

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CITICASTERS LICENSES, L.P.

This statement and the attached figures were prepared on behalf of Citicasters Licenses, L.P. ("CLLP"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CLLP proposes to acquire WACR-FM, Okolona, MS. 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
WACR-FM-CP - CP ³	64364	FM	Okolona	Chickasaw	MS	Columbus-Tupelo-West Point, MS	Columbus-Tupelo-West Point, MS
WBIP-FM	71214	FM	Booneville	Prentiss	MS	Columbus-Tupelo-West Point, MS	Columbus-Tupelo-West Point, MS
WESE	68352	FM	Baldwyn	Lee	MS	Columbus-Tupelo-West Point, MS	Columbus-Tupelo-West Point, MS
WKMQ	68351	AM	Tupelo	Lee	MS	Columbus-Tupelo-West Point, MS	Columbus-Tupelo-West Point, MS
WTUP	68353	AM	Tupelo	Lee	MS	Columbus-Tupelo-West Point, MS	Columbus-Tupelo-West Point, MS
WWZD-FM	68354	FM	New Albany	Union	MS	Columbus-Tupelo-West Point, MS	Columbus-Tupelo-West Point, MS

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 Market, an ownership study has been prepared in accordance with the Federal Communications Commission's local radio ownership rule.⁴

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 This construction permit, BPH20030113ABV, was filed by the current Licensee to effectuate RM-10053, which changes the WACR-FM Community of License from Columbus, MS to Okolona, MS. This change also changes the Arbitron Metro within which WACR-FM is located.

⁴ See 47 C.F.R. § 73.3555(a).

Pursuant to RM-10053, the community of license of WACR-FM-CP is now located within the Columbus-Tupelo-West Point, MS Arbitron Metro.⁵ As depicted in Figure 1, the contour of WACR-FM-CP as proposed does not overlap with the contour of any commonly owned station outside an Arbitron Metro.

Arbitron Market Study

WACR-FM-CP is geographically "Home" to the Columbus-Tupelo-West Point, MS 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
Columbus-Tupelo-West Point, MS Arbitron Metro⁶

Count	Calls	Fac ID	Owner	Band	Status ⁷	Community	County
1	WCNA	50294	Air South Radio Inc	FM	a	Potts Camp	Marshall
2	WFTA	666	Air South Radio Inc	FM	b	Fulton	Itawamba
3	WAFR	1592	American Family Association Incorporated	FM	b	Tupelo	Lee
4	WAJS	79265	American Family Association Incorporated	FM	b	Tupelo	Lee
5	WAQB	1542	American Family Association Incorporated	FM	b	Tupelo	Lee
6	WKMQ	68351	Clear Channel Communications	AM	b	Tupelo	Lee
7	WTUP	68353	Clear Channel Communications	AM	b	Tupelo	Lee
8	WACR-FM	64364	Clear Channel Communications	FM	g	Okolona	Chickasaw
9	WBIP-FM	71214	Clear Channel Communications	FM	b	Booneville	Prentiss
10	WESE	68352	Clear Channel Communications	FM	b	Baldwyn	Lee
11	WWZD-FM	68354	Clear Channel Communications	FM	b	New Albany	Union
12	WBIP	71213	Community Broadcasting Services Mississippi Inc	AM	b	Booneville	Prentiss
13	WSMS	6664	Cumulus Broadcasting Inc	FM	a	Artesia	Lowndes
14	WSYE	48630	Dowdy & Dowdy	FM	b	Houston	Chickasaw
15	WELO	58829	Dowdy, John M	AM	b	Tupelo	Lee
16	WWMS	58932	Dowdy, John M	FM	a	Oxford	Lafayette
17	WZLQ	58828	Dowdy, John M	FM	b	Tupelo	Lee

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.

⁶ Source: BIA.

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.

18	WCMR	58037	Humphrey, R & Eaton, R	FM	a	Bruce	Calhoun
19	WKZU	63297	Kudzu Communications Incorporated	FM	a	Ripley	Tippah
20	WMAE-FM	43190	Mississippi Authority for Educational Television	FM	b	Booneville	Prentiss
21	WNAU	7070	MPM Investment Group	AM	b	New Albany	Union
22	WAMY	62223	Stanford Communications Inc	AM	b	Amory	Monroe
23	WWZQ	65201	Stanford Communications Inc	AM	b	Aberdeen	Monroe
24	WAFM	62222	Stanford Communications Inc	FM	b	Amory	Monroe
25	WSEL	50286	Tupelo Communications	AM	b	Pontotoc	Pontotoc
26	WSEL-FM	50287	Tupelo Communications	FM	b	Pontotoc	Pontotoc
27	WWKZ	65200	Urban Radio Licenses, LLC ⁸	FM	b	Aberdeen	Monroe
28	WCPC	71291	WCPC Broadcasting	AM	b	Houston	Chickasaw

Interim Contour-Overlap Analysis

Because the principal community of the station to be acquired, and the communities of all commonly-owned or attributable stations with overlapping principal contours with the station to be acquired are located inside an Arbitron Metro, an interim contour-overlap analysis is not required.

Conclusions

In the Arbitron Radio Market studied herein, there are at least 28 radio stations. CCU currently has attributable interests in 2-AM / 5-FM stations which are home to the Columbus-Tupelo-West Point, MS. When the assignment of license of radio station WWKZ(FM), now pending before the Commission, is approved and consummated, CCC will have an attributable interest in 2-AM / 4-FM stations, in compliance with the media ownership limits for the Columbus-Tupelo-West Point, MS Arbitron Metro.

Based on the above, it is concluded that the proposed transaction complies with Section 73.3555(a) of the FCC Rules upon CCC's divestiture of station WWKZ(FM).

Respectfully submitted,

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FCC Engineering Supervisor
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⁸ The license of WWKZ(FM) is currently held by a licensee subsidiary of CCC. An application has been filed to assign WWKZ(FM) to Urban Radio Licenses, LLC. See File No. BALH-20050308AAO.

Figure 1

