

RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
KFRU/KBXR/KPLA RADIO STATIONS
COLUMBIA, MISSOURI
KLIK/KBBM/KJMO RADIO STATIONS
JEFFERSON CITY, MISSOURI
KOQL RADIO STATION
ASHLAND, MISSOURI
March 2004

TECHNICAL STATEMENT

1. This Technical Statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC ("CLL"), proposed assignee of KFRU, 1400 kHz, KBXR, Channel 272C3, and KPLA, Channel 268C1, Columbia, Missouri; KLIK, 1240 kHz, KBBM, Channel 261C2, and KJMO, Channel 281A, Jefferson City, Missouri; and KOQL, Channel 291C1, Ashland, Missouri. CLL also has attributable interests in station KCVK, Channel 299A, Otterville, Missouri.¹ Due to the manner in which the city grade contours of the stations overlap, three distinct markets are created.² Market # 1 consists of FM stations KOQL, KPLA, KBXR and KBBM and AM station KFRU. Market #2 consists of FM stations KOQL, KPLA, KJMO and KBBM and AM station KFRU. Market #3 consists of FM stations KOQL, KBBM and KCVK. Exhibit #1 is a map depicting the subject stations.

2. A study, therefore, has been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission's rules. Since the contour of KOQL is a subject

-
- 1) An application to assign KCVK to CLL is pending.
- 2) CLL has interests in only two other stations in Missouri: KMJK, Lexington, Missouri, and KRLK, Stockton, Missouri. These FM stations are sufficiently removed from the stations to be acquired that they are not considered in this instant review (there is no overlap of city grade contours between these two stations and any of the other FM stations to be acquired).

station in each of the three markets, its city grade contour will be used to determine the number of other commercial AM and FM stations that either have transmitter sites within, or provide coverage to, the subject radio market. The number of subject stations in the pertinent market will then be added.

3. Exhibit #2 is a depiction of the stations within the KOQL/Radio Market. The map shows the transmitter sites of thirteen AM and FM stations. Exhibit #3 is a tabulation of the stations in Radio Market #1. Based on the number of stations in the KOQL/Radio Market, added to the five subject stations, there are eighteen stations in Radio Market #1. The number of stations depicted falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.³ At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service, is permissible.

5. Exhibit #3 is a tabulation of the stations in Radio Market #2. Based on the number of stations in the KOQL/Radio Market contour, with the five subject stations added, there are eighteen stations in Radio Market #2. The number of stations depicted falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.⁴ At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service, is permissible.

3) Although there are additional stations providing service to the Radio Market, they are not considered since the number of stations was ample to demonstrate compliance with the rules based on the number of stations proposed to be commonly owned.

4) See Footnote 3 supra.

6. Exhibit #4 is a tabulation of the stations in the Radio Market #3. Based on the number of stations in the KOQL/Radio Market contour, with the three subject stations added, there are sixteen stations in Radio Market #3. The number of stations depicted falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.⁵ At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service, is permissible. Based on the number of stations which are commonly held in each of the above referenced markets, the assignment of KFRU, KBXR, KOQL, KPLA, KLIK, KBBM and KJMO is in compliance with the Commission's multiple ownership rules, as detailed in §73.3555 of the rules.

7. The foregoing technical statement was prepared on behalf of Cumulus Licensing LLC by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities was extracted from the CDBS database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.

5) See Footnote 3 supra.

Graham Brock, Inc. - Broadcast Technical Consultants

KBXR
 BLH-20000208ABM
 Latitude: 39-00-52 N
 Longitude: 092-16-32 W
 ERP: 3.50 kW
 Channel: 272C3

KPLA
 BLH-19980306KB
 Latitude: 39-00-52 N
 Longitude: 092-16-32 W
 ERP: 42.00 kW
 Channel: 268C1

KOQL
 BLH19981125KG
 Latitude: 38-45-01 N
 Longitude: 092-33-31 W
 ERP: 69.00 kW
 Channel: 291C1

KFRU 5.0 mV/m

KOQL 3.16 mV/m

KPLA 3.16 mV/m

KBXR 3.16 mV/m

KJMO
 BLH-20010319AAZ
 Latitude: 38-33-50 N
 Longitude: 092-11-21 W
 ERP: 5.30 kW
 Channel: 281A

KBBM
 BLH-19910606KE
 Latitude: 38-31-25 N
 Longitude: 092-24-25 W
 ERP: 33.00 kW
 Channel: 261A

KCVK
 BMLED-20011026AAX
 Latitude: 38-39-21 N
 Longitude: 092-54-27 W
 ERP: 2.70 kW
 Channel: 299A

KLIK
 Latitude: 38-33-50 N
 Longitude: 092-11-21 W
 ERP: 1.00 kW
 Frequency: 1240 kHz

KFRU
 Latitude: 38-57-45 N
 Longitude: 092-18-14 W
 ERP: 1.00 kW
 Frequency: 1400 kHz

KCVK 3.16 mV/m

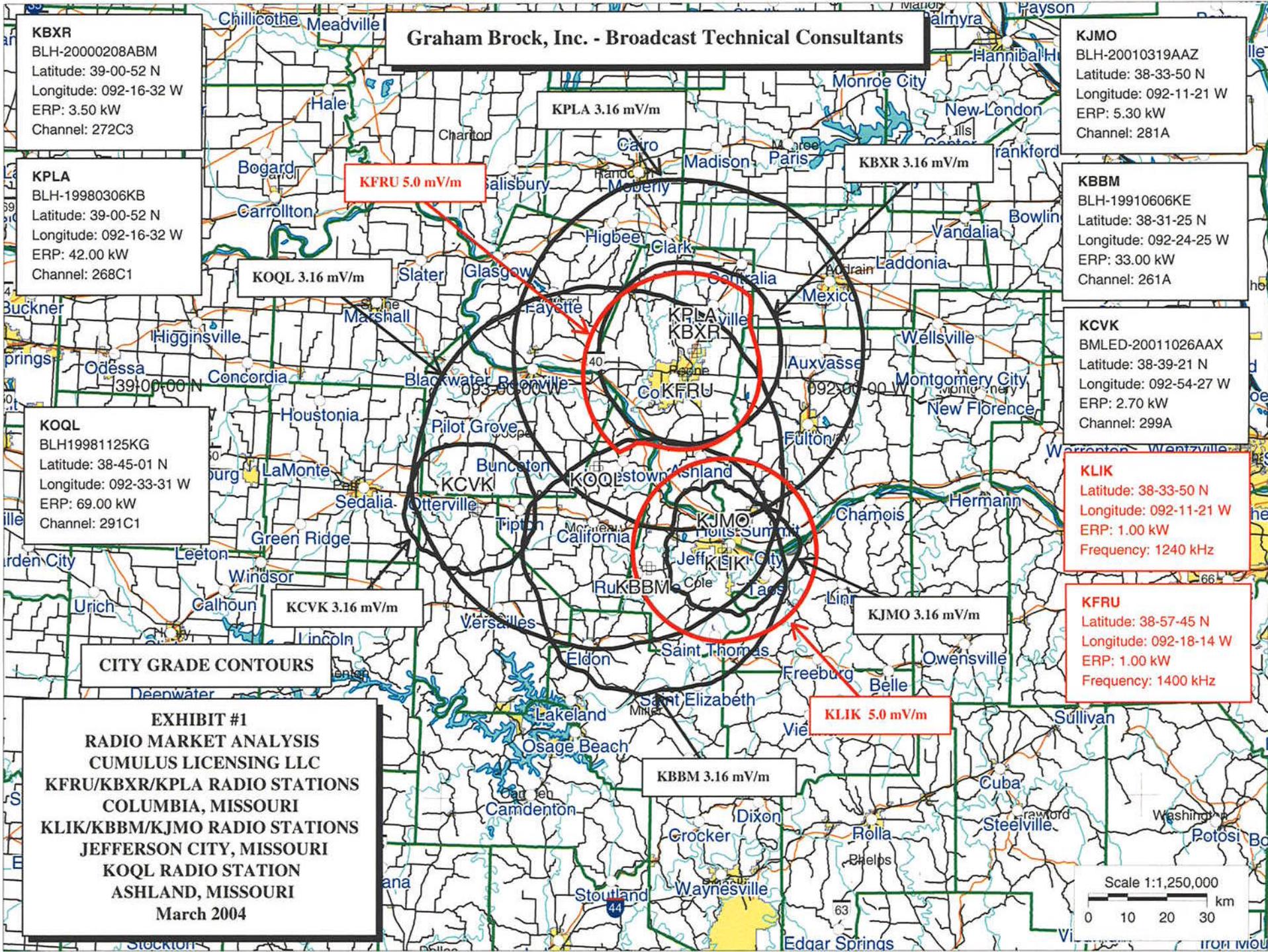
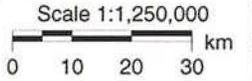
KJMO 3.16 mV/m

CITY GRADE CONTOURS

KLIK 5.0 mV/m

KBBM 3.16 mV/m

EXHIBIT #1
RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
KFRU/KBXR/KPLA RADIO STATIONS
COLUMBIA, MISSOURI
KLIK/KBBM/KJMO RADIO STATIONS
JEFFERSON CITY, MISSOURI
KOQL RADIO STATION
ASHLAND, MISSOURI
 March 2004

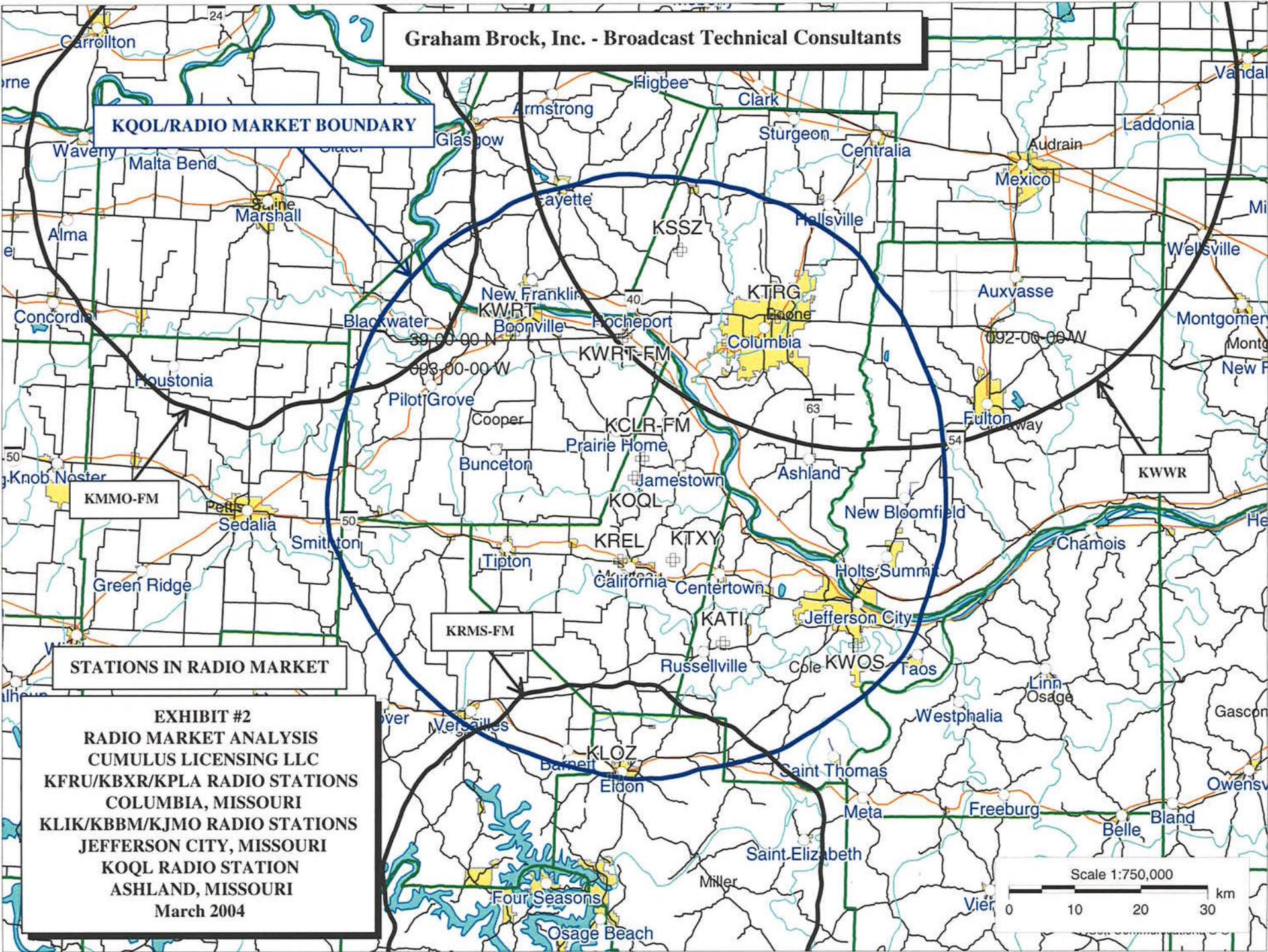
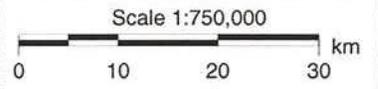


Graham Brock, Inc. - Broadcast Technical Consultants

KQOL/RADIO MARKET BOUNDARY

STATIONS IN RADIO MARKET

EXHIBIT #2
RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
KFRU/KBXR/KPLA RADIO STATIONS
COLUMBIA, MISSOURI
KLIK/KBBM/KJMO RADIO STATIONS
JEFFERSON CITY, MISSOURI
KOQL RADIO STATION
ASHLAND, MISSOURI
March 2004



RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
KFRU/KBXR/KPLA RADIO STATIONS
COLUMBIA, MISSOURI
KLIK/KBBM/KJMO RADIO STATIONS
JEFFERSON CITY, MISSOURI
KOOL RADIO STATION
ASHLAND, MISSOURI
March 2004

EXHIBIT #3

Tabulation of Stations in Radio Market #1

AM Stations

KWOS	950 kHz	Jefferson City, Missouri
KWRT	1370 kHz	Boonville, Missouri
* KFRU	1400 kHz	Columbia, Missouri
KREL	1420 kHz	California, Missouri
KTGR	1580 kHz	Columbia, Missouri

Total FM Stations - 5

FM Stations

KLOZ	Ch 224C2	Eldon, Missouri
KWRT-FM	Ch 226A	Boonville, Missouri
+ KRMS-FM	Ch 228C2	Osage Beach, Missouri
KATI	Ch 232C2	California, Missouri
KSSZ	Ch 230C3	Fayette, Missouri
+ KWWR	Ch 239C	Mexico, Missouri
KCLR-FM	Ch 257C2	Boonville, Missouri
* KBBM	Ch 261C2	Jefferson City, Missouri
* KPLA	Ch 268C1	Columbia, Missouri
* KBXR	Ch 272C3	Columbia, Missouri
+ KMMO-FM	Ch 275C1	Marshall, Missouri
* KOQL	Ch 291C1	Ashland, Missouri
KTXY	Ch 295C	Jefferson City, Missouri

Total FM Stations - 13

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 18

* Subject station.

RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
KFRU/KBXR/KPLA RADIO STATIONS
COLUMBIA, MISSOURI
KLIK/KBBM/KJMO RADIO STATIONS
JEFFERSON CITY, MISSOURI
KOOL RADIO STATION
ASHLAND, MISSOURI
March 2004

EXHIBIT #4

Tabulation of Stations in Radio Market #2

AM Stations

	KWOS	950 kHz	Jefferson City, Missouri
*	KLIK	1240 kHz	Jefferson City, Missouri
	KWRT	1370 kHz	Boonville, Missouri
	KREL	1420 kHz	California, Missouri
	KTGR	1580 kHz	Columbia, Missouri

Total FM Stations - 5

FM Stations

	KLOZ	Ch 224C2	Eldon, Missouri
	KWRT-FM	Ch 226A	Boonville, Missouri
+	KRMS-FM	Ch 228C2	Osage Beach, Missouri
	KATI	Ch 232C2	California, Missouri
	KSSZ	Ch 230C3	Fayette, Missouri
+	KWWR	Ch 239C	Mexico, Missouri
	KCLR-FM	Ch 257C2	Boonville, Missouri
*	KBBM	Ch 261C2	Jefferson City, Missouri
*	KPLA	Ch 268C1	Columbia, Missouri
+	KMMO-FM	Ch 275C1	Marshall, Missouri
*	KJMO	Ch 281A	Jefferson City, Missouri
*	KOQL	Ch 291C1	Ashland, Missouri
	KTXY	Ch 295C	Jefferson City, Missouri

Total FM Stations - 13

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 18

* Subject station.

RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
KFRU/KBXR/KPLA RADIO STATIONS
COLUMBIA, MISSOURI
KLIK/KBBM/KJMO RADIO STATIONS
JEFFERSON CITY, MISSOURI
KOQL RADIO STATION
ASHLAND, MISSOURI
March 2004

EXHIBIT #5

Tabulation of Stations in Radio Market #3

AM Stations

KWOS	950 kHz	Jefferson City, Missouri
KWRT	1370 kHz	Boonville, Missouri
KREL	1420 kHz	California, Missouri
KTGR	1580 kHz	Columbia, Missouri

Total FM Stations - 4

FM Stations

KLOZ	Ch 224C2	Eldon, Missouri
KWRT-FM	Ch 226A	Boonville, Missouri
+ KRMS-FM	Ch 228C2	Osage Beach, Missouri
KATI	Ch 232C2	California, Missouri
KSSZ	Ch 230C3	Fayette, Missouri
+ KWWR	Ch 239C	Mexico, Missouri
KCLR-FM	Ch 257C2	Boonville, Missouri
* KBBM	Ch 261C2	Jefferson City, Missouri
+ KMMO-FM	Ch 275C1	Marshall, Missouri
* KOQL	Ch 291C1	Ashland, Missouri
KTXY	Ch 295C	Jefferson City, Missouri
* KCVK	Ch 299A	Otterville, Missouri

Total FM Stations - 12

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 16

* Subject station.

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

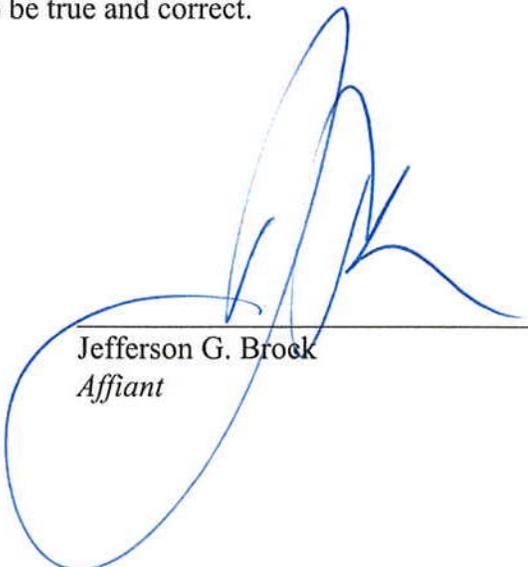
State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Cumulus Licensing LLC to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 10th day of March, 2004.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 10th day of March, 2004.*



Notary Public, State of Georgia
My Commission Expires: September 3, 2007