

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CITICASTERS LICENSES INC.

This statement and the attached figures were prepared on behalf of Citicasters Licensees Inc. (“CLI”), a licensee subsidiary of Clear Channel Communications, Inc. (“CCC”). CLI proposes to modify the facilities of WMTX(FM) AND WFLZ-FM, Tampa, FL¹. A multiple ownership analysis was prepared considering the following radio stations under present or proposed common ownership, time brokerage or joint sales:²

Table 1: Proposed Commonly Owned, Brokered or Jointly-Sold Stations Studied and Associated Arbitron Metro³ Information

Calls	Fac ID	Band	Community	Geographic Arbitron Market	Declared Arbitron Market
WIKX	28899	FM	CHARLOTTE HARBOR	Non-Metro	Non-Metro
WXXL	29569	FM	TAVARES	Non-Metro	Orlando, FL
WFLF	51970	AM	PINE HILLS	Orlando, FL	Orlando, FL
WCTQ	48672	FM	SARASOTA	Sarasota-Bradenton, FL	Sarasota-Bradenton, FL
WDDV	3060	AM	VENICE	Sarasota-Bradenton, FL	Sarasota-Bradenton, FL
WLTQ-FM	3059	FM	VENICE	Sarasota-Bradenton, FL	Sarasota-Bradenton, FL
WSDV	48671	AM	SARASOTA	Sarasota-Bradenton, FL	Sarasota-Bradenton, FL
WSRZ-FM	48673	FM	CORAL COVE	Sarasota-Bradenton, FL	Sarasota-Bradenton, FL
WBTP	41382	FM	CLEARWATER	Tampa-St. Petersburg-Clearwater, FL	Tampa-St. Petersburg-Clearwater, FL
WDAE	74198	AM	ST. PETERSBURG	Tampa-St. Petersburg-Clearwater, FL	Tampa-St. Petersburg-Clearwater, FL
WFLA	29729	AM	TAMPA	Tampa-St. Petersburg-Clearwater, FL	Tampa-St. Petersburg-Clearwater, FL
WFLZ-FM Prp	29732	FM	Tampa	Tampa-St. Petersburg-Clearwater, FL	Tampa-St. Petersburg-Clearwater, FL
WFUS Prp⁴	63984	FM	GULFPORT	Tampa-St. Petersburg-Clearwater, FL	Tampa-St. Petersburg-Clearwater, FL
WHNZ	23077	AM	TAMPA	Tampa-St. Petersburg-Clearwater, FL	Tampa-St. Petersburg-Clearwater, FL
WMTX Prp	23078	FM	Tampa	Tampa-St. Petersburg-Clearwater, FL	Tampa-St. Petersburg-Clearwater, FL
WXTB	11274	FM	CLEARWATER	Tampa-St. Petersburg-Clearwater, FL	Tampa-St. Petersburg-Clearwater, FL

¹ WFUS(FM) is seeking modification by separate application. This study assumes that modification is complete.

² None of the following stations are attributable by virtue of a time brokerage agreement or joint sales agreement.

³ Arbitron data presented herein is obtained from BIA’s “Media Access Pro.”

⁴ WFUS(FM) is seeking modification by separate application. This study assumes that modification is complete.

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.⁵

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 WMTX(FM) AND WFLZ-FM, as proposed, which is not located in an Arbitron market, or regardless of contour overlap, which is located in the same Arbitron Metro⁶ as WMTX(FM) AND WFLZ-FM. The community of license of WMTX(FM) AND WFLZ-FM is located within the Tampa, FL Arbitron Metro, and WMTX(FM) AND WFLZ-FM are reported by BIA as being “Home” to that Metro. Contour overlap of the stations to be modified, as depicted in Figure 1, also occurs with commonly-owned stations whose communities of license are located in the Tampa, FL, Sarasota, FL, and Orlando, FL Arbitron Metro market, and commonly owned stations whose communities of license are located outside any Arbitron Metro market.

Arbitron Market Study

WMTX(FM) AND WFLZ-FM are reported by BIA as being “Home” to the Tampa-St. Petersburg-Clearwater, FL 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 Tampa-St. Petersburg-Clearwater, FL Arbitron Metro⁷

Count	calls	band	Owner	Status ⁸	Community	Join Date
1	WWMI	AM	ABC/Disney	b	St. Petersburg	02-Jul-03
2	WPSO	AM	AKMA Broadcast Network	b	New Port Richey	02-Jul-03
3	WXYB	AM	ASA Broadcasting Inc	b	Indian Rocks Beach	02-Jul-03
4	WYFE	FM	Bible Broadcasting Network	b	Tarpon Springs	02-Jul-03
5	WLLD	FM	CBS Radio	a	Lakeland	02-Jul-03
6	WQYK	AM	CBS Radio	b	Seffner	02-Jul-03
7	WQYK-FM	FM	CBS Radio	b	St. Petersburg	02-Jul-03
8	WRBQ-FM	FM	CBS Radio	b	Tampa	02-Jul-03
9	WSJT	FM	CBS Radio	a	Holmes Beach	02-Jul-03
10	WYUU	FM	CBS Radio	b	Safety Harbor	02-Jul-03
11	WBTP	FM	Clear Channel Communications Inc	b	Clearwater	02-Jul-03
12	WDAE	AM	Clear Channel Communications Inc	b	St. Petersburg	02-Jul-03
13	WFLA	AM	Clear Channel Communications Inc	b	Tampa	02-Jul-03
14	WFLZ-FM	FM	Clear Channel Communications Inc	b	Tampa	02-Jul-03

⁵ See 47 C.F.R. § 73.3555(a).

⁶ 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.

⁷ Source: BIA.

⁸ 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.

15	WFUS	FM	Clear Channel Communications Inc	b	Gulfport	02-Jul-03
16	WHNZ	AM	Clear Channel Communications Inc	b	Tampa	02-Jul-03
17	WMTX	FM	Clear Channel Communications Inc	b	Tampa	02-Jul-03
18	WXTB	FM	Clear Channel Communications Inc	b	Clearwater	02-Jul-03
19	WDUV	FM	Cox Radio Inc	b	New Port Richey	02-Jul-03
20	WHPT	FM	Cox Radio Inc	a	Sarasota	02-Jul-03
21	WPOI	FM	Cox Radio Inc	b	St. Petersburg	02-Jul-03
22	WSUN-FM	FM	Cox Radio Inc	b	Holiday	02-Jul-03
23	WWRM	FM	Cox Radio Inc	b	Tampa	02-Jul-03
24	WXGL	FM	Cox Radio Inc	b	St. Petersburg	02-Jul-03
25	WFTI-FM	FM	Family Stations Inc	b	St Petersburg	02-Jul-03
26	WHBO	AM	Genesis Communications Incorporated	b	Pinellas Park	02-Jul-03
27	WMGG	AM	Genesis Communications Incorporated	b	Dunedin	02-Jul-03
28	WWBA	AM	Genesis Communications Incorporated	b	Largo	02-Jul-03
29	WWJB	AM	Hernando Broadcasting Company	b	Brooksville	02-Jul-03
30	WLCC	AM	Minority Media and Telecommunications Council	b	Brandon	02-Jul-03
31	WMNF	FM	Nathan B. Stubblefield Foundation	b	Tampa	02-Jul-03
32	WRXB	AM	Polnet Communications Ltd	b	St. Petersburg Beach	02-Jul-03
33	WCIE	FM	Radio Training Network Inc	b	New Port Richey	02-Jul-03
34	WQBN	AM	Radio Tropical Incorporated	b	Temple Terrace	02-Jul-03
35	WGUL	AM	Salem Communications Corporation	b	Dunedin	02-Jul-03
36	WTBN	AM	Salem Communications Corporation	b	Pinellas Park	02-Jul-03
37	WTWD	AM	Salem Communications Corporation	b	Plant City	02-Jul-03
38	WBVM	FM	St Petersburg Diocese	b	Tampa	02-Jul-03
39	WTMP	AM	Tama Broadcasting Inc	b	Egypt Lake	02-Jul-03
40	WTMP-FM	FM	Tama Broadcasting Inc	b	Dade City	02-Jul-03
41	WUSF	FM	University of South Florida	b	Tampa	02-Jul-03
42	WDCF	AM	Wagenvoord Advertising Group Inc	b	Dade City	02-Jul-03
43	WTAN	AM	Wagenvoord Advertising Group Inc	b	Clearwater	02-Jul-03
44	WZHR	AM	Wagenvoord Advertising Group Inc	b	Zephyrhills	02-Jul-03
45	WTIS	AM	Westshore Broadcasting Inc	b	Tampa	02-Jul-03
46	WJQB	FM	WGUL FM Inc	b	Spring Hill	02-Jul-03
47	WXOF	FM	WGUL FM Inc	a	Yankeetown	01-Jan-04
48	WAMA	AM	ZGS Communications	b	Tampa	02-Jul-03
49	WGES	AM	ZGS Communications	b	St. Petersburg	02-Jul-03

Interim Contour-Overlap Analysis

Because the proposed principal community contour of the stations to be modified intersects the principal community contour of stations under common ownership or attribution whose community of license is located outside any Arbitron Metro, an interim contour-overlap analysis is also 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 overlapping contours form two "radio market" for interim contour-overlap analysis under the Commission's rules. See *Figure 1*.

The "radio market 1" is defined by the mutually overlapping principal community contours of WFLF(AM), WXXL(FM), WMTX(FM), AND WFLX-FM. The predicted principal community contours of these stations (1 AM / 3 FM), as well as other stations whose principal community contours overlap this combination, are shown in *Figure 2*. *Figure 3* is the tabulation of some of the radio stations identified in the contour-overlap "radio market."

The "radio market 2" is defined by the mutually overlapping principal community contours of WDDV(AM,WDAE(AM),WFLZ-FM. MTX(FM), WLTQ-FM, WSRZ-FM, and WIKX (FM). The predicted principal community contours of these stations (2 AM / 5 FM), as well as other stations whose principal community contours overlap this combination, are shown in *Figure 4*. *Figure 5* is the tabulation of some of the radio stations identified in the contour-overlap "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 1" studied herein, there are at least 21 radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio market."

In the interim contour-overlap "radio market 2" studied herein, there are at least 67 radio stations, including the subject co-owned stations, which overlap or intersect with the defined "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 Arbitron Metro market studied herein, there are at least 47 radio stations, including the subject commonly-owned 3-AM / 5-FM stations, which are home to the Tampa-St. Petersburg-Clearwater, FL Metro. This proposal does not affect the existing number of commonly-owned stations in the subject Arbitron Metro.

In the interim contour-overlap "radio market 1" studied herein, there are at least 21 radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio market." Including the commonly-owned 1-AM/ 3-FM stations.

In the interim contour-overlap "radio market 2" studied herein, there are at least 67 radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio market." Including the commonly-owned 2-AM/ 5-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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Figure 1 Map of All Markets

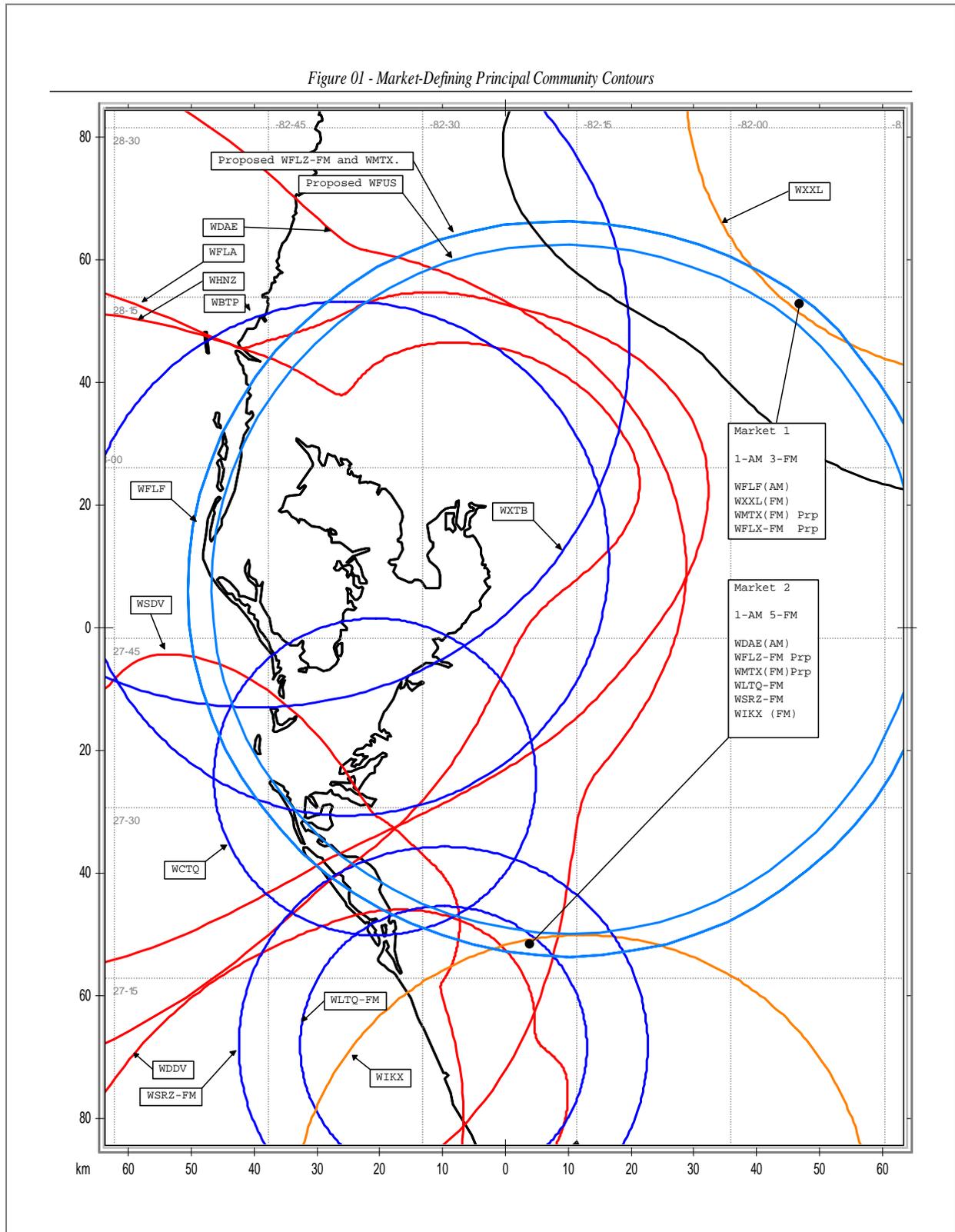


Figure 2. Market 1 Map

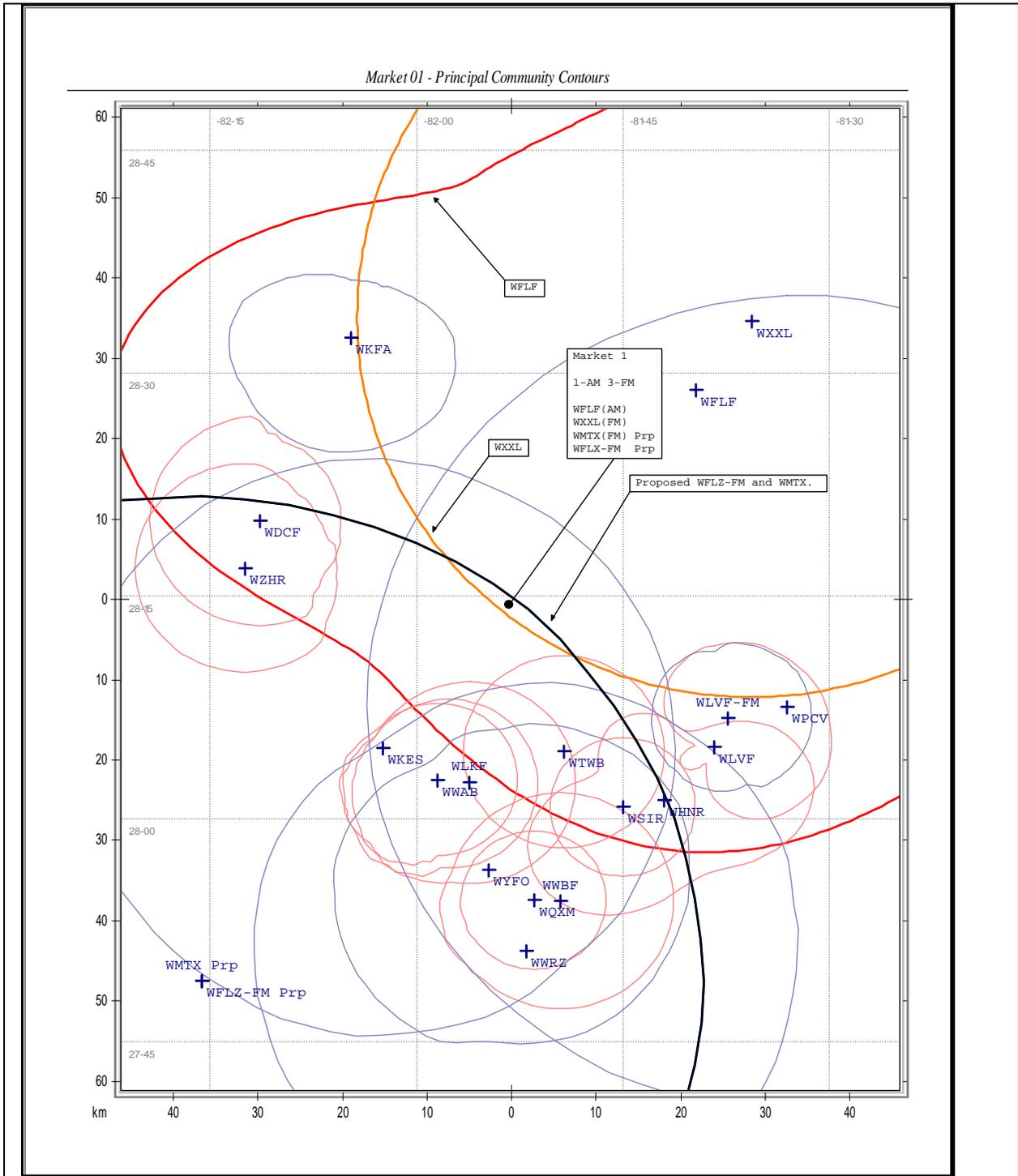


Figure 3 Tabulation of Stations in Market 1

Count	Call Sign	Freq	Licensee	Dist_km
1	WKFA	FM	FLORIDA PUBLIC RADIO, INC.	37.6
2	WLVF-FM	FM	LANDMARK BAPTIST CHURCH, INC.	29.77
3	WKES	FM	THE MOODY BIBLE INSTITUTE OF CHICAGO	23.91
4	WYFO	FM	BIBLE BROADCASTING NETWORK, INC.	33.71
5	WPCV	FM	HALL COMMUNICATIONS, INC.	35.55
6	WWRZ	FM	HALL COMMUNICATIONS, INC.	43.66
7	WFLZ-FM Prp	FM	CITICASTERS LICENSES, INC.	59.94
8	WMTX Prp	FM	CITICASTERS LICENSES, INC.	59.94
9	WXXL	FM	AMFM RADIO LICENSES, L.L.C.	44.94
10	WFLF	AM	CLEAR CHANNEL BROADCASTING LICENSES, INC.	34.11
11	WLVF	AM	LANDMARK BAPTIST CHURCH, INC.	30.39
12	WWBF	AM	THORNBURG COMMUNICATIONS, INC.	37.91
13	WONN	AM	HALL COMMUNICATIONS, INC.	24.04
14	WWAB	AM	RADIO STATION WWAB, INC.	23.99
15	WDCF	AM	RADIO WORLD, INC.	31.29
16	WHNR	AM	GB ENTERPRISES COMMUNICATIONS CORP.	30.94
17	WZHR	AM	RADIO WORLD, INC.	31.81
18	WLKF	AM	HALL COMMUNICATIONS, INC.	23.28
19	WQXM	AM	FLORIDA BROADCASTING MEDIA, LLC	37.45
20	WSIR	AM	ANSCOMBE BROADCASTING GROUP, LTD.	29.03
21	WTWB	AM	LA RAZA MEDIA GROUP, LLC	19.97

Figure 5. Tabulation of stations in Radio Market 2

Count	Call Sign	Band	Licensee	Dist_km
1	WXYB	AM	ASA BROADCASTING, INC	73.46
2	WYFO	FM	BIBLE BROADCASTING NETWORK, INC.	85.46
3	WBRD	AM	BIRACH BROADCASTING CORPORATION	34.9
4	WBVM	FM	BISHOP OF THE DIOCESE OF ST. PETERSBURG	62.83
5	WGCU-FM	FM	BOARD OF TRUSTEES, FLORIDA GULF COAST UNIVERSITY	79.91
6	WMYE	FM	CALL COMMUNICATIONS GROUP, INC.	79.66
7	WGUL	AM	CARON BROADCASTING, INC.	85.19
8	WLSS	AM	CARON BROADCASTING, INC.	7.51
9	WQYK-FM	FM	CBS RADIO INC. OF FLORIDA	71.35
10	WQYK	AM	CBS RADIO INC. OF TAMPA	78.66
11	WRBQ-FM	FM	CBS RADIO STATIONS INC.	71.35
12	WYUU	FM	CBS RADIO STATIONS INC.	75.46
13	WSJT	FM	CBS RADIO STATIONS INC.	75.46
14	WLLD	FM	CBS RADIO STATIONS INC.	49.8
15	WLTQ-FM	FM	CITICASTERS LICENSES, INC.	17.86
16	WDDV	AM	CITICASTERS LICENSES, INC.	20.47
17	WIKX	FM	CITICASTERS LICENSES, INC.	45.27
18	WSRZ-FM	FM	CITICASTERS LICENSES, INC.	17.86
19	WFLZ-FM Prp	FM	CITICASTERS LICENSES, INC.	59.83
20	WMTX Prp	FM	CITICASTERS LICENSES, INC.	59.83
21	WDAE	AM	CLEAR CHANNEL BROADCASTING LICENSES, INC.	68.77
22	WWOJ	FM	COHAN RADIO GROUP, INC.	86.5
23	WHPT	FM	COX RADIO, INC.	17.83
24	WPOI	FM	COX RADIO, INC.	59.84
25	WXGL	FM	COX RADIO, INC.	67.76
26	WXGL	FM	COX RADIO, INC.	87.81
27	WWRM	FM	COX RADIO, INC.	60.17
28	WWRM	FM	COX RADIO, INC.	59.84
29	WFTI-FM	FM	FAMILY STATIONS, INC.	59.69
30	WQXM	AM	FLORIDA BROADCASTING MEDIA, LLC	85.39
31	WINK-FM	FM	FORT MYERS BROADCASTING COMPANY	80.91
32	WPTK	AM	FORT MYERS BROADCASTING COMPANY	71.24
33	WHBO	AM	GENESIS COMMUNICATIONS OF TAMPA BAY, INC.	73.59
34	WWBA	AM	GENESIS COMMUNICATIONS OF TAMPA BAY, INC.	79.79
35	WMGG	AM	GENESIS COMMUNICATIONS OF TAMPA BAY, INC.	92.49
36	WONN	AM	HALL COMMUNICATIONS, INC.	92.54
37	WWRZ	FM	HALL COMMUNICATIONS, INC.	79.86

38	WZZS	FM	HEARTLAND BROADCASTING CORP.	57.29
39	WZSP	FM	HEARTLAND BROADCASTING CORP.	43.27
40	WFLN	AM	INTEGRITY RADIO OF FLORIDA LLC	51.15
41	WMYR	AM	J&B WMYR, LLC	89.71
42	WAUC	AM	MARVINA ENTERPRISES, INC.	60.73
43	WLCC	AM	MMTC BROADCASTING LLC	82.05
44	WMNF	FM	NATHAN B. STUBBLEFIELD FOUNDATION	59.84
45	WSMR	FM	NORTHWESTERN COLLEGE	20.83
46	WRXB	AM	POLNET COMMUNICATIONS, LTD	58.42
47	WTMY	AM	POLNET COMMUNICATIONS, LTD.	13.78
48	WVIJ	FM	PORT CHARLOTTE EDUCATIONAL BROADCASTING FOUNDATION	45.43
49	WWMI	AM	RADIO DISNEY GROUP, LLC	69.02
50	WWAB	AM	RADIO STATION WWAB, INC.	92.43
51	WJIS	FM	RADIO TRAINING NETWORK, INC.	17.52
52	WQBN	AM	RADIO TROPICAL, INC.	73.09
53	WTAN	AM	RADIO WORLD INC.	86.73
54	WTMP	AM	SCOTT SAVAGE, RECEIVER	81.15
55	WTWD	AM	SOUTH TEXAS BROADCASTING, INC.	79.43
56	WSRQ	AM	SRQ RADIO, LLC	13.13
57	WSEB	FM	SUNCOAST EDUCATIONAL BROADCASTING CORP.	47.62
58	WKZM	FM	THE MOODY BIBLE INSTITUTE OF CHICAGO	11.15
59	WWBF	AM	THORNBURG COMMUNICATIONS, INC.	87.24
60	WUSF	FM	UNIVERSITY OF SOUTH FLORIDA	62.92
61	WCRM	AM	VIDA RADIO MINISTRIES	90.28
62	WWPR	AM	VIDIFY MEDIA, INC.	26.55
63	WENG	AM	VIPER COMMUNICATIONS, INC.	35.48
64	WAMA	AM	WAMA, INC	70.17
65	WWCN	AM	WJPT LICENSE LIMITED PARTNERSHIP	76.96
66	WTIS	AM	WTIS-AM, INC.	69.84
67	WGES	AM	ZGS BROADCASTING OF TAMPA	67.79