

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CLEAR CHANNEL BROADCASTING LICENSES, INC.

This statement and the attached figures were prepared on behalf of Clear Channel Broadcasting Licenses, Inc. ("CCBL"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CCBL proposes to modify the facilities of KRVK(FM), Midwest, WY. A multiple ownership analysis was prepared considering the following radio stations under present or proposed common ownership, time brokerage or joint sales.¹

Table 1: Proposed Commonly Owned, Brokered or Jointly-Sold Stations Studied and Associated Arbitron Metro² Information

Calls	Fac ID	Band	Community	County	State	Geographic Arbitron Market	Declared Arbitron Market
KTWO	11924	AM	Casper	Natrona	WY	Casper, WY	Casper, WY
KKTL	86873	AM	Casper	Natrona	WY	Casper, WY	Casper, WY
KMGW	7360	FM	Casper	Natrona	WY	Casper, WY	Casper, WY
KWYY	26300	FM	Casper	Natrona	WY	Casper, WY	Casper, WY
KTRS-FM	26301	FM	Casper	Natrona	WY	Casper, WY	Casper, WY
KRVK	88406	FM	Midwest	Natrona	WY	Casper, WY	Casper, WY

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 Markets, an ownership study has been prepared in accordance with the Federal Communications Commission's local radio ownership rule.³

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 KRVK(FM) as proposed, or which is located in the same Arbitron Metro⁴ as KRVK(FM). The community of license of KRVK(FM) is located within the Casper, WY Arbitron Metro, and KRVK(FM) is reported by BIA as being "Home" to that Metro only.

Arbitron Market Study

KRVK(FM) is reported by BIA as being "Home" to the Casper, WY Arbitron Metro. This proposal is not in compliance with the local radio ownership rules for that Arbitron Metro, as evidenced by Table 2 below. However, the existing KRVK(FM) licensed facility was also not in compliance with the

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

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

³ See 47 C.F.R. § 73.3555(a).

⁴ A station is considered to be "located in an Arbitron Metro" if the station's community of license is located within the boundaries of that Metro, or, the station is listed as "Home" to that Metro by BIA.

Arbitron Metro-based rules. This proposal maintains the *status quo* in the Casper, WY Arbitron Metro -- no stations are added to or removed from the Metro, nor is KRVK(FM)'s "Home" Arbitron Metro changed, by virtue of this instant application. Because this 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
Casper, WY Arbitron Metro⁵

Count	Calls	Fac ID	Band	Owner	Status	City	County
1	KKTL	86873	AM	Clear Channel Communications	b	Casper	Natrona
2	KMGW	7360	FM	Clear Channel Communications	b	Casper	Natrona
3	KRVK	88406	FM	Clear Channel Communications	b	Midwest	Natrona
4	KTRS-FM	26301	FM	Clear Channel Communications	b	Casper	Natrona
5	KTWO	11924	AM	Clear Channel Communications	b	Casper	Natrona
6	KWYY	26300	FM	Clear Channel Communications	b	Casper	Natrona
7	KMLD	11927	FM	Mountain States Radio Inc	b	Casper	Natrona
8	KASS	43477	FM	Mt Rushmore Broadcasting Inc	b	Casper	Natrona
9	KHOC	15925	FM	Mt Rushmore Broadcasting Inc	b	Casper	Natrona
10	KQLT	47878	FM	Mt Rushmore Broadcasting Inc	b	Casper	Natrona
11	KVOC	35861	AM	Mt Rushmore Broadcasting Inc	b	Casper	Natrona
12	KCSP-FM	71810	FM	Western Inspirational Broadcasters Inc	b	Casper	Natrona
13	KUYO	11003	AM	Wyoming Christian Broadcasting	b	Evansville	Natrona

Interim Contour-Overlap Analysis

Because the principal community of the station to be modified, and the communities of all commonly-owned or attributable stations with overlapping principal contours with the station to be modified, are located inside an Arbitron Metro, an interim contour-overlap analysis is not required.

Conclusions

In the Arbitron Radio Market studied herein, there are at least 13 radio stations, including the subject commonly-owned 2-AM / 4-FM stations, which

⁵ Source: BIA.

are home to the Casper, WY Arbitron Metro. This proposal does not affect the existing number of commonly-owned stations in the subject Arbitron Metro.

Respectfully submitted,

Stephen G. Davis
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Figure 1

