

**TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CC LICENSES, LLC**

This statement and the attached figures were prepared on behalf of CC Licenses, LLC ("CCLL"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CCLL proposes to modify the facilities of WPHR-FM to specify operations on channel 295B1 at Solvay, New York, in lieu of channel 295B at Auburn, New York. A multiple ownership analysis was prepared considering the following radio stations under present or proposed common ownership, time brokerage or joint sales:¹

Table 1: Proposed Commonly Owned, Brokered or Jointly-Sold Stations
Studied and Associated Arbitron Metro² Information

Calls	Fac ID	Band	Community	County	State	Geographic Arbitron Market	Declared Arbitron Market
WBBS	48730	FM	Fulton	Oswego	NY	Syracuse, NY	Syracuse, NY
WHEN	7080	AM	Syracuse	Onondaga	NY	Syracuse, NY	Syracuse, NY
WPHR-FM	25018	FM	Solvay ³	Onondaga	NY	Syracuse, NY	Syracuse, NY
WSYR	48720	AM	Syracuse	Onondaga	NY	Syracuse, NY	Syracuse, NY
WWHT	57842	FM	Syracuse	Onondaga	NY	Syracuse, NY	Syracuse, NY
WYYY	48725	FM	Syracuse	Onondaga	NY	Syracuse, NY	Syracuse, NY

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.⁴

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 WPHR-FM as proposed, or which is located in the same Arbitron Metro⁵ as WPHR-FM. The proposed community of license of WPHR-FM is located within the Syracuse, NY Arbitron Metro, and WPHR-FM currently is reported by BIA as being "Home" to that Metro. Contour overlap of the station to be modified does not occur with attributable stations whose communities of license are located outside any Arbitron Metro markets.

¹ None of the following stations are attributable by virtue of a time brokerage agreement or joint sales agreement.

² Arbitron data presented herein is obtained from BIA's "Media Access Pro."

³ By this minor modification application, a change in the community of license of WPHR-FM to Solvay, NY is being requested. Solvay is located in Onondaga County and is geographically part of the Syracuse Arbitron market.

⁴ See 47 C.F.R. § 73.3555(a).

⁵ 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

WPHR-FM is relocating to a community geographically located within the Syracuse, NY Arbitron 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
Syracuse, NY Arbitron Metro⁶

Count	Calls	Fac ID	Band	Owner	Status ⁷	Community	County	State
1	WWDG	22134	FM	Aloha Station Trust LLC	b	Deruyter	Madison	NY
2	WBXL	3639	FM	Baldwinsville Central School District	b	Baldwinsville	Onondaga	NY
3	WBBS	48730	FM	Clear Channel	b	Fulton	Oswego	NY
4	WHEN	7080	AM	Clear Channel	b	Syracuse	Onondaga	NY
5	WPHR-FM	25018	FM	Clear Channel	b	Solvay ⁸	Onondaga	NY
6	WSYR	48720	AM	Clear Channel	b	Syracuse	Onondaga	NY
7	WWHT	57842	FM	Clear Channel	b	Syracuse	Onondaga	NY
8	WYYY	48725	FM	Clear Channel	b	Syracuse	Onondaga	NY
9	WFBL	34821	AM	Buckley Broadcasting Corporation	b	Syracuse	Onondaga	NY
10	WSEN	7712	AM	Buckley Broadcasting Corporation	b	Baldwinsville	Onondaga	NY
11	WSEN-FM	7716	FM	Buckley Broadcasting Corporation	b	Baldwinsville	Onondaga	NY
12	WITC	9430	FM	Cazenovia College	b	Cazenovia	Madison	NY
13	WAQX-FM	52606	FM	Citadel Communications	b	Manlius	Onondaga	NY
14	WLTI	58719	FM	Citadel Communications	b	Syracuse	Onondaga	NY
15	WNSS	50515	AM	Citadel Communications	b	Syracuse	Onondaga	NY
16	WNTQ	50514	FM	Citadel Communications	b	Syracuse	Onondaga	NY
17	WRCU-FM	12241	FM	Colgate University	b	Hamilton	Madison	NY
18	WGKV	1047	FM	Educational Media Foundation	b	Pulaski	Oswego	NY
19	WAMF	52370	AM	Fox, Craig	b	Fulton	Oswego	NY
20	WOLF	73380	AM	Fox, Craig	b	Syracuse	Onondaga	NY
21	WOLF-FM	5344	FM	Fox, Craig	b	Oswego	Oswego	NY
22	WSIV	22133	AM	Fox, Craig	b	E. Syracuse	Onondaga	NY

⁶ Source: BIA. Table 2 excludes those station(s) listed by BIA as added to this Arbitron Metro within the last two years, if the community of license of such station(s) is not located within the geographic boundaries of this Arbitron Metro (that is, such station's status is "a", as defined in footnote 7).

⁷ 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.

⁸ See footnote 3.

Count	Calls	Fac ID	Band	Owner	Status ⁷	Community	County	State
23	WVOA-FM	67058	FM	Fox, Craig	b	Mexico	Oswego	NY
24	WKRH	56996	FM	Galaxy Communications	b	Minetto	Oswego	NY
25	WKRL-FM	54547	FM	Galaxy Communications	b	North Syracuse	Onondaga	NY
26	WSCP	1046	AM	Galaxy Communications	b	Sandy Creek-Pulaski	Oswego	NY
27	WSGO	24130	AM	Galaxy Communications	b	Oswego	Oswego	NY
28	WTKV	24131	FM	Galaxy Communications	b	Oswego	Oswego	NY
29	WTKW	22234	FM	Galaxy Communications	b	Bridgeport	Onondaga	NY
30	WTLA	54546	AM	Galaxy Communications	b	North Syracuse	Onondaga	NY
31	WZUN	60253	FM	Galaxy Communications	b	Phoenix	Oswego	NY
32	WMHR	40432	FM	Mars Hill Broadcasting Co., Inc.	b	Syracuse	Onondaga	NY
33	WCNY-FM	66284	FM	Public Broadcasting Council of Central NY Inc	b	Syracuse	Onondaga	NY
34	WNYO	63122	FM	State University of New York	b	Oswego	Oswego	NY
35	WRVD	63131	FM	State University of New York	b	Syracuse	Onondaga	NY
36	WRVO	63115	FM	State University of New York	b	Oswego	Oswego	NY
37	WXXE	87460	FM	Syracuse Community Radio Inc	b	Fenner	Madison	NY
38	WAER	64354	FM	Syracuse University	b	Syracuse	Onondaga	NY
39	WMCR	70890	AM	Warren Broadcasting Co Inc	b	Oneida	Madison	NY
40	WMCR-FM	58038	FM	Warren Broadcasting Co Inc	b	Oneida	Madison	NY
41	WJPZ-FM	73148	FM	WJPZ Radio Inc	b	Syracuse	Onondaga	NY

Interim Contour-Overlap Analysis

Because the proposed principal community contour of the station to be modified does not intersect the principal community contour of any station under common ownership or attribution whose community of license is located outside any Arbitron Metro, an interim contour-overlap analysis is not required.

Conclusions

In the Arbitron Metro market studied herein, there are at least 41 radio stations, including the subject commonly-owned 2-AM / 4-FM stations, which are home to the Syracuse, NY Arbitron Metro. This proposal does not affect the existing number of attributable stations in the subject Arbitron Metro.

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

Respectfully submitted,

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