

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 KZSN(FM), Hutchinson, KS. A multiple ownership analysis was prepared considering the following radio stations under present or proposed common ownership, time brokerage or joint sales<sup>1</sup>:

Table 1: Proposed Commonly Owned, Brokered or Jointly-Sold Stations Studied  
and Associated Arbitron Metro<sup>2</sup> Information

Calls	Service	Fac ID	Community	Geographic Arbitron Market	Declared Arbitron Market
KKRD	FM	53600	Wichita	Wichita, KS	Wichita, KS
KRBB	FM	39902	Wichita	Wichita, KS	Wichita, KS
KRZZ-FM	FM	53599	Derby	Wichita, KS	Wichita, KS
KZSN	FM	61364	Hutchinson	None	Wichita, KS

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 Markets, an ownership study has been prepared in accordance with the Federal Communications Commission's local radio ownership rule.<sup>3</sup>

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 KZSN(FM) as proposed to be modified, or which is located in the same Arbitron Metro<sup>4</sup> as KZSN(FM). The community of license of KZSN(FM) is not located within an Arbitron Metro, and KZSN(FM) is reported by BIA as being "Home" to the Wichita, KS Metro. Contour overlap of the station to be modified, as depicted in Figure 1, occurs with commonly-owned stations whose communities of license are located in the nearby Wichita, KS Arbitron Metro markets.

Arbitron Market Study

KZSN(FM) is reported by BIA as being "Home" to the Wichita, KS Metro. This proposal is in compliance with the local radio ownership rules for that Arbitron Metro, as evidenced by Table 2 below:

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<sup>1</sup> None of the following stations are attributable by virtue of a time brokerage agreement or joint sales agreement.

<sup>2</sup> Arbitron data presented herein is taken from BIA's "Media Access Pro."

<sup>3</sup> See 47 C.F.R. § 73.3555(a).

<sup>4</sup> A station is considered to be "located in an Arbitron Metro" if the station's city of license is located within the boundaries of that Metro, or, the station is listed as "Home" to that Metro by Arbitron.

Table 2 - Stations Considered to be in the  
Wichita, KS Arbitron Metro<sup>5</sup>

Count	Calls	Fac. Id.	Band	Owner	Status <sup>6</sup>	Community	County
1	KQAM	61362	AM	ABC/Disney	b	Wichita	Sedgwick
2	KMYR	53150	AM	Agape Communications	b	Wichita	Sedgwick
3	KSGL	610	AM	Agape Communications	b	Wichita	Sedgwick
4	KCFN	1692	FM	American Family Association Inc.	b	Wichita	Sedgwick
5	KJRG	35021	AM	Anderson Stations	b	Newton	Harvey
6	KBCU	4987	FM	Bethel College	b	North Newton	Harvey
7	KYFW	5098	FM	Bible Broadcasting Network	b	Wichita	Sedgwick
8	KBTL	83259	FM	Butler County Community College	b	El Dorado	Butler
9	KSJM	14239	FM	Carter Broadcast Group Inc	a	Winfield	Cowley
10	KKRD	53600	FM	Clear Channel Communications	b	Wichita	Sedgwick
11	KRBB	39902	FM	Clear Channel Communications	b	Wichita	Sedgwick
12	KRZZ-FM	53599	FM	Clear Channel Communications	b	Derby	Sedgwick
13	KZSN	61364	FM	Clear Channel Communications	a	Hutchinson	Reno
14	KDGS	70266	FM	Entercom	b	Andover	Butler
15	KEYN-FM	53151	FM	Entercom	b	Wichita	Sedgwick
16	KFBZ	53153	FM	Entercom	b	Haysville	Sedgwick
17	KFH	53152	AM	Entercom	b	Wichita	Sedgwick
18	KFH-FM	23292	FM	Entercom	b	Clearwater	Sedgwick
19	KNSS	53598	AM	Entercom	b	Wichita	Sedgwick
20	KFDI-FM	72357	FM	Journal Communications Inc.	b	Wichita	Sedgwick
21	KFTI	72356	AM	Journal Communications Inc.	b	Wichita	Sedgwick
22	KFXJ	37133	FM	Journal Communications Inc.	b	Augusta	Butler
23	KICT-FM	63548	FM	Journal Communications Inc.	b	Wichita	Sedgwick
24	KMXW	35020	FM	Journal Communications Inc.	b	Newton	Harvey
25	KYQQ	37121	FM	Journal Communications Inc.	a	Arkansas City	Cowley
26	KAHS	48538	AM	Reunion Broadcasting LLC	b	El Dorado	Butler
27	KANR	15410	FM	Smith, Daniel D	a	Belle Plaine	Sumner
28	KTLI	48540	FM	Stephens Family Limited Partnership	b	El Dorado	Butler
29	KYWA	48537	FM	WAY FM Media Group Inc	b	Wichita	Sedgwick
30	KMUW	72364	FM	Wichita State University	b	Wichita	Sedgwick

#### Contour-Overlap Radio Markets

Because KZSN(FM), is not geographically part of an Arbitron Metro, an interim contour overlap study is required.

The contour overlap "radio market" applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the proposed attributable

<sup>5</sup> Source: BIA.

<sup>6</sup> 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.

stations. A station is considered for analysis for this purpose if its community of license is located outside any Arbitron Metro. These mutually overlapping contours form one "radio market" requiring analysis under the Commission's rules.

The "radio market" applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the proposed commonly owned stations. The predicted principal community contours of KZSN(FM) Proposed, KRBB(FM) License and Proposed, KTHR(FM) and KZCH(FM) are shown in *Figure 1* herein.

#### 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 controlled stations, excluding any stations whose transmitter sites are further than 92 kilometers from the perimeter of mutual overlap, and, excluding any commonly owned or controlled stations do not serve to define the market.

In the contour overlap "radio market" studied herein, there are at least 30 radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio market." *Figures 2 and 3* tabulate some of the radio stations identified in the contour overlap "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 radio market studied herein, there are at least 30 radio stations, including the subject commonly-owned 0-AM / 4-FM stations, which are home to the Wichita, KS Arbitron 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" studied herein, there are at least 30 radio stations, including the subject commonly-owned 0-AM / 4-FM stations which form the market.

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

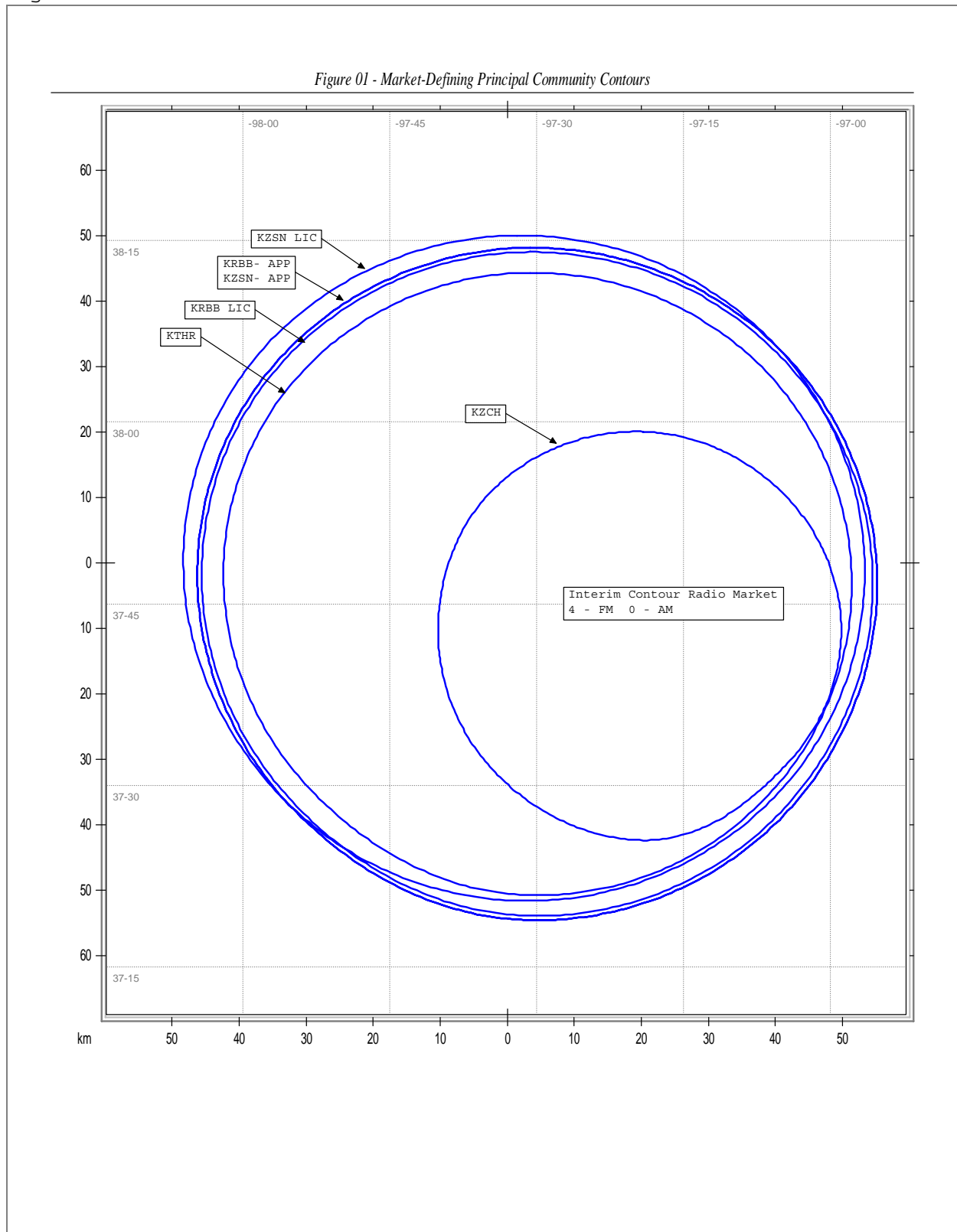


Figure 2

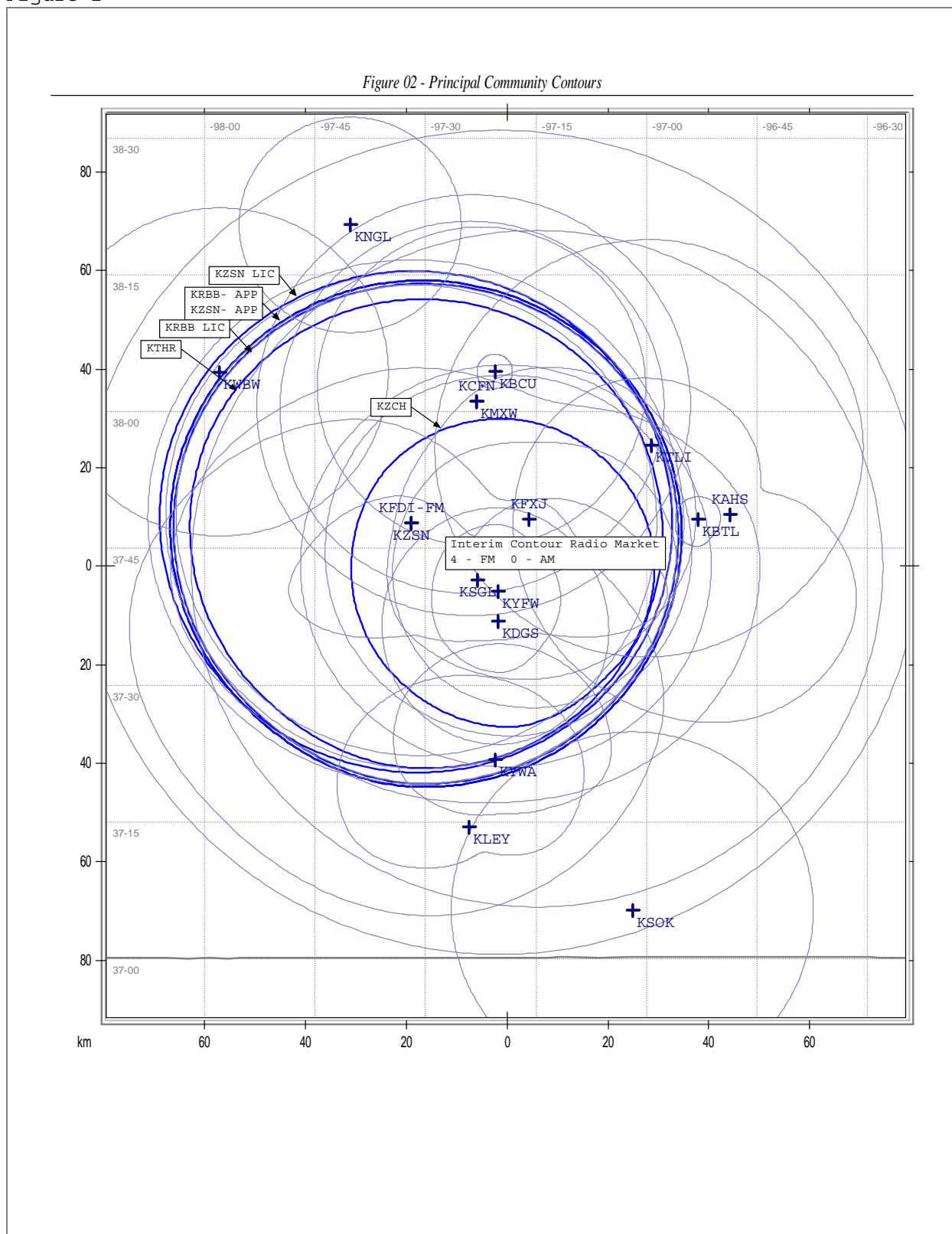


Figure 3

Count	Call Sign	Facility_id	Licensee	Dist_km
1	KRBB	39902	CAPSTAR TX LIMITED PARTNERSHIP	18.18
2	KZCH	53599	CAPSTAR TX LIMITED PARTNERSHIP	0
3	KTHR	53600	CAPSTAR TX LIMITED PARTNERSHIP	18.18
4	KZSN	61364	CAPSTAR TX LIMITED PARTNERSHIP	20.83
5	KFH	53598	ENTERCOM WICHITA LICENSE, LLC	0
6	KFTI	72356	JOURNAL BROADCAST CORPORATION COWLEY COUNTY BROADCASTING, INC.	4.96
7	KSOK	14238		74.33
8	KQAM	61362	RADIO DISNEY GROUP, LLC	4.78
9	KNSS	53152	ENTERCOM WICHITA LICENSE, LLC	6.25
10	KMYR	53150	AGAPE COMMUNICATIONS, INC.	3.48
11	KLEY	31895	JOHNSON ENTERPRISES, INC.	53.47
12	KSGI	610	AGAPE COMMUNICATIONS, INC.	6.3
13	KNGL	15840	DAVIES COMMUNICATIONS, INC.	75.77
14	KJRG	35021	KJRG, INC.	36.67
15	KWBW	18069	EAGLE COMMUNICATIONS, INC.	69.16
16	KAHS	48538	REUNION BROADCASTING L.L.C.	45.79
17	KDGS	70266	ENTERCOM WICHITA LICENSE, LLC	11.4
18	KFBZ	53153	ENTERCOM WICHITA LICENSE, LLC	18.18
19	KYWA	48537	WAY-FM MEDIA GROUP, INC.	39.3
20	KICT- FM	63548	JOURNAL BROADCAST CORPORATION	20.95
21	KFDI- FM	72357	JOURNAL BROADCAST CORPORATION	20.83
22	KEYN- FM	53151	ENTERCOM WICHITA LICENSE, LLC	20.36
23	KMUW	72364	WICHITA STATE UNIVERSITY BIBLE BROADCASTING NETWORK, INC.	3.78
24	KYFW	5098		5.29
25	KFBZ	53153	ENTERCOM WICHITA LICENSE, LLC	6.25
26	KFXJ	37133	JOURNAL BROADCAST CORPORATION	10.59
27	KCFN	1692	AMERICAN FAMILY ASSOCIATION	33.88
28	KBCU	4987	BETHEL COLLEGE	39.53
29	KMXW	35020	JOURNAL BROADCAST CORPORATION	33.88
30	KTLI	48540	ADONAI RADIO GROUP, INC. BUTLER COUNTY COMMUNITY COLLEGE	37.97
31	KBTL	83259		39.43