

**RADIO MARKET ANALYSIS**  
**CUMULUS LICENSING LLC**  
**WNNF RADIO STATION**  
**CINCINNATI, OHIO**  
**WOFX-FM RADIO STATION**  
**CINCINNATI, OHIO**  
**December 2008**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC ("Cumulus"), proposed assignee of WNNF, Channel 231B, and WOFX-FM, Channel 223B, Cincinnati, Ohio. Cumulus's ultimate parent entity, Cumulus Media, Inc., holds an attributable interest in WVAE Lico, Inc., licensee of stations WGRR, Channel 278B, Hamilton, Ohio and WFTK, Channel 243B, Lebanon, Ohio; and in WRRM Lico, Inc., licensee of WRRM, Channel 253B, Cincinnati, Ohio. Each of these stations is licensed to a community in a metro county in the Cincinnati, Ohio Arbitron Market. Therefore, this review will verify compliance with the Commission's multiple ownership rules in a rated market.

**CINCINNATI, OHIO**  
**ARBITRON/BIA MARKET REVIEW**

2. As shown on Exhibit #1, there are fifty-one AM and FM (commercial and non-commercial) stations listed in the Cincinnati, Ohio Arbitron Market (Market #28). Cumulus would be in control of five FM stations in the market. The number of stations indicated falls in the forty-five or more stations tier of §73.3555(a)(1)(i) of the Commission's rules. At this level, common ownership or control of up to eight stations, with no more than five in the same service,

is permissible. Therefore, Cumulus's ownership of WNNF and WOFX-FM, in conjunction with its interest in WGRR, WFTK and WRRM in the Cincinnati, Ohio Arbitron Market is in compliance with the rules.

3. Based on the foregoing, the assignment of WNNF and WOFX-FM to Cumulus is in compliance with §73.3555(a)(1) of the rules.

4. 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 in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.3. BIA database. Technical data related to AM and FM facilities was extracted from the Commission's CDBS database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.



## FCC Geographic Market Definition for Cincinnati, OH

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WAKW	FM	93.3	C	ChrsContem	Cincinnati, OH	07/02/2003	28	Pillar of Fire	Cincinnati, OH	Hamilton
WGRR	FM	103.5	C	Oldies	Cincinnati, OH	07/02/2003	28	Cumulus Media Partners LLC	Hamilton, OH	Butler
WCIN	AM	1480	C	Smooth	Cincinnati, OH	07/02/2003	28	American Broadcasting LLC	Cincinnati, OH	Hamilton
WCKY	AM	1530	C	Sports	Cincinnati, OH	07/02/2003	28	Clear Channel Communications Inc	Cincinnati, OH	Hamilton
WCVG	AM	1320	C	Black Gospl	Cincinnati, OH	07/02/2003	28	p Golden Door Broadcasting LLC	Covington, KY	Kenton
WFTK	FM	96.5	C	Rock	Cincinnati, OH	03/09/2006	28	Cumulus Media Partners LLC	Lebanon, OH	Warren
WCNW	AM	1560	C	Sothn Gspel	Cincinnati, OH	07/02/2003	28	Vernon R. Baldwin Inc	Fairfield, OH	Butler
WDBZ	AM	1230	C	Black Gospl	Cincinnati, OH	07/02/2003	28	Radio One Inc	Cincinnati, OH	Hamilton
WEBN	FM	102.7	C	Rock	Cincinnati, OH	07/02/2003	28	Clear Channel Communications Inc	Cincinnati, OH	Hamilton
WDJO	AM	1160	C	Oldies	Cincinnati, OH	07/02/2003	28	Christian Broadcasting System Ltd	Florence, KY	Boone
WGYV	AM	1380	C	Nws/Tlk/Old	Cincinnati, OH	09/03/2008	28	Williamson, Robert	Greenville, AL	Butler
WIZF	FM	101.1	C	Urban	Cincinnati, OH	07/02/2003	28	Radio One Inc	Erlanger, KY	Kenton
WIOK	FM	107.5	C	Gospel	Cincinnati, OH	07/02/2003	28	Hammond Broadcasting Inc	Falmouth, KY	Pendleton
WKRC	AM	550	C	News/Talk	Cincinnati, OH	07/02/2003	28	Clear Channel Communications Inc	Cincinnati, OH	Hamilton
WKRQ	FM	101.9	C	Hot AC	Cincinnati, OH	07/02/2003	28	Bonneville International Corp	Cincinnati, OH	Hamilton
WNNF	FM	94.1	C	Hot AC	Cincinnati, OH	07/02/2003	28	Clear Channel Communications Inc	Cincinnati, OH	Hamilton
WMOJ	FM	100.3	C	Urban AC	Cincinnati, OH	07/02/2003	28	Radio One Inc	Norwood, OH	Hamilton
WLW	AM	700	C	Nws/Tlk/Spt	Cincinnati, OH	07/02/2003	28	Clear Channel Communications Inc	Cincinnati, OH	Hamilton
WKFS	FM	107.1	C	CHR	Cincinnati, OH	07/02/2003	28	Clear Channel Communications Inc	Milford, OH	Clermont
WMOH	AM	1450	C	Sprts/Talk	Cincinnati, OH	07/02/2003	28	Vernon R. Baldwin Inc	Hamilton, OH	Butler
WSAI	AM	1360	C	Sports	Cincinnati, OH	07/02/2003	28	Clear Channel Communications Inc	Cincinnati, OH	Hamilton
WNOP	AM	740	C	Talk/Chrst	Cincinnati, OH	07/02/2003	28	Catholic Radio Foundation of Greater Cincinnati	Newport, KY	Campbell
WXGO	AM	1270	C	Oldies	Cincinnati, OH	03/10/2006	28	Dubois County Broadcasting	Madison, IN	Jefferson
WOXY	FM	97.7	C	Adult Hits	Cincinnati, OH	07/02/2003	28	First Broadcasting Investment Partners, LLC	Oxford, OH	Butler
WPFB	AM	910	C	Country	Cincinnati, OH	08/07/2003	28	Radio Stations WPAY/WPFB, Inc.	Middletown, OH	Butler
WPFB	FM	105.9	C	Country	Dayton, OH	07/02/2003	62	Radio Stations WPAY/WPFB, Inc.	Middletown, OH	Butler
WRAC	FM	103.1	C	Cntry/Gospl	Cincinnati, OH	06/13/2007	28	DreamCatcher Communications Incorporated	West Union, OH	Adams
WRRM	FM	98.5	C	Christmas	Cincinnati, OH	07/02/2003	28	Cumulus Media Partners LLC	Cincinnati, OH	Hamilton
WSCH	FM	99.3	C	Country	Cincinnati, OH	07/02/2003	28	Wagon Wheel Broadcasting LLC	Aurora, IN	Dearborn
WSWD	FM	97.3	C	Alternative	Cincinnati, OH	07/02/2003	28	Bonneville International Corp	Fort Thomas, KY	Campbell
WCVX	AM	1050	C	Chrst/Talk	Cincinnati, OH	07/02/2003	28	Christian Broadcasting System Ltd	Cincinnati, OH	Hamilton
WUBE	FM	105.1	C	Country	Cincinnati, OH	07/02/2003	28	Bonneville International Corp	Cincinnati, OH	Hamilton
WOFX	FM	92.5	C	Clsc Rock	Cincinnati, OH	07/02/2003	28	Clear Channel Communications Inc	Cincinnati, OH	Hamilton

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed



## FCC Geographic Market Definition for Cincinnati, OH

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WNLT	FM	104.3	C	ChrsContem	Cincinnati, OH	07/02/2003	28	Vernon R. Baldwin Inc	Harrison, OH	Hamilton
WNKR	FM	106.5	C	Country	Cincinnati, OH	07/02/2003	28	Grant County Broadcasters	Williamstown, KY	Grant
WYGY	FM	94.9	C	Country	Cincinnati, OH	07/02/2003	28	Bonneville International Corp	Fairfield, OH	Butler
WAOL	FM	99.5	C	Adult Hits	Cincinnati, OH	07/02/2003	28	First Broadcasting Investment Partners, LLC	Ripley, OH	Brown
WAIF	FM	88.3	NC	Variety	Cincinnati, OH	07/02/2003	28	The Real Stepchild Radio of Cincinnati Inc	Cincinnati, OH	Hamilton
WGUC	FM	90.9	NC	Classical	Cincinnati, OH	07/02/2003	28	Cincinnati Public Radio Inc	Cincinnati, OH	Hamilton
WHSS	FM	89.5	NC	AAA/Altve	Cincinnati, OH	07/02/2003	28	Hamilton School District	Hamilton, OH	Butler
WJVS	FM	88.3	NC	AC	Cincinnati, OH	07/02/2003	28	Great Oaks Joint Vocational School District	Cincinnati, OH	Hamilton
WORI	FM	90.1	NC	ChrsContem	Cincinnati, OH	07/02/2003	28	Educational Media Foundation	Delhi Hills, OH	Hamilton
WLHS	FM	89.9	NC	Educational	Cincinnati, OH	07/02/2003	28	Lakota Local School District	West Chester, OH	Butler
WLMH	FM	89.1	NC	Varty/Educa	Cincinnati, OH	07/02/2003	28	Little Miami Local Schools	Morrow, OH	Warren
WMKV	FM	89.3	NC	Nostalgia	Cincinnati, OH	07/02/2003	28	LifeSphere	Reading, OH	Hamilton
WMUB	FM	88.5	NC	Nws/Tlk/Jaz	Cincinnati, OH	07/02/2003	28	Miami University	Oxford, OH	Butler
WNKU	FM	89.7	NC	AAA/NPR	Cincinnati, OH	07/02/2003	28	Northern Kentucky University	Highland Heights, KY	Campbell
WOBO	FM	88.7	NC	Urban	Cincinnati, OH	07/02/2003	28	Educational Community Radio Inc	Batavia, OH	Clermont
WVXU	FM	91.7	NC	News/Info	Cincinnati, OH	07/02/2003	28	Cincinnati Public Radio Inc	Cincinnati, OH	Hamilton
WKRY	FM	88.1	NC	Sothn Gspel	Cincinnati, OH	10/23/2003	28	Good Shepherd Radio Inc	Versailles, IN	Ripley
WMWX	FM	88.9	NC	Clsc Rock	Cincinnati, OH	08/05/2006	28	Spryex Communications Inc	Miamitown, OH	Hamilton

Number of Stations in Geographic Market 51

### Previous Stations in Geographic Market

WKYN	FM	107.7	C	Country		04/28/2006	0	Gateway Radio Works	Owingsville, KY	Bath
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**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

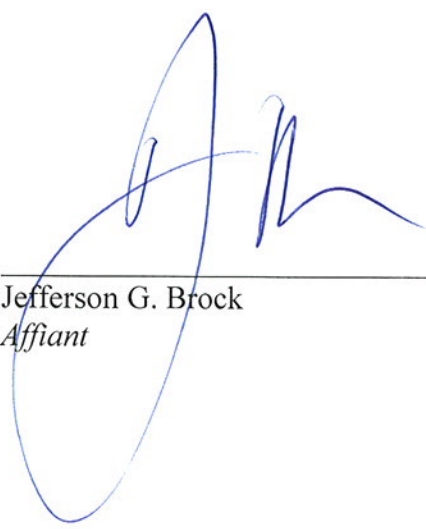
*State of Georgia    )*  
*St. Simons Island    ) ss:*  
*County of Glynn    )*

**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 23rd day of December 2008.*



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Jefferson G. Brock  
*Affiant*

*Sworn to and subscribed before me  
this the 23rd day of December 2008*



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*Notary Public, State of Georgia  
My Commission Expires: June 16, 2012*