

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
CAPSTAR TX LIMITED PARTNERSHIP

This statement and the attached figures were prepared on behalf of Capstar TX Limited Partnership ("CTLTP"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CTLTP proposes to modify the facilities of KEZL(FM), Fowler, CA. 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

| Calls   | Fac ID | Band | Community | County | State | Geographic Arbitron Market | Declared Arbitron Market |
|---------|--------|------|-----------|--------|-------|----------------------------|--------------------------|
| KCBL    | 9749   | AM   | Fresno    | Fresno | CA    | Fresno, CA                 | Fresno, CA               |
| KRDU    | 54559  | AM   | Dinuba    | Tulare | CA    | Visalia-Tulare-Hanford, CA | Fresno, CA               |
| KVBL    | 2096   | AM   | Visalia   | Tulare | CA    | Visalia-Tulare-Hanford, CA | Fresno, CA               |
| KALZ    | 48777  | FM   | Fresno    | Fresno | CA    | Fresno, CA                 | Fresno, CA               |
| KBOS-FM | 9748   | FM   | Tulare    | Tulare | CA    | Visalia-Tulare-Hanford, CA | Fresno, CA               |
| KEZL    | 2097   | FM   | Fowler    | Fresno | CA    | Fresno, CA                 | Fresno, CA               |
| KFSO-FM | 2099   | FM   | Visalia   | Tulare | CA    | Visalia-Tulare-Hanford, CA | Fresno, CA               |
| KRZR    | 48776  | FM   | Hanford   | Kings  | CA    | Visalia-Tulare-Hanford, CA | Fresno, CA               |
| KSOF    | 54560  | FM   | Dinuba    | Tulare | CA    | Visalia-Tulare-Hanford, CA | Fresno, CA               |

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.<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 KEZL(FM) as proposed, or which is located in the same Arbitron Metro<sup>4</sup> as KEZL(FM). The community of license of KEZL(FM) is located within the Fresno, CA Arbitron Metro, and KEZL(FM) is reported by BIA as being "Home" to that Metro only. Contour overlap of the station to be modified, as depicted in Figure 1, also occurs with commonly-owned stations whose communities of license are located in the nearby Visalia-Tulare-Hanford, CA 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).

<sup>4</sup> 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 Market Study

KEZL(FM) is reported by BIA as being "Home" to the Fresno, CA 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 KEZL(FM) licensed facility was also not in compliance with the Arbitron metro-based rules. This proposal maintains the status-quo in the Fresno, CA Arbitron Metro: no stations are added to or removed from the metro, nor is KEZL(FM)'s Arbitron market 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  
Fresno, CA Arbitron Metro<sup>5</sup>

| Count | Calls   | Fac ID | Band | Owner                               | Status <sup>6</sup> | Community | County |
|-------|---------|--------|------|-------------------------------------|---------------------|-----------|--------|
| 1     | KEYQ    | 2098   | AM   | Association for Community Education | b                   | Fresno    | Fresno |
| 2     | KOKO-FM | 3970   | FM   | Big Broadcast of Arizona LLC        | b                   | Kerman    | Fresno |
| 3     | KAAT    | 8341   | FM   | California Sierra Corporation       | a                   | Oakhurst  | Madera |
| 4     | KFSR    | 8349   | FM   | California State University         | b                   | Fresno    | Fresno |
| 5     | KALZ    | 48777  | FM   | Clear Channel Communications        | b                   | Fresno    | Fresno |
| 6     | KBOS-FM | 9748   | FM   | Clear Channel Communications        | a                   | Tulare    | Tulare |
| 7     | KCBL    | 9749   | AM   | Clear Channel Communications        | b                   | Fresno    | Fresno |
| 8     | KEZL    | 2097   | FM   | Clear Channel Communications        | b                   | Fowler    | Fresno |
| 9     | KFSO-FM | 2099   | FM   | Clear Channel Communications        | a                   | Visalia   | Tulare |
| 10    | KRDU    | 54559  | AM   | Clear Channel Communications        | a                   | Dinuba    | Tulare |
| 11    | KRZR    | 48776  | FM   | Clear Channel Communications        | a                   | Hanford   | Kings  |
| 12    | KSOF    | 54560  | FM   | Clear Channel Communications        | a                   | Dinuba    | Tulare |
| 13    | KVBL    | 2096   | AM   | Clear Channel Communications        | a                   | Visalia   | Tulare |
| 14    | KDKL    | 85850  | FM   | Educational Media Foundation        | b                   | Coalinga  | Fresno |
| 15    | KFNO    | 20924  | FM   | Family Stations Inc                 | b                   | Fresno    | Fresno |
| 16    | KFCF    | 22641  | FM   | Fresno Free College Foundation      | b                   | Fresno    | Fresno |
| 17    | KBIF    | 9226   | AM   | Gore-Overgaard Broadcasting, Inc.   | b                   | Fresno    | Fresno |
| 18    | KIRV    | 48513  | AM   | Gore-Overgaard Broadcasting, Inc.   | b                   | Fresno    | Fresno |
| 19    | KMGV    | 18409  | FM   | Infinity Broadcasting               | b                   | Fresno    | Fresno |

<sup>5</sup> Source: BIA.

<sup>6</sup> Status: "a" -- the station is reported by BIA as "Home" to this Arbitron Metro; "g" -- the station's community of license is located within the geographic boundaries of this Arbitron Metro; "b" -- the station is both listed by BIA as "Home" to this Arbitron Metro, and its community of license is located in this Arbitron Metro.

|    |         |       |    |                                      |   |             |        |
|----|---------|-------|----|--------------------------------------|---|-------------|--------|
| 20 | KMJ     | 26923 | AM | Infinity Broadcasting                | b | Fresno      | Fresno |
| 21 | KOOR    | 29429 | AM | Infinity Broadcasting                | b | Clovis      | Fresno |
| 22 | KOQO-FM | 29296 | FM | Infinity Broadcasting                | b | Fresno      | Fresno |
| 23 | KRNC    | 26933 | FM | Infinity Broadcasting                | b | Fresno      | Fresno |
| 24 | KSKS    | 26924 | FM | Infinity Broadcasting                | b | Fresno      | Fresno |
| 25 | KWYE    | 18406 | FM | Infinity Broadcasting                | b | Fresno      | Fresno |
| 26 | KJWL    | 31538 | FM | JSA Broadcasting                     | b | Fresno      | Fresno |
| 27 | KAJP    | 9993  | FM | Lazer Broadcasting Corporation       | b | Firebaugh   | Fresno |
| 28 | KNGS    | 72672 | FM | Lazer Broadcasting Corporation       | b | Coalinga    | Fresno |
| 29 | KGST    | 38453 | AM | Lotus Communications Corporation     | b | Fresno      | Fresno |
| 30 | KLBN    | 38455 | FM | Lotus Communications Corporation     | b | Auberry     | Fresno |
| 31 | KMMM    | 51845 | FM | Lotus Communications Corporation     | a | Madera      | Madera |
| 32 | KFYE    | 18860 | FM | Mapleton Communications LLC          | b | Kingsburg   | Fresno |
| 33 | KFRR    | 29051 | FM | Mondosphere Broadcasting             | a | Woodlake    | Tulare |
| 34 | KJFX    | 65773 | FM | Mondosphere Broadcasting             | b | Fresno      | Fresno |
| 35 | KWOL    | 64144 | FM | Mondosphere Broadcasting             | b | San Joaquin | Fresno |
| 36 | KMEN    | 88205 | FM | Moon Broadcasting Corp               | b | Mendota     | Fresno |
| 37 | KWRU    | 18407 | AM | Multicultural Radio Broadcasting Inc | b | Fresno      | Fresno |
| 38 | KIGS    | 51122 | AM | P&C Broadcasting                     | a | Hanford     | Kings  |
| 39 | KMPH-FM | 26266 | FM | Pappas Telecasting Companies         | a | Hanford     | Kings  |
| 40 | KSJV    | 54496 | FM | Radio Bilingue Inc                   | b | Fresno      | Fresno |
| 41 | KBHH    | 82085 | FM | Radio Campesina Inc                  | b | Kerman      | Fresno |
| 42 | KFIG    | 26592 | AM | Radio Central LLC                    | b | Fresno      | Fresno |
| 43 | KAVT    | 87176 | AM | RAK Communications Inc               | b | Fresno      | Fresno |
| 44 | KQEQ    | 33252 | AM | RAK Communications Inc               | b | Fowler      | Fresno |
| 45 | KXEX    | 54960 | AM | RAK Communications Inc               | b | Fresno      | Fresno |
| 46 | KMAK    | 56145 | FM | Smith, Richard B.                    | b | Orange Cove | Fresno |
| 47 | KYNO    | 65774 | AM | Spanish Catholic Radio               | b | Fresno      | Fresno |
| 48 | KOND    | 39567 | FM | Univision Communications Inc         | b | Clovis      | Fresno |
| 49 | KZOL    | 31716 | FM | Univision Communications Inc         | a | North Fork  | Madera |
| 50 | KVPR    | 72188 | FM | White Ash Broadcasting Inc           | b | Fresno      | Fresno |

### 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 50 radio stations, including the subject commonly-owned 3-AM / 6-FM stations, which are home to the Fresno, CA Metro. This proposal does not affect the existing number of commonly-owned stations in the subject BIA Metro.

Respectfully submitted,

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December 10, 2004

Figure 1

