

Exhibit 22 – Statement A
NATURE OF THE PROPOSAL
prepared for
Citadel Broadcasting Company
KKMG(FM) Pueblo, Colorado
Facility ID 11229
Ch. 255C 3.1 kW 641 m

Citadel Broadcasting Company (“*Citadel*”), licensee of FM radio station KKMGM(FM) (Ch. 255C, Pueblo, Colorado), herein seeks approval to construct an auxiliary antenna facility for the station.

Citadel is presently licensed (BLH-19951005KA) to operate the main KKMGM facility with a maximum effective radiated power (“ERP”) of 72 kW (with beam tilt) at a height above average terrain (“HAAT”) of 695 meters. The instant application proposes to locate a KKMGM auxiliary antenna near the licensed KKMGM facility. The proposed auxiliary antenna will be side-mounted on an existing tower (ASR 1025328) and will operate at 3.1 kW ERP (non-directional) with an antenna HAAT of 641 meters.

Exhibit 22 - Figure 1 demonstrates that the 60 dB μ (1 mV/m) contour of the proposed auxiliary facility does not extend beyond the 60 dB μ contour of the main facility, in compliance with §73.1675(a)(1). Because minimum distance spacing and contour protection rules do not apply to auxiliary facilities, the instant proposal is believed to comply with all pertinent FCC allocations requirements.

The proposed auxiliary facility will be collocated with the KKMGM transmitter site at a multi-use broadcast facility atop Cheyenne Mountain. The proposed transmitter is not anticipated to adversely effect other broadcast facilities near the site as the auxiliary facility will only be utilized when the far more powerful main KKMGM facility is not operational. Also, based on data extracted from the FCC’s CDBS database, there are no AM stations within 3.2 km of the proposed KKMGM auxiliary facility.

The proposed facility is 601 km from the nearest FCC monitoring station is at Grand Island, Nebraska and 156 km from the Table Mountain, Colorado quiet zone. These distances greatly exceed the minimum distances specified in §73.1030(c)(3)(iii) and §73.1030(b)(1)(iii) that would

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suggest coordination with these facilities. Further, because operation of the KKMG auxiliary facility represents a net reduction in effective radiated power from that presently licensed, no harmful effects are anticipated.

It is thus believed that the facility proposed herein will satisfy all of the pertinent Commission Rules and Policies now in effect regarding allocation matters for an auxiliary facility.

EXHIBIT 22 - FIGURE 1 PROPOSED COVERAGE CONTOURS

prepared November 2006 for
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