

**RADIO MARKET ANALYSIS**  
**CUMULUS LICENSING LLC**  
**NEW FM STATION**  
**EFFINGHAM, KANSAS**  
**January 2007**

**TECHNICAL STATEMENT**

1. This Technical Statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC, permittee of a New FM station ("New FM") on Channel 244C3, Humboldt, Nebraska. Cumulus is proposing to change the community of license of the New FM station to Effingham, Kansas. As such, a Radio Market Analysis is needed. Effingham, Kansas, the proposed community of license, is not located in a metro county within any rated market. Principals of Cumulus have attributable interests in stations KMAJ, 1440 kHz, KTOP, 1490 kHz, and KDVV, Channel 262C Topeka, Kansas; KQTP, Channel 275C2, St. Marys, Kansas; and KCMO, 710 kHz, Kansas City, Missouri. Cumulus also has an interest in the entity seeking a transfer of station KCHZ, Channel 239C1, Ottawa, Kansas.<sup>1</sup> Since the New FM is not in a rated market, but does have overlap with other attributable stations, a revised contour overlap analysis is needed. Based on these facilities and their respective city grade contours, two distinct overlap markets are created. Market #1 consists of AM stations KTOP and KMAJ and FM stations New FM, KDVV, KQPT and KCHZ. Market #2 consists of AM station KCMO and FM stations New FM and KCHZ. Exhibit #1 is a map depicting the subject stations.

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1) Cumulus also has interests in KWIC, Channel 257C3, Topeka, Kansas; KCMO-FM, Channel 235C0, Kansas City, Missouri; KMJK, Channel 297C, Lexington, Missouri; KCJK, Channel 286C1, Garden City, Missouri and KCFX, Channel 266C0, Harrisonville, Missouri. As the proposed New FM station does not have city grade overlap with any of the these stations, they are not considered further.

2. A study, therefore, has been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission's rules. As the city grade contour of KCHZ is a subject station in both markets, we will determine the number of contributing stations which have sites within, or provide city grade service to, the KCHZ contour. To this total we will then add the relevant subject stations to show compliance in the two markets. Therefore, the KCHZ contour establishes the "Radio Market Boundary" for this review. The study will determine the number of other commercial AM and FM stations that either have transmitter sites within or provide coverage to the subject radio market. Only those stations with transmitter sites within 92.0 kilometers will be considered as contributors to the market. No other station in which Cumulus has interests will be considered, unless it is a subject station in the market under review.

3. Exhibit #2 is a depiction of the non-subject contributing stations within, or providing service to, the KCHZ Radio Market boundary. A total of eleven stations are depicted. Exhibit #3 is a tabulation of the stations in Radio Market #1, which, including the six subject stations, totals seventeen stations. 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.<sup>2</sup> At the fifteen to twenty-nine stations level, common ownership or control of up to six stations is allowed, with no more than four in the same service. As such, Market #1 is in compliance.

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2) There are additional stations, however they were not considered as the number of stations shown were sufficient to demonstrate compliance, based on the number of stations to be commonly held.

4. Exhibit #4 is a tabulation of the stations in the Radio Market #2, which, including the three subject stations, totals fourteen stations. The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules.<sup>3</sup> At the fourteen or fewer stations level, common ownership or control of up to five stations is allowed, with no more than three in the same service, provided the number to be commonly held does not exceed 50% of the stations in the market. As such, Market #2 is in compliance with the rules.

5. Based on Cumulus's interests in the above referenced stations in two markets, it is demonstrated herein that the proposed change of community of license for the New FM station is in compliance with the Commission's multiple ownership rules, as detailed in §73.3555 of the rules.

6. 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 relating to AM and FM facilities was extracted from the CDBS database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.

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3) See Footnote 2, supra.

**Graham Brock, Inc. - Broadcast Technical Consultants**

**New FM**  
 Latitude: 39-24-12 N  
 Longitude: 095-26-18 W  
 ERP: 8.10 kW  
 Channel: 245C2  
 Frequency: 96.9 MHz

**KDVV**  
 BLH-19890718KB  
 Latitude: 38-57-15 N  
 Longitude: 095-54-43 W  
 ERP: 100.00 kW  
 Channel: 262C  
 Frequency: 100.3 MHz

**KQTP**  
 BLH-20030326AHX  
 Latitude: 39-03-50 N  
 Longitude: 095-45-49 W  
 ERP: 30.00 kW  
 Channel: 275C2  
 Frequency: 102.9 MHz

**KTOP**  
 Latitude: 39-04-39 N  
 Longitude: 095-40-46 W  
 ERP: 1.00 kW  
 Frequency: 1490.0 kHz

**KMAJ**  
 Latitude: 39-01-17 N  
 Longitude: 095-34-15 W  
 ERP: 5.00 kW  
 Frequency: 1440.0 kHz

**KCHZ**  
 BMLH-20031103ADD  
 Latitude: 39-00-45 N  
 Longitude: 095-01-46 W  
 ERP: 98.00 kW  
 Channel: 239C1  
 Frequency: 95.7 MHz

**KCMO**  
 Latitude: 39-19-08 N  
 Longitude: 094-29-48 W  
 ERP: 10.00 kW  
 Frequency: 710.0 kHz

**KCMO 5.0 mV/m**

**KMAJ 5.0 mV/m**

**KQTP 3.16 mV/m**

**NEW FM 3.16 mV/m**

**KMJK CP 3.16 mV/m**

**KMJK 3.16 mV/m**

**KDVV 3.16 mV/m**

**KWIC 3.16 mV/m**

**KCHZ 3.16 mV/m**

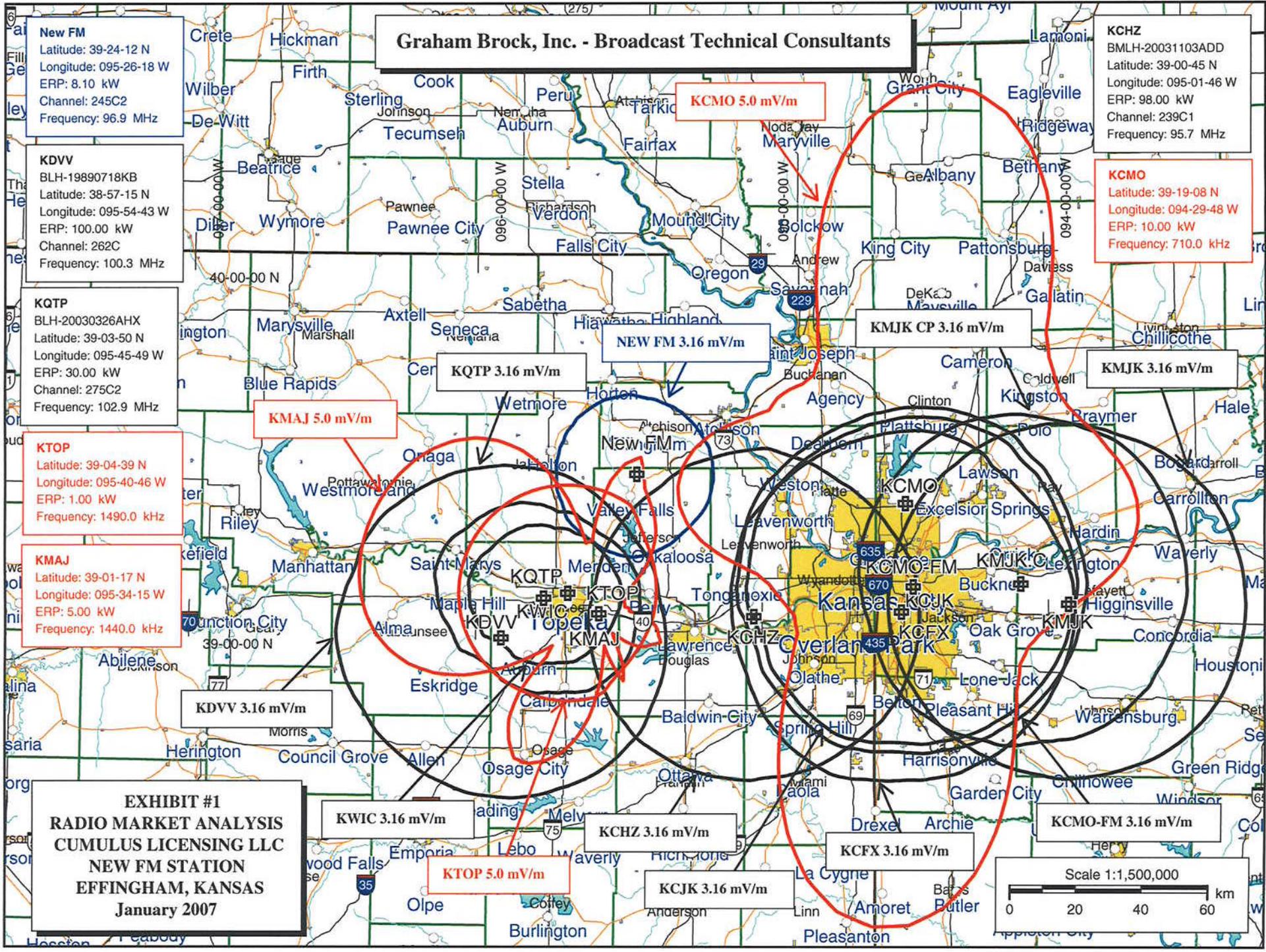
**KCFX 3.16 mV/m**

**KCMO-FM 3.16 mV/m**

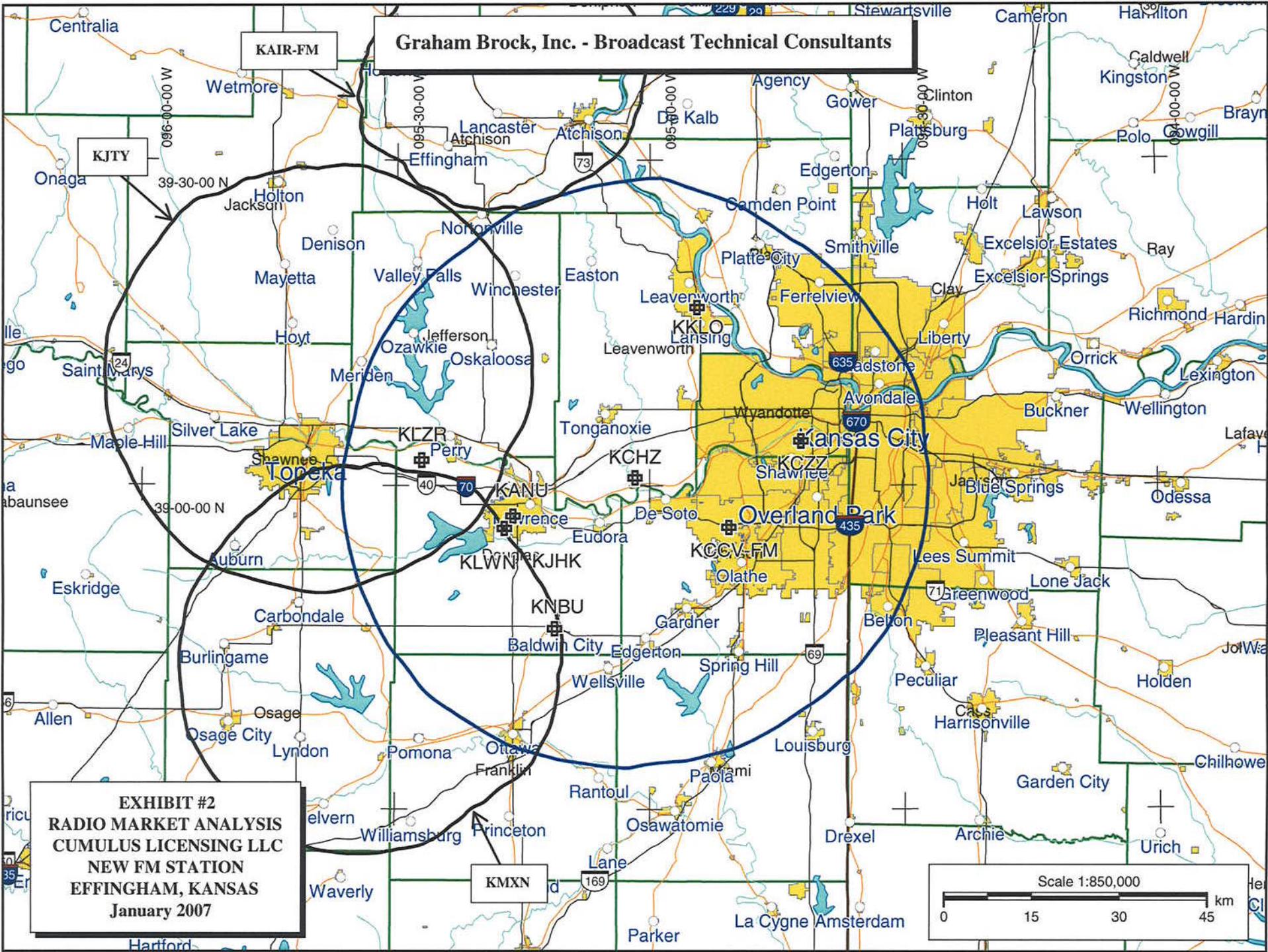
**KTOP 5.0 mV/m**

**KCJK 3.16 mV/m**

**EXHIBIT #1**  
**RADIO MARKET ANALYSIS**  
**CUMULUS LICENSING LLC**  
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**Graham Brock, Inc. - Broadcast Technical Consultants**



**EXHIBIT #2**  
**RADIO MARKET ANALYSIS**  
**CUMULUS LICENSING LLC**  
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**EXHIBIT #3**

**Tabulation of Stations in Radio Market #1**

**AM Stations**

	KLWN	1320 kHz	Lawrence, Kansas
*	KMAJ	1440 kHz	Topeka, Kansas
*	KTOP	1490 kHz	Topeka, Kansas
	KKLO	1410 kHz	Leavenworth, Kansas
	KCZZ	1480 kHz	Mission, Kansas

Total AM Stations - 5

**FM Stations**

+	KTJY	Ch 201C1	Topeka, Kansas
	KNBU	Ch 209A	Baldwin City, Kansas
	KJHK	Ch 214A	Lawrence, Kansas
	KANU	Ch 218C1	Lawrence, Kansas
	KCCV-FM	Ch 222C3	Olathe, Kansas
+	KMXN	Ch 225C2	Osage City, Kansas
+	KAIR-FM	Ch 229C3	Horton, Kansas
*	KCHZ	Ch 239C1	Ottawa, Kansas
*	New FM	Ch 245C2	Effingham, Kansas
*	KDVV	Ch 262C	Topeka, Kansas
*	KQTP	Ch 275C2	St. Marys, Kansas
	KLZR	Ch 290C1	Lawrence, Kansas

Total FM Stations - 12

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 17**

- \* Subject station.
- + Provides city grade coverage to radio market.

**RADIO MARKET ANALYSIS**  
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**January 2007**

**EXHIBIT #4**

**Tabulation of Stations in Radio Market #2**

**AM Stations**

* KCMO	710 kHz	Kansas City, Missouri
KLWN	1320 kHz	Lawrence, Kansas
KKLO	1410 kHz	Leavenworth, Kansas
KCZZ	1480 kHz	Mission, Kansas

Total AM Stations - 4

**FM Stations**

+ KTJY	Ch 201C1	Topeka, Kansas
KNBU	Ch 209A	Baldwin City, Kansas
KJHK	Ch 214A	Lawrence, Kansas
KANU	Ch 218C1	Lawrence, Kansas
KCCV-FM	Ch 222C3	Olathe, Kansas
+ KMXN	Ch 225C2	Osage City, Kansas
+ KAIR-FM	Ch 229C3	Horton, Kansas
* KCHZ	Ch 239C1	Ottawa, Kansas
* New FM	Ch 245C2	Effingham, Kansas
KLZR	Ch 290C1	Lawrence, Kansas

Total FM Stations - 10

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 14**

- \* Subject station.
- + Provides city grade coverage to radio market.

**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.

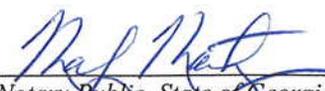
His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

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 15th day of January 2007.*

  
\_\_\_\_\_  
Jefferson G. Brock  
*Affiant*

*Sworn to and subscribed before me  
this the 15th day of January 2007*

  
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*Notary Public, State of Georgia*  
*My Commission Expires: September 3, 2007*