

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CLEAR CHANNEL BROADCASTING LICENSES, INC.

This statement and the attached figures were prepared on behalf of Clear Channel Broadcasting Licenses, Inc. ("CCBL"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CCBL proposes to modify the facilities of WWDG(FM), DeRuyter, NY. 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	Band	Community	County	Geographic Arbitron Market	Declared Arbitron Market
WBBS	48730	FM	Fulton	Oswego	Syracuse, NY	Syracuse, NY
WHEN	7080	AM	Syracuse	Onondaga	Syracuse, NY	Syracuse, NY
WPHR	25018	FM	Auburn	Cayuga	Non- metro	Syracuse, NY
WSYR	48720	AM	Syracuse	Onondaga	Syracuse, NY	Syracuse, NY
WWDG	22134	FM	Deruyter	Madison	Syracuse, NY	Syracuse, NY
WWHT	57842	FM	Syracuse	Onondaga	Syracuse, NY	Syracuse, NY
WYYY	48725	FM	Syracuse	Onondaga	Syracuse, NY	Syracuse, NY
WUMX	53656	FM	Rome	Oneida	Utica-Rome, NY	Utica-Rome, NY

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.³

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 WWDG(FM) as proposed, or which is located in the same Arbitron Metro⁴ as WWDG(FM). The community of license of WWDG(FM) is located within the Syracuse, NY Arbitron Metro, and WWDG(FM) is reported by BIA as being "Home" to that Metro. Contour overlap of the station to be modified, as depicted in Figure 1, also occurs with commonly-owned stations whose communities of license are located outside any Arbitron Metro market.

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.

Arbitron Market Study

WWDG(FM) is reported by BIA as being "Home" to the Syracuse, NY Arbitron Metro. This proposal is not in compliance with the local radio ownership rules for that Arbitron Metro, as evidenced by Table 2 below. However, the existing WWDG(FM) licensed facility was also not in compliance with the Arbitron Metro-based rules. This proposal maintains the status-quo in the Syracuse, NY Arbitron Metro: no stations are added to or removed from the metro, nor is WWDG(FM)'s Arbitron market changed, by virtue of this instant application. Because this modification would not create a "new violation" of the ownership rules, this existing combination of radio stations qualifies for grandfathering. See Note 4 to 47 C.F.R. Section 73.3555 (minor modification applications are subject to ownership restrictions only if implementing a change in an FM radio station's community of license or if new or increased concentration of ownership among commonly-owned media would be created); accord 2002 Biennial Regulatory Review—Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, 18 FCC Rcd 13,620 at fn. 1033 (2003) (modifications of facilities in a grandfathered combination are prohibited if the proposed modification would create a new violation of the ownership rules).

Table 2 - Stations Considered to be in the
Syracuse, NY Arbitron Metro⁵

Count	Calls	Fac ID	Band	Owner	Status ⁶	Community	County	State
1	WBXL	3639	FM	Baldwinsville Central School District	b	Baldwinsville	Onondaga	NY
2	WFBL	34821	AM	Buckley Broadcasting Corporation	b	Syracuse	Onondaga	NY
3	WSEN	7712	AM	Buckley Broadcasting Corporation	b	Baldwinsville	Onondaga	NY
4	WSEN	7716	FM	Buckley Broadcasting Corporation	b	Baldwinsville	Onondaga	NY
5	WITC	9430	FM	Cazenovia College	b	Cazenovia	Madison	NY
6	WAQX	52606	FM	Citadel Broadcasting Corp	b	Manlius	Onondaga	NY
7	WLTJ	58719	FM	Citadel Broadcasting Corp	b	Syracuse	Onondaga	NY
8	WNSS	50515	AM	Citadel Broadcasting Corp	b	Syracuse	Onondaga	NY

⁵ Source: BIA.

⁶ 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.

9	WNTQ	50514	FM	Citadel Broadcasting Corp	b	Syracuse	Onondaga	NY
10	WBBS	48730	FM	Clear Channel Communications	b	Fulton	Oswego	NY
11	WHEN	7080	AM	Clear Channel Communications	b	Syracuse	Onondaga	NY
12	WPHR	25018	FM	Clear Channel Communications	a	Auburn	Cayuga	NY
13	WSYR	48720	AM	Clear Channel Communications	b	Syracuse	Onondaga	NY
14	WWDG	22134	FM	Clear Channel Communications	b	Deruyter	Madison	NY
15	WWHT	57842	FM	Clear Channel Communications	b	Syracuse	Onondaga	NY
16	WYYY	48725	FM	Clear Channel Communications	b	Syracuse	Onondaga	NY
17	WRCU	12241	FM	Colgate University	b	Hamilton	Madison	NY
18	WAMF	52370	AM	DeRosa, Donald H.	b	Fulton	Oswego	NY
19	WOLF	73380	AM	Fox, Craig	b	Syracuse	Onondaga	NY
20	WOLF	5344	FM	Fox, Craig	b	Oswego	Oswego	NY
21	WSIV	22133	AM	Fox, Craig	b	E. Syracuse	Onondaga	NY
22	WVOA	67058	FM	Fox, Craig	b	Mexico	Oswego	NY
23	WKRH	56996	FM	Galaxy Communications	b	Minetto	Oswego	NY
24	WKRL	54547	FM	Galaxy Communications	b	North Syracuse	Onondaga	NY
25	WSCP	1046	AM	Galaxy Communications	b	Sandy Creek- Pulaski	Oswego	NY
26	WSCP	1047	FM	Galaxy Communications	b	Pulaski	Oswego	NY
27	WSGO	24130	AM	Galaxy Communications	b	Oswego	Oswego	NY
28	WTKV	24131	FM	Galaxy Communications	b	Oswego	Oswego	NY
29	WTKW	22234	FM	Galaxy Communications	b	Bridgeport	Onondaga	NY
30	WTLA	54546	AM	Galaxy Communications	b	North Syracuse	Onondaga	NY
31	WZUN	60253	FM	Galaxy Communications	b	Phoenix	Oswego	NY
32	WMHR	40432	FM	Mars Hill Broadcasting Co., Inc.	b	Syracuse	Onondaga	NY
33	WCNY	66284	FM	Public Broadcasting Council of Central NY Inc	b	Syracuse	Onondaga	NY
34	WNYO	63122	FM	State University of New York	b	Oswego	Oswego	NY

35	WRVD	63131	FM	State University of New York	b	Syracuse	Onondaga	NY
36	WRVO	63115	FM	State University of New York	b	Oswego	Oswego	NY
37	WXXE	87460	FM	Syracuse Community Radio Inc	b	Fenner	Madison	NY
38	WAER	64354	FM	Syracuse University	b	Syracuse	Onondaga	NY
39	WMCR	70890	AM	Warren Broadcasting Co Inc	b	Oneida	Madison	NY
40	WMCR	58038	FM	Warren Broadcasting Co Inc	b	Oneida	Madison	NY
41	WJPZ	73148	FM	WJPZ Radio Inc	b	Syracuse	Onondaga	NY

Interim Contour-Overlap Analysis

Because the proposed principal community contour of the station to be modified intersects the principal community contour of a station 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 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 WWDG(FM)-App, WPHR(FM), WYYY(FM), WBBS(FM), WWHT(FM), WHEN(AM), and WSYR(AM). 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 2*. *Figure 3* is the tabulation of some of the radio stations identified in the contour-overlap "radio market."

Count of Stations in Defined Interim Contour-Overlap Market

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 45 radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio market." *Figure 3* is the

tabulation of 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 5 degrees of azimuth.

Conclusions

In the Arbitron Metro Market studied herein, there are at least 41 radio stations, including the subject commonly-owned 2-AM / 5-FM stations, which are home to the Syracuse, NY 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 45 stations, including the commonly-owned 2-AM / 5-FM stations.

Respectfully submitted,

Troy G. Langham
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Figure 1

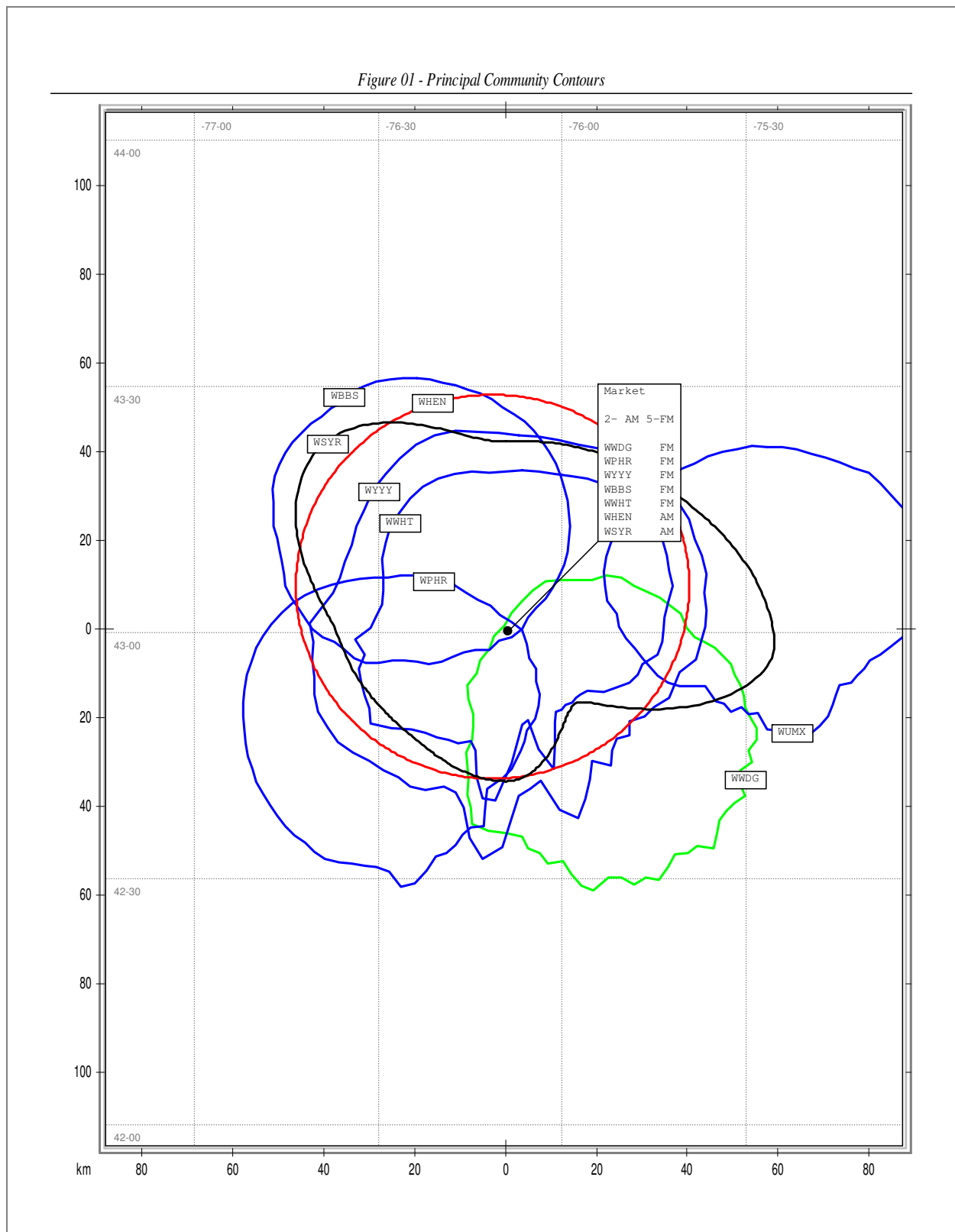


Figure 2

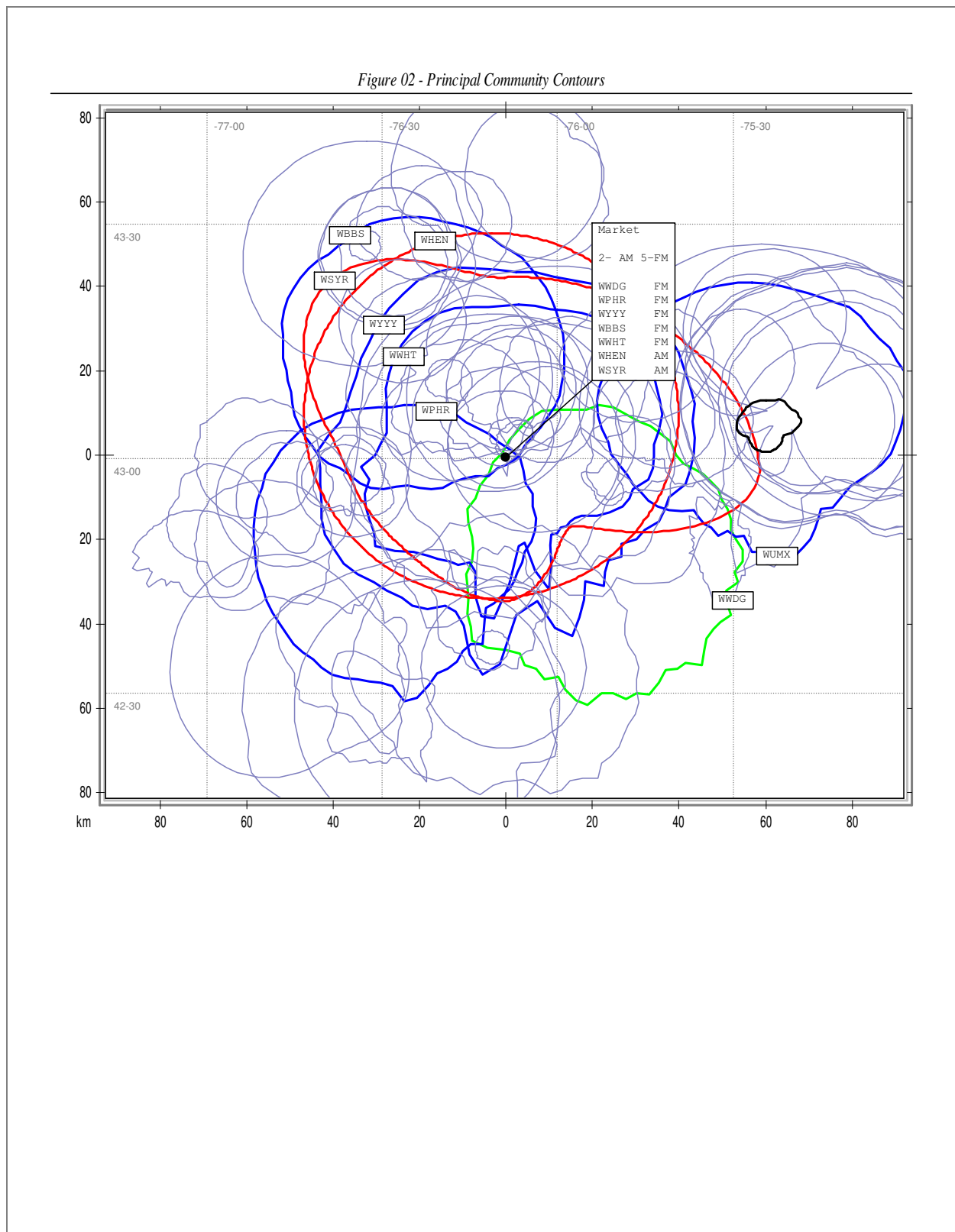


Figure 3

Count	Call Sign	Facility_id	Licensee	Distance_km
1	WWDG	22134	CLEAR CHANNEL BROADCASTING LICENSES, INC.	35.5
2	WPHR	25018	CLEAR CHANNEL BROADCASTING LICENSES, INC.	32.71
3	WYYY	48725	CLEAR CHANNEL BROADCASTING LICENSES, INC.	7.26
4	WBBS	48730	CITICASTERS LICENSES, L.P.	30.49
5	WUMX	53656	CLEAR CHANNEL BROADCASTING LICENSES, INC.	57.67
6	WWHT	57842	CLEAR CHANNEL BROADCASTING LICENSES, INC.	6.59
7	WHEN	7080	CLEAR CHANNEL BROADCASTING LICENSES, INC.	9.97
8	WSYR	48720	CLEAR CHANNEL BROADCASTING LICENSES, INC.	2.24
9	WAUB	43791	AUBURN BROADCASTING, INC.	38.43
10	WWLF	25001	WOLF RADIO, INC	35.94
11	WSFW	5391	AUBURN BROADCASTING, INC.	51.91
12	WPIE	52124	PEMBROOK PINES ITHACA LTD. N.A.	68.82
13	WHCU	18048	EAGLE BROADCASTING COMPANY, INC.	62.91
14	WKRT	9428	CITADEL BROADCASTING COMPANY	50.1
15	WSEN	7712	BUCKLEY BROADCASTING OF NEW YORK, LLC	24.51
16	WSCP	1046	GALAXY COMMUNICATIONS, L.P.	66.48
17	WAMF	52370	DONALD H. DEROSA	39.84
18	WNSS	50515	CITADEL BROADCASTING COMPANY	7.26
19	WFBL	34821	BUCKLEY BROADCASTING OF NEW YORK, LLC	16.55
20	WOLF	73380	WOLF RADIO INC.	5.84
21	WSIV	22133	CRAM COMMUNICATIONS LLC	13.63

22	WTLA	54546	GALAXY COMMUNICATIONS, L.P.	16.13
23	WSGO	24130	GALAXY COMMUNICATIONS, L.P.	52.14
24	WYFY	72067	BIBLE BROADCASTING NETWORK, INC.	58.86
25	WMCR	70890	WARREN BROADCASTING COMPANY, INC.	38.27
26	WIBX	168	REGENT LICENSEE OF UTICA/ROME, INC.	66.75
27	WRUN	73969	REGENT LICENSEE OF UTICA/ROME, INC.	67.75
28	WTLB	54548	GALAXY COMMUNICATIONS, L.P.	71.31
29	WEOS	65559	THE COLLEGES OF THE SENECA	79.54
30	WFLK	40804	MB COMMUNICATIONS, INC.	71.88
31	WVBR- FM	13909	CORNELL RADIO GUILD, INC.	68.78
32	WSUC- FM	63111	STATE UNIVERSITY OF NEW YORK	45.53
33	WCOV- FM	34561	FAMILY LIFE MINISTRIES, INC.	58.38
34	WLLW	5392	AUBURN BROADCASTING, INC.	51.91
35	WSQG- FM	74054	WSKG PUBLIC TELECOMM. COUNCIL	57.71
36	WIII	9427	CITADEL BROADCASTING COMPANY	50.1
37	WNTQ	50514	CITADEL BROADCASTING COMPANY	12.29
38	WDWN	9426	CAYUGA COUNTY COMM. COLLEGE	32.71
39	WCNY- FM	66284	THE PUB. B/C COUNC. OF CEN. NY, INC.	12.39
40	WXHC	20318	EVES BROADCASTING, INC.	35.8
41	WMHR	40432	MARS HILL BROADCASTING CO., INC.	6
42	WYXL	18051	EAGLE BROADCASTING COMPANY	62.91
43	WNYR- FM	36288	LAKE COUNTRY BROADCASTING, INC.	61.04
44	WKRH	56996	GALAXY COMMUNICATIONS, L.P.	52.29
45	WZUN	60253	GALAXY COMMUNICATIONS, L.P.	15
46	WJPZ- FM	73148	WJPZ RADIO, INC.	3.34
47	WTKV	24131	GALAXY COMMUNICATIONS, L.P.	52.08

48	WNYO	63122	STATE UNIVERSITY OF NEW YORK	58.87
49	WSEN-FM	7716	BUCKLEY BROADCASTING OF NEW YORK, LLC	24.51
50	WRVO	63115	STATE UNIVERSITY OF NEW YORK	55.97
51	WKRL-FM	54547	GALAXY COMMUNICATIONS, L.P.	16.13
52	WRVD	63131	STATE UNIVERSITY OF NEW YORK	3.86
53	WBXL	3639	BALDWINVILLE CENTRAL SCHOOL DIST.	21.8
54	WLTi	58719	CITADEL BROADCASTING COMPANY	5.84
55	WOLF-FM	5344	WOLF RADIO, INC.	56.61
56	WVOA-FM	67058	RENARD COMMUNICATIONS CORP.	53.2
57	WXXE	87460	SYRACUSE COMMUNITY RADIO, INC.	30.09
58	WRCU-FM	12241	COLGATE UNIVERSITY	54.98
59	WITC	9430	CAZENOVIA COLLEGE	25.61
60	WHCL-FM	68224	TRUSTEES OF HAMILTON COLLEGE	60.84
61	WSCP-FM	1047	GALAXY COMMUNICATIONS, L.P.	68.28
62	WLZW	169	REGENT LICENSEE OF UTICA/ROME, INC.	80.58
63	WRCK	54549	GALAXY COMMUNICATIONS, L.P.	80.87
64	WBGJ	85534	WOLF RADIO, INC.	40.58
65	WUNY	53735	PUBLIC BC COUNCIL OF CENTRAL NY, INC	80.68
66	WTKW	22234	GALAXY COMMUNICATIONS, L.P.	22.86
67	WFRG-FM	50362	REGENT LICENSEE OF UTICA/ROME, INC.	59.99
68	WODZ-FM	72068	REGENT LICENSEE OF UTICA/ROME, INC.	80.58
69	WKLL	54959	GALAXY COMMUNICATIONS, L.P.	80.87
70	WMCR-FM	58038	WARREN BROADCASTING CO. INC.	39.74