

RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
WRQN RADIO STATION
CH 228B1 - 93.5 MHZ - 7.0 KW
BOWLING GREEN, OHIO
November 2005

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC ("Cumulus"), licensee of WRQN, Channel 228A, Bowling Green, Ohio. Cumulus is submitting an application to upgrade the WRQN facility. WRQN is licensed to a community within a metro county in the Toledo, Ohio Arbitron Market (Market #84). Cumulus is also the licensee of WKKO, Channel 260B, Toledo, Ohio; WLQR, 1470 kHz, Toledo, Ohio; WRWK, Channel 293A, Delta, Ohio; WTOD, 1560 kHz, Toledo, Ohio; WWWW, Channel 288A, Sylvania, Ohio; WXKR, Channel 233B, Port Clinton, Ohio; and WTWR, Channel 252A, Luna Pier, Michigan. All of these stations are also licensed to metro counties, or are considered home, in the Toledo, Ohio BIA/Arbitron market.¹

2. Since all eight stations are located in the Toledo, Ohio Arbitron Market, an analysis based on the stations in a rated market is necessary. As shown on Exhibit #1, there are thirty-one AM and FM (commercial and non-commercial) stations listed in the Toledo, Ohio Arbitron Market. Cumulus is presently, and would continue to be, in control of six FM stations and two AM stations in the market. The number of stations indicated falls in the thirty to forty-five stations tier of §73.3555(a)(1)(ii) of the Commission's rules. At this level, common ownership or

1) WRQN does not overlap any other Cumulus station located outside the Toledo, Ohio Arbitron Market.

control of up to seven stations, with no more than four in the same service, is permissible. The combination of stations owned by Cumulus existed prior to the change in §73.3555 of the rules and, as such, is grandfathered.² Further, pursuant to Note 4, §73.3555 (2003), since the WRQN minor change application will not change the concentration of stations in the subject Arbitron market, it is believed that the WRQN application remains grandfathered under the Commission's ownership rules.

3. 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 in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.0. BIA database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.

2) Under the former contour overlap analysis rules, Cumulus was in compliance with the ownership rules.



FCC Geographic Market Definition for Toledo, OH

| Call Letters | AM/FM | Freq | Type Station | Format | Home Market | Market Designn Date | Home Mkt Rank | Owner | City & State of License | County of License |
|--------------|-------|-------|--------------|-------------|-------------|---------------------|---------------|---|-------------------------|-------------------|
| WBCY | FM | 89.5 | NC | ChrsContem | Toledo, OH | 07/02/2003 | 84 | Taylor University Broadcasting | Archbold, OH | Fulton |
| WBGU | FM | 88.1 | NC | Variety | Toledo, OH | 07/02/2003 | 84 | Bowling Green State University | Bowling Green, OH | Wood |
| WCWA | AM | 1230 | C | Talk | Toledo, OH | 07/02/2003 | 84 | Clear Channel Communications | Toledo, OH | Lucas |
| WDMN | AM | 1520 | C | ChrsContem | Toledo, OH | 07/02/2003 | 84 | Cornerstone Church Incorporated | Rossford, OH | Lucas |
| WDTR | FM | 88.1 | NC | ChrsContem | Toledo, OH | 10/12/2004 | 84 | Northland Community Broadcasters | Monroe, MI | Monroe |
| WGTE | FM | 91.3 | NC | Clsc/Jazz | Toledo, OH | 07/02/2003 | 84 | Public Broadcasting Foundation of NW Ohio | Toledo, OH | Lucas |
| WIMX | FM | 95.7 | C | Urban AC | Toledo, OH | 07/02/2003 | 84 | URBan Radio Broadcasting LLC | Gibsonburg, OH | Sandusky |
| WIOT | FM | 104.7 | C | Rock | Toledo, OH | 07/02/2003 | 84 | Clear Channel Communications | Toledo, OH | Lucas |
| WJUC | FM | 107.3 | C | Urban | Toledo, OH | 07/02/2003 | 84 | Welch Communications Inc | Swanton, OH | Fulton |
| WJYM | AM | 730 | C | Gospel | Toledo, OH | 07/02/2003 | 84 | Family Worship Center Church Inc | Bowling Green, OH | Wood |
| WJZE | FM | 97.3 | C | Urban | Toledo, OH | 07/02/2003 | 84 | URBan Radio Broadcasting LLC | Oak Harbor, OH | Ottawa |
| WKKO | FM | 99.9 | C | Country | Toledo, OH | 07/02/2003 | 84 | Cumulus Broadcasting Inc | Toledo, OH | Lucas |
| WLQR | AM | 1470 | C | Sports | Toledo, OH | 07/02/2003 | 84 | Cumulus Broadcasting Inc | Toledo, OH | Lucas |
| WMTR | FM | 96.1 | C | AC | Toledo, OH | 07/02/2003 | 84 | Nobco Inc | Archbold, OH | Fulton |
| WNKL | FM | 96.9 | C | ChrsContem | Toledo, OH | 10/14/2003 | 84 | Cornerstone Church Incorporated | Wauseon, OH | Fulton |
| WOTL | FM | 90.3 | NC | Religion | Toledo, OH | 07/02/2003 | 84 | Family Stations Inc | Toledo, OH | Lucas |
| WPFX | FM | 107.7 | C | Clsc Rock | Toledo, OH | 07/02/2003 | 84 | Clear Channel Communications | North Baltimore, OH | Wood |
| WPOS | FM | 102.3 | C | Religion | Toledo, OH | 07/02/2003 | 84 | Maumee Valley Broadcast Assn | Holland, OH | Lucas |
| WRQN | FM | 93.5 | C | Oldies | Toledo, OH | 07/02/2003 | 84 | Cumulus Broadcasting Inc | Bowling Green, OH | Wood |
| WRVF | FM | 101.5 | C | AC | Toledo, OH | 07/02/2003 | 84 | Clear Channel Communications | Toledo, OH | Lucas |
| WRWK | FM | 106.5 | C | Alternative | Toledo, OH | 07/02/2003 | 84 | Cumulus Broadcasting Inc | Delta, OH | Fulton |
| WSPD | AM | 1370 | C | Sprts/Talk | Toledo, OH | 07/02/2003 | 84 | Clear Channel Communications | Toledo, OH | Lucas |
| WTOD | AM | 1560 | C | Talk | Toledo, OH | 07/02/2003 | 84 | Cumulus Broadcasting Inc | Toledo, OH | Lucas |
| WTWR | FM | 98.3 | C | CHR | Toledo, OH | 07/02/2003 | 84 | Cumulus Broadcasting Inc | Luna Pier, MI | Monroe |
| WVKS | FM | 92.5 | C | CHR | Toledo, OH | 07/02/2003 | 84 | Clear Channel Communications | Toledo, OH | Lucas |
| WWWM | FM | 105.5 | C | Hot AC | Toledo, OH | 07/02/2003 | 84 | Cumulus Broadcasting Inc | Sylvania, OH | Lucas |
| WXKR | FM | 94.5 | C | Clsc Rock | Toledo, OH | 07/02/2003 | 84 | Cumulus Broadcasting Inc | Port Clinton, OH | Ottawa |
| WXTS | FM | 88.3 | NC | Jazz | Toledo, OH | 07/02/2003 | 84 | Toledo City School District, Board of Education | Toledo, OH | Lucas |
| WXUT | FM | 88.3 | NC | Alternative | Toledo, OH | 07/02/2003 | 84 | University of Toledo | Toledo, OH | Lucas |
| WYSA | FM | 88.5 | NC | Christian | Toledo, OH | 07/02/2003 | 84 | Side by Side Inc | Wauseon, OH | Fulton |
| WYSZ | FM | 89.3 | NC | Christian | Toledo, OH | 07/02/2003 | 84 | Side by Side Inc | Maumee, OH | Lucas |

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

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(c) BIA Financial Network, Inc.

EXHIBIT #1



FCC Geographic Market Definition for Toledo, OH

| Call Letters | AM/ FM | Freq | Type Station | Format | Home Market | Market Designtn Date | Home Mkt Rank | Owner | City & State of License | County of License |
|-----------------|-----------|------|-----------------|--------|-------------|----------------------------|---------------------|-------|----------------------------|----------------------|
|-----------------|-----------|------|-----------------|--------|-------------|----------------------------|---------------------|-------|----------------------------|----------------------|

Number of Stations in Geographic Market 31

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

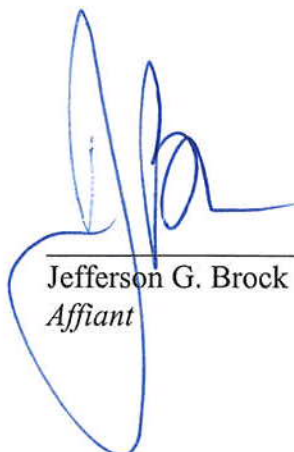
State of Georgia)
St. Simons Island) ss:
County of Glynn)

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 3rd day of November, 2005.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 3rd day of November, 2005*



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