

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CAPSTAR TX LIMITED PARTNERSHIP

This statement and the attached figures were prepared on behalf of Capstar TX Limited Partnership ("CTLTP"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CTLTP proposes to modify the facilities of KLUB(FM), Bloomington, Texas. 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	Service	Community	County	State	Geographic Arbitron Market	Declared Arbitron Market
KIXS	25584	FM	VICTORIA	Victoria	TX	Non Metro	Non Metro
KLUB	68301	FM	BLOOMINGTON	Victoria	TX	Non Metro	Non Metro
KQVT	19434	FM	VICTORIA	Victoria	TX	Non Metro	Non Metro

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.³ The proposed commonly owned stations are not located within any Arbitron Metro.

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 KLUB(FM) as proposed, or which is located in the same Arbitron Metro⁴ as KLUB(FM).

Interim Contour-Overlap Analysis

Because the principal community contour of the station to be modified intersects the principal community contour of a commonly-owned station 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

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 See 47 C.F.R. § 73.3555(a).

⁴ 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 one "radio market" for interim contour-overlap analysis under the Commission's rules.

The "radio market" is defined by the mutually overlapping principal community contours of KLUB(FM) (app) (this instant application), KISX(FM), and KQVT(FM). The predicted principal community contours of these stations (0 AM / 3 FM), as well as other stations whose principal community contours overlap this combination, are shown in *Figure 1*. *Figure 2* is the tabulation of some of the radio stations identified in the "radio market."

Count of Stations in Defined Markets

The number of radio stations in a 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" studied herein, there are at least 19 radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio market." *Figure 2* is the tabulation of some of the radio stations identified in the "radio market".

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 45 degrees of azimuth.

Conclusions

In the interim contour-overlap "radio market" studied herein, there are at least 19 stations, including the commonly-owned 3-FM 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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October 20, 2004

Figure 01 - Principal Community Contours

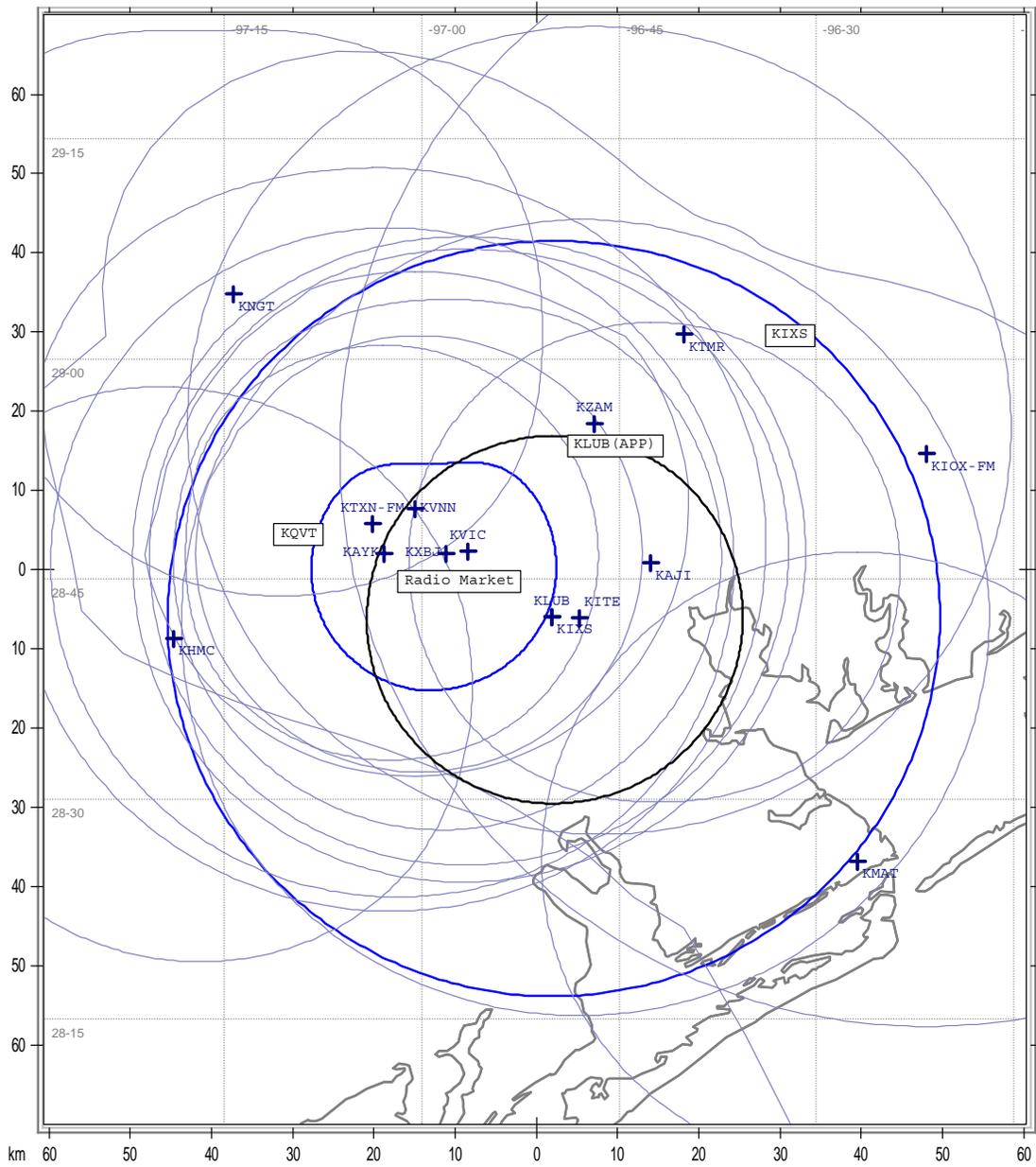


Figure 2 - List of Stations in Radio Market 1

Count	Call Sign	Facility_id	Licensee	Dis_km
1	KIXS	25584	CAPSTAR TX LIMITED PARTNERSHIP	6.36
2	KLUB	68301	CAPSTAR TX LIMITED PARTNERSHIP	6.36
3	KITE	12179	VICTORIA RADIOWORKS, LTD.	8.15
4	KVIC	28477	VICTORIA RADIO WORKS, LTD.	8.61
5	KVRT	61176	SOUTH TX PUBLIC B/CSTNG SYSTEM, INC. EDUCATIONAL MEDIA FNDATN OF VICTORIA, INC.	8.64
6	KXBJ	18756		11.14
7	KQVT	19434	CAPSTAR TX LIMITED PARTNERSHIP	12.73
8	KAJI	6022	FORT BEND BROADCASTING COMPANY, INC.	14.26
9	KNAL	27532	VICTORIA RADIOWORKS, LTD.	14.5
10	KVNN	28474	VICTORIA RADIO WORKS, LTD.	16.77
11	KAYK	82204	AMERICAN FAMILY ASSOCIATION	18.75
12	KEPG	74362	VICTORIA RADIOWORKS, LTD.	19.15
13	KZAM	27619	FORT BEND BROADCASTING COMPANY	19.81
14	KTXN-FM	13984	COSMOPOLITAN ENTERPRISES OF VICTORIA	20.92
15	KTMR	28191	SIGA BROADCASTING CORPORATION	34.84
16	KHMC	11205	CINCO DE MAYO BROADCASTING LIBERMAN BRDCASTNG OF HOUSTON LIC CORP.	45.52
17	KIOX-FM	36507		50.53
18	KNGT	25588	RAWHIDE RADIO, LLC	50.91
19	KMAT	72527	WILLIAM E. CORDELL	54.29