

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
CITICASTERS LICENSES, L.P.

This statement and the attached figures were prepared on behalf of Citicasters Licenses, L.P. ("CLLP"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CLLP proposes to acquire WACR-FM, Columbus, Mississippi. A multiple ownership analysis was prepared considering the following radio stations under present or proposed common ownership or time brokerage:

Table 1: Proposed Commonly Owned or Controlled Stations Studied and Associated Arbitron Metro<sup>1</sup> Information

<i>Call Sign</i>	<i>City</i>	<i>State</i>	<i>Status</i>	<i>Distance km</i>	<i>COL Home<sup>2</sup></i>	<i>Declared Home<sup>3</sup></i>
WWKZ	ABERDEEN	MS	CP	61.17	Tupelo	Tupelo
WTXT	FAYETTE	AL	LIC	38.07	non-metro	Tuscaloosa
WZBQ	CARROLLTON	AL	CP	11.88	non-metro	Tuscaloosa
WZBQ	CARROLLTON	AL	LIC	11.92	non-metro	Tuscaloosa
WACR-FM	COLUMBUS	MS	LIC	12.79	Columbus	Columbus

Tupelo: Tupelo, MS Arbitron Metro (185)

Columbus: Columbus-Starkville-West Point, MS Arbitron Metro (257)

Tuscaloosa: Tuscaloosa, AL Arbitron Metro (228)

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 multiple ownership rules<sup>4</sup>.

Aside from those stations enumerated in Table 1 above, 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 WACR-FM, or which is located in the same Arbitron Metro<sup>5</sup> as WACR-FM. WACR-FM has its city of license located within the Columbus-Starkville-West Point, MS Arbitron Metro, and is listed by Arbitron as being "Home" to that metro. Contour overlap, as depicted in Figure 1, occurs with stations whose cities of license are located in the nearby Tupelo, MS Arbitron metro, and some stations whose cities of license are not located within any Arbitron Metro.

<sup>1</sup> Arbitron Data presented herein is taken from BIA's "Media Access Pro".

<sup>2</sup> The Arbitron Metro within which the station's City of License is Located, if any.

<sup>3</sup> The Arbitron Metro to which this station is listed as "Home" in Arbitron, if any.

<sup>4</sup> See 47 C.F.R. § 73.3555.

<sup>5</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.

Arbitron Market Study

WACR-FM is located within the Columbus-Starkville-West Point, MS Arbitron Metro, and is declared Home to that 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 Columbus-Starkville-West Point, MS Arbitron Metro<sup>6</sup>

Owner	Fac ID	Legal CALLS	Service	Status <sup>7</sup>	City
Citicasters Licenses, L.P.	64364	WACR-FM	FM	b	Columbus
Cumulus Broadcasting Inc	54534	WJWF	AM	b	Columbus
Cumulus Broadcasting Inc	10348	WKOR	AM	b	Starkville
Cumulus Broadcasting Inc	24531	WKOR-FM	FM	b	Columbus
Cumulus Broadcasting Inc	54535	WMBC	FM	b	Columbus
Cumulus Broadcasting Inc	57710	WMXU	FM	b	Starkville
Cumulus Broadcasting Inc	6664	WSMS	FM	g	Artesia
Cumulus Broadcasting Inc	57709	WSSO	AM	b	Starkville
Flinn Broadcasting Corporation	84434	WQJB	FM	b	State College
Mississippi State University	43173	WMSV	FM	b	Starkville
T & W Communications Inc	64363	WACR	AM	b	Columbus
TeleSouth Communications Inc	6194	WKBB	FM	b	West Point
TeleSouth Communications Inc	6195	WROB	AM	b	West Point
Urban Radio Broadcasting LLC	12229	WAJV	FM	a	Brooksville
Urban Radio Broadcasting LLC	10349	WMSU	FM	b	Starkville

Contour-Based Radio Markets

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

Radio Market 1 is defined by the mutually overlapping principal community contours of WTXT(FM), WZBQ(FM), and WACR-FM. The predicted principal community contours of these stations (3 FM), as well as other stations whose principal community contours overlap this combination, are shown in *Figure 2*.

Count of Stations in Defined Markets

<sup>6</sup> Source: BIA.

<sup>7</sup> Status: "a", the station is listed by Arbitron as "Home" to this metro. "g" the station's Community of License is located within the boundaries of this Arbitron metro. "b" the station is both listed as "Home" to the metro, and its Community of License is located in the metro.

The number of radio stations in a "radio market" is determined by counting the operating radio 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 which do not serve to define the market.

In the "radio markets" studied herein, there are at least 40 radio stations, including the subject co-owned stations, that overlap or intersect with the defined "radio market." *Figure 3* is the tabulation of some of the radio stations identified in the "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.

Based on the above, it is concluded that the proposed acquisition complies with §73.3555(a) of the FCC Rules.

Sincerely,

Stephen G. Davis  
Senior Vice President, Engineering  
Citicasters Licenses, L.P.

Figure 01 - Market-Defining Principal Community Contours

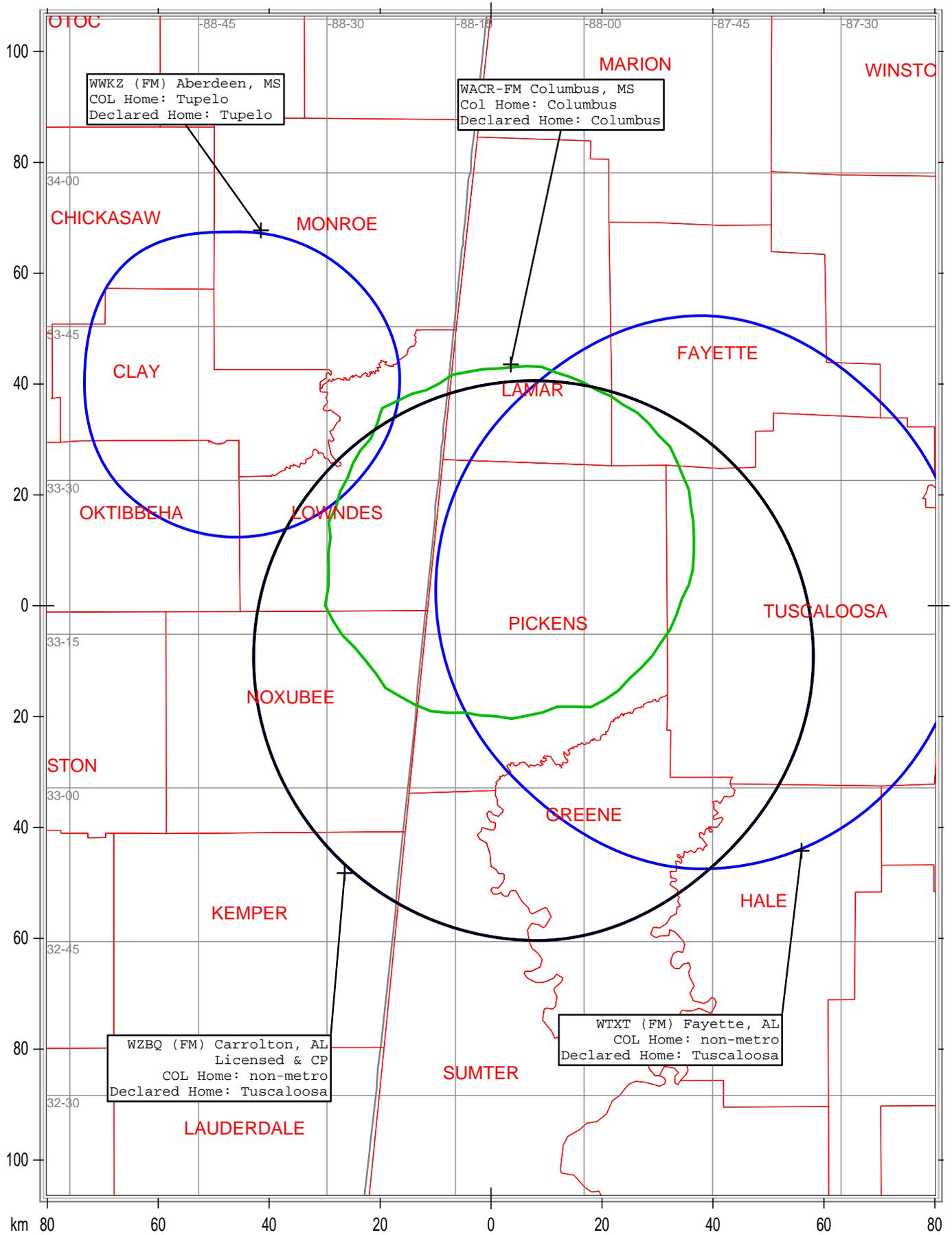
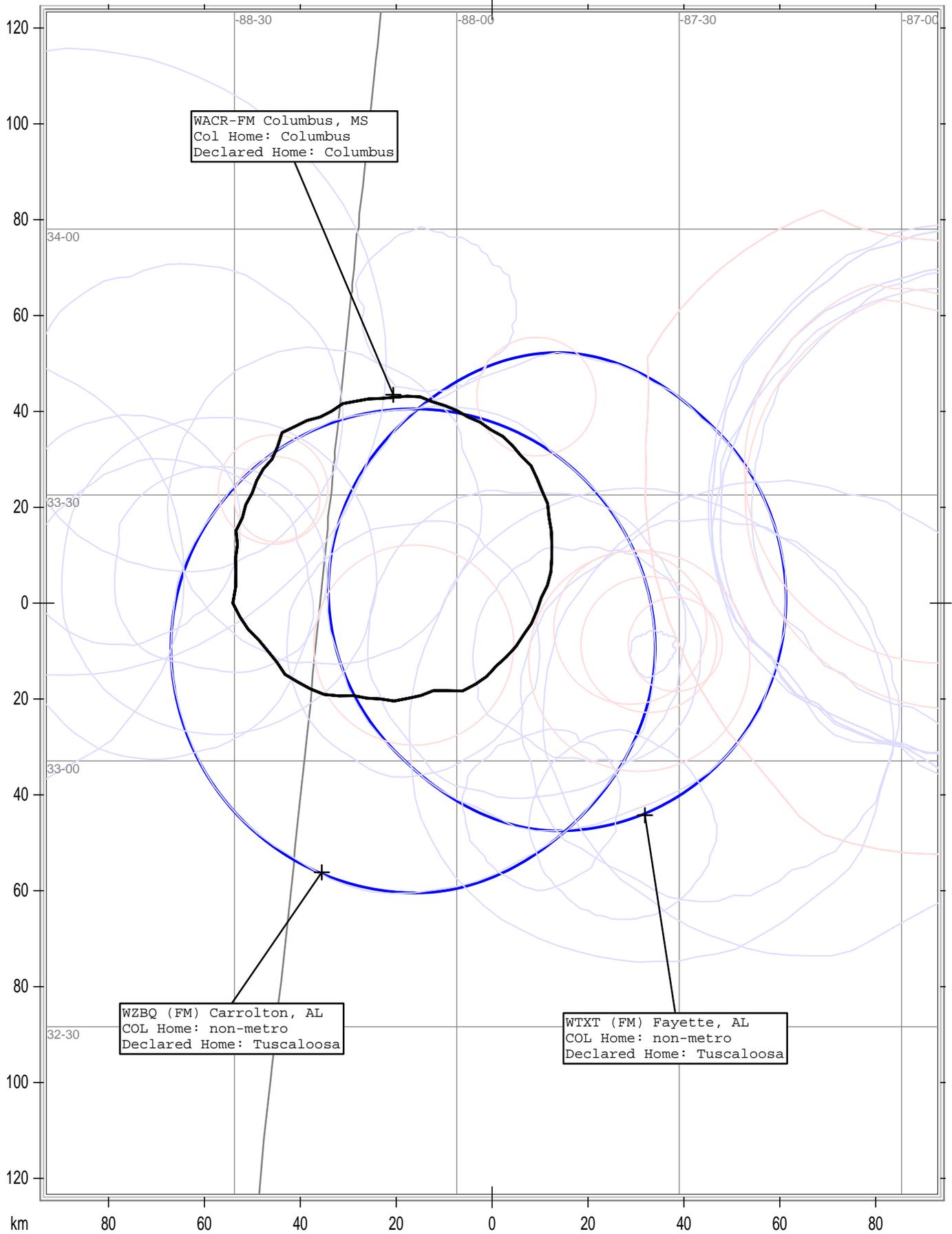


Figure 2

Market Defining Principal Community Contours

And Stations In the Market



**Figure 3 - Stations in the Market -- Market Defining Stations shown in Bold.**

<i>Call Sign</i>	<i>Facility_id</i>	<i>City</i>	<i>State</i>	<i>Licensee</i>	<i>Status</i>	<i>Distance km</i>
<b>WTXT</b>	<b>68418</b>	<b>FAYETTE</b>	<b>AL</b>	<b>CAPSTAR TX LIMITED PARTNERSHIP</b>	<b>LIC</b>	<b>13.99</b>
<b>WZBQ</b>	<b>70264</b>	<b>CARROLLTON</b>	<b>AL</b>	<b>CAPSTAR TX LIMITED PARTNERSHIP</b>	<b>LIC</b>	<b>18.46</b>
<b>WACR-FM</b>	<b>64364</b>	<b>COLUMBUS</b>	<b>MS</b>	<b>CAPSTAR TX LIMITED PARTNERSHIP (Proposed)</b>	<b>LIC</b>	<b>23.67</b>
WMAB-FM	43212	MISSISSIPPI STATE	MS	MISSISSIPPI AUTHORITY FOR EDUCATIONAL TV	LIC	114.47
WKOR-FM	24531	COLUMBUS	MS	CUMULUS LICENSING LLC	LIC	38.23
WMXU	57710	STARKVILLE	MS	CUMULUS LICENSING LLC	LIC	68.47
WSMS	6664	ARTESIA	MS	CUMULUS LICENSING LLC	LIC	75.96
WJEC	36451	VERNON	AL	LAMAR COUNTY BROADCASTING CO., INC.	LIC	62.49
WAJV	12229	BROOKSVILLE	MS	URBAN RADIO LICENSES, LLC	LIC	58.33
WALN	1539	CARROLLTON	AL	AMERICAN FAMILY ASSOCIATION	LIC	18.46
WSYE	48630	HOUSTON	MS	JMD, INC.	LIC	102.01
WMSV	43173	STARKVILLE	MS	MISSISSIPPI STATE UNIVERSITY	LIC	78.44
WMBC	54535	COLUMBUS	MS	CUMULUS LICENSING LLC	LIC	58.33
WDGM	86803	GREENSBORO	AL	WARRIOR BROADCASTING INC.	LIC	54.77
WQZZ	31145	EUTAW	AL	JIM LAWSON COMMUNICATIONS, INC.	LIC	42.84
WUAL-FM	69168	TUSCALOOSA	AL	UNIVERSITY OF ALABAMA	LIC	52.6
WBEI	67577	REFORM	AL	APEX BROADCASTING, INC.	LIC	10.32
WANZ	70914	NORTHPORT	AL	APEX BROADCASTING, INC.	LIC	21.4
WTUG-FM	54796	TUSCALOOSA	AL	APEX BROADCASTING, INC.	LIC	44.1
WVUA-FM	4242	TUSCALOOSA	AL	BOARD OF TRUSTEES, UNIVERSITY OF ALABAMA	LIC	36.16
WBHJ	730	TUSCALOOSA	AL	CXR HOLDINGS, INC.	LIC	66.31
WBHK	65227	WARRIOR	AL	CXR HOLDINGS, INC.	LIC	105.81
WZRR	16899	BIRMINGHAM	AL	CITADEL BROADCASTING COMPANY	LIC	101.46
WYSF	16901	BIRMINGHAM	AL	CITADEL BROADCASTING COMPANY	LIC	101.46
WZZK-FM	48724	BIRMINGHAM	AL	CXR HOLDINGS, INC.	LIC	105.81
WDJC-FM	34819	BIRMINGHAM	AL	KIMTRON, INC.	LIC	98.28
WBPT	5355	BIRMINGHAM	AL	CXR HOLDINGS, INC.	LIC	105.81
WBRC	71221	BIRMINGHAM	AL	WBRC LICENSE, INC.	LIC	106.59
WJWF	54534	COLUMBUS	MS	CUMULUS LICENSING LLC	LIC	49.67
WRAG	70262	CARROLLTON	AL	BIRMINGHAM CHRISTIAN RADIO	LIC	18.53
WACR	64363	COLUMBUS	MS	T & W COMMUNICATIONS CORPORATION	LIC	51.31
WWPG	68420	TUSCALOOSA	AL	LAWSON OF TUSCALOOSA, INC.	LIC	34.18
WLDX	60505	FAYETTE	AL	THOMLEY BROADCASTING CO., INC.	LIC	43.91
WTBC	731	TUSCALOOSA	AL	JOHN SISTY ENTERPRISES, INC.	LIC	39.54
WTSK	54795	TUSCALOOSA	AL	APEX BROADCASTING, INC.	LIC	33.33

**Figure 3 - Stations in the Market -- Market Defining Stations shown in Bold.**

<i>Call Sign</i>	<i>Facility_id</i>	<i>City</i>	<i>State</i>	<i>Licensee</i>	<i>Status</i>	<i>Distance km</i>
WSPZ	24384	TUSCALOOSA	AL	APEX BROADCASTING, INC.	LIC	29.61
WEZN	121756	BIRMINGHAM	AL		LIC	99.84
WAPI	16900	BIRMINGHAM	AL	CITADEL BROADCASTING COMPANY	LIC	98.17
WJOX	16897	BIRMINGHAM	AL	CITADEL BROADCASTING COMPANY	LIC	94.61
WJOX	16897	BIRMINGHAM	AL	CITADEL BROADCASTING COMPANY	LIC	94.61