

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
CITICASTERS LICENSES, L.P.

This statement and the attached figures were prepared on behalf of Citicasters Licenses, L.P. ("CL"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CL proposes to correct the licensed coordinates and operating heights of KGAB(AM), Orchard Valley, WY. A multiple ownership analysis was prepared considering the following radio stations under present or proposed common ownership, time brokerage or joint sales:<sup>1</sup>

Table 1: Proposed Commonly Owned, Brokered or Jointly-Sold Stations Studied and Associated Arbitron Metro<sup>2</sup> Information

Call Sign	Fac ID	Band	Community	County	State	Geographic Arbitron Market	Declared Arbitron Market
KOWB	24700	AM	LARAMIE ORCHARD	ALBANY	WY	Non-Metro	Non-Metro
KGAB	30224	AM	VALLEY	LARAMIE	WY	Cheyenne, WY	Cheyenne, WY
KCGY	14753	FM	LARAMIE	ALBANY	WY	Non-Metro	Cheyenne, WY
KIGN	56234	FM	BURNS	LARAMIE	WY	Cheyenne, WY	Cheyenne, WY
KLEN	5991	FM	CHEYENNE	LARAMIE	WY	Cheyenne, WY	Cheyenne, WY
KCOL	68685	AM	WASHINGTON	LARIMER	CO	Ft. Collins- Greeley, CO	Ft. Collins- Greeley, CO
KOLZ	30225	FM	CHEYENNE	LARAMIE	WY	Cheyenne, WY	Cheyenne, WY
KQMY	7693	FM	CHEYENNE	LARAMIE	WY	Cheyenne, WY	Ft. Collins- Greeley, CO
KPAW	68976	FM	FORT COLLINS	LARIMER	CO	Ft. Collins- Greeley, CO	Ft. Collins- Greeley, CO

Since certain of these stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations), or are located in, or home to, the same Arbitron Metro market, an ownership study has been prepared in accordance with the Federal Communications Commission's local radio ownership rule.<sup>3</sup>

CCC does not have an attributable interest in any other station with a principal community contour that overlaps or intersects the principal community contour of KGAB(AM) as proposed, or which is located in the same Arbitron Metro as KGAB(AM). The community of license of KGAB(AM) is located within the Cheyenne, WY Arbitron Metro, and is reported by BIA as being "Home" to that Metro. Contour overlaps of KGAB(AM), as depicted in Figure 1, also occur with commonly-owned stations whose communities of license are located in the Cheyenne, WY Arbitron Metro market, the Fort Collins-Greeley, CO Arbitron Metro market, and a commonly owned station whose community of license is located outside any Arbitron Metro market.

<sup>1</sup> None of the following stations are attributable by virtue of a time brokerage agreement or joint sales agreement.

<sup>2</sup> Arbitron data presented herein is obtained from BIA's "Media Access Pro."

<sup>3</sup> See 47 C.F.R. § 73.3555(a).

Arbitron Market Study

KGAB(AM) is reported by BIA as being "Home" to the Cheyenne, WY Metro. The number of stations attributable to CCC in this Arbitron Metro does not comply with the local radio ownership rules, as evidenced by Table 2 below. However, the existing combination of attributable stations, including KGAB(AM) as currently licensed, is also not in compliance with the Arbitron Metro-based rules. This proposal maintains the *status quo* in the Cheyenne, WY Arbitron Metro -- no stations are added to or removed from the Metro, nor is KGAB(AM)'s "Home" Arbitron Metro changed, by virtue of this instant application. Because this proposed modification would not create a "new violation" of the ownership rules, this existing combination of radio stations qualifies for grandfathering. See Note 4 to 47 C.F.R. Section 73.3555 (minor modification applications are subject to ownership restrictions only if implementing a change in an FM radio station's community of license or if new or increased concentration of ownership among commonly-owned media would be created); accord 2002 Biennial Regulatory Review--Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, 18 FCC Rcd 13,620 at fn. 1033 (2003) (modifications of facilities in a grandfathered combination are prohibited if the proposed modification would create a new violation of the ownership rules).

Table 2 - Stations Considered to be in the Cheyenne, WY Arbitron Metro<sup>4</sup>

Count	Calls	Fac ID	Band	Owner	Status	Community	County
1	KCGY	14753	FM	Clear Channel	a	Laramie	Albany
2	KGAB	30224	AM	Clear Channel	b	Orchard Valley	Laramie
3	KIGN	56234	FM	Clear Channel C	b	Burns	Laramie
4	KLEN	5991	FM	Clear Channel	b	Cheyenne	Laramie
5	KOLZ	30225	FM	Clear Channel	b	Cheyenne	Laramie
6	KQLF	7693	FM	Clear Channel	g	Cheyenne	Laramie
7	KKAW	83584	FM	Chisholm Trail Broadcasting LLC	b	Albin	Laramie
8	KREO	79134	FM	Chisholm Trail Broadcasting LLC	b	Pine Bluffs	Laramie
9	KWYC	87267	FM	CSN International	b	Orchard Valley	Laramie
10	KAIW	93001	FM	Educational Media Foundation	b	Laramie	Laramie
11	KAIX	86624	FM	Educational Media Foundation	b	Cheyenne	Laramie
12	KJUA	54740	AM	La Familia Broadcasting LLC	b	Cheyenne	Laramie
13	KRND	87155	AM	La Familia Broadcasting LLC	b	Fox Farm	Laramie
14	KFBC	43629	AM	Montgomery Broadcasting Limited	b	Cheyenne	Laramie
15	KRAE	35510	AM	Oregon Trail Broadcasting LLC	b	Cheyenne	Laramie
16	KRRR	35511	FM	Oregon Trail Broadcasting LLC	b	Cheyenne	Laramie

<sup>4</sup> Source: BIA.

Count	Calls	Fac ID	Band	Owner	Status	Community	County
17	KZDR	162407	FM	Oregon Trail Broadcasting LLC	b	Cheyenne	Laramie
18	KKPL	54394	FM	Regent Communications Inc	g	Cheyenne	Laramie

### Interim Contour-Overlap Analysis

Because the principal community contours of KGAB(AM) intersects the principal community contour of a station under common ownership or attribution whose community of license is located outside any Arbitron Metro, an interim contour-overlap analysis is also set forth in this statement.

### Interim Contour-Based Radio Markets

A "radio market" under the interim contour-overlap method is the area encompassed by the mutually overlapping principal community contours of the stations under common-ownership or attribution. Here, such mutually overlapping contours form three "radio markets" for interim contour-overlap analysis under the Commission's rules.

Radio Market "1" is defined by the mutually overlapping principal community contours of KGAB(AM), KOWB(AM), KCOL(AM), KOLZ(FM), KQMY(FM) and KCGY(FM). The predicted principal community contours of these stations (3 AM / 3 FM), as well as other stations whose principal community contours overlap this combination, are shown in *Figure 1*. *Figure 2* is the tabulation of some of the radio stations identified in the contour-overlap "radio market 1."

Radio Market "2" is defined by the mutually overlapping principal community contours of KGAB(AM), KCOL(AM), KOLZ(FM), KQMY(FM), KLEN(FM), KIGN(FM) and KCGY(FM).. The predicted principal community contours of these stations (2 AM / 5 FM), as well as other stations whose principal community contours overlap this combination, are shown in *Figure 1*. *Figure 2* is the tabulation of some of the radio stations identified in the contour-overlap "radio market 2."

Radio Market "3" is defined by the mutually overlapping principal community contours of KGAB(AM), KCOL(AM), KOLZ(FM), KQMY(FM), KCGY(FM), KPAW(FM) and KIGN(FM). The predicted principal community contours of these stations (2 AM / 5 FM), as well as other stations whose principal community contours overlap this combination, are shown in *Figure 1*. *Figure 2* is the tabulation of some of the radio stations identified in the contour-overlap "radio market 3."

### Count of Stations in Defined Markets

The number of radio stations in a contour-overlap "radio market" is determined by counting the operating stations having principal community contours which overlap or intersect the principal community contours which define the radio market, plus the subject commonly owned or attributable stations, excluding any stations whose transmitter sites are further than 92 kilometers from the perimeter of mutual overlap, and excluding any commonly owned or attributable stations that do not serve to define the market.

In each interim contour-overlap "radio market" studied herein, there are at least 46 radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio markets." *Figure 2* is the tabulation of some of the radio stations common to the contour-overlap "radio markets".

Only known licensed, operating radio stations were included in this tabulation. Distances to contours for AM stations were predicted using the antenna patterns as identified in the Commission's AM database and the appropriate Ground Wave Field Strength versus Distance Graph of 47 C.F.R. § 73.184. Ground conductivities were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 C.F.R. § 73.313. Terrain data was derived from the N.G.D.C. 30 second computer database for each of the FM stations using radials spaced every 45 degrees of azimuth.

### Conclusions

In the Arbitron Metro Market studied herein, there are at least 18 radio stations, including the subject commonly-owned 1-AM / 5-FM stations, which are home to the Cheyenne, WY. This proposal does not affect the existing number of commonly-owned stations in the subject Arbitron Metro.

In each of the interim contour-overlap "radio markets" studied herein, there are at least 46 stations, including the commonly-owned stations.

Respectfully submitted,

Lance Nelms  
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Figure 1

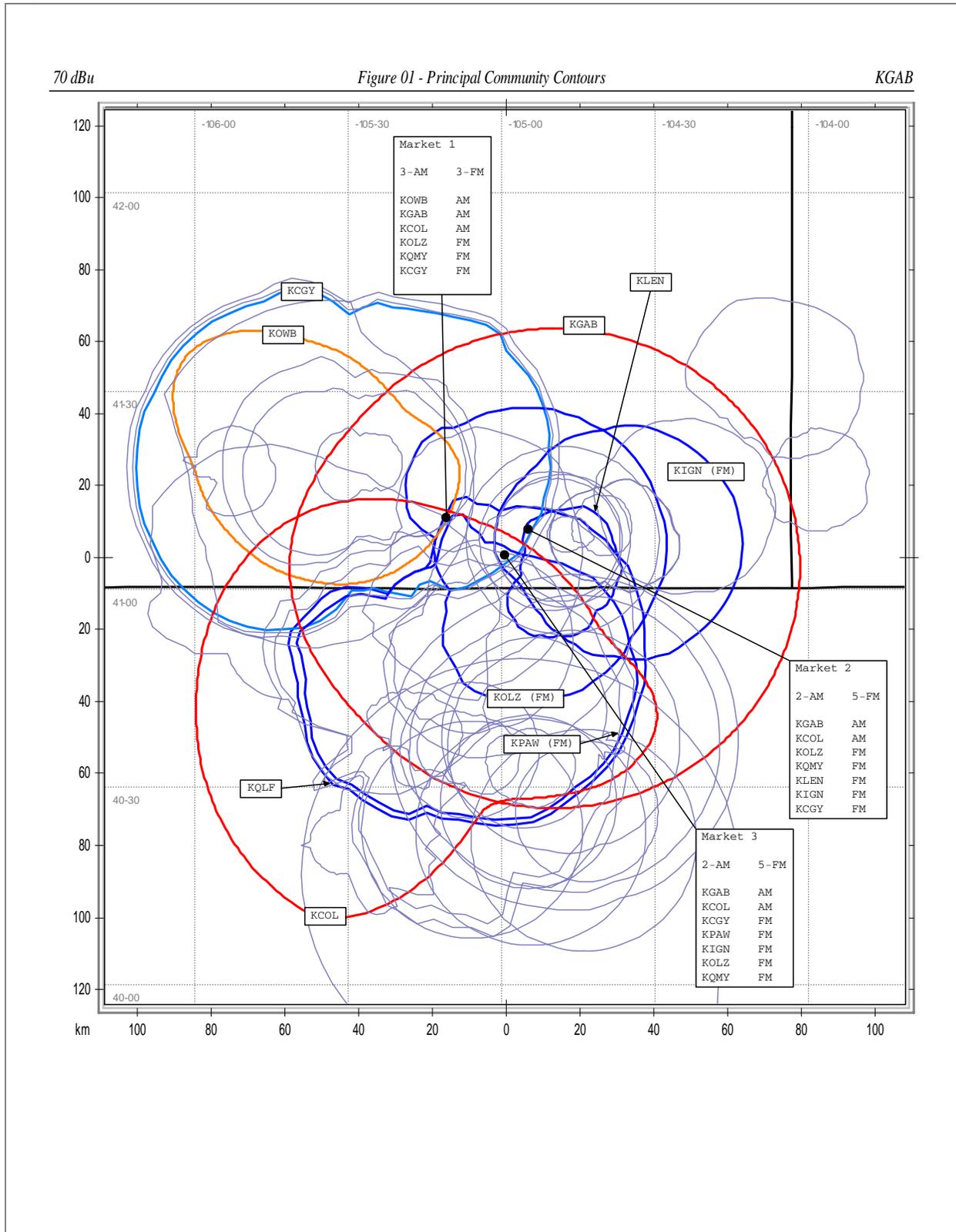


Figure 2 - Stations common to markets 1, 2, and 3.

Count	Call Sign	Fac ID	Licensee	Dist_km
1	KQLF	7693	CITICASTERS LICENSES, L.P.	27.14
2	KCGY	14753	CLEAR CHANNEL BROADCASTING LICENSES, INC.	45.67
3	KOLZ	30225	CITICASTERS LICENSES, L.P.	1.74
4	KIGN	56234	CITICASTERS LICENSES, L.P.	27.6
5	KOWB	24700	CLEAR CHANNEL BROADCASTING LICENSES, INC.	53.8
6	KGAB	30224	CITICASTERS LICENSES, L.P.	14.27
7	KCOL	68685	JACOR BROADCASTING OF COLORADO, INC.	48.76
8	KMAX-FM	84497	REGENT BROADCASTING OF FT. COLLINS, INC.	21.65
9	KLHV	84102	EDUCATIONAL MEDIA FOUNDATION	59.24
10	KKPL	54394	REGENT BROADCASTING OF FT. COLLINS, INC.	12.28
11	KARS-FM	10334	REGENT BROADCASTING OF FT. COLLINS, INC.	63.43
12	KRKY-FM	76780	NRC BROADCASTING, INC.	92.09
13	KJAC	38345	NRC BROADCASTING, INC.	59.23
14	KXWA	89401	WAY-FM MEDIA GROUP, INC.	59.24
15	KCSU-FM	62435	BOARD OF GOVERNORS OF THE COLORADO STATE UNIVERSITY SYSTEM	55.79
16	KLWV	91514	EDUCATIONAL MEDIA FOUNDATION	45.78
17	KUSZ	82198	MURRAY GREY BROADCASTING, INC.	45.78
18	KOLT-FM	67474	TRACY BROADCASTING CORPORATION	17.51
19	KIMX	82007	APPALOOSA BROADCASTING COMPANY, INC.	43.75
20	KAIW	93001	EDUCATIONAL MEDIA FOUNDATION	78.73
21	KRQU	9761	LARAMIE MOUNTAIN BROADCASTING, L.L.C.	45.78
22	KUWR	69131	UNIVERSITY OF WYOMING	45.83
23	KUNC	68219	COMMUNITY RADIO FOR NORTHERN COLORADO	51.66
24	KRFC	82804	PUBLIC RADIO FOR THE FRONT RANGE	56.68
25	KTRR	50375	REGENT BROADCASTING OF FT. COLLINS, INC.	51.66
26	KUAD-FM	49538	REGENT BROADCASTING OF FT. COLLINS, INC.	51.66
27	KWYC	87267	CSN INTERNATIONAL	48.11
28	KZDR	162407	WHITE PARK BROADCASTING, INC.	25.95
29	KRRR	35511	BRAHMIN BROADCASTING CORPORATION	25.95
30	KREO	79134	CHISHOLM TRAIL BROADCASTING LLC	85.92
31	KKAW	83584	CHISHOLM TRAIL BROADCASTING LLC	88.46
32	KEZF	84104	CEDAR COVE BROADCASTING, INC.	17.97
33	KAIX	86624	EDUCATIONAL MEDIA FOUNDATION	25.77
34	KSXT	35517	O. J. & CAROL PRATT	77.7
35	KIIX	68966	JACOR BROADCASTING OF COLORADO, INC.	55.69
36	KHAT	10333	APPALOOSA BROADCASTING COMPANY, INC.	50.21
37	KJMP	129513	WHITE PARK BROADCASTING, INC.	59.26

Count	Call Sign	Fac ID	Licensee	Dist_km
38	KGRE	33821	GREELEY BROADCASTING CORPORATION	75.7
39	KJJJ	58940	RODRIGUEZ-GALLEGOS BROADCASTING CORPORATION	69.69
40	KRCN	70625	PILGRIM COMMUNICATIONS, INC.	89.67
41	KFKA	71443	MUSIC VENTURES, LLC, DBA BROADCAST MEDIA LLC	83.16
42	KHNC	17183	DONALD A. AND SHARON E. WIEDEMAN	78.2
43	KFBC	43629	MONTGOMERY BROADCASTING L.L.C.	13.59
44	KJUA	54740	LA FAMILIA BROADCASTING, LLC	16.68
45	KRAE	35510	BRAHMIN BROADCASTING CORPORATION	15.29
46	KRND	87155	LA FAMILIA BROADCASTING, LLC	16.68