

**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.<sup>1</sup> Cumulus has attributable interests in KRWP, Channel 248C, Beaumont, Texas; KSTB, Channel 268A, Crystal Beach, Texas; KQXY-FM, Channel 231C1, Beaumont, Texas<sup>2</sup>; 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.<sup>3</sup> 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.<sup>4</sup> At the forty-five or more

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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.<sup>5</sup> 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.

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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

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

**KVST LIC. 3.16 mV/m**

**KVST App. 3.16 mV/m**

**KQXY-FM APP 3.16 mV/m**

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

**KVST CP 3.16 mV/m**

**KQXY-FM 3.16 mV/m**

**KBIU CP 3.16 mV/m**

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

**KXZZ 5.0 mV/m**

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

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

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

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

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

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

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

**KKGB 3.16 mV/m**

**KBIU/KYKZ 3.16 mV/m**

**KRWP 3.16 mV/m**

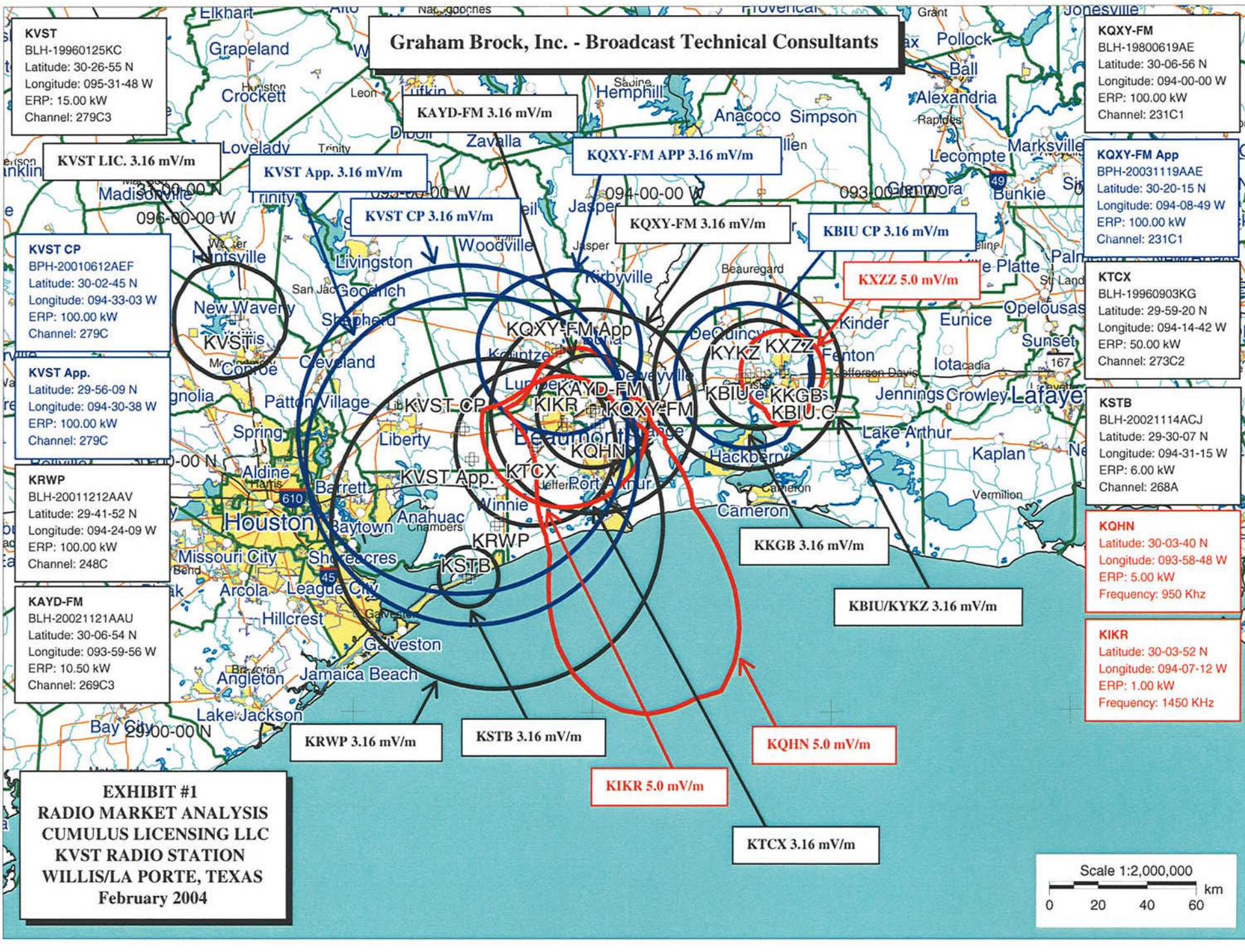
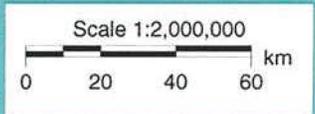
**KSTB 3.16 mV/m**

**KQHN 5.0 mV/m**

**KIKR 5.0 mV/m**

**KTCX 3.16 mV/m**

**EXHIBIT #1**  
**RADIO MARKET ANALYSIS**  
**CUMULUS LICENSING LLC**  
**KVST RADIO STATION**  
**WILLIS/LA PORTE, TEXAS**  
**February 2004**



**Graham Brock, Inc. - Broadcast Technical Consultants**

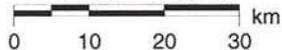
**KTBT-FM/KRBE/KODA/KLOL/KKBQ-FM/KILT-FM/KHMX/KHJZ-FM**

**FM STATIONS IN MARKET**

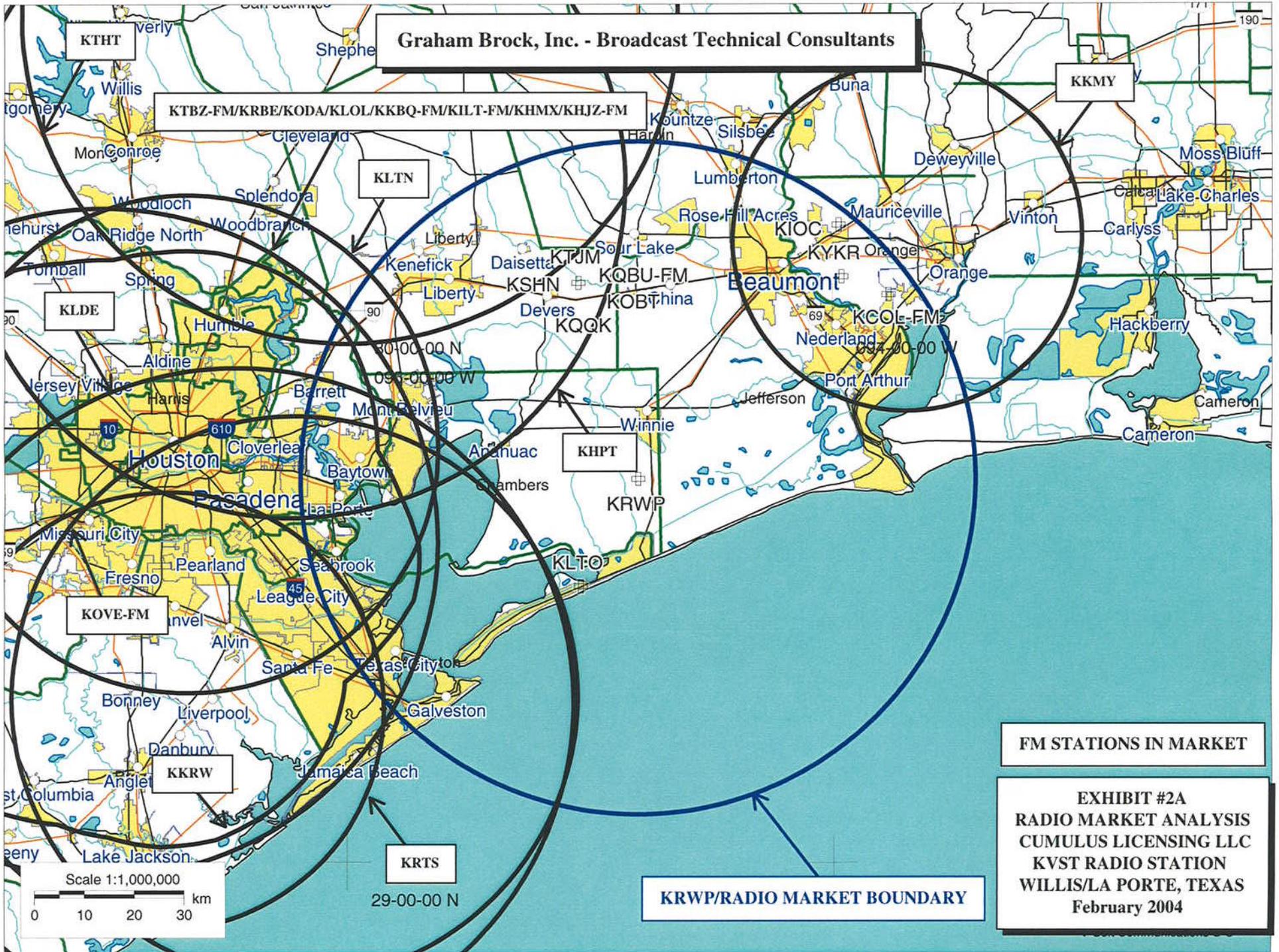
**EXHIBIT #2A  
RADIO MARKET ANALYSIS  
CUMULUS LICENSING LLC  
KVST RADIO STATION  
WILLIS/LA PORTE, TEXAS  
February 2004**

**KRWP/RADIO MARKET BOUNDARY**

Scale 1:1,000,000



29-00-00 N





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

**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       |
| + KHMV              | 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       |
| * KAYD-FM           | Ch 269C3 | Silsbee, Texas       |
| * KTCX              | Ch 273C2 | Beaumont, Texas      |
| + KLTN              | Ch 275C  | Houston, Texas       |
| * KVST <sup>6</sup> | Ch 279C  | La Porte, Texas      |
| + KRBE              | Ch 281C  | Houston, Texas       |
| + KKMV              | 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 - 30**

**TOTAL NUMBER OF STATIONS IN STUDY - 49**

\* Subject stations.

+ Contributes city grade contour to subject market.

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**KVST (FM) RADIO STATION**  
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**February 2004**

**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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**February 2004**

**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 <sup>7</sup> | 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**

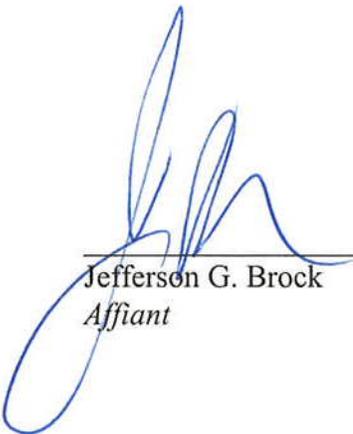
State of Georgia )  
St. Simons Island ) ss:  
County of Glynn )

**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.

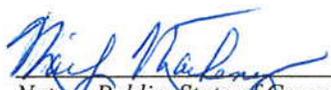
*This the 4th day of February, 2004.*



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Jefferson G. Brock  
Affiant

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



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