

RADIO MARKET ANALYSIS
NEW FM STATION
CUMULUS LICENSING, LLC
HAZELTON, NORTH DAKOTA
February 2006

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC ("Cumulus"), an applicant for a new FM station on Channel 277C1 at Hazelton, North Dakota. The Commission's staff has requested an updated Radio Market Analysis regarding Cumulus's pending application for Hazelton, North Dakota (BNPH-20041217AXY). The new FM at Hazelton, North Dakota is not allotted/authorized to a community within a metro county in any Arbitron/BIA market, nor is it considered "home" to any rated market. Cumulus is also the licensee of KLXX, 1270 kHz, Bismarck-Mandan, North Dakota; and KBYZ, Channel 243C, KACL, Channel 254C1 and KKCT, Channel 248C1, Bismarck, North Dakota. KLXX, KBYZ, KACL and KKCT are all licensed to communities within the Bismarck, North Dakota Arbitron/BIA Market (Market #285). The city grade contour of the proposed new FM station at Hazelton, North Dakota overlaps with KLXX, KBYZ, KACL and KKCT. As such, a revised contour overlap study is needed to show compliance with the Commission's rules.¹ Attached as Exhibit #1 is a map showing the city grade contours of the stations.

REVISED CONTOUR OVERLAP ANALYSIS

2. Since the contours of all four FM stations and the one AM station have a common area of overlap, a study has been conducted to verify that the ownership of these facilities is in

1) As the Hazelton facility is neither licensed to a metro county, nor considered "home" to the Bismarck, North Dakota Arbitron Market, no analysis of the rated market is necessary.

compliance with the Commission's multiple ownership rules. The contours of the subject stations will be used to define the market boundary. No stations with transmitters located more than 92.0 kilometers from the boundary of the common overlap of subject stations will be considered. Further, no other facility controlled by Cumulus will be considered as a market contributor, unless it is a subject station in the pertinent radio market under study.

3. Exhibit #2 is a depiction of the AM and FM stations (commercial and non-commercial) providing service to the Radio Market. Exhibit #3 is a tabulation of the stations in the Radio Market, showing a total of seventeen, including the five subject stations.² The number of stations depicted falls in the fifteen to twenty-nine stations tier of 73.3555(a)(1)(iii) of the Commission's rules. At this level, common ownership or control of up to six stations, with no more than four in the same service, is permissible.

4. Based on the above, the application for the new FM station at Hazelton, North Dakota is in compliance with the Commission's rules.

5. The foregoing technical statement was prepared for Cumulus Licensing LLC by Graham Brock, Inc, its Technical Consultant. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities was extracted from the Commission's CDBS database. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.

2) Non-commercial stations KBMK, Channel 202C3, Bismarck, North Dakota (BLED-20060127ARK); KNRI, Channel 209A, Bismarck, North Dakota (BLED-20060127ARN); and KVLQ, Channel 206A, Lincoln, North Dakota (BLED-20060127ARJ) are all operational in the Bismarck area and are considered contributing stations to the instant market.

Graham Brock, Inc. - Broadcast Technical Consultants

Hazleton APP
BNPH-20041217AXY
Latitude: 46-35-24 N
Longitude: 100-47-46 W
ERP: 100.00 kW
Channel: 277C1
Frequency: 103.3 MHz
AMSL Height: 873.0 m

KBYZ
BLH-19850617KL
Latitude: 46-35-25 N
Longitude: 100-47-47 W
ERP: 100.00 kW
Channel: 243C
Frequency: 96.5 MHz
AMSL Height: 869.0 m

KACL
BLH-19971017KD
Latitude: 46-35-25 N
Longitude: 100-47-47 W
ERP: 100.00 kW
Channel: 254C1
Frequency: 98.7 MHz
AMSL Height: 832.0 m

KKCT
BLH-19931105KB
Latitude: 46-35-25 N
Longitude: 100-47-47 W
ERP: 100.00 kW
Channel: 248C1
Frequency: 97.5 MHz
AMSL Height: 832.0 m

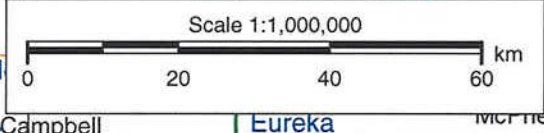
KLXX
Latitude: 46-48-37 N
Longitude: 100-50-10 W
ERP: 1.00 kW
Frequency: 1270.0 kHz

KLXX 5.0 mV/m

HAZELTON/KBYZ 3.16 mV/m

KACL/KKCT 3.16 mV/m

EXHIBIT #1
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Graham Brock, Inc. - Broadcast Technical Consultants

RADIO MARKET BOUNDARY

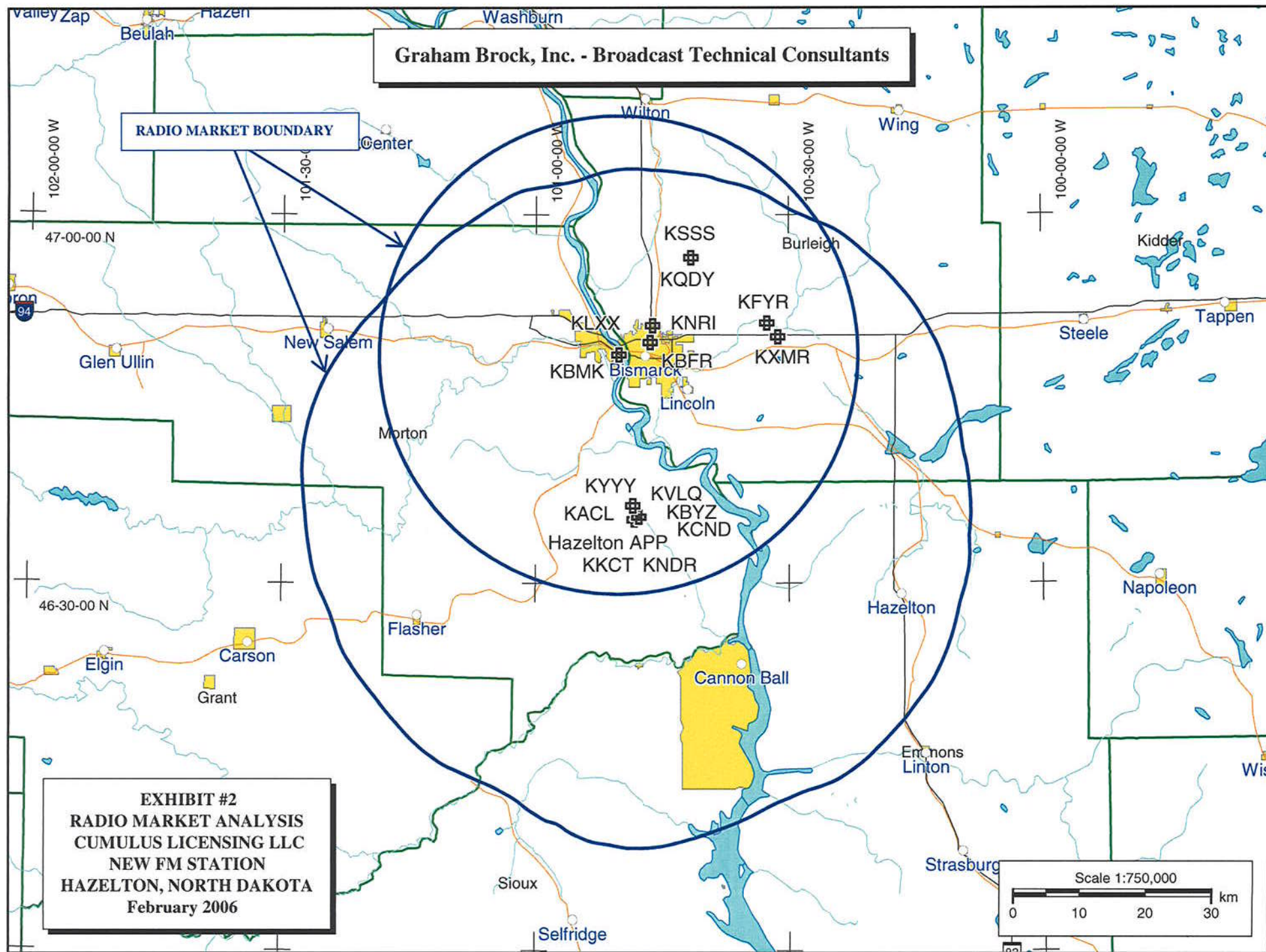


EXHIBIT #2
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EXHIBIT #3

Tabulation of Stations in Radio Market

AM Stations

KFYR	550 kHz	Bismarck, North Dakota
KXMR	710 kHz	Bismarck, North Dakota
KBMR	1130 kHz	Bismarck, North Dakota
* KLXX	1270 kHz	Bismarck-Mandan, North Dakota

Total AM Stations - 4

FM Stations

KBMK	Ch 202C3	Bismarck, North Dakota
KVLQ	Ch 206A	Bismarck, North Dakota
KNRI	Ch 209A	Bismarck, North Dakota
KCND	Ch 213C1	Bismarck, North Dakota
KBFR	Ch 219A	Bismarck, North Dakota
KYYY	Ch 225C	Bismarck, North Dakota
KQDY	Ch 233C	Bismarck, North Dakota
* KBYZ	Ch 243C	Bismarck, North Dakota
* KKCT	Ch 248C1	Bismarck, North Dakota
* KACL	Ch 254C1	Bismarck, North Dakota
KSSS	Ch 268C	Bismarck, North Dakota
* NEW	Ch 277C1	Hazelon, North Dakota
KNDR	Ch 284C1	Mandan, North Dakota

Total FM Stations - 13

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 17

* Subject station.

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

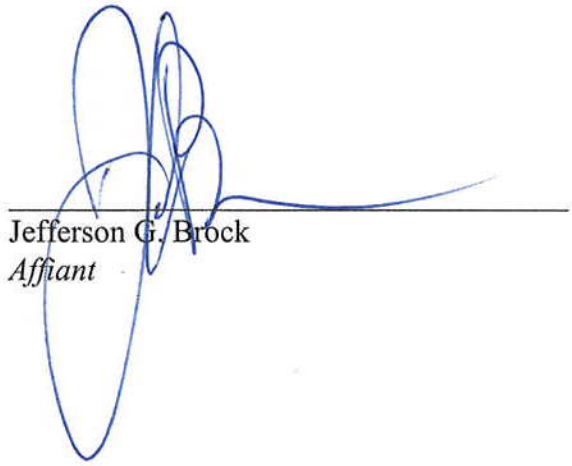
State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Cumulus Licensing LLC to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 22nd day of February, 2006.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 22nd day of February, 2006*



Notary Public, State of Georgia
My Commission Expires: September 3, 2007