

**RADIO MARKET ANALYSIS**  
**CUMULUS LICENSING LLC**  
**WJOD (FM) RADIO STATION**  
**ASBURY, IOWA**  
**June 2008**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC ("Cumulus"). Cumulus is the licensee of WJOD, Channel 277C3, Asbury, Iowa. An application to make minor changes to the facilities of WJOD is being submitted. As such a Radio Market Analyses is necessary. Cumulus is also the licensee of KXGE, Channel 272A, KLYV, Channel 287C2 and WDBQ, 1490 kHz, Dubuque, Iowa; and WDBQ-FM, Channel 298A, Galena, Illinois. Each of these stations is licensed to a community within a metro county in the Dubuque, Iowa Arbitron Market. Therefore, this review will verify compliance of commonly owned stations in a rated market.

**DUBUQUE, IOWA ARBITRON/BIA MARKET REVIEW**

2. As shown on Exhibit #1, there are nineteen AM and FM (commercial and non-commercial) stations listed in the Dubuque, Iowa Arbitron Market (Market #236). Cumulus controls four FM stations and one AM station in the market. The number of stations indicated falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules. At this level, common ownership or control of up to six stations, with no more than four in the same service, is permissible. Therefore, Cumulus is in compliance in the rated Dubuque, Iowa market.

3. Based on the compliance shown in the rated market, the proposed minor change application for WJOD is in compliance with the Commission's multiple ownership 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 4.2. 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 either database which may be adverse to the information contained herein.



## FCC Geographic Market Definition for Dubuque, IA

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KDTH	AM	1370	C	Adlt Stndrd	Dubuque, IA	07/02/2003	239	Radio Dubuque Inc	Dubuque, IA	Dubuque
KATF	FM	92.9	C	AC	Dubuque, IA	07/02/2003	239	Radio Dubuque Inc	Dubuque, IA	Dubuque
KXGE	FM	102.3	C	AOR	Dubuque, IA	07/02/2003	239	p Cumulus	Dubuque, IA	Dubuque
KLYV	FM	105.3	C	Top 40	Dubuque, IA	07/02/2003	239	p Cumulus	Dubuque, IA	Dubuque
WGLR	FM	97.7	C	Country	Dubuque, IA	07/02/2003	239	Television Wisconsin Inc	Lancaster, WI	Grant
WDBQ	AM	1490	C	Nws/Tlk/Spt	Dubuque, IA	07/02/2003	239	p Cumulus	Dubuque, IA	Dubuque
WGLR	AM	1280	C	Sports	Dubuque, IA	07/02/2003	239	Television Wisconsin Inc	Lancaster, WI	Grant
WPVL	FM	107.1	C	Oldies	Dubuque, IA	07/02/2003	239	Television Wisconsin Inc	Platteville, WI	Grant
WPVL	AM	1590	C	Sports	Dubuque, IA	07/02/2003	239	Television Wisconsin Inc	Platteville, WI	Grant
WDBQ	FM	107.5	C	Oldies	Dubuque, IA	07/02/2003	239	p Cumulus	Galena, IL	Jo Daviess
KDST	FM	99.3	C	Country	Dubuque, IA	07/02/2003	239	Design Homes Incorporated	Dyersville, IA	Dubuque
WJOD	FM	103.3	C	Country	Dubuque, IA	07/02/2003	239	p Cumulus	Asbury, IA	Dubuque
KGRR	FM	97.3	C	Clsc Rock	Dubuque, IA	07/02/2003	239	Radio Dubuque Inc	Epworth, IA	Dubuque
KIYX	FM	106.1	C	Lite AC	Dubuque, IA	07/02/2003	239	Television Wisconsin Inc	Sageville, IA	Dubuque
WJTY	FM	88.1	NC	Religion	Dubuque, IA	07/02/2003	239	Family Life Communications Inc	Lancaster, WI	Grant
WSUP	FM	90.5	NC	Altve/Varty	Dubuque, IA	07/02/2003	239	University of Wisconsin	Platteville, WI	Grant
WVRE	FM	101.1	C	Country	Dubuque, IA	07/02/2003	239	Radio Dubuque Inc	Dickeyville, WI	Grant
KDUB	FM	89.7	NC	NPR	Dubuque, IA	12/23/2005	239	University of Northern Iowa	Dubuque, IA	Dubuque
KIAD	FM	88.5	NC	ChrsContem	Dubuque, IA	04/25/2006	239	American Family Association Incorporated	Dubuque, IA	Dubuque
WSSW	FM	89.1	NC	Classical	Dubuque, IA		239	State of Wisconsin - Educational Communications	Platteville, WI	Grant

**Number of Stations in Geographic Market    20**

**Previous Stations in Geographic Market**

WQLF	FM	102.1	C	Clsc Hits		01/20/2006	0	Thompson & Spielman	Lena, IL	Stephenson
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"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

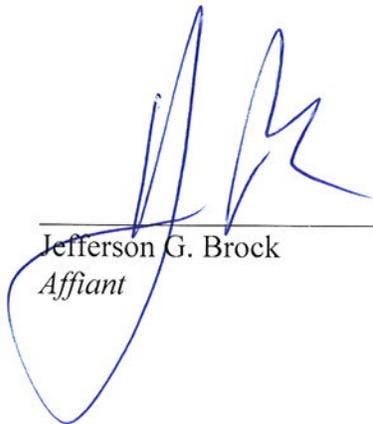
*State of Georgia )*  
*St. Simons Island ) ss:*  
*County of Glynn )*

**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.

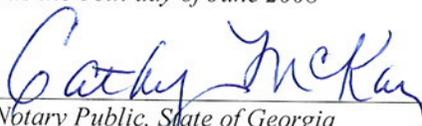
His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

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 June 2008.*

  
\_\_\_\_\_  
Jefferson G. Brock  
Affiant

*Sworn to and subscribed before me  
this the 10th day of June 2008*

  
\_\_\_\_\_  
Notary Public, State of Georgia  
My Commission Expires: March 18, 2011