

# TECHNICAL STATEMENT RADIO MULTIPLE OWNERSHIP ANALYSIS

This statement and the attached figures were prepared on behalf of AMFM Texas Licenses Limited Partnership. ("ATLLP"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). ATLLP proposes to acquire the facilities of KBKS-FM, Tacoma, WA. 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
KBKS-FM	27020	FM	Tacoma	Pierce	WA	Seattle-Tacoma, WA	Seattle-Tacoma, WA
KFNK	3915	FM	Eatonville	Pierce	WA	Seattle-Tacoma, WA	Seattle-Tacoma, WA
KHHO	18523	AM	Tacoma	Pierce	WA	Seattle-Tacoma, WA	Seattle-Tacoma, WA
KJR	48386	AM	Seattle	King	WA	Seattle-Tacoma, WA	Seattle-Tacoma, WA
KJR-FM	48385	FM	Seattle	King	WA	Seattle-Tacoma, WA	Seattle-Tacoma, WA
KNBQ	33829	FM	Centralia	Lewis	WA	Non-Metro	Seattle-Tacoma, WA
KUBE	48387	FM	Seattle	King	WA	Seattle-Tacoma, WA	Seattle-Tacoma, WA

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 market, 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 KBKS-FM as proposed, or which is located in the same Arbitron Metro<sup>4</sup> as KBKS-FM. The community of license of KBKS-FM is located within the Seattle-Tacoma, WA Arbitron Metro, and KBKS-FM is reported by BIA as being "Home" to that Metro. Contour overlap of the station to be acquired, as depicted in Figure 1, also occurs with commonly-owned stations whose communities of license are located in the Seattle-Tacoma, WA Arbitron

<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.

Metro market, and commonly owned stations whose communities of license are located outside any Arbitron Metro market.

#### Arbitron Market Study

KBKS-FM is reported by BIA as being "Home" to the Seattle-Tacoma, WA Metro. This proposal is in compliance with the local radio ownership rules for that Arbitron Metro, as evidenced by Table 2 below:

Table 2 - Stations Considered to be in the  
Seattle-Tacoma, WA Arbitron Metro<sup>5</sup>

Count	Calls	Fac ID	Band	Owner	Status <sup>6</sup>	Community	County	Market Date
1	KXXO	67027	FM	3 Cities Inc	b	Olympia	Thurston	2003/07/02
2	KKDZ	12112	AM	ABC/Disney	b	Seattle	King	2003/07/02
3	KBCS	4627	FM	Bellevue Community College	b	Bellevue	King	2003/07/02
4	KASB	4631	FM	Bellevue School District 405	b	Bellevue	King	2003/07/02
5	KDDS-FM	33622	FM	Bustos Media Enterprises LLC	a	Elma	Grays Harbor	2003/07/02
6	KTBK	33683	AM	Bustos Media Enterprises LLC	b	Auburn-Federal Way	King	2003/07/02
7	KWFJ	8393	FM	Calvary Baptist Church	b	Roy	Pierce	2003/07/02
8	KBKS-FM	27020	FM	CBS Radio <sup>7</sup>	b	Tacoma	Pierce	2003/07/02
9	KJAQ	1091	FM	CBS Radio	b	Seattle	King	2003/07/02

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<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.

<sup>7</sup> Station being acquired.

10	KMPS-FM	20356	FM	CBS Radio	b	Seattle	King	2003/07/02
11	KPTK	6387	AM	CBS Radio	b	Seattle	King	2003/07/02
12	KZOK-FM	20357	FM	CBS Radio	b	Seattle	King	2003/07/02
13	KFNK	3915	FM	Clear Channel Communications Inc	b	Eatonville	Pierce	2003/07/02
14	KHHO	18523	AM	Clear Channel Communications Inc	b	Tacoma	Pierce	2003/07/02
15	KJR	48386	AM	Clear Channel Communications Inc	b	Seattle	King	2003/07/02
16	KJR-FM	48385	FM	Clear Channel Communications Inc	b	Seattle	King	2003/07/02
17	KNBQ	33829	FM	Clear Channel Communications Inc	a	Centralia	Lewis	2005/10/25
18	KUBE	48387	FM	Clear Channel Communications Inc	b	Seattle	King	2003/07/02
19	KIRO	6362	AM	Bonneville International Corp	b	Seattle	King	2003/07/02
20	KIRO-FM	33682	FM	Bonneville International Corp	b	Tacoma	Pierce	2003/07/02
21	KTTH	27023	AM	Bonneville International Corp	b	Seattle	King	2003/07/02

22	KVTI	12068	FM	Clover Park Technical College	b	Tacoma	Pierce	2003/07/02
23	KCIS	14504	AM	Crista Ministries	b	Edmonds	Snohomish	2003/07/02
24	KCMS	14505	FM	Crista Ministries	b	Edmonds	Snohomish	2003/07/02
25	KWPZ	14506	FM	Crista Ministries	a	Lynden	Whatcom	2003/07/02
26	KISW	47750	FM	Entercom	b	Seattle	King	2003/07/02
27	KKWF	6367	FM	Entercom	b	Seattle	King	2003/07/02
28	KMTT	18513	FM	Entercom	b	Tacoma	Pierce	2003/07/02
29	KNDD	34530	FM	Entercom	b	Seattle	King	2003/07/02
30	KBRD	26893	AM	Estate of Larry D. 'Skip' Marrow	b	Lacey	Thurston	2003/07/02
31	KAOS	65611	FM	Evergreen State College	b	Olympia	Thurston	2003/07/02
32	KARR	20669	AM	Family Stations Inc	b	Kirkland	King	2003/07/02
33	KMCQ	41861	FM	First Broadcasting Investment Partners, LLC	a	The Dalles	Wasco	2005/09/26
34	KING-FM	11755	FM	Beethoven	b	Seattle	King	2003/07/02
35	KOMO	21647	AM	Fisher Communications Inc	b	Seattle	King	2003/07/02
36	KPLZ-FM	21663	FM	Fisher Communications Inc	b	Seattle	King	2003/07/02

37	KVI	35853	AM	Fisher Communications Inc	b	Seattle	King	2003/07/02
38	KGTK	47567	AM	Gottlieb, Alan M.	b	Olympia	Thurston	2003/07/02
39	KITZ	9737	AM	Gottlieb, Alan M.	b	Silverdale	Kitsap	2003/07/02
40	KGRG	14061	AM	Green River Foundation	b	Enumclaw	King	2003/07/02
41	KGRG- FM	25168	FM	Green River Foundation	b	Auburn	King	2003/07/02
42	KLAY	11890	AM	Huntington, Clay	b	Lakewood	Snohomish	2003/07/02
43	KBRC	39496	AM	Keane, Jim & Ann	a	Mount Vernon	Skagit	2008/11/03
44	KGY	34486	AM	KGY Inc	b	Olympia	Thurston	2003/07/02
45	KRIZ	35549	AM	KRIZ Broadcasting Inc	b	Renton	King	2003/07/02
46	KYIZ	86941	AM	KRIZ Broadcasting Inc	b	Renton	King	2003/07/02
47	KZIZ	35550	AM	KRIZ Broadcasting Inc	b	Pacific	Pierce	2003/07/02
48	KSER	29649	FM	KSER Foundation	b	Everett	Snohomish	2003/07/02
49	KUOW	20298	AM	KUOW/Puget Sound Public Radio	b	Tumwater	Thurston	2003/07/02
50	KMIH	41205	FM	Mercer Island School District #400	b	Mercer Island	King	2003/07/02
51	KXPA	11752	AM	MultiCultural Radio Broadcasting Inc	b	Bellevue	King	2003/07/02

52	KPLI	91212	FM	Pacific Lutheran University	b	Olympia	Thurston	2005/04/26
53	KPLU-FM	51199	FM	Pacific Lutheran University	b	Tacoma	Pierce	2003/07/02
54	KGHP	52167	FM	Peninsula School District No. 401	b	Gig Harbor	Pierce	2003/07/02
55	KXOT	62470	FM	Public Radio Capital Inc	b	Tacoma	Pierce	2003/07/02
56	KBLE	33667	AM	Sacred Heart Radio Inc	b	Seattle	King	2003/07/02
57	KGNW	28819	AM	Salem Communications Corporation	b	Burien-Seattle	King	2003/07/02
58	KKMO	33301	AM	Salem Communications Corporation	b	Tacoma	Pierce	2003/07/02
59	KKOL	20355	AM	Salem Communications Corporation	b	Seattle	King	2003/07/02
60	KLFE	12031	AM	Salem Communications Corporation	b	Seattle	King	2003/07/02
61	KNTS	87153	AM	Salem Communications Corporation	b	Seattle	King	2003/07/02
62	KIXI	4629	AM	Sandusky Radio	b	Mercer Island	King	2003/07/02
63	KKNW	57834	AM	Sandusky Radio	b	Seattle	King	2003/07/02
64	KQMV	4630	FM	Sandusky Radio	b	Bellevue	King	2003/07/02

65	KRWM	53870	FM	Sandusky Radio	b	Bremerton	Kitsap	2003/07/02
66	KWJZ	57843	FM	Sandusky Radio	b	Seattle	King	2003/07/02
67	KNHC	59526	FM	Seattle Public Schools	b	Seattle	King	2003/07/02
68	KBRO	48248	AM	Seattle Streaming Radio LLC	b	Bremerton	Kitsap	2003/07/02
69	KLDY	3711	AM	Seattle Streaming Radio LLC	b	Lacey	Thurston	2003/07/02
70	KNTB	26892	AM	Seattle Streaming Radio LLC	b	Lakewood	Snohomish	2003/07/02
71	KFMY	51167	FM	South Sound Broadcasting, LLC	a	Oakville	Grays Harbor	2004/10/29
72	KRKO	62056	AM	SR Broadcasting Inc	b	Everett	Snohomish	2003/07/02
73	KSUH	32339	AM	Suh, Jean	b	Puyallup	Pierce	2003/07/02
74	KWYZ	54040	AM	Suh, Jean	b	Everett	Snohomish	2003/07/02
75	KUPS	68996	FM	University of Puget Sound	b	Tacoma	Pierce	2003/07/02
76	KEXP-FM	68668	FM	University of Washington	b	Seattle	King	2003/07/02
77	KUOW-FM	66571	FM	University of Washington	b	Seattle	King	2003/07/02
78	KWDB	49918	AM	West Beach Broadcasting	b	Oak Harbor	Island	2003/07/02

### Interim Contour-Overlap Analysis

Because the proposed principal community contour of the station to be acquired intersects the principal community contour of a station under common ownership or attribution whose community of license is located outside any Arbitron Metro, an interim contour-overlap analysis is also set forth in this statement.

### Interim Contour-Based Radio Markets

A "radio market" under the interim contour-overlap method is the area encompassed by the mutually overlapping principal community contours of the stations under common-ownership or attribution. Here, such mutually overlapping contours form one "radio market" for interim contour-overlap analysis under the Commission's rules.

The "radio market" is defined by the mutually overlapping principal community contours of KBKS-FM, KFNK, KHHO, KJR, KJR-FM, KNBQ, and KUBE. The predicted principal community contours of these stations (2 AM / 5 FM), as well as other stations whose principal community contours overlap this combination, are shown in *Figure 2*. *Figure 3* is the tabulation of some of the radio stations identified in the contour-overlap "radio market."

### Count of Stations in Defined Markets

The number of radio stations in a contour-overlap "radio market" is determined by counting the operating stations having principal community contours which overlap or intersect the principal community contours which define the radio market, plus the subject commonly owned or attributable stations, excluding any stations whose transmitter sites are further than 92 kilometers from the perimeter of mutual overlap, and excluding any commonly owned or attributable stations that do not serve to define the market.

In the interim contour-overlap "radio market" studied herein, there are at least 52 radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio market." *Figure 3* is the tabulation of some of the radio stations identified in the contour-overlap "radio market".

Only known licensed, operating radio stations were included in this tabulation. Distances to contours for AM stations 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 C.F.R. § 73.184. Ground conductivities were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 C.F.R. § 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 45 degrees of azimuth.



### Conclusions

In the Arbitron Metro market studied herein, there are at least 78 radio stations, including the subject commonly-owned 2-AM / 2-FM stations, which are home to the Seattle-Tacoma, WA Metro. This proposal does not affect the existing number of commonly-owned stations in the subject Arbitron Metro.

In the interim contour-overlap "radio market" studied herein, there are at least 52 stations, including the commonly-owned 2-AM / 5-FM stations.

Based on the above, it is concluded that the proposed modification complies with Section 73.3555(a) of the FCC Rules.

Figure 1

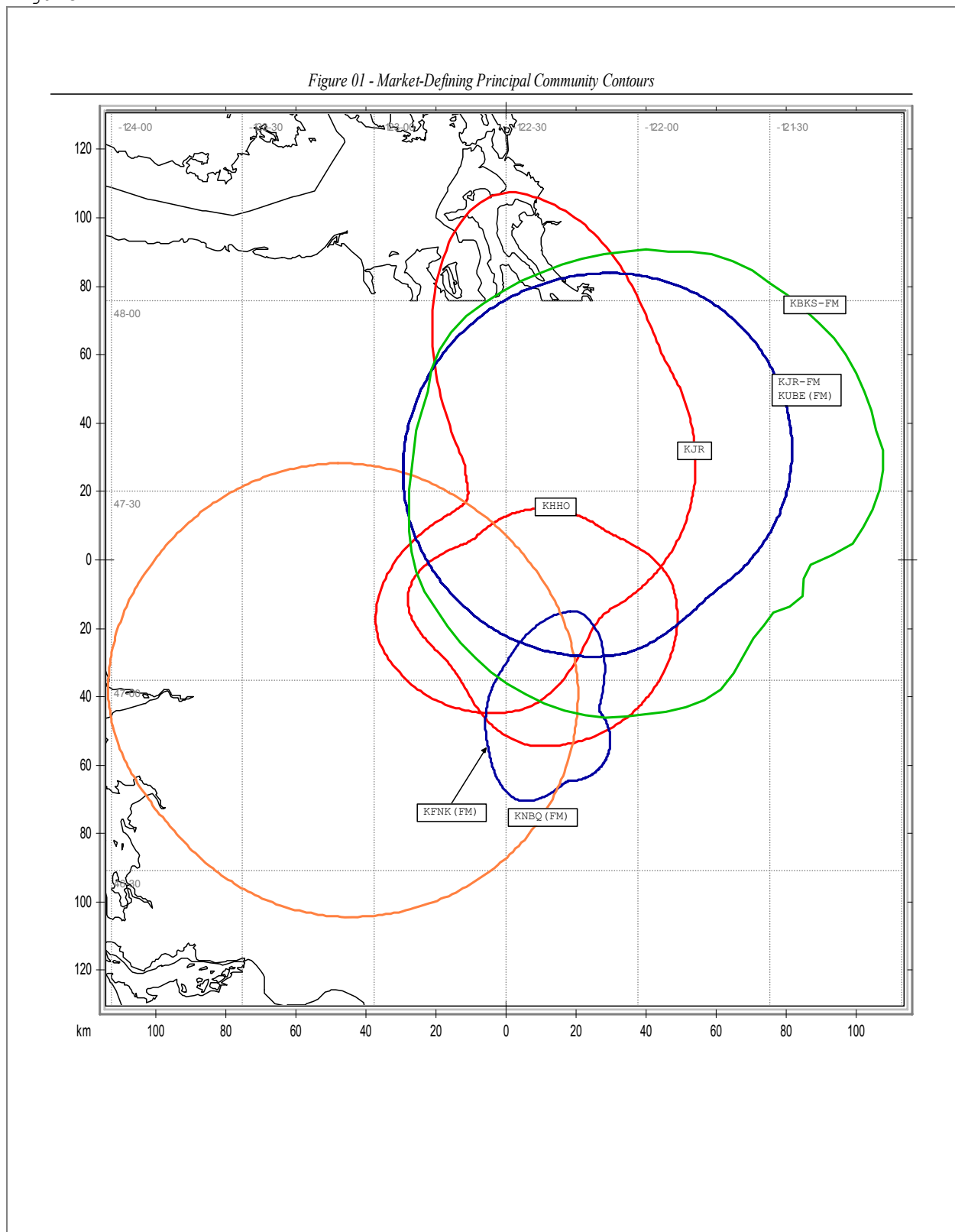


Figure 02 - Principal Community Contours

The map displays the principal community contours for the Phoenix, Arizona radio market. The map is oriented with latitude on the vertical axis (ranging from 33°N to 35°N) and longitude on the horizontal axis (ranging from 108°W to 112°W). The map shows the outlines of the United States and Mexico, with the Phoenix area highlighted. The map includes the following information:

- Latitude and Longitude:** The map is bounded by latitude lines at 33-00, 33-30, 34-00, 34-30, and 35-00, and longitude lines at 108-00, 108-30, 109-00, 109-30, 110-00, 110-30, 111-00, and 111-30.
- Radio Stations and Contours:** The map shows the principal community contours for the following radio stations:
  - KBKS-FM
  - KJR-FM
  - KUBE (FM)
  - KJRR
  - KARR
  - KCIS
  - KRKO
  - KWYZ
  - KLFE
  - KNTS
  - KPLU-FM
  - KHHO
  - KJRR
  - KUBE (FM)
  - KBKS-FM
  - KJRR
  - KTBK
  - KUP
  - KXOT
  - KHHO
  - KGRG-FM
  - KMAS
  - KONE
  - KKOL
  - KHHO
  - KNTS
  - KAY
  - KLDK
  - KAOS
  - KBRD
  - KNBQ (FM)
  - KWES
  - KFNK (FM)
  - KNBQ (FM)
  - KITI
  - KELA
- Radio Market Legend:**
  - 2-AM 5-FM
  - KHHO
  - KJR
  - KFNK (FM)
  - KNBQ (FM)
  - KJR-FM
  - KUBE (FM)
  - KBKS-FM

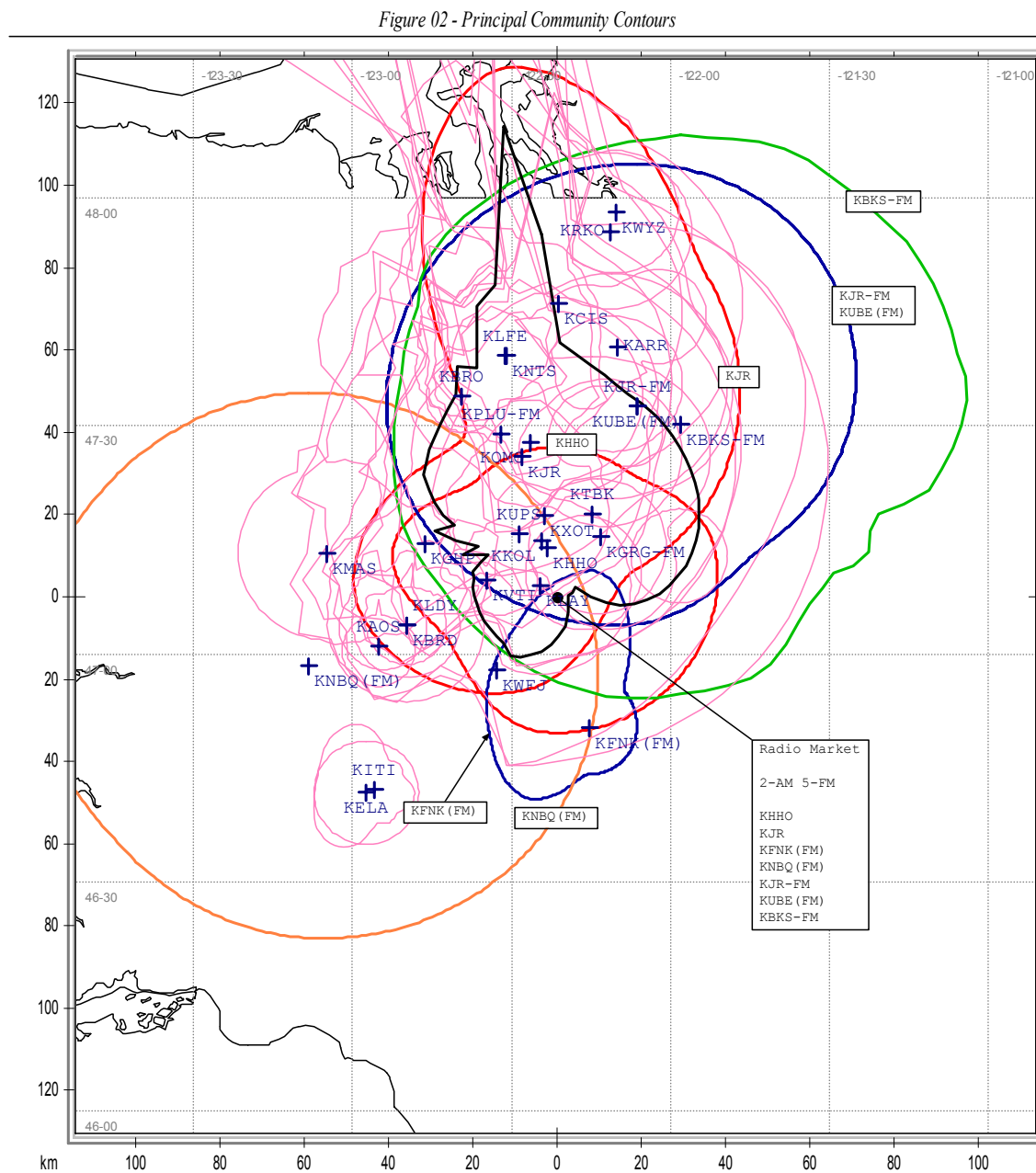


Figure 3 - Tabulation of stations in Radio Market 1

Count	Call Sign	Fac_id	Licensee	Dist_km
1	KHHO	18523	ACKERLEY BROADCASTING OPERATIONS, LLC	12.07
2	KJR	48386	ACKERLEY BROADCASTING OPERATIONS, LLC	35.16
3	KFNK(FM)	3915	ACKERLEY BROADCASTING OPERATIONS, LLC	32.7
4	KNBQ(FM)	33829	CITICASTERS LICENSES, L.P.	61.29
5	KJR-FM	48385	ACKERLEY BROADCASTING OPERATIONS, LLC	50.41
6	KUBE(FM)	48387	ACKERLEY BROADCASTING OPERATIONS, LLC	50.41
7	KBKS-FM	27020	CBS RADIO HOLDINGS INC.	51.63
8	KMAS	60878	OLYMPIC BROADCASTING, INC.	55.46
9	KITI	53398	PREMIER BROADCASTERS, INC.	64.08
10	KELA	32996	BICOASTAL MEDIA LICENSES IV, LLC	65.78
11	KOMO	21647	FISHER BROADCASTING - SEATTLE RADIO, L.L.C.	38.08
12	KIRO	6362	BONNEVILLE HOLDING COMPANY	30.86
13	KZIZ	35550	KRIZ BROADCASTING, INC.	15.9
14	KLAY	11890	CLAY FRANK HUNTINGTON	4.62
15	KBRO	48248	SEATTLE STREAMING RADIO, LLC	53.69
16	KTBK	33683	BUSTOS MEDIA OF SEATTLE LICENSE, LLC	21.8
17	KBRD	26893	BJ & SKIP'S FOR THE MUSIC	36.27
18	KGy	34486	KGy, INC.	41.73
19	KYIZ	86941	KRIZ BROADCASTING, INC.	37.02
20	KITZ	9737	KITZ RADIO, INC.	60.5
21	KLDY	3711	SEATTLE STREAMING RADIO, LLC	36.27
22	KKNW	57834	ORCA RADIO, INC.	52.94
23	KPTK	6387	CBS RADIO HOLDINGS INC.	30.22
24	KIXI	4629	BELLEVUE RADIO, INC.	52.68
25	KKOL	20355	INSPIRATION MEDIA, INC.	14.12
26	KTTH	27023	BONNEVILLE HOLDING COMPANY	30.22
27	KGW	28819	INSPIRATION MEDIA, INC.	35.16
28	KUOW	20298	KUOW/PUGET SOUND PUBLIC RADIO	44.31
29	KSUH	32339	RADIO HANKOOK, INC.	8.9
30	KGTK	47567	KITZ RADIO, INC.	36.27
31	KKMO	33301	INSPIRATION MEDIA, INC.	20.92
32	KVI	35853	FISHER BROADCASTING - SEATTLE RADIO, L.L.C.	33.37
33	KRKO	62056	S-R BROADCASTING, CO.	89.92
34	KNTS	87153	INSPIRATION MEDIA, INC.	60.12
35	KCIS	14504	CRISTA MINISTRIES	71.49
36	KKDZ	12112	RD SEATTLE ASSETS, LLC	48.73
37	KNTB	26892	SEATTLE STREAMING RADIO, LLC	16.83
38	KRIZ	35549	KRIZ BROADCASTING, INC.	37.02
39	KLFE	12031	INSPIRATION MEDIA, INC.	60.09
40	KXPA	11752	MULTICULTURAL RADIO BROADCASTING LICENSEE, LLC	53.56
41	KBLE	33667	SACRED HEART RADIO, INC.	48.48
42	KARR	20669	FAMILY STATIONS, INC.	62.61
43	KGRG	14061	GREEN RIVER FOUNDATION	31.17
44	KWFJ	8393	CALVARY BAPTIST CHURCH	22.69
45	KXOT	62470	PRC TACOMA -- I LLC	20.01
46	KPLI	91212	PACIFIC LUTHERAN UNIVERSITY, INC.	42.03
47	KGHP	52167	PENINSULA SCHOOL DISTRICT NO. 401	33.59
48	KGRG-FM	25168	GREEN RIVER COMMUNITY COLLEGE	18.16
49	KVTI	12068	CLOVER PARK TECHNICAL COLLEGE	16.76
50	KUPS	68996	UNIVERSITY OF PUGET SOUND	17.66
51	KPLU-FM	51199	PACIFIC LUTHERAN UNIVERSITY, INC.	41.56
52	KAOS	65611	THE EVERGREEN STATE COLLEGE	43.81