

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
CITADEL BROADCASTING COMPANY

This radio multiple ownership analysis was prepared on behalf of Citadel Broadcasting Company (“Citadel”) in connection with Citadel’s proposed acquisition of KKAT(FM), Ogden, Utah. The following radio stations are proposed to be under common ownership or control in the Salt Lake City/Ogden area:

Call Sign	City of License	Facilities
KBEE(AM)	Salt Lake City, UT	860 kHz, 0.2 kW-N, 3 kW-CH, 10 kW-D, U
KJQS(AM)	Murray, UT	1230 kHz, 1 kW, D
KFNZ(AM)	Salt Lake City, UT	1320 kHz, 5 kW, U, DA-1
KUBL-FM	Salt Lake City, UT	Channel 227C, 25 kW, 1140 m
KBEE-FM	Salt Lake City, UT	Channel 254C, 40 kW, 894 m
KBER(FM)	Ogden, UT	Channel 266C, 25 kW, 1140 m
KKAT(FM)	Ogden, UT	Channel 270C, 25 kW, 1140 m*
KENZ(FM)	Orem, UT	Channel 298C, 45 kW, 869 m

The principal community contours of all of these stations are depicted on a map included herein as Figure 1. The radio multiple ownership analysis considers only those stations with overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations). An ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

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\* Application for License pending. FCC File No. BLH-20030508AAI.

### Radio Markets

The “radio market” applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned.<sup>†</sup> As listed in the table below, there is one defined “radio market” formed by the subject stations:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	KBEE, KJQS, KFNZ	KUBL, KBEE, KBER, KKAT, KENZ

### Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating, commercial stations having principal community contours which overlap or intersect the principal community contours which define the radio market, plus the subject stations to be co-owned. Only those stations having principal community contour overlap with the defined market area were employed in the count of stations. The results of the analysis are tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	23 AM; 29 FM; 52 Total

Figure 2 is a tabulation of the radio stations identified in the defined radio markets. Only known licensed, operating, commercial stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission’s AM database and the appropriate Ground Wave Field Strength versus

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<sup>†</sup> See Order in Implementation of Section 202(a) and 202(b)(1) of the Telecommunications Act of 1996 (Broadcast Radio Ownership) FCC 96-90, released March 8, 1996 and Memorandum Opinion and Order in Revision of Radio Rules and Policies 7 FCC Rcd 6387, 6395 para. 39 (1992).

Distance Graph described in Section 73.184 of the FCC Rules. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method outlined in Section 73.313 of the FCC Rules. Terrain data were derived from the U.S.G.S. 3-second computer database for each of the FM stations using radials evenly-spaced every 2 degrees of azimuth.

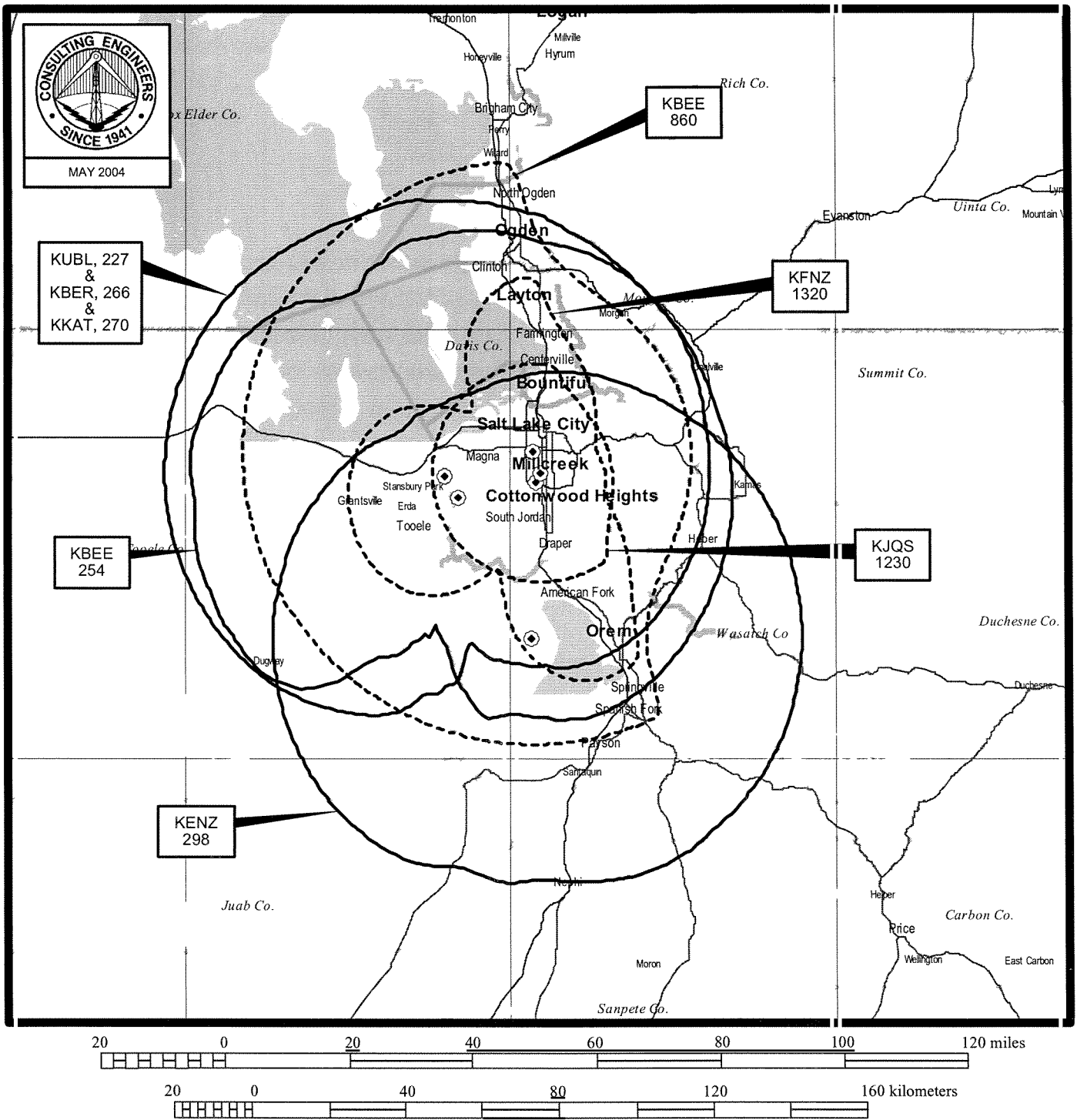
Based on the above, it is concluded that the proposed combination of the stations to be owned complies with Section 73.3555(a) of the FCC Rules.

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May 5, 2004

Figure 1



## PREDICTED PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

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Tabulation of Stations in Radio Markets

Market 1	
Number	Station
AM Stations	
1	KNRS, SALT LAKE CITY, UT, 570 kHz
2	KVNU, LOGAN, UT, 610 kHz
3	KTKK, SANDY, UT, 630 kHz
4	KMTI, MANTI, UT, 650 kHz
5	KALL, NORTH SALT LAKE CITY, UT, 700 kHz
6	KSVN, OGDEN, UT, 730 kHz
7	KSOS, BRIGHAM CITY, UT, 800 kHz
8	KBEE, SALT LAKE CITY, UT, 860 kHz
9	KWDZ, SALT LAKE CITY, UT, 910 kHz
10	KOVO, PROVO, UT, 960 kHz
11	KIQN, TOOELE, UT, 1010 kHz
12	KDYL, SOUTH SALT LAKE, UT, 1060 kHz
13	KSL, SALT LAKE CITY, UT, 1160 kHz
14	KJQS, MURRAY, UT, 1230 kHz
15	KZNS, SALT LAKE CITY, UT, 1280 kHz
16	KFNZ, SALT LAKE CITY, UT, 1320 kHz
17	KSOP, SOUTH SALT LAKE, UT, 1370 kHz
18	KSRR, PROVO, UT, 1400 kHz
19	KLO, OGDEN, UT, 1430 kHz
20	KHQN, SPANISH FORK, UT, 1480 kHz
21	KLLB, WEST JORDAN, UT, 1510 kHz
22	KMRI, WEST VALLEY CITY, UT, 1550 kHz
23	KSGO, CENTERVILLE, UT, 1600 kHz
FM Stations	
1	KUUU, TOOELE, UT, Channel 221
2	KTCE, PAYSON, UT, Channel 222
3	KUBL-F, SALT LAKE CITY, UT, Channel 227
4	KODJ, SALT LAKE CITY, UT, Channel 231
5	KHTB, PROVO, UT, Channel 235
6	KXRK, PROVO, UT, Channel 242
7	KCFM, LEVAN, UT, Channel 244

Market 1	
Number	Station
8	KZHT, SALT LAKE CITY, UT, Channel 246
9	KTPM, FRANKLIN, ID, Channel 248
10	KLGL, RICHFIELD, UT, Channel 248
11	KBZN, OGDEN, UT, Channel 250
12	KBEE-F, SALT LAKE CITY, UT, Channel 254
13	KURR, BOUNTIFUL, UT, Channel 258
14	KSFI, SALT LAKE CITY, UT, Channel 262
15	KJQN, BRIGHAM CITY, UT, Channel 264
16	KBER, OGDEN, UT, Channel 266
17	KEGA, OAKLEY, UT, Channel 268
18	KKAT, OGDEN, UT, Channel 270
19	KDUT, RANDOLPH, UT, Channel 272
20	KQMB, MIDVALE, UT, Channel 274
21	KRSP-F, SALT LAKE CITY, UT, Channel 278
22	KUDE, NEPHI, UT, Channel 280
23	KSOP-F, SALT LAKE CITY, UT, Channel 282
24	KNJQ, MANTI, UT, Channel 286
25	KCPX, CENTERVILLE, UT, Channel 289
26	KOSY-F, SPANISH FORK, UT, Channel 293
27	KRAR, BRIGHAM CITY, UT, Channel 295
28	KENZ, OREM, UT, Channel 298
29	KUDD, ROY, UT, Channel 300