

**RADIO MARKET ANALYSIS**  
**CUMULUS LICENSING LLC**  
**KGEE RADIO STATION**  
**PECOS, TEXAS**  
**April 2011**

**TECHNICAL STATEMENT**

1. This statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC (“Cumulus”). Cumulus is submitting an application to upgrade station KGEE, Pecos, Texas, as such a Radio Market analysis is needed. KGEE is not located in nor considered “home” to any Arbitron market. The only other Cumulus station that overlaps KGEE is KBAT, Channel 260C1, Monahans, Texas.<sup>1</sup> Thus, this review will verify compliance of commonly owned stations in a non-rated market.

**REVISED CONTOUR OVERLAP ANALYSIS**

2. As KGEE is licensed to a non-metro county, a contour overlap analysis is conducted for ownership compliance. A map depicting the city grade contours of the seven subject stations is attached as Exhibit #1. As indicated, the proposed KGEE facility has city grade contour overlap with only KBAT, Monahans, Texas. Therefore, a study has been conducted to verify that the minor change application for KGEE is in compliance with the Commission’s multiple ownership rules, based on the revised contour overlap rules.

3. The city grade contours of KGEE and KBAT will be used to determine the number of other stations in the market and their contours will be considered the “Radio Market Boundary”.

---

1) Cumulus is also the licensee of KMND, 1510 kHz, KNFM, Channel 222C, and KZBT, Channel 227C1, Midland, Texas; and KRIL, 1470 kHz, and KODM, Channel 250C1, Odessa, Texas. KMND, KNFM, KZBT, KRIL and KODM are all licensed to communities in metro counties within the Odessa-Midland, Texas Arbitron Market. Since the proposed KGEE does not have contour overlap with any of these other facilities, they are not considered further.

No stations with transmitters located more than 92.0 kilometers from the boundary of the common overlap of subject stations will be considered. Further, no other facility controlled by Cumulus will be considered as a market contributor, unless it is a subject station in the radio market under study.

4. Exhibit #2 is a depiction of the AM and FM stations (commercial and non-commercial) providing service to the Radio Market, a total of seven stations, including the two subject stations. Exhibit #3 is a tabulation of the stations in the Radio Market. 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>2</sup> At the fourteen or fewer stations level, common ownership or control of up to five stations, with no more than three in the same service, is permissible, provided the number of stations to be commonly held does not exceed 50% of the stations in the market. Therefore, Cumulus is in compliance in contour overlap Radio Market.

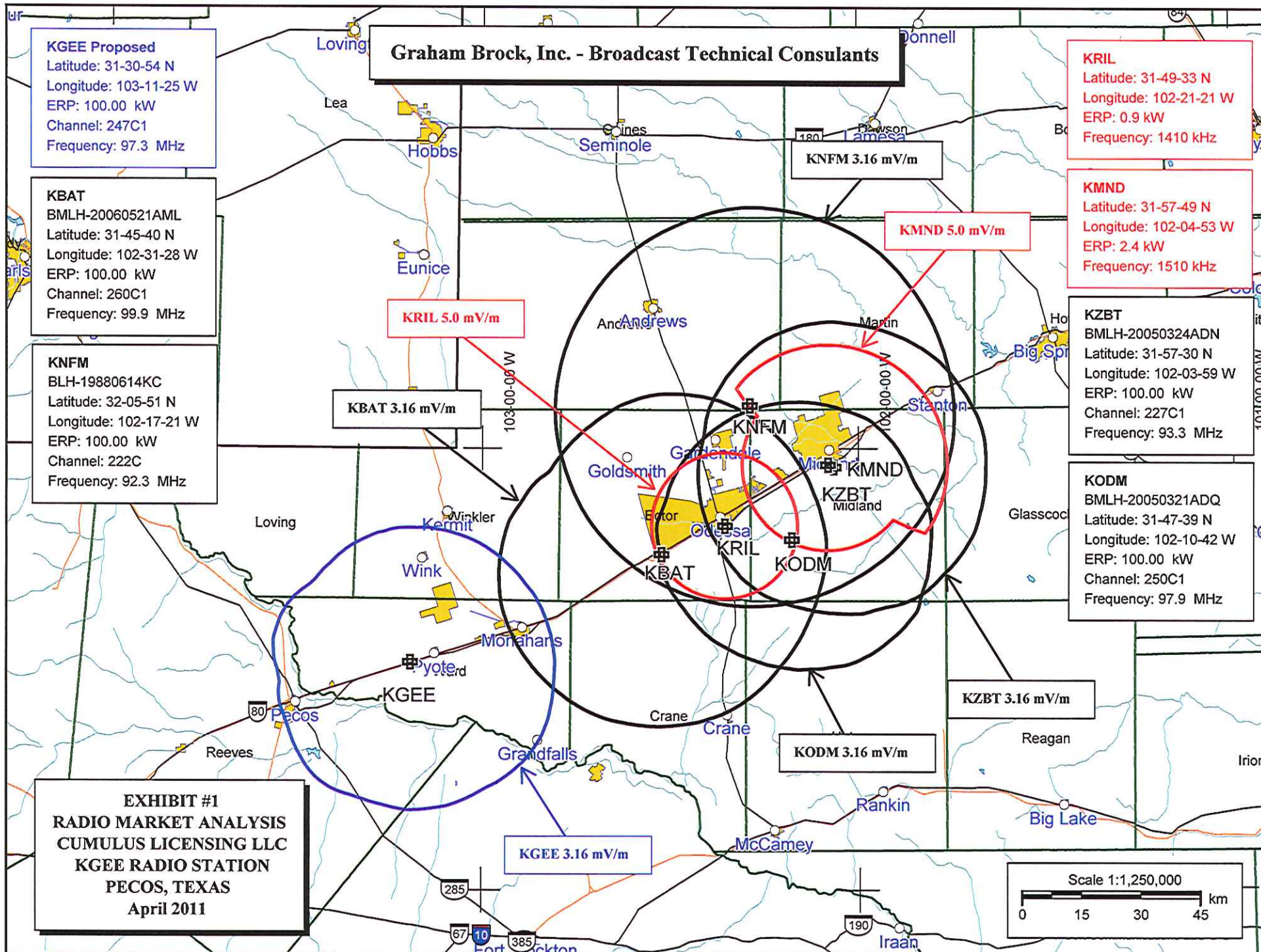
5. Based on the compliance shown in the non-rated market reviewed, the proposed minor change application for station KGEE is in compliance with §73.3555 of the Commission's rules regarding the above referenced stations.

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

---

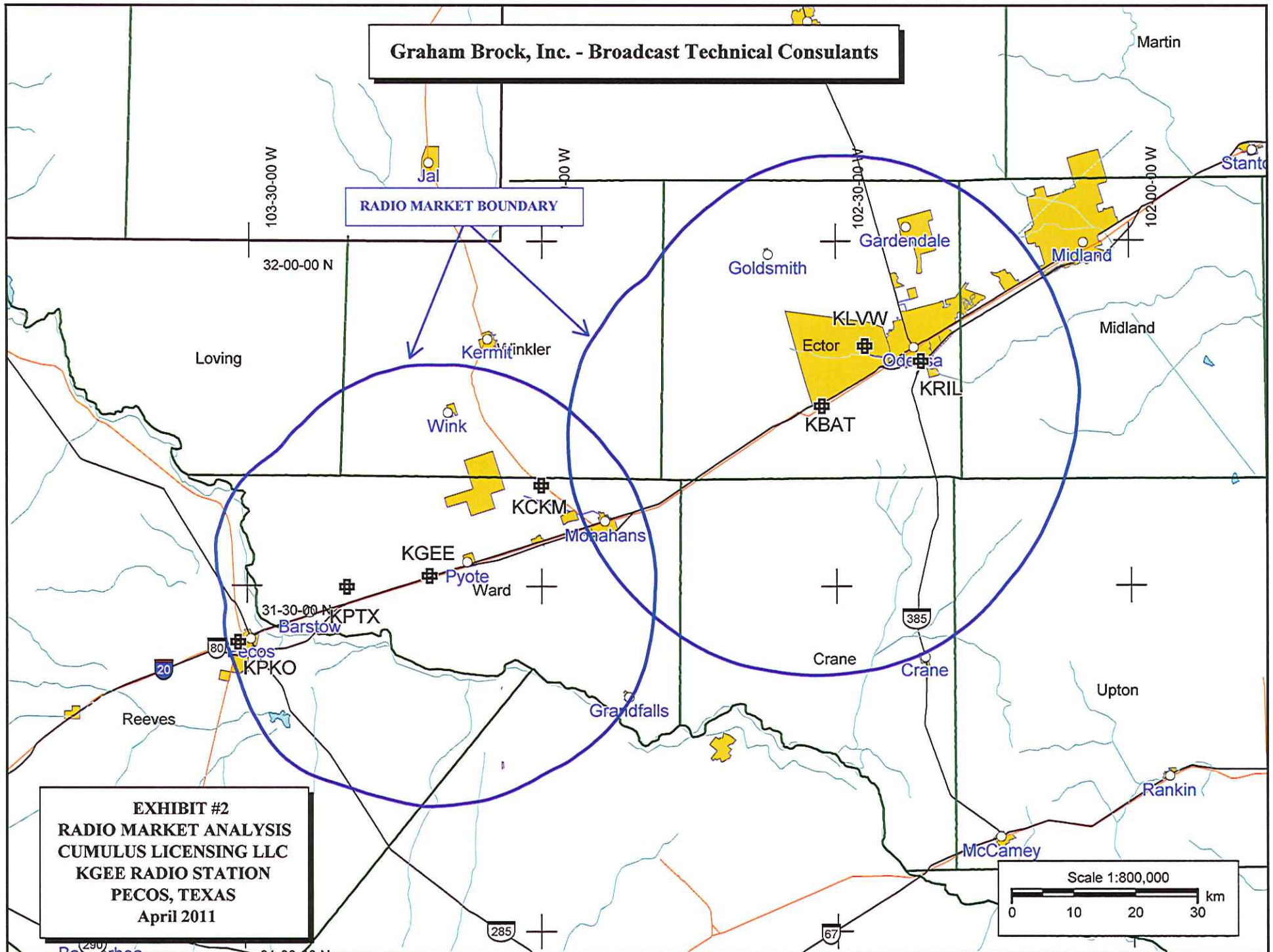
2) There are additional stations, but they were not considered as there were a sufficient amount based on the number of stations to commonly held.

extracted from the CDBS database. All data relating to AM and FM facilities in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.6. BIA database. We assume no liability for errors or omissions in that database or program which may be adverse to the information contained herein.





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



**EXHIBIT #2**  
**RADIO MARKET ANALYSIS**  
**CUMULUS LICENSING LLC**  
**KGEE RADIO STATION**  
**PECOS, TEXAS**  
**April 2011**

Scale 1:800,000  
0 10 20 30 km

**RADIO MARKET ANALYSIS**  
**CUMULUS LICENSING LLC**  
**KGEE RADIO STATION**  
**PECOS, TEXAS**  
**April 2011**

**EXHIBIT #3**

**Tabulation of Stations in Radio Market**

**AM Stations**

KOZA	1230 kHz	Odessa, Texas
KCKM	1330 kHz	Monahans, Texas
KRIL	1400 kHz	Odessa, Texas

Total AM Stations - 3

**FM Stations**

KPKO	Ch 217A	Pecos, Texas
* KGEE	Ch 247C1	Pecos, Texas
KPTX	Ch 252C3	Pecos, Texas
* KBAT	Ch 260C1	Monahans, Texas

Total FM Stations - 4

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 7**

\* Subject station.

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

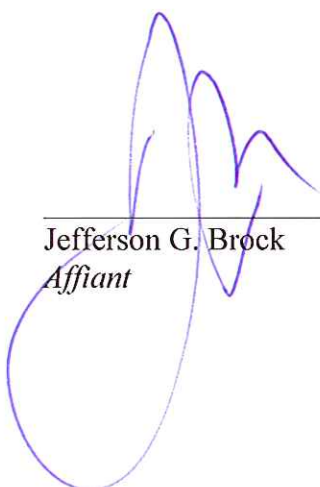
*State of Georgia    )*  
*St. Simons Island    ) ss:*  
*County of Glynn    )*

**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.

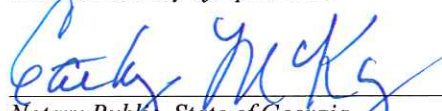
His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

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 20th day of April 2011.*

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

*Sworn to and subscribed before me  
this the 20th day of April 2011*

  
\_\_\_\_\_  
*Notary Public, State of Georgia*  
*My Commission Expires: March 14, 2015*