

**ENGINEERING STATEMENT COVERING
BROADCAST MULTIPLE OWNERSHIP STUDY
CUMULUS LICENSING LLC
BISMARCK AND HAZELTON, NORTH DAKOTA**

DECEMBER 2004

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This engineering statement and supporting tabulations and figures has been prepared on behalf of **Cumulus Licensing LLC (“Cumulus”)**. The purpose of the statement is to demonstrate **Cumulus** compliance with *Section 73.3555* of the Commission’s Rules with respect to multiple ownership of AM and FM broadcast facilities.

Cumulus proposes common ownership in the following five stations:

KLXX	Bismarck, ND	1270 kHz	1 kW Day
KACL	Bismarck, ND	CH 254C1	BLH 19970117KD
KBYZ	Bismarck, ND	CH 243C	BLH 19850617KL
KKCT	Bismarck, ND	CH 248C1	BLH 19931105KB
FM197	Hazelton, ND	CH 277C	December 2004 301

These five stations are considered as one market since the principal community contour for the Hazelton, North Dakota station completely envelops the principal community contours of all three FM stations licensed to Bismarck and almost all of the KLXX 5 mV/m contour.

A multiple ownership analysis was prepared considering the above described radio stations under proposed common ownership or control, which stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) in accordance with *Section 73.3555* of the FCC Rules.

RADIO MARKETS & METHODOLOGY

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. In this case, the market is made up of FM stations KACL, KBYZ, KKCT and FM197 and AM station KLXX. The predicted principal community contours for all five stations are shown on

Figure 1, attached. It is noted that the KACL and KKCT contour locations are indistinguishable from each other. Counties in the market include:

Oliver	Sioux
Morton	Emmons
Grant	Burleigh

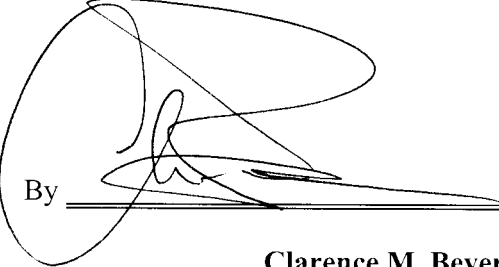
Bismarck, North Dakota is located in Burleigh County while Hazelton is located in Emmons County, North Dakota. Based on the Arbitron Market Definition for Bismarck, North Dakota, Fall 2004, Burleigh and Morton Counties in North Dakota are the metro counties. Emmons County is not part of the metro. Since Hazelton lies outside of an Arbitron metro, the market is determined by contour overlap.

Table 1 lists all AM stations whose 5 mV/m daytime contour duplicates some portion of the market. The contours for these stations are plotted on Figure 2 in green along with the market. Table 1 also lists all FM stations whose 70 dBu contour duplicates some portion of the market. The contours for these stations are plotted on Figure 3 in blue along with the market.

Only known CP or licensed operating full service commercial stations were employed in 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 Distance Graph of 47 CFR 73.184. Ground conductivities were obtained from FCC Figure M3. Distances to the FM contours were determined based on the methodology of 47 CFR 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 5 degrees of azimuth.

Based on the above analysis, it is believed that the proposed common ownership of stations complies with *Section 73.3555* of the Commission's Rules as there are a total of 16 FM and 4 AM stations in the market. **Cumulus** will own four FM stations in the market and one AM station.

The foregoing was prepared on behalf of **Cumulus Licensing LLC** by Clarence M. Beverage of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.

By 

Clarence M. Beverage
for Communications Technologies, Inc.
Marlton, New Jersey

SUBSCRIBED AND SWORN TO before me,

this 17th day of December, 2004,

Esther G. Sperbeck, NOTARY PUBLIC

ESTHER G. SPERBECK
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES OCT. 15, 2007

TABLE 1

CUMULUS LICENSING LLC

BISMARCK & HAZELTON, NORTH DAKOTA MARKET

DECEMBER 2004

CALL ARN	ST	CITY OWNER	FREQ	PAT	AG	PWR	DESC
	LATITUDE	LONGITUDE					
KXMR	ND	BISMARCK	710.00000	LD		50.000	DA2
		BL19990524DC					CLEAR CHANNEL BROADCASTING LICENSES, INC.
46-50-04.0	N 100-31-19.0	W					
KLXX	ND	BISMARCK-MANDAN	1270.00000	LD		1.000	ND1
		BL					CUMULUS LICENSING LLC
46-48-37.0	N 100-50-10.0	W					
KFYR	ND	BISMARCK	550.00000	LD		5.000	DAN
		BL					CITICASTERS LICENSES, L.P.
46-51-12.0	N 100-32-37.0	W					
KBMR	ND	BISMARCK	1130.00000	LD		10.000	NDD
		BL19970502AA					CLEAR CHANNEL BROADCASTING LICENSES, INC.
46-48-37.0	N 100-44-10.0	W					

TABLE 2

CUMULUS LICENSING LLC

BISMARCK & HAZELTON, NORTH DAKOTA MARKET

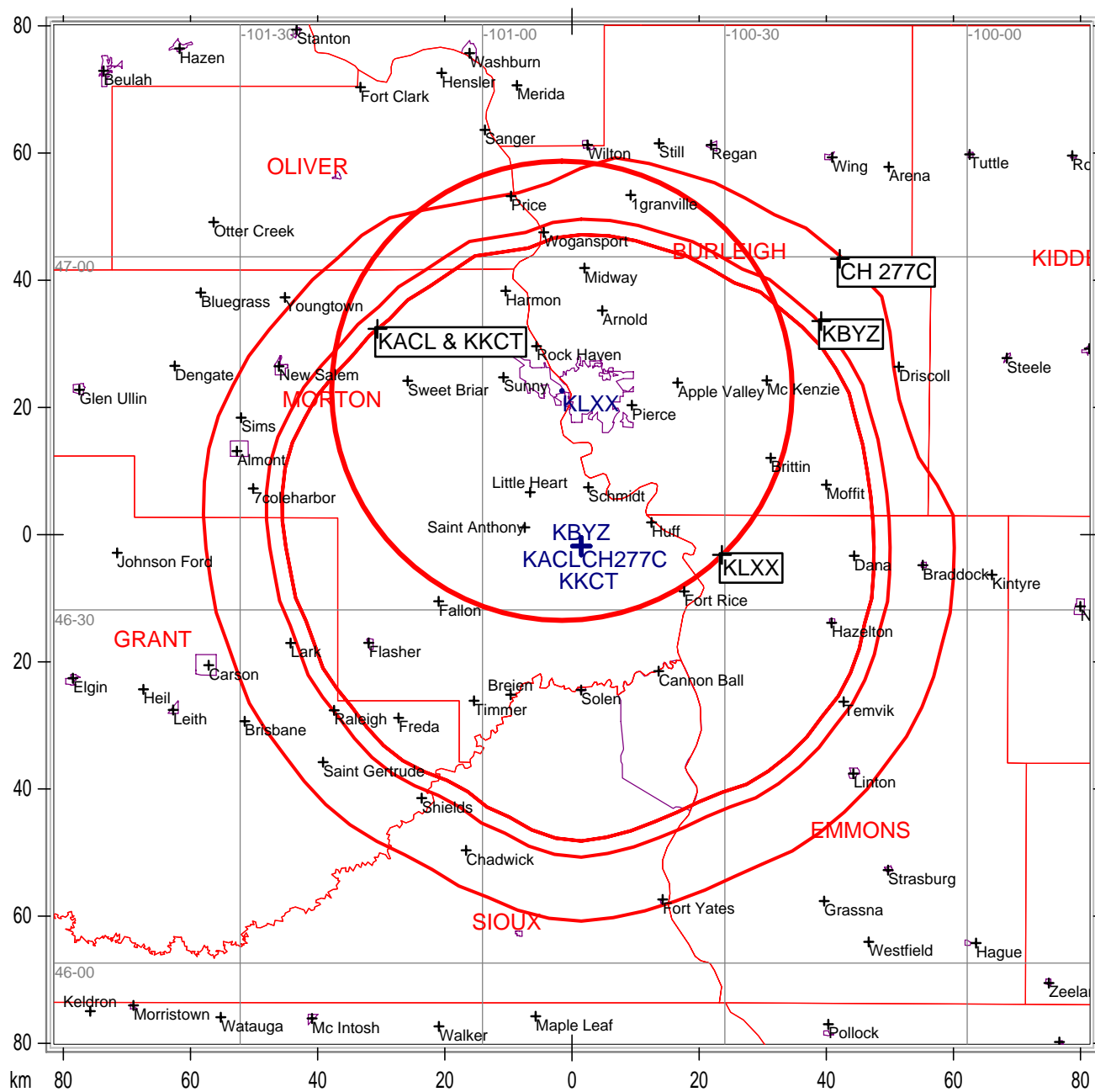
DECEMBER 2004

CALL ARN LATITUDE	ST	CITY OWNER LONGITUDE	FREQ HAAT:m AMSL:m	CHN	CL	ERP	STAT
CH277C BLH19850617KL 46-35-25.0 N	ND	BISMARCK CUMULUS LICENSING LLC 100-47-47.0 W	103.30000 455.417 1035.000		C	100000.00	LIC
KACL BLH19971017KD 46-35-25.0 N	ND	BISMARCK CUMULUS LICENSING LLC 100-47-47.0 W	98.70000 252.417 832.000		C1	100000.00	LIC
KBYZ BLH19850617KL 46-35-25.0 N	ND	BISMARCK CUMULUS LICENSING LLC 100-47-47.0 W	96.50000 289.417 869.000		C	100000.00	LIC
KKCT BLH19931105KB 46-35-25.0 N	ND	BISMARCK CUMULUS LICENSING LLC 100-47-47.0 W	97.50000 252.417 832.000		C1	100000.00	LIC
KLND BLED19971031KB 45-44-54.0 N	SD	LITTLE EAGLE SEVENTH GENERATION MEDIA SVCS, INC. 100-48-30.0 W	89.50000 207.833 802.000		C1	100000.00	LIC
KVLQ BPED19981019MA 46-35-24.0 N	ND	LINCOLN EDUCATIONAL MEDIA FOUNDATION 100-47-46.0 W	89.10000 289.536 869.000		A	540.00	CP
KQDY BLH19840330AA 46-56-31.0 N	ND	BISMARCK CLEAR CHANNEL BROADCASTING LICENSES, INC. 100-41-38.0 W	94.50000 339.405 925.000		C	100000.00	LIC
KLBE-LP BNPL20010614AHX 46-50-25.0 N	ND	BISMARCK NEW SONG COMMUNITY CHURCH 100-46-31.0 W	100.70000 28.857 571.000		LP100	100.00	CP
NEW BNPL20010613ABB 46-48-19.0 N	ND	BISMARCK BISMARCK EDUCATIONAL PRAYER ASSOCIATION 100-47-32.0 W	93.70000 -85.976 447.000		LP100	100.00	CP
KNDR BLH19851108KG 46-35-11.0 N	ND	MANDAN CENTRAL DAKOTA ENTERPRISES, INC. 100-48-20.0 W	104.70000 254.667 838.000		C1	100000.00	LIC
KBFR BLED20031030AGD 46-49-38.0 N	ND	BISMARCK FAMILY STATIONS, INC. 100-46-28.0 W	91.70000 106.821 642.000		A	780.00	LIC

TABLE 2
PAGE 2

CALL ARN LATITUDE	ST	CITY OWNER LONGITUDE	FREQ HAAT:m AMSL:m	CHN	CL	ERP	STAT
KCND	ND	BISMARCK	90.50000		C1	50000.00	LIC
BLED19970919KB PRAIRIE PUBLIC BROADCASTING, INC.							
46-35-23.0 N 100-48-02.0 W 370.643 951.000							
KNRI	ND	BISMARCK	89.70000		A	250.00	CP
BPED19990602MD EDUCATIONAL MEDIA FOUNDATION							
46-51-00.0 N 100-46-11.0 W 48.190 592.000							
KSSS	ND	BISMARCK	101.50000		C	100000.00	LIC
BLH19940810KE CLEAR CHANNEL BROADCASTING LICENSES, INC.							
46-56-31.0 N 100-41-38.0 W 299.405 885.000							
KBMK	ND	BISMARCK	88.30000		C1	100000.00	CP
BPED19990527MD BROADCASTING FOR THE CHALLENGED, INC.							
46-47-06.0 N 100-34-35.0 W 146.643 682.000							
KYYY	ND	BISMARCK	92.90000		C	96000.00	LIC
BMLH19870624KC CITICASTERS LICENSES, L.P.							
46-36-19.0 N 100-48-30.0 W 362.619 940.000							

CUMULUS LICENSING, LLC BISMARCK & HAZELTON, ND MARKET



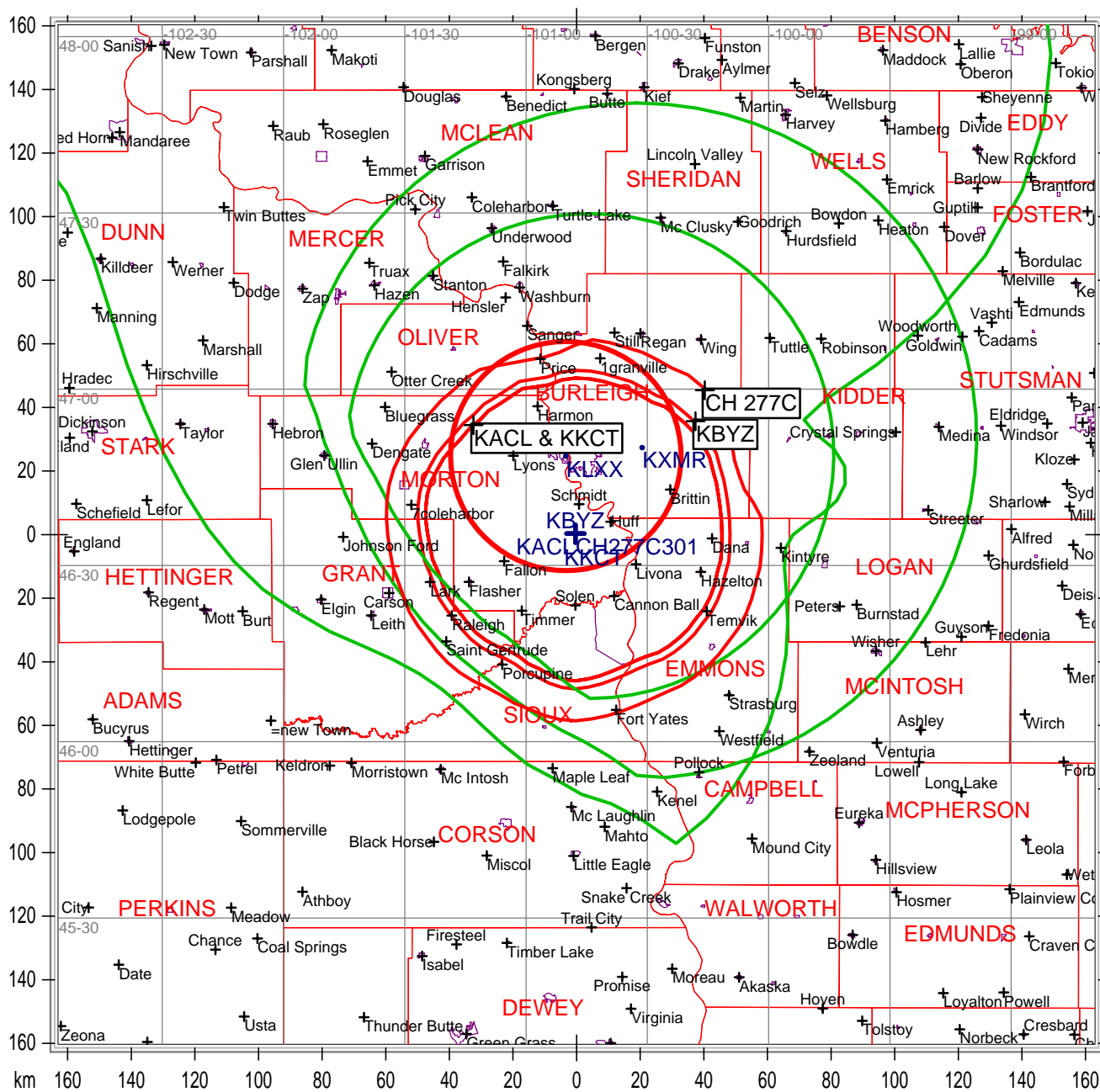
Communications Technologies, Inc. Marlton, New Jersey

County Borders City Borders Lat/Lon Grid

Map Scale: 1:1000000 1 cm = 10.00 km V/H Size: 160.30 x 162.99 km

Figure 1

CUMULUS LICENSING, LLC BISMARCK & HAZELTON, ND MARKET



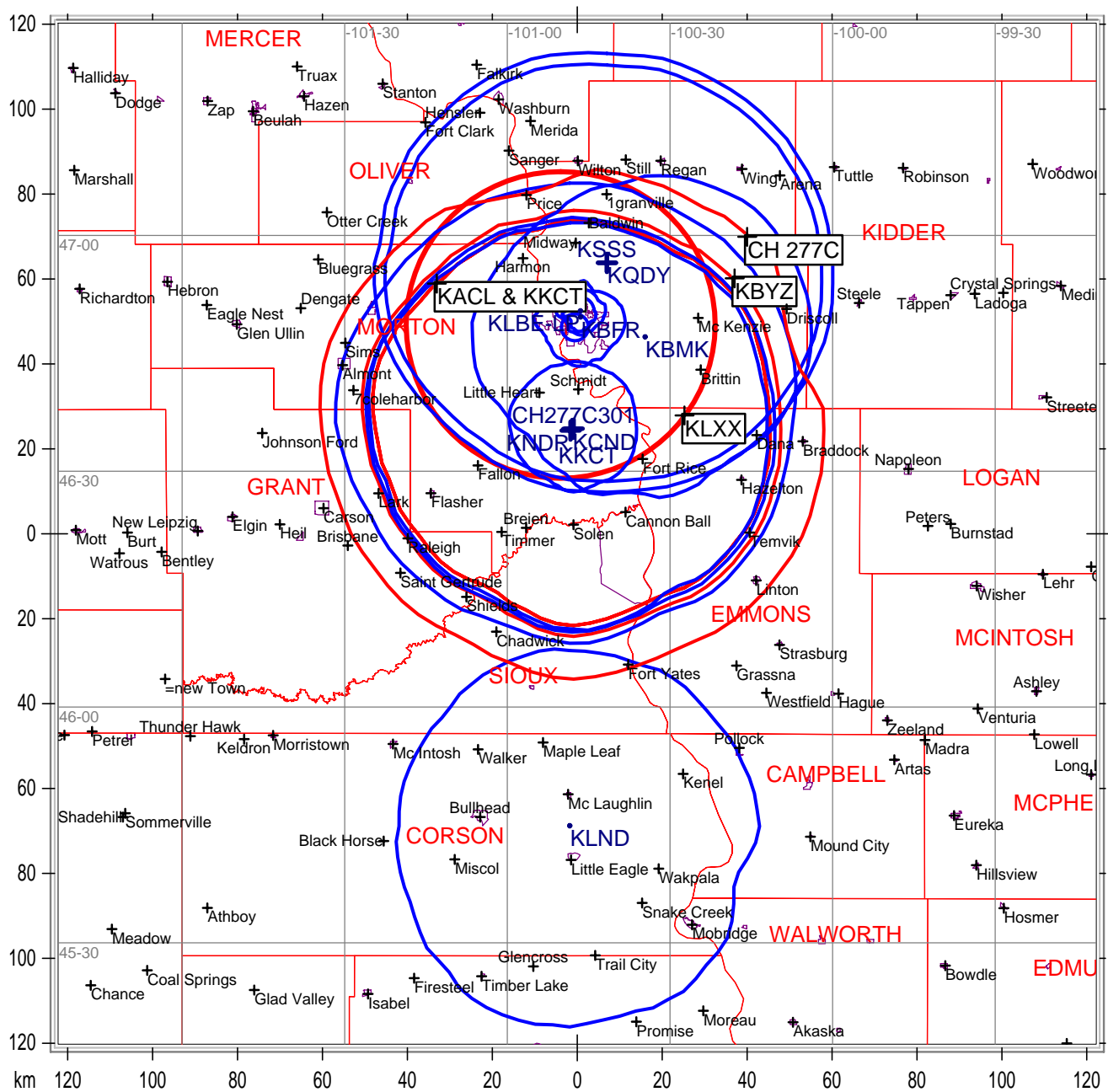
Communications Technologies, Inc. Marlton, New Jersey

County Borders City Borders Lat/Lon Grid

Map Scale: 1:2000000 1 cm = 20.00 km V/H Size: 320.60 x 325.98 km

Figure 2

CUMULUS LICENSING, LLC BISMARCK & HAZELTON, ND MARKET



Communications Technologies, Inc. Marlton, New Jersey

County Borders City Borders Lat/Lon Grid

Map Scale: 1:1500000 1 cm = 15.00 km V|H Size: 240.45 x 244.48 km

Figure 3