

RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
NEW FM RADIO STATION
PARACHUTE, COLORADO
December 2007

TECHNICAL STATEMENT

1. This Technical Statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC (“Cumulus”), permittee of a New FM at Parachute, Colorado. Cumulus is submitting an application to modify the outstanding permit for its New FM and a Radio Market Analysis is necessary. Cumulus is the licensee of stations KEKB, Channel 260C, Fruita, Colorado; KEXO, 1230 kHz, KBKL¹, Channel 300C, and KMXY, Channel 282C0, Grand Junction, Colorado; and KKNN², Channel 236C, Delta, Colorado. KEKB, KEXO, KBKL and KMXY are all licensed to communities in a metro county in the Grand Junction, Colorado Arbitron Market. The New FM and KKNN are not licensed (or authorized) to a metro county in the Grand Junction Market, but KKNN is considered “home” to that market. Attached as Exhibit #1 is a map showing the city grade contours of the all of these facilities. It is noted that the proposed New FM facility at Parachute, Colorado, will have contour overlap with KBKL (license and CP), KMXY and KEKB. Therefore, this review will verify compliance of commonly owned stations in only the non-rated markets.³

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- 1) KBKL also has a permit to make changes (BPH-20070723AEK), which is considered in this instant review.
 - 2) KKNN has a pending application (BPH-20040602AE), which is considered in this instant review.
 - 3) As the New FM does not overlap either KEXO or KKNN, these two additional stations are not considered further.

REVISED CONTOUR OVERLAP ANALYSIS

2. A study has been conducted to verify that the ownership of the stations owned by Cumulus is in compliance with the Commission's multiple ownership rules. The city grade contours of the New FM, KEKB, KBKL and KMXV have a common area of overlap. The city grade contours of the four subject stations therefore define the market boundary, hereinafter referred to as the "Radio Market". The study will determine the number of other commercial AM and FM stations that either have transmitter sites within or provide coverage to the Radio Market Boundary. No stations with transmitter sites located more than 92.0 kilometers from the boundary of the common overlap of subject stations will be considered as contributors to the market. Further, no other facility controlled by Cumulus will be considered as a market contributor, unless it is a subject station in the market under review.

3. Exhibit #2 is a depiction of the stations within, or providing service, to the Radio Market boundary. Exhibit #3 is a tabulation of the stations in the Radio Market, a total of fifteen stations when the four subject stations are included. The number of stations depicted falls in the fifteen to twenty nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.⁴ At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service. Therefore, Cumulus is in compliance with the ownership rules for a non-rated market.

4) There are additional stations, but they were not considered as the stations identified are sufficient to allow for common control of the stations which will be commonly owned.

4. Based on the compliance shown in the non-rated markets, the proposed modification application for the New FM is in compliance with §73.3555 of the Commission's rules.

5. 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 relocating to AM and FM facilities in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.2 BIA database. Technical data relating to AM and FM facilities was extracted from the Commission's CDBS database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.

Graham Brock, Inc. - Broadcast Technical Consultants

New FM Parachute
 Latitude: 39-26-31 N
 Longitude: 108-01-15 W
 ERP: 0.20 kW
 Channel: 266A
 Frequency: 101.1 MHz

KBKL
 BLH-19980304KI
 Latitude: 39-03-56 N
 Longitude: 108-44-52 W
 ERP: 100.00 kW
 Channel: 300C
 Frequency: 107.9 MHz

KBKL CP
 BPH-20070723AEK
 Latitude: 39-03-56 N
 Longitude: 108-44-52 W
 ERP: 100.00 kW
 Channel: 300C
 Frequency: 107.9 MHz

KEXO
 Latitude: 39-05-41 N
 Longitude: 108-34-41 W
 ERP: 1.00 kW
 Frequency: 1230.0 kHz

KEKB
 BLH-19980304KJ
 Latitude: 39-03-56 N
 Longitude: 108-44-52 W
 ERP: 79.00 kW
 Channel: 260C
 Frequency: 99.9 MHz

KMXY
 BLH-19960402KD
 Latitude: 39-03-56 N
 Longitude: 108-44-52 W
 ERP: 100.00 kW
 Channel: 282C0
 Frequency: 104.3 MHz

KKNN
 BMLH-19870227PC
 Latitude: 38-52-40 N
 Longitude: 108-13-30 W
 ERP: 100.00 kW
 Channel: 236C
 Frequency: 95.1 MHz

KKNN.A
 BPH-20040602ACE
 Latitude: 38-52-40 N
 Longitude: 108-13-30 W
 ERP: 100.00 kW
 Channel: 236C
 Frequency: 95.1 MHz

KBKL/KMXY 3.16 mV/m

New FM 3.16 mV/m

KEKB 3.16 mV/m

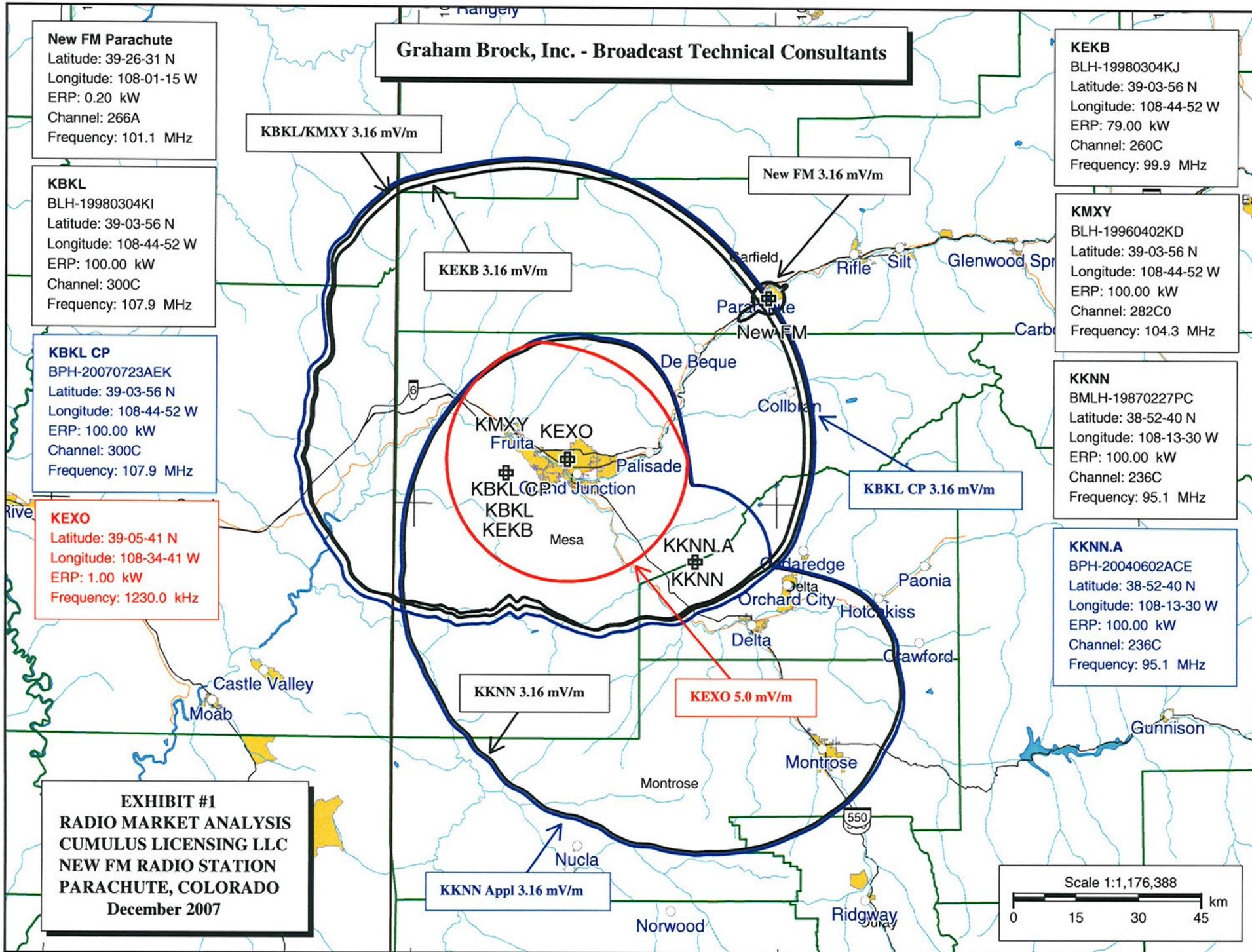
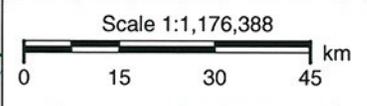
KBKL CP 3.16 mV/m

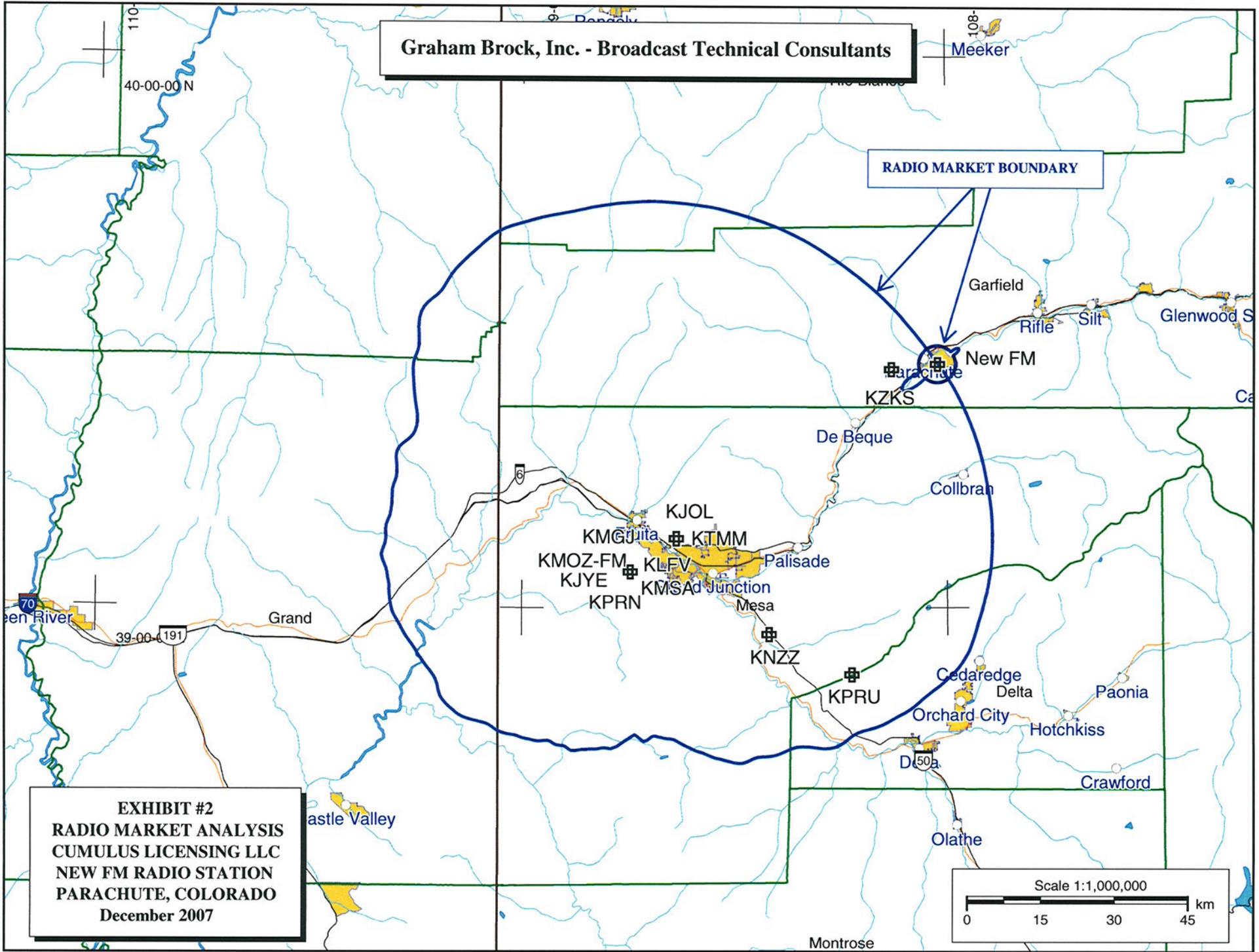
KKNN 3.16 mV/m

KEXO 5.0 mV/m

KKNN Appl 3.16 mV/m

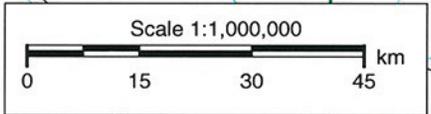
EXHIBIT #1
RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
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PARACHUTE, COLORADO
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RADIO MARKET BOUNDARY

EXHIBIT #2
RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
NEW FM RADIO STATION
PARACHUTE, COLORADO
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EXHIBIT #3

Tabulation of Stations in Radio Market

AM Stations

KJOL	620 kHz	Grand Junction, Colorado
KNZZ	1100 kHz	Grand Junction, Colorado
KTMM	1340 kHz	Grand Junction, Colorado

Total AM Stations - 3

FM Stations

KPRN	Ch 208C1	Grand Junction, Colorado
KLFV	Ch 212C2	Grand Junction, Colorado
KMSA	Ch 217C2	Grand Junction, Colorado
KJYE	Ch 222C	Grand Junction, Colorado
KMGJ	Ch 226C0	Grand Junction, Colorado
* KEKB	Ch 260C	Fruita, Colorado
KMOZ-FM	Ch 264C1	Grand Junction, Colorado
* New FM	Ch 266A	Parachute, Colorado
KPRU	Ch 277C2	Delta, Colorado
* KMXV	Ch 282C0	Grand Junction, Colorado
KZKS	Ch 287C	Rifle, Colorado
* KBKL	Ch 300C	Grand Junction, Colorado

Total FM Stations - 12

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 15

* Subject station.

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

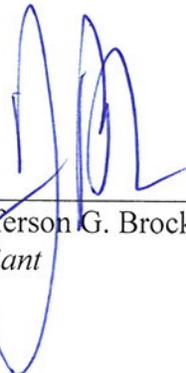
State of Georgia)
St. Simons Island) ss:
County of Glynn)

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.

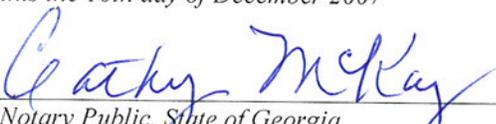
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 10th day of December 2007.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 10th day of December 2007*



Notary Public, State of Georgia
My Commission Expires: March 18, 2011