

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
CITADEL BROADCASTING COMPANY

This radio multiple ownership analysis was prepared on behalf of Citadel Broadcasting Company (“Citadel”) in connection with Citadel’s proposed acquisition of the following radio stations in the area of Erie, Pennsylvania:

Call Sign	City of License	Facilities
WRIE(AM)	Erie, PA	1260 kHz, 5 kW, U, DA-2
WXTA(FM)	Edinboro, PA	Channel 250B1, 10 kW, 154 m
WXKC(FM)	Erie, PA	Channel 260B, 50 kW, 150 m
WQHZ(FM)	Erie, PA	Channel 272A, 1.7 kW, 187 m

The principal community contours of all of these stations are depicted on a map included herein as Figure 1. The radio multiple ownership analysis considers only those stations with overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations). An ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

Radio Markets

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. \* As listed in the table below, there is one defined “radio market” formed by the subject stations:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	WRIE	WXTA, WXXC, WQHZ

#### Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating, commercial stations having principal community contours which overlap or intersect the principal community contours which define the radio market, plus the subject stations to be co-owned. Only those stations having principal community contour overlap with the defined market area were employed in the count of stations. The results of the analysis are tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	9 AM; 12 FM; 21 Total

Figure 2 is a tabulation of the radio stations identified in the defined radio markets. Only known licensed, operating, commercial stations were employed for 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 described in Section 73.184 of the FCC Rules. Ground conductivity data

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\* See Order in Implementation of Section 202(a) and 202(b)(1) of the Telecommunications Act of 1996 (Broadcast Radio Ownership) FCC 96-90, released March 8, 1996 and Memorandum Opinion and Order in Revision of Radio Rules and Policies 7 FCC Rcd 6387, 6395 para. 39 (1992).

were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method outlined in Section 73.313 of the FCC Rules. Terrain data were derived from the U.S.G.S. 3-second computer database for each of the FM stations using radials evenly-spaced every 2 degrees of azimuth.

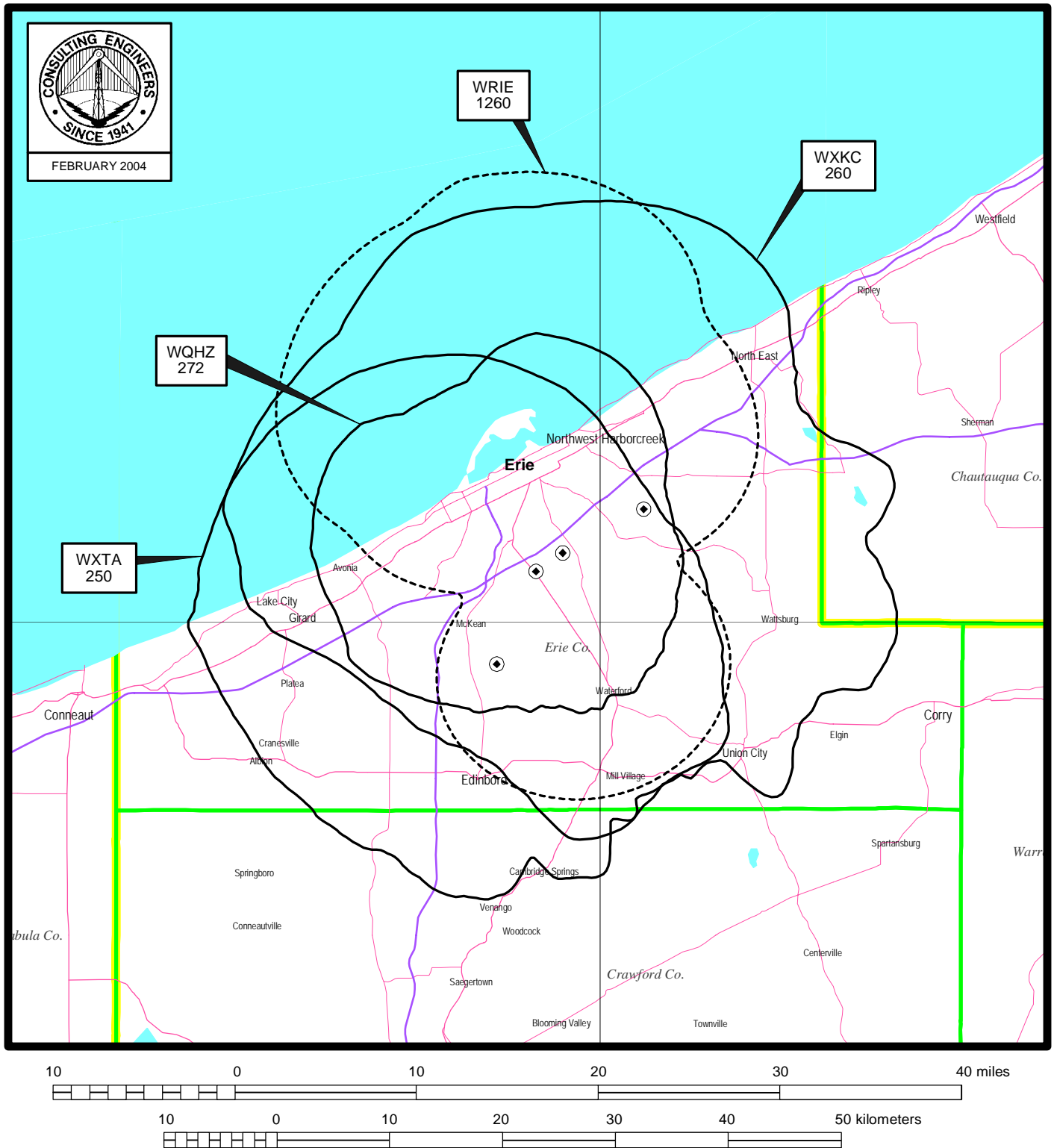
Based on the above, it is concluded that the proposed combination of the stations to be owned complies with Section 73.3555(a) of the FCC Rules.

Louis Robert du Treil, Jr.

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February 18, 2004

Figure 1



## PREDICTED PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

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Tabulation of Stations in Radio Markets

<b>Market 1</b>	
Number	Station
<b>AM Stations</b>	
1	WFUN, ASHTABULA, OH, 970 kHz
2	WRIE, ERIE, PA, 1260 kHz
3	WFNN, ERIE, PA, 1330 kHz
4	WWOW, CONNEAUT, OH, 1360 kHz
5	WWCB, CORRY, PA, 1370 kHz
6	WJET, ERIE, PA, 1400 kHz
7	WPSE, ERIE, PA, 1450 kHz
8	WMGW, MEADVILLE, PA, 1490 kHz
9	WEYZ, NORTH EAST, PA, 1530 kHz
<b>FM Stations</b>	
1	WUSE, FAIRVIEW, PA, Channel 230
2	WHUZ, SAEGERTOWN, PA, Channel 232
3	WFGO, ERIE, PA, Channel 234
4	WXTA, EDINBORO, PA, Channel 250
5	WXKC, ERIE, PA, Channel 260
6	WGY, MEADVILLE, PA, Channel 262
7	WRKT, NORTH EAST, PA, Channel 265
8	WQHZ, ERIE, PA, Channel 272
9	WRTS, ERIE, PA, Channel 279
10	WXXO, CAMBRIDGE SPRINGS, PA, Channel 283
11	WGOJ, CONNEAUT, OH, Channel 288
12	WCTL, UNION CITY, PA, Channel 292