

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
January 2014

This statement and the attached figures were prepared on behalf of a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CCC proposes to modify the facilities of KFFF(FM), Bennington, NE. 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  | Geographic Arbitron Market  | Declared Arbitron Market    |
|-------|--------|------|------------|---------|-----------------------------|-----------------------------|
| KFAB  | 26931  | AM   | Omaha      | Sarpy   | Omaha-Council Bluffs, NE-IA | Omaha-Council Bluffs, NE-IA |
| KGOR  | 26928  | FM   | Omaha      | Sarpy   | Omaha-Council Bluffs, NE-IA | Omaha-Council Bluffs, NE-IA |
| KISO  | 71411  | FM   | Omaha      | Sarpy   | Omaha-Council Bluffs, NE-IA | Omaha-Council Bluffs, NE-IA |
| KFFF  | 163    | FM   | Bennington | Douglas | Omaha-Council Bluffs, NE-IA | Omaha-Council Bluffs, NE-IA |
| KXKT  | 69686  | FM   | Glenwood   | Cass    | Non-Metro                   | Omaha-Council Bluffs, NE-IA |

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 KFFF(FM), as proposed, which is not located in an Arbitron market, or regardless of contour overlap, which is located in the same Arbitron Metro<sup>4</sup> as KFFF(FM). The community of license of KFFF(FM) is located within the Omaha-Council Bluffs, NE-IA Arbitron Metro, and KFFF(FM) is reported by BIA as being "Home" to that Metro. 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 Omaha-Council Bluffs, NE-IA Arbitron Metro market, and commonly owned stations whose communities of license are located outside any 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

KFFF(FM) is reported by BIA as being "Home" to the Omaha-Council Bluffs, NE-IA 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  
Arbitron Metro<sup>5</sup>

| Count | Calls   | Band | Fac_ID | Owner                              | Status <sup>6</sup> | MKT Date  |
|-------|---------|------|--------|------------------------------------|---------------------|-----------|
| 1     | KYFG    | FM   | 50311  | Bible Broadcasting Network Inc     | b                   | 2-Jul-03  |
| 2     | KZLW    | FM   | 175203 | Calvary Chapel Of Omaha            | b                   | 10-Mar-11 |
| 3     | KFAB    | AM   | 26931  | Clear Channel Communications Inc   | b                   | 2-Jul-03  |
| 4     | KFFF    | FM   | 163    | Clear Channel Communications Inc   | b                   | 2-Jul-03  |
| 5     | KGOR    | FM   | 26928  | Clear Channel Communications Inc   | b                   | 2-Jul-03  |
| 6     | KISO    | FM   | 71411  | Clear Channel Communications Inc   | b                   | 2-Jul-03  |
| 7     | KXKT    | FM   | 69686  | Clear Channel Communications Inc   | a                   | 2-Jul-03  |
| 8     | KBBX-FM | FM   | 47957  | Connoisseur Media LLC              | a                   | 2-Jul-03  |
| 9     | KIOS-FM | FM   | 17416  | Douglas County School District 001 | b                   | 2-Jul-03  |
| 10    | KMLV    | FM   | 85846  | Educational Media Foundation       | b                   | 2-Jul-03  |
| 11    | KIWR    | FM   | 29126  | Iowa Western Community College     | b                   | 2-Jul-03  |
| 12    | KEZO-FM | FM   | 74105  | Journal Broadcast Group Inc        | b                   | 2-Jul-03  |
| 13    | KKCD    | FM   | 74103  | Journal Broadcast Group Inc        | b                   | 2-Jul-03  |
| 14    | KQCH    | FM   | 50314  | Journal Broadcast Group Inc        | b                   | 2-Jul-03  |
| 15    | KSRZ    | FM   | 50308  | Journal Broadcast Group Inc        | b                   | 2-Jul-03  |
| 16    | KXSP    | AM   | 50313  | Journal Broadcast Group Inc        | b                   | 2-Jul-03  |
| 17    | KOMJ    | AM   | 74104  | Kona Coast Radio LLC               | b                   | 2-Jul-03  |
| 18    | KMMQ    | AM   | 52802  | NRG Media LLC                      | a                   | 2-Jul-03  |
| 19    | KOIL    | AM   | 542    | NRG Media LLC                      | b                   | 2-Jul-03  |
| 20    | KOOO    | FM   | 35067  | NRG Media LLC                      | b                   | 2-Jul-03  |
| 21    | KOPW    | FM   | 52801  | NRG Media LLC                      | a                   | 2-Jul-03  |
| 22    | KOZN    | AM   | 87182  | NRG Media LLC                      | b                   | 2-Jul-03  |
| 23    | KQKQ-FM | FM   | 43238  | NRG Media LLC                      | b                   | 2-Jul-03  |
| 24    | KZOT    | AM   | 43237  | NRG Media LLC                      | b                   | 2-Jul-03  |
| 25    | KCRO    | AM   | 54902  | Salem Communications Corp          | b                   | 2-Jul-03  |
| 26    | KGBI-FM | FM   | 24713  | Salem Communications Corp          | b                   | 2-Jul-03  |
| 27    | KOTK    | AM   | 50307  | Salem Communications Corp          | b                   | 2-Jul-03  |
| 28    | KBLR-FM | FM   | 87840  | Siebert, Rick                      | b                   | 2-Jul-03  |
| 29    | KVNO    | FM   | 69395  | University of Nebraska             | b                   | 2-Jul-03  |
| 30    | KVSS    | FM   | 34435  | VSS Catholic Communications Inc    | b                   | 4-May-10  |
| 31    | KLNG    | AM   | 72464  | Wilkins Communications Ne Inc      | b                   | 2-Jul-03  |

<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.

### Interim Contour-Overlap Analysis

Because the proposed principal community contour of the station to be modified 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 KFFF(FM), KFAB(AM), KGOR(FM), KISO(FM), and KXKT(FM). The predicted principal community contours of these stations (1 AM / 4 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 28 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 31 radio stations, including the subject commonly-owned 1-AM / 4-FM stations, which are home to the Omaha-Council Bluffs, NE-IA 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 53 stations, including the commonly-owned 1-AM / 4-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

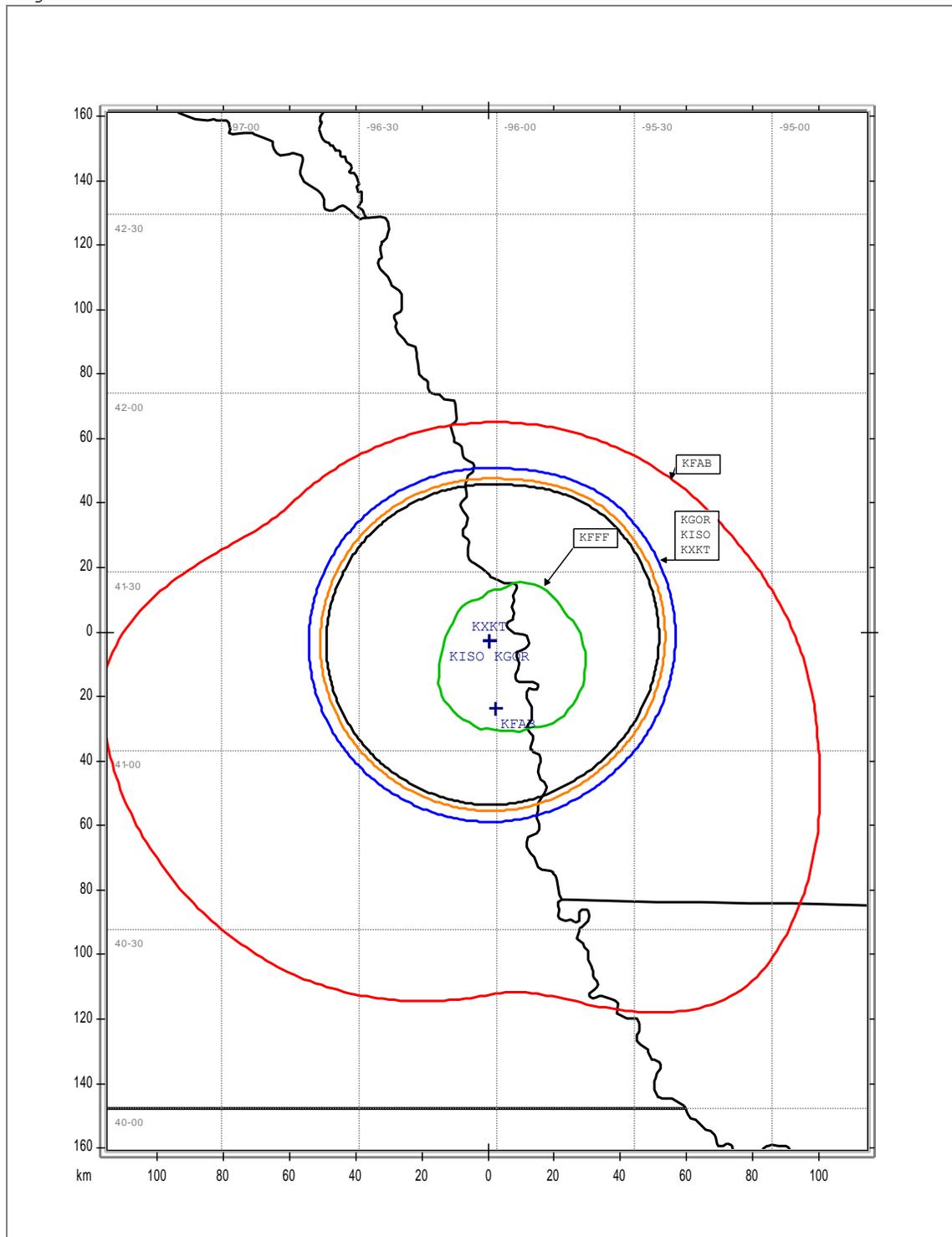
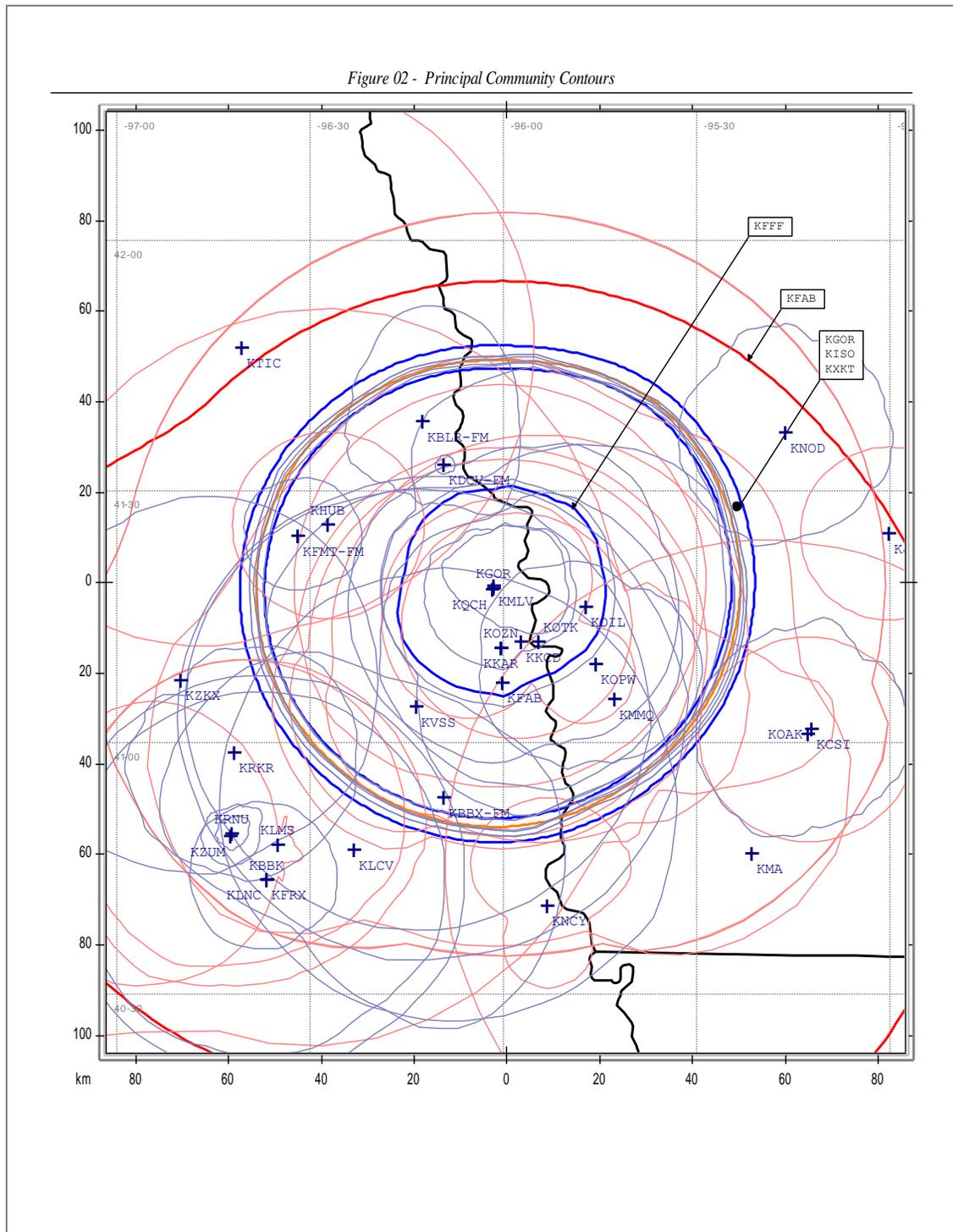


Figure 2



**Figure 3 - Tabulation of stations in Radio Market**

| Count | Call Sign | Faci_id | Licensee   | Dist_km |
|-------|-----------|---------|--|---------|
| 1     | KYFG      | 50311   | BIBLE BROADCASTING NETWORK, INC.                   | 1.51    |
| 2     | KFAB      | 26931   | CAPSTAR TX LLC                                     | 22.13   |
| 3     | KGOR      | 26928   | CAPSTAR TX LLC                                     | 3.01    |
| 4     | KXKT      | 69686   | CAPSTAR TX LLC                                     | 2.91    |
| 5     | KFFF PRP  | 163     | CAPSTAR TX LLC                                     | 2.91    |
| 6     | KISO      | 71411   | CLEAR CHANNEL BROADCASTING LICENSES, INC.          | 2.91    |
| 7     | KOMJ      | 74104   | COCHISE BROADCASTING LLC                           | 9.79    |
| 8     | KLCV      | 12837   | COMMUNITY BROADCASTING, INC.                       | 67.74   |
| 9     | KBBX-FM   | 47957   | CONNOISSEUR MEDIA OF OMAHA, LLC                    | 49.39   |
| 10    | KDCV-FM   | 15376   | DANA COLLEGE                                       | 29.21   |
| 11    | KIOS-FM   | 17416   | DOUGLAS COUNTY SCHOOL DISTRICT 001                 | 3.49    |
| 12    | KMLV      | 85846   | EDUCATIONAL MEDIA FOUNDATION                       | 2.92    |
| 13    | KOAK      | 26457   | HAWKEYE COMMUNICATIONS, INC.                       | 73.63   |
| 14    | KCSI      | 26456   | HAWKEYE COMMUNICATIONS, INC.                       | 74      |
| 15    | KIWR      | 29126   | IOWA WESTERN COMMUNITY COLLEGE                     | 2.92    |
| 16    | KXSP      | 50313   | JOURNAL BROADCAST CORPORATION                      | 0.53    |
| 17    | KXSP      | 50313   | JOURNAL BROADCAST CORPORATION                      | 0.42    |
| 18    | KSRZ      | 50308   | JOURNAL BROADCAST CORPORATION                      | 3.3     |
| 19    | KQCH      | 50314   | JOURNAL BROADCAST CORPORATION                      | 3.3     |
| 20    | KEZO-FM   | 74105   | JOURNAL BROADCAST CORPORATION                      | 3.3     |
| 21    | KKCD      | 74103   | JOURNAL BROADCAST CORPORATION                      | 3.3     |
| 22    | KKCD      | 74103   | JOURNAL BROADCAST CORPORATION                      | 13.51   |
| 23    | KMA       | 35107   | KMA BROADCASTING L.P.                              | 80.33   |
| 24    | KRKR      | 54707   | MISSION NEBRASKA, INC.                             | 69.95   |
| 25    | KTIC      | 33880   | NEBRASKA RURAL RADIO ASSOCIATION                   | 77.04   |
| 26    | KOPW      | 52801   | NRG LICENSE SUB, L.L.C.                            | 26.64   |
| 27    | KLIN      | 35064   | NRG LICENSE SUB, LLC                               | 77.5    |
| 28    | KHUB      | 34550   | NRG LICENSE SUB, LLC                               | 40.57   |
| 29    | KOZN      | 87182   | NRG LICENSE SUB, LLC                               | 14.44   |
| 30    | KKAR      | 542     | NRG LICENSE SUB, LLC                               | 14.47   |
| 31    | KOIL      | 43237   | NRG LICENSE SUB, LLC                               | 18.21   |
| 32    | KMMQ      | 52802   | NRG LICENSE SUB, LLC                               | 34.93   |
| 33    | KLNC      | 58730   | NRG LICENSE SUB, LLC                               | 83.91   |
| 34    | KBBK      | 35063   | NRG LICENSE SUB, LLC                               | 83.91   |
| 35    | KFMT-FM   | 34549   | NRG LICENSE SUB, LLC                               | 46.14   |
| 36    | KQKQ-FM   | 43238   | NRG LICENSE SUB, LLC                               | 3.09    |
| 37    | KOOO      | 35067   | NRG LICENSE SUB, LLC                               | 34.18   |
| 38    | KBLR-FM   | 87840   | NRG LICENSE SUB, LLC                               | 39.84   |
| 39    | KOTK      | 50307   | PENNSYLVANIA MEDIA ASSOCIATES, INC.                | 15      |
| 40    | KGBI-FM   | 24713   | PENNSYLVANIA MEDIA ASSOCIATES, INC.                | 2.92    |
| 41    | KNCY      | 63941   | RIVERFRONT BROADCASTING LLC                        | 72.17   |
| 42    | KCRO      | 54902   | SALEM MEDIA OF ILLINOIS, LLC                       | 1.51    |
| 43    | KZUM      | 63955   | SUNRISE COMMUNICATIONS, INC.                       | 82.14   |
| 44    | KVNO      | 69395   | THE BOARD OF REGENTS OF THE UNIVERSITY OF NEBRASKA | 3.09    |
| 45    | KLNE      | 54708   | THREE EAGLES OF LINCOLN, INC.                      | 76.25   |
| 46    | KFOR      | 34436   | THREE EAGLES OF LINCOLN, INC.                      | 78.66   |
| 47    | KFRX      | 57287   | THREE EAGLES OF LINCOLN, INC.                      | 83.85   |
| 48    | KZKX      | 53143   | THREE EAGLES OF LINCOLN, INC.                      | 73.73   |
| 49    | KRNU      | 69268   | UNIVERSITY OF NEBRASKA                             | 81.41   |
| 50    | KVSS      | 34435   | VSS CATHOLIC COMMUNICATIONS, INC.                  | 33.69   |
| 51    | KLNG      | 72464   | WILKINS COMMUNICATIONS NETWORK, INC.               | 14.33   |
| 52    | KNOD      | 15141   | WIRELESS BROADCASTING, L.L.C.                      | 68.95   |