

**ENGINEERING STATEMENT COVERING
BROADCAST MULTIPLE OWNERSHIP STUDY
CUMULUS LICENSING LLC
LINN, MISSOURI**

DECEMBER 2004

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This engineering statement and supporting tabulations and figures has been prepared on behalf of **Cumulus Licensing LLC (“Cumulus”)**. The purpose of the statement is to demonstrate **Cumulus’** compliance with *Section 73.3555* of the Commission’s Rules with respect to multiple ownership of AM & FM broadcast facilities.

Cumulus has a time brokerage agreement to program the seven licensed stations listed below and is the proposed assignee in a transaction that has been approved by the FCC but is not yet consummated. The seven licensed stations have been considered in the study to determine whether the proposed Linn facility, also listed below, will result in 70 dBu overlap.

Proposed MO LINN 103.1 MHz A APP
CH 267A AUCTION FM 37

KBBM MO JEFFERSON CITY 100.1 MHz C2 LIC
CP BLH19910606KE PREMIER RADIO GROUP, L.L.C.

KBXR MO COLUMBIA 102.3 MHz C3 LIC
CP BLH20000208ABM FT. SMITH FM, INC.

KOQL MO ASHLAND 106.1 MHz C1 LIC
CP BLH19981125KG MID-MISSOURI BROADCASTING, INC.

KPLA MO COLUMBIA 101.5 MHz C1 LIC
CP BLH19980306KB COLUMBIA FM, INC.

KJMO MO JEFFERSON CITY 104.1 MHz A LIC
BLH20010319AAZ PREMIER RADIO GROUP, L.L.C.

KFRU MO COLUMBIA 1400 kHz LD 1.000 ND1 LIC
BL19990604DD COLUMBIA AM, INC.

KLIK MO JEFFERSON CITY 1240 kHz LU 1.000 ND1 LIC
BZ20010319ACC PREMIER RADIO GROUP, L.L.C.

The principal community contours for these eight stations are plotted on map Figure 1, attached. Linn, MO is plotted in Blue, the remaining FM stations in Green and the two AM stations in Red. By examination of the map it is apparent that the Linn, MO CH 276A proposal makes up a market composed of the Linn, MO facility with FM stations KBBM, KJMO and KOQL and AM station KLIK.

A multiple ownership analysis was prepared considering the above described radio stations under proposed common ownership or control, which stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) in accordance with *Section 73.3555* of the FCC Rules.

RADIO MARKETS & METHODOLOGY

The “radio market” applicable to common ownership or control of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. In this case, the Market is made up of the four FM and one AM station previously described. Counties in the markets include:

Boone	Moniteau
Osage	Miller
Calloway	Morgan
Cole	Cooper
Pettis	Howard

Linn, Missouri is located in Osage County, Missouri which is not part of any Arbitron metro based on the Arbitron Market Definition for the closest market, Columbia, MO. The only metro county is Boone County. Since Osage County is not an Arbitron metro county the market has been calculated based on contour overlap.

A simplified analysis of other stations in the market was undertaken by searching for all stations whose transmitter site lay within a 40 km radius of the KOQL tower site. At this distance, all other stations will have their transmitter sites within the KOQL 70 dBu contour. A total of 14 FM and 3 AM stations were located which are listed on the following page.

FM Stations

KCOU	MO	COLUMBIA	88.10000	A	LIC
KTXY	MO	JEFFERSON CITY	106.90000	C	LIC
KCLR-FM	MO	BOONVILLE	99.30000	C2	LIC
KJMO	MO	JEFFERSON CITY	104.10000	A	LIC
KATI	MO	CALIFORNIA	94.30000	C2	LIC
KMCV	MO	HIGH POINT	89.90000	C3	LIC
KCVK	MO	OTTERVILLE	107.70000	A	LIC
KWRT-FM	MO	BOONVILLE	93.10000	A	CP MOD
KBBM	MO	JEFFERSON CITY	100.10000	C2	LIC
KWWC-FM	MO	COLUMBIA	90.50000	A	LIC
KBIA	MO	COLUMBIA	91.30000	C1	LIC
KPLA	MO	COLUMBIA	101.50000	C1	LIC
KBXR	MO	COLUMBIA	102.30000	C3	LIC
KSSZ	MO	FAYETTE	93.90000	C3	LIC

AM Stations

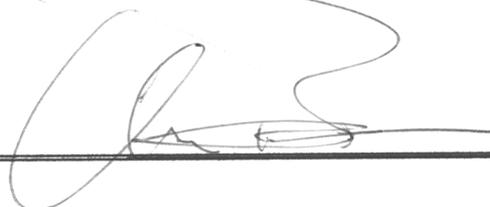
KWRT	MO	BOONVILLE	1370.0 LD	1.000	ND1
KRLL	MO	CALIFORNIA	1420.0 LD	0.500	ND1
KTGR	MO	COLUMBIA	1580.0 LD	0.250	ND1

Only known CP or licensed operating full service stations were employed in the study. Distances to the FM contours were determined based on the methodology of 47 CFR 73.313. Terrain data was derived from the FCC 30 second terrain database for each of the FM stations, using radials spaced every 5 degrees of azimuth. Distances to the AM coverage contours 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 CFR 73.184. Ground conductivities were obtained from FCC Figure M3.

Based on the above analysis, it is believed that the proposed common ownership of stations complies with *Section 73.3555* of the Commission's Rules as there are a minimum of 20 FM stations and 5 AM stations in the Market including the eight stations listed on page 1 which Cumulus has an attributable interest. Rule Section 73.3555(a)(1)(iii) provides for the proposed Cumulus Case, cognizable interest in four FM stations and 1 AM station, because there are between 15 and 29 radio stations in the market.

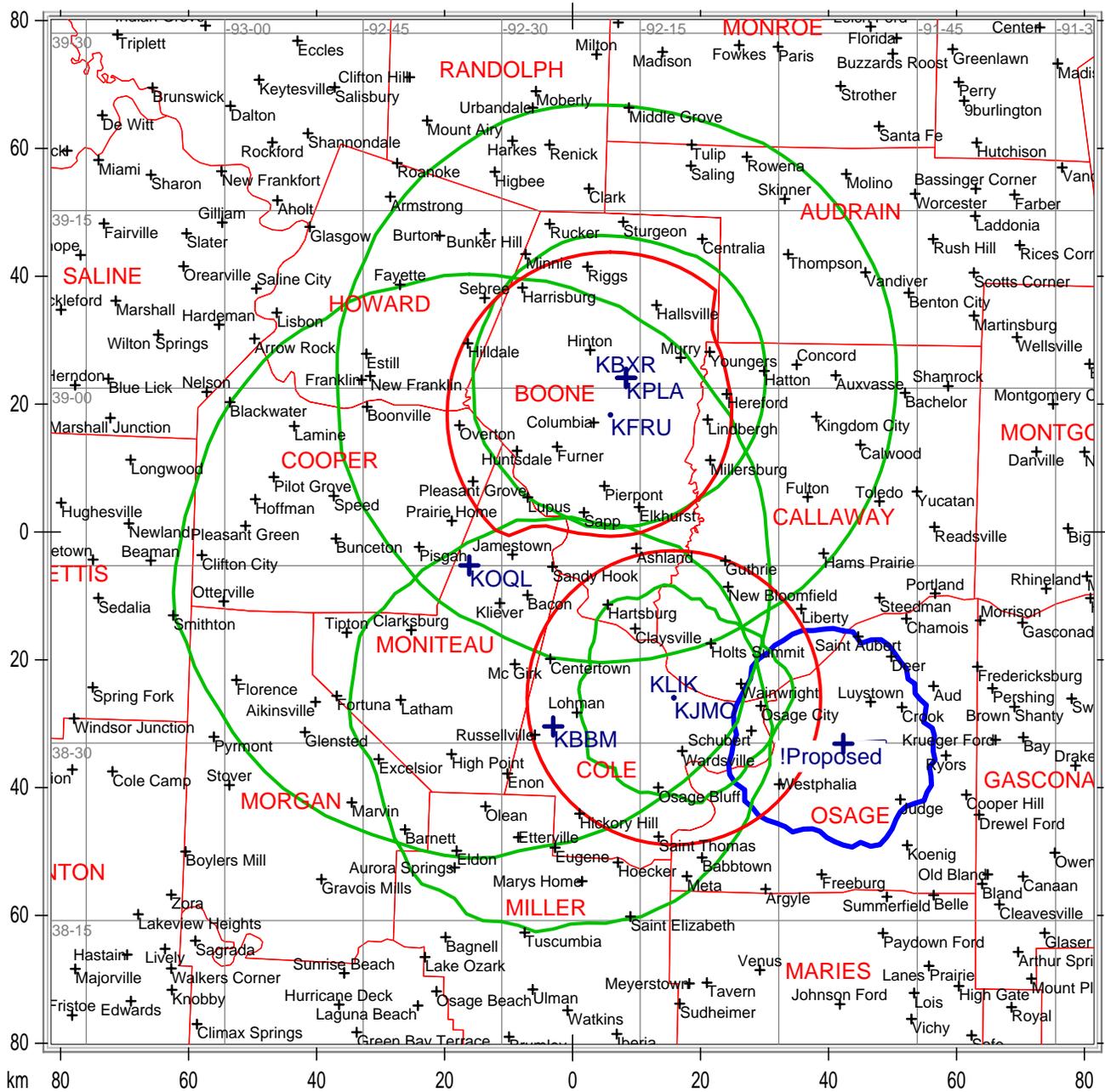
The foregoing was prepared on behalf of **Cumulus Licensing LLC** by Clarence M. Beverage of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.

By



Clarence M. Beverage
for Communications Technologies, Inc.
Marlton, New Jersey

CUMULUS LICENSING LLC CH 276A 6 kW @ 100 M HAAT LINN, MISSOURI & OTHER MARKET FACILITIES



Communications Technologies, Inc. Marlton, New Jersey

County Borders Lat/Lon Grid