	Ch 218C1	Lawrence, Kansas
KCCV-FM	Ch 222C3	Olathe, Kansas
KCVT	Ch 223C3	Silver Lake, Kansas
KMXN	Ch 225C2	Osage City, Kansas
KMXV	Ch 227C0	Kansas City, Missouri

AMENDED RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
KDVV(FM) RADIO STATION
TOPEKA, KANSAS
November 2010

EXHIBIT #5 (continued)

Tabulation of Stations in Radio Market #2

KFKF-FM	Ch 231C0	Kansas City, Kansas
WIBW-FM	Ch 233C0	Topeka, Kansas
KHCA	Ch 237A	Wamego, Kansas
* KCHZ	Ch 239C1	Ottawa, Kansas
KRBZ	Ch 243C0	Kansas City, Missouri
* KDVB	Ch 245C2	Effingham, Kansas
KLRX	Ch 247C1	Lee's Summit, Missouri
KUDL	Ch 251C0	Kansas City, Kansas
KGEX	Ch 259C0	Kansas City, Missouri
* KDVV	Ch 262C	Topeka, Kansas
KCFX	Ch 266C0	Harrisonville, Missouri
KMKF	Ch 268C2	Manhattan, Kansas
KCKC	Ch 271C0	Kansas City, Missouri
* KTOP-FM	Ch 275C2	St. Marys, Kansas
KPRS	Ch 277C	Kansas City, Missouri
KBEQ-FM	Ch 282C0	Kansas City, Missouri
KXBZ	Ch 284C2	Manhattan, Kansas
KCJK	Ch 286C1	Garden City, Missouri
KLZR	Ch 290C1	Lawrence, Kansas
WDAF-FM	Ch 293C1	Liberty, Missouri
KTPK	Ch 295C	Topeka, Kansas

Total FM Stations - 34

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 46

* Subject station.

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

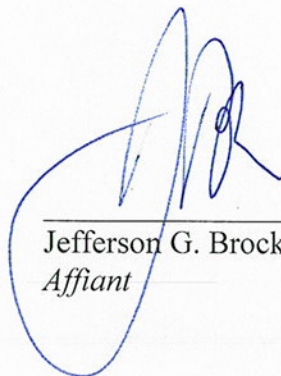
State of Georgia)
St. Simons Island) ss:
County of Glynn)

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.

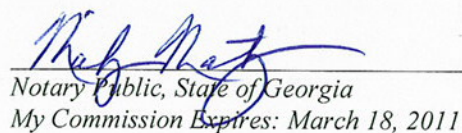
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 10th day of November 2010.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 10th day of November 2010*



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