

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 licensed subsidiary of Clear Channel Communications, Inc. ("CCC"). CCLL proposes to modify the facilities of WSVO(FM), Staunton, Virginia. A multiple ownership analysis was prepared considering the following radio stations under present or proposed common ownership, time brokerage or joint sales.

Table 1: Proposed Commonly Owned, Brokered or Jointly-Sold Stations Studied and Associated Arbitron Metro<sup>1</sup> Information

Calls	Fac ID	Service	Community	State	Geographic Arbitron Market	Declared Arbitron Market
WKDW	11666	AM	Staunton	VA	Non-Metro	Non-Metro
WKCI	70862	AM	Waynesboro	VA	Non-Metro	Non-Metro
<b>WSVO-PRP</b>	<b>11665</b>	<b>FM</b>	<b>Staunton</b>	<b>VA</b>	<b>Non-Metro</b>	<b>Non-Metro</b>
WACL	63491	FM	Elkton	VA	Harrisonburg, VA	Harrisonburg, VA
WKCY	41815	AM	Harrisonburg	VA	Harrisonburg, VA	Harrisonburg, VA
WKCY-FM	41811	FM	Harrisonburg	VA	Harrisonburg, VA	Harrisonburg, VA

Since certain of these stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) an ownership study has been prepared in accordance with the Federal Communications Commission's local radio ownership rule.<sup>2</sup> The station to be modified is not located within any Arbitron Metro.<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 WSVO(FM) as proposed.

Interim Contour-Overlap Analysis

Because the principal community contour of the station to be modified intersects the principal community contour of attributable stations located outside any Arbitron Metro, and the subject station is itself located outside any Arbitron Metro, an interim contour-overlap analysis is 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

<sup>1</sup> Arbitron data presented herein is obtained from BIA's "Media Access Pro."

<sup>2</sup> See 47 C.F.R. § 73.3555(a).

<sup>3</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.

overlapping contours form two "radio markets" for interim contour-overlap analysis under the Commission's rules.

A total of two "radio markets" are defined by the mutually overlapping principal community contours of the stations listed in *Table 1* above. *Table 2* is a detailed listing of each of those markets in tabular form, *Figure 1* is a map depicting markets defined in *Table 2*.

Market 1		Market 2	
<b>1-AM 3-FM</b>		<b>2-AM 3-FM</b>	
WKCY	AM	WKDW(AM)	AM
WSVO-PRP	FM	WKCI(AM)	AM
WKCY-FM	FM	WSVO-PRP	FM
WACL	FM	WKCY-FM	FM
		WACL	FM

#### Count of Stations in Defined Markets

The number of radio stations in an interim 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(s)" studied herein, there are at least 19 radio stations, including the subject commonly owned stations, which overlap or intersect with the defined "radio market(s)." With 19 stations in a market, the applicable ownership limit is a combination of no more six stations, up to four in one service.

*Table 2* is the tabulation of the radio stations identified in the "radio market(s)." *Figure 3* is a map depicting the stations so identified. 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 5 degrees of azimuth.

#### Conclusions

In each of the interim contour-overlap "radio market(s)" studied herein, there are at least 19 stations.

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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Figure 01 - Market-Defining Principal Community Contours

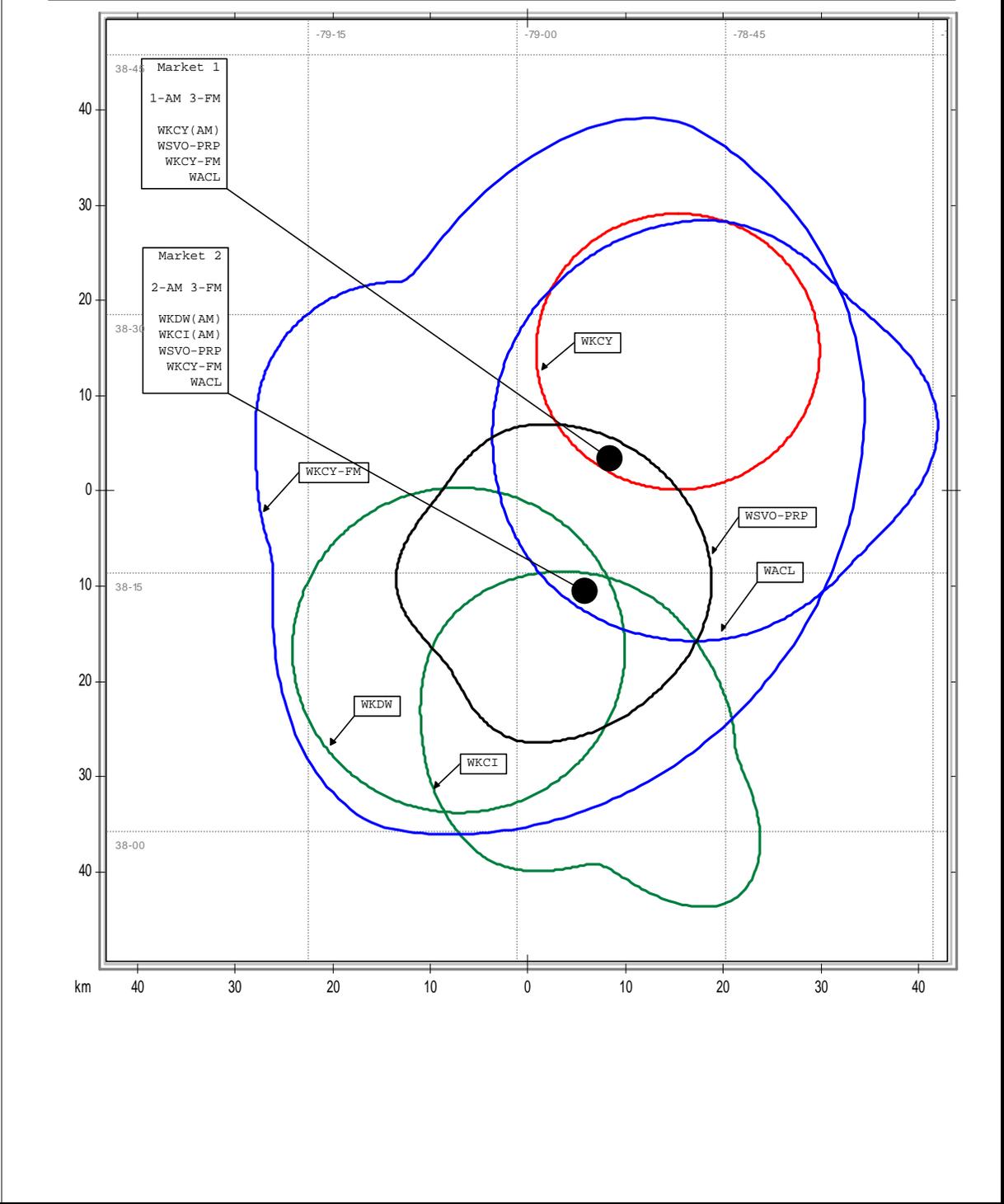


Table 2 - List of Stations in Radio Markets

Count	Call Sign	Facility_id	Licensee	Distance to Market 1	Distance to Market 2
1	WYFT	5110	BIBLE BROADCASTING NETWORK, INC.	52.74	63.22
2	WEMC	4308	BOARD OF TRUSTEES OF EASTERN MENNONITE UN	13.35	25.96
3	WMXH-FM	12625	EASY RADIO, INC.	35.14	47.08
4	WTON-FM	50078	HIGH IMPACT COMMUNICATIONS INC	42.95	35.53
5	WMRA	65447	JAMES MADISON UNIVERSITY BOARD OF VISITORS	24.21	36.02
6	WMRY	6130	JAMES MADISON UNIVERSITY BOARD OF VISITORS	46.58	36.23
7	WXJM	4247	JAMES MADISON UNIVERSITY BOARD OF VISITORS	9.76	22.49
8	WJDV	40648	M. BELMONT VERSTANDIG, INC.	24.21	36.02
9	WQPO	39492	M. BELMONT VERSTANDIG, INC.	11.33	23.55
10	WTGD	73935	M. BELMONT VERSTANDIG, INC.	11.33	23.55
11	WLTK	12600	MASSANUTTEN BROADCASTING COMPANY, INC.	28.5	40.89
12	WCYK-FM	70861	MONTICELLO MEDIA LLC	32.66	21.96
13	WHTE-FM	56361	MONTICELLO MEDIA LLC	31.28	34.57
14	WZGN	11672	MONTICELLO MEDIA LLC	32.78	23.82
15	WPVA	53099	POSITIVE ALTERNATIVE RADIO, INC.	36.73	24.61
16	WWWV	19837	SAGA COMMUNICATIONS OF CHARLOTTESVILLE, LLC	54	47.86
17	WVTU	70344	VIRGINIA TECH FOUNDATION, INC.	32.61	22.07
18	WBOP	68304	VOX COMMUNICATIONS GROUP LLC	35.37	27.59
19	WSIG	60105	VOX COMMUNICATIONS GROUP LLC	28.53	40.92

Figure 02 - Principal Community Contours

