

RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
KVST (FM) RADIO STATION
WILLIS/LA PORTE, TEXAS
February 2004

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC ("Cumulus"), proposed assignee of KVST, Channel 279C3, Willis, Texas. There is also an outstanding construction permit to upgrade KVST to Channel 279C and change its community of license to La Porte, Texas, as well as an application to modify the outstanding permit.¹ Cumulus has attributable interests in KRWP, Channel 248C, Beaumont, Texas; KSTB, Channel 268A, Crystal Beach, Texas; KQXY-FM, Channel 231C1, Beaumont, Texas²; KTCX, Channel 273C2, Beaumont, Texas; KQHN, 950 kHz, Nederland, Texas; KIKR, 1450 kHz, Beaumont, Texas; and has a pending application seeking an assignment of license of station KAYD-FM, Channel 269C3, Silsbee, Texas.³ The licensed facilities of KVST at Willis, Texas, do not overlap with any existing Cumulus stations. Therefore, it is considered a stand alone facility. However, the 70 dBu contour of the authorized KVST permit (as well as the proposed modification application) overlaps with the city grade contours of FM stations KQXY-FM, KAYD-FM, KTCX, KRWP and KSTB, as well as AM stations KQHN and KIKR. Based on the

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- 1) The permit proposes a slight relocation of the KVST, Channel 279C, La Porte, Texas, facility.
 - 2) There is an outstanding application to relocate KQXY-FM to a new site. This proposed move will not change the number of commonly owned stations in the markets to be reviewed. Therefore, the licensed KQXY-FM facility will be used for this instant analysis.
 - 3) Cumulus also has interests in stations KXZZ, 1580 kHz, Lake Charles, Louisiana; KBUI, Channel 279C1, Lake Charles, Louisiana (with an outstanding permit for Channel 277C2); KYKZ, Channel 241C1, Lake Charles, Louisiana; and KKGB, Channel 267C3, Sulphur, Louisiana. None of these facilities, as shown on Exhibit #1, overlap with either the license or construction permit of KVST. Therefore, these stations are excluded from any further consideration in this instant study (and will also not be considered market contributors).

overlap of contours two separate markets are created. Market #1 consists of FM stations KRWP, KQXY-FM, KAYD-FM, KTCX and KVST (CP or application) and AM stations KQHN and KIKR. Market #2 consists of FM stations KRWP, KVST (CP or application) and KSTB. This results in Cumulus having attributable interests in stations in two distinct markets. Exhibit #1 is a map depicting the subject stations.

2. A study, therefore, has been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission's rules. The principal community contours of the subject stations establish the market boundary, hereinafter referred to as the "Radio Market". Since KRWP is a subject station in both markets, its contour will be used to determine the number of other commercial AM and FM stations either within the contour, or that provide city grade service to the contour. These stations will then be added to the subject stations for the respective market to determine the number of stations in the market.

3. Exhibit #2A and #2B are a depictions of the stations within the KRWP Radio Market boundary. There are twenty-five FM stations and seventeen AM stations depicted. Exhibit #3A and #3B are tabulations of the stations in Radio Market #1 (KRWP/ KQXY-FM/ KAYD-FM/ KTCX/KVST (CP or application)/ KQHN/KIKR); including the seven subject stations, there are forty-nine stations in the subject market. The number of stations depicted falls in the forty-five or more stations tier of §73.3555(a)(1)(I) of the Commission's rules.⁴ At the forty-five or more

4) Although there are additional stations providing service to the Radio Market, they are not considered since the number of stations was ample to demonstrate compliance with the rules based on the number of stations proposed to be commonly owned.

stations level, common ownership or control of up to eight stations, with no more than five in the same service, is permissible.

4. Exhibit #4A and #4B are tabulations of the stations in Radio Market #2 (KRWP/KVST (CP or application)/KSTB); including the three subject stations, there are forty-five stations in the subject market. The number of stations depicted falls in the forty-five or more stations tier of §73.3555(a)(1)(I) of the Commission's rules.⁵ At the forty-five or more stations level, common ownership or control of up to eight stations, with no more than five in the same service, is permissible.

5. Therefore, Cumulus's interests in five FM stations and two AM stations in Radio Market #1 and three FM stations in Radio Market #2 are in compliance with the rules. As such, the proposed assignment of KVST to Cumulus is in compliance with the Commission's multiple ownership rules, as detailed in §73.3555 of the rules.

6. 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 was extracted from the CDBS database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.

5) See Footnote 3 supra.

Graham Brock, Inc. - Broadcast Technical Consultants

KVST
BLH-19960125KC
Latitude: 30-26-55 N
Longitude: 095-31-48 W
ERP: 15.00 kW
Channel: 279C3

KVST LIC. 3.16 mV/m

KVST App. 3.16 mV/m

KAYD-FM 3.16 mV/m

KQXY-FM APP 3.16 mV/m

KQXY-FM
BLH-19800619AE
Latitude: 30-06-56 N
Longitude: 094-00-00 W
ERP: 100.00 kW
Channel: 231C1

KQXY-FM App
BPH-20031119AAE
Latitude: 30-20-15 N
Longitude: 094-08-49 W
ERP: 100.00 kW
Channel: 231C1

KVST CP
BPH-20010612AEF
Latitude: 30-02-45 N
Longitude: 094-33-03 W
ERP: 100.00 kW
Channel: 279C

KVST App.
Latitude: 29-56-09 N
Longitude: 094-30-38 W
ERP: 100.00 kW
Channel: 279C

KRWP
BLH-20011212AAV
Latitude: 29-41-52 N
Longitude: 094-24-09 W
ERP: 100.00 kW
Channel: 248C

KAYD-FM
BLH-20021121AAU
Latitude: 30-06-54 N
Longitude: 093-59-56 W
ERP: 10.50 kW
Channel: 269C3

KTCX
BLH-19960903KG
Latitude: 29-59-20 N
Longitude: 094-14-42 W
ERP: 50.00 kW
Channel: 273C2

KSTB
BLH-20021114ACJ
Latitude: 29-30-07 N
Longitude: 094-31-15 W
ERP: 6.00 kW
Channel: 268A

KQHN
Latitude: 30-03-40 N
Longitude: 093-58-48 W
ERP: 5.00 kW
Frequency: 950 Khz

KIKR
Latitude: 30-03-52 N
Longitude: 094-07-12 W
ERP: 1.00 kW
Frequency: 1450 Khz

EXHIBIT #1
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KRWP 3.16 mV/m

KSTB 3.16 mV/m

KIKR 5.0 mV/m

KQHN 5.0 mV/m

KTCX 3.16 mV/m

KBIU/KYKZ 3.16 mV/m

KKGB 3.16 mV/m

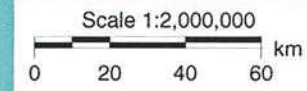
KXZZ 5.0 mV/m

KBIU CP 3.16 mV/m

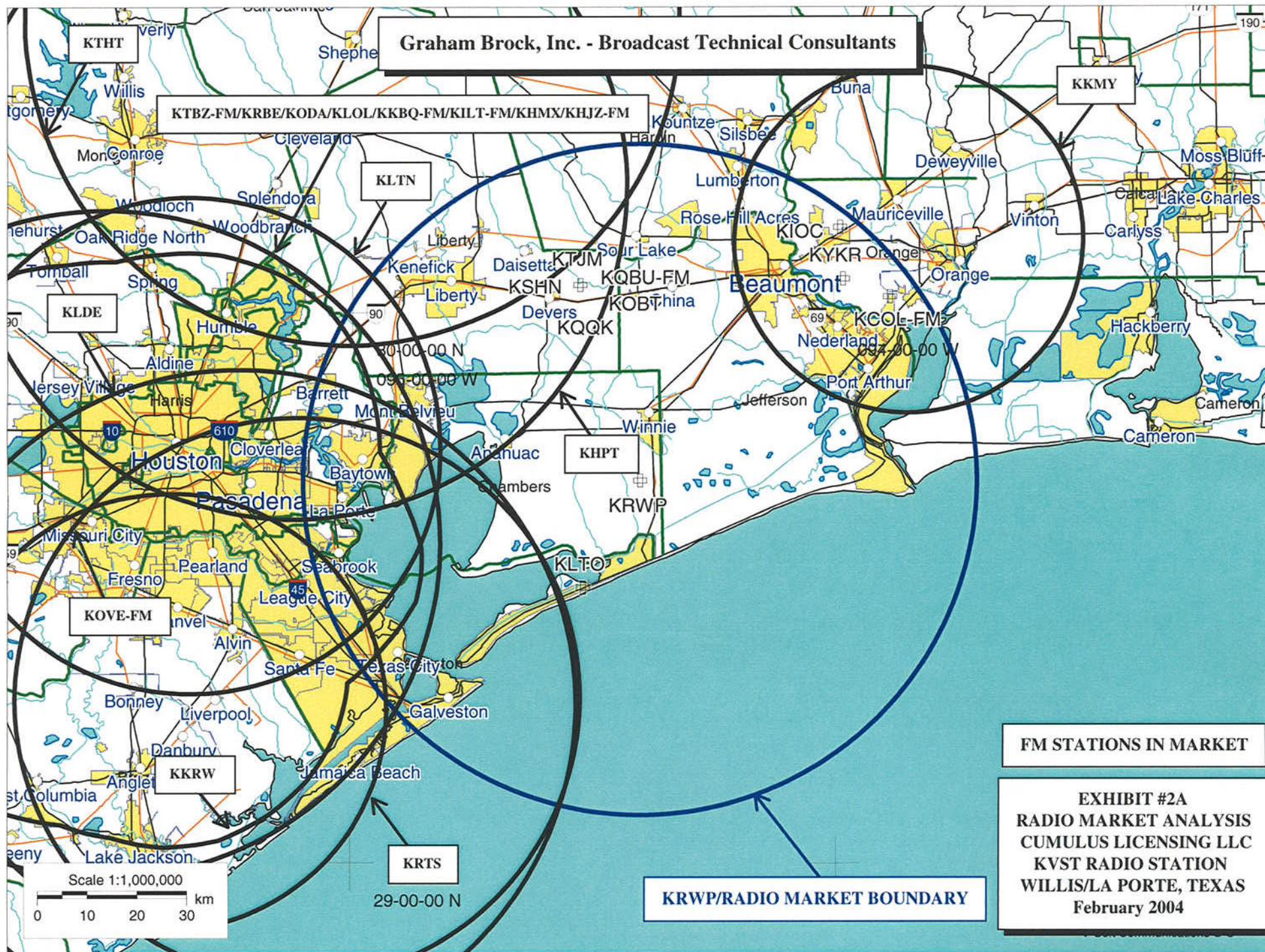
KQXY-FM 3.16 mV/m

KVST CP 3.16 mV/m

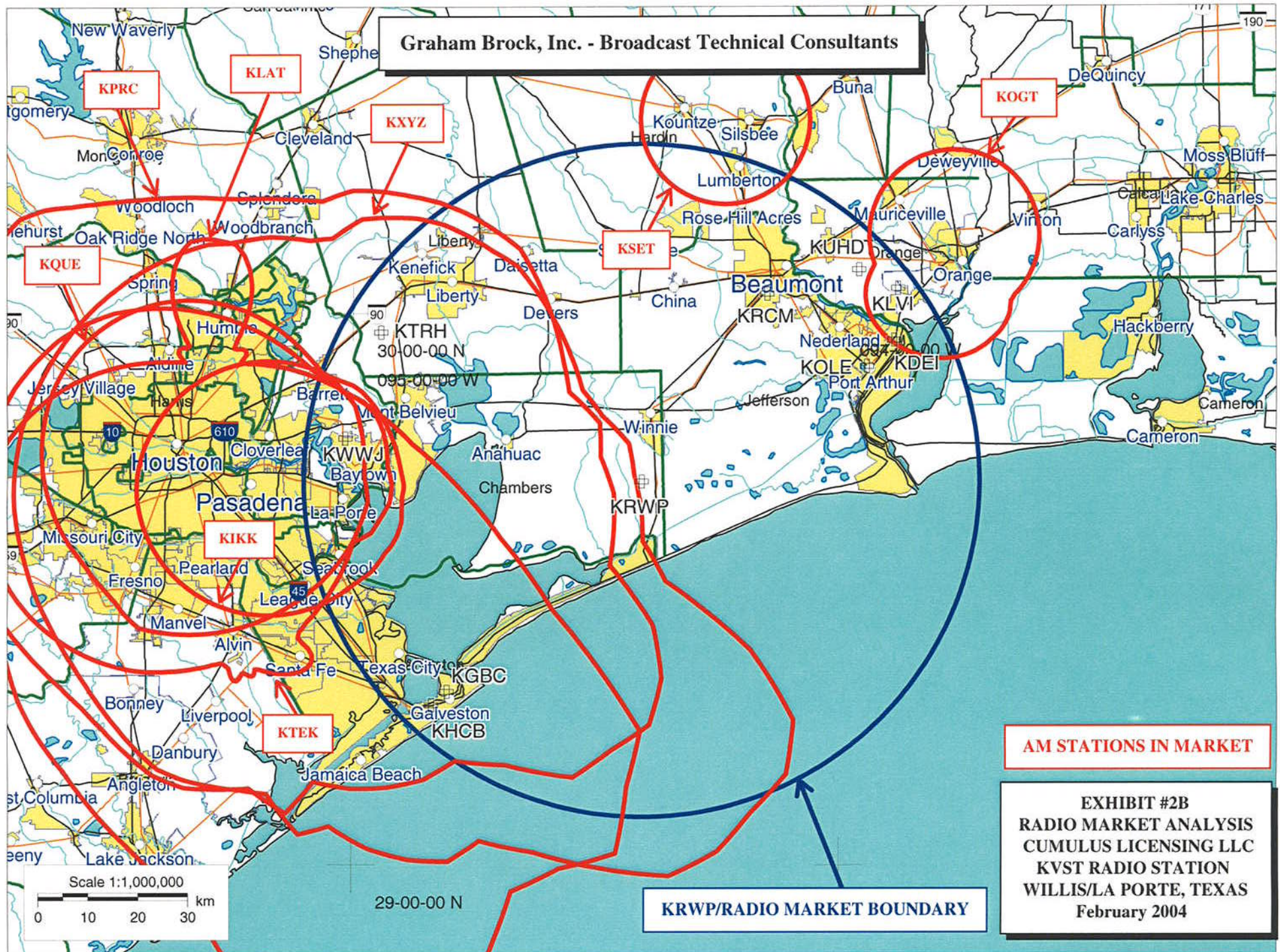
KVST CP 3.16 mV/m



Graham Brock, Inc. - Broadcast Technical Consultants



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RADIO MARKET ANALYSIS
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EXHIBIT #3A

Tabulation of AM Radio Stations in Radio Market #1

	KLVI	560 kHz	Beaumont, Texas
+	KIKK	650 kHz	Pasadena, Texas
	KYST	920 kHz	Texas City, Texas
+	PRC	950 kHz	Houston, Texas
+	KLAT	1010 kHz	Houston, Texas
+	KTEK	1110 kHz	Alvin, Texas
	KUHD	1150 kHz	Port Neches, Texas
+	KQUE	1230 kHz	Houston, Texas
	KDEI	1250 kHz	Port Arthur, Texas
+	KSET	1300 kHz	Silsbee, Texas
+	KXYZ	1320 kHz	Houston, Texas
	KOLE	1340 kHz	Port Arthur, Texas
	KWWJ	1360 kHz	Baytown, Texas
	KRCM	1380 kHz	Beaumont, Texas
	KHCB	1400 kHz	Galveston, Texas
*	KIKR	1450 kHz	Beaumont, Texas
*	KQHN	1510 kHz	Nederland, Texas
	KGBC	1540 kHz	Galveston, Texas
+	KOGT	1600 kHz	Orange, Texas

Total AM Stations - 19

- * Subject stations.
- + Contributes city grade contour to subject market.

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EXHIBIT #3B

Tabulation of FM Radio Stations in Radio Market #1

+ KRTS	Ch 221C1	Seabrook, Texas
KCOL-FM	Ch 223C2	Groves, Texas
+ KKBQ-FM	Ch 225C	Pasadena, Texas
KQBU-FM	Ch 227C	Port Arthur, Texas
+ KKRW	Ch 229C	Houston, Texas
* KQXY-FM	Ch 231C1	Beaumont, Texas
+ KTBZ-FM	Ch 233C	Houston, Texas
KYKR	Ch 236C1	Beaumont, Texas
+ KHJZ-FM	Ch 239C	Houston, Texas
+ KHMx	Ch 243C	Houston, Texas
+ KTHT	Ch 246C	Cleveland, Texas
* KRWP	Ch 248C	Beaumont, Texas
KTJM	Ch 253C	Port Arthur, Texas
+ KODA	Ch 256C	Houston, Texas
KSHN	Ch 260C2	Liberty, Texas
+ KILT-FM	Ch 262C	Houston, Texas
KOBT	Ch 264C	Winnie, Texas
+ KLLO	Ch 266C	Houston, Texas
* KAYD-FM	Ch 269C3	Silsbee, Texas
* KTCX	Ch 273C2	Beaumont, Texas
+ KLTN	Ch 275C	Houston, Texas
* KVST ⁶	Ch 279C	La Porte, Texas
+ KRBE	Ch 281C	Houston, Texas
+ KKMx	Ch 283C1	Orange, Texas
KLTO	Ch 287A	Crystal Beach, Texas
KIOC	Ch 291C	Orange, Texas
+ KOVE-FM	Ch 293C	Galveston, Texas
+ KHPT	Ch 295C	Conroe, Texas
+ KLDE	Ch 298C	Lake Jackson, Texas
KQK	Ch 300C	Beaumont, Texas

Total FM Stations - 30

TOTAL NUMBER OF STATIONS IN STUDY - 49

* Subject stations.

+ Contributes city grade contour to subject market.

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EXHIBIT #4A

Tabulation of AM Radio Stations in Radio Market #2

	KLVI	560 kHz	Beaumont, Texas
+	KIKK	650 kHz	Pasadena, Texas
	KYST	920 kHz	Texas City, Texas
+	KPRC	950 kHz	Houston, Texas
+	KLAT	1010 kHz	Houston, Texas
+	KTEK	1110 kHz	Alvin, Texas
	KUHD	1150 kHz	Port Neches, Texas
+	KQUE	1230 kHz	Houston, Texas
	KDEI	1250 kHz	Port Arthur, Texas
+	KSET	1300 kHz	Silsbee, Texas
+	KXYZ	1320 kHz	Houston, Texas
	KOLE	1340 kHz	Port Arthur, Texas
	KWWJ	1360 kHz	Baytown, Texas
	KRCM	1380 kHz	Beaumont, Texas
	KHCB	1400 kHz	Galveston, Texas
	KGBC	1540 kHz	Galveston, Texas
+	KOGT	1600 kHz	Orange, Texas

Total AM Stations - 17

- * Subject stations.
- + Contributes city grade contour to subject market.

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EXHIBIT #4B

Tabulation of FM Radio Stations in Radio Market #2

+ KRTS	Ch 221C1	Seabrook, Texas
KCOL-FM	Ch 223C2	Groves, Texas
+ KKBQ-FM	Ch 225C	Pasadena, Texas
KQBU-FM	Ch 227C	Port Arthur, Texas
+ KKRW	Ch 229C	Houston, Texas
+ KTBZ-FM	Ch 233C	Houston, Texas
KYKR	Ch 236C1	Beaumont, Texas
+ KHJZ-FM	Ch 239C	Houston, Texas
+ KHMx	Ch 243C	Houston, Texas
+ KTHT	Ch 246C	Cleveland, Texas
* KRWP	Ch 248C	Beaumont, Texas
KTJM	Ch 253C	Port Arthur, Texas
+ KODA	Ch 256C	Houston, Texas
KSHN	Ch 260C2	Liberty, Texas
+ KILT-FM	Ch 262C	Houston, Texas
KOBT	Ch 264C	Winnie, Texas
+ KLOL	Ch 266C	Houston, Texas
* KSTB	Ch 268A	Crystal Beach, Texas
+ KLTN	Ch 275C	Houston, Texas
* KVST ⁷	Ch 279C	La Porte, Texas
+ KRBE	Ch 281C	Houston, Texas
+ KKMY	Ch 283C1	Orange, Texas
KLTO	Ch 287A	Crystal Beach, Texas
KIOC	Ch 291C	Orange, Texas
+ KOVE-FM	Ch 293C	Galveston, Texas
+ KHPT	Ch 295C	Conroe, Texas
+ KLDE	Ch 298C	Lake Jackson, Texas
KQQK	Ch 300C	Beaumont, Texas

Total FM Stations - 28

TOTAL NUMBER OF STATIONS IN STUDY - 49

* Subject stations.

+ Contributes city grade contour to subject market.

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

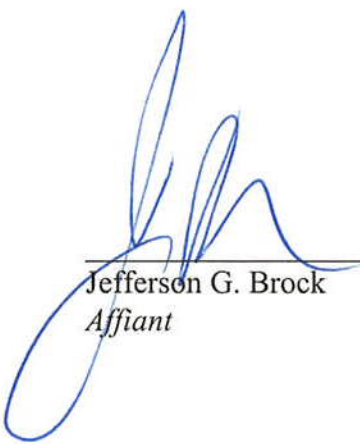
State of Georgia)
St. Simons Island) ss:
County of Glynn)

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 4th day of February, 2004.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 4th day of February, 2004.*



Notary Public, State of Georgia
My Commission Expires September 3, 2007