

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CAPSTAR TX LIMITED PARTNERSHIP

This statement and the attached figures were prepared on behalf of Capstar TX Limited Partnership ("CTLTP"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CTLTP proposes to modify the facilities of KDZA-FM, Pueblo, CO. A multiple ownership analysis was prepared considering the following radio stations under present or proposed common ownership, time brokerage or joint sales:¹

Table 1: Proposed Commonly Owned, Brokered or Jointly-Sold Stations
Studied and Associated Arbitron Metro² Information

Calls	Fac ID	Band	Community	County	State	Geographic Arbitron Market	Declared Arbitron Market
KCCY	40847	FM	Pueblo	Pueblo	CO	Pueblo, CO	Colorado Springs, CO
KCSJ	53846	AM	Pueblo	Pueblo	CO	Pueblo, CO	Pueblo, CO
KDZA-FM	40848	FM	Pueblo	Pueblo	CO	Pueblo, CO	Pueblo, CO
KGHF	53850	AM	Pueblo	Pueblo	CO	Pueblo, CO	Pueblo, CO
KVUU	35868	FM	Pueblo	Pueblo	CO	Pueblo, CO	Colorado Springs, CO
KPHT	87658	FM	Rocky Ford	Otero	CO	Non-Metro	Non-Metro

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 market, an ownership study has been prepared in accordance with the Federal Communications Commission's local radio ownership rule.³

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 KDZA-FM as proposed, or which is located in the same Arbitron Metro⁴ as KDZA-FM. The community of license of KDZA-FM is located within the Pueblo, CO Arbitron Metro, and KDZA-FM is reported by BIA as being "Home" to that Metro. Contour overlap of the station to be modified, as depicted in Figure 1, also occurs with commonly-owned stations whose communities of license are located in the Pueblo, CO Arbitron Metro market, and a commonly-owned station whose community of license is located outside any Arbitron Metro market.

¹ None of the following stations are attributable by virtue of a time brokerage agreement or joint sales agreement.

² Arbitron data presented herein is obtained from BIA's "Media Access Pro."

³ See 47 C.F.R. § 73.3555(a).

⁴ A station is considered to be "located in an Arbitron Metro" if the station's community of license is located within the boundaries of that Metro, or, the station is listed as "Home" to that Metro by BIA.

Arbitron Market Study

KDZA-FM is reported by BIA as being "Home" to the Pueblo, CO 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
Pueblo, CO Arbitron Metro⁵

Count	Calls	Fac ID	Band	Owner	Status	Community	County
1	KYZX	53845	FM	Bahakel Communications Limited	g	Pueblo West	Pueblo
2	KCCY	40847	FM	Clear Channel	g	Pueblo	Pueblo
3	KCSJ	53846	AM	Clear Channel	b	Pueblo	Pueblo
4	KDZA-FM	40848	FM	Clear Channel	b	Pueblo	Pueblo
5	KGHF	53850	AM	Clear Channel	b	Pueblo	Pueblo
6	KVUU	35868	FM	Clear Channel	g	Pueblo	Pueblo
7	KKMG	11229	FM	Citadel Communications	g	Pueblo	Pueblo
8	KCFP	12326	FM	Colorado Public Radio	b	Pueblo	Pueblo
9	KKPC	53851	AM	Colorado Public Radio	b	Pueblo	Pueblo
10	KTSC-FM	69148	FM	Colorado State University - Pueblo	b	Pueblo	Pueblo
11	KTPL	12362	FM	Educational Communications of Colorado Springs Inc	g	Pueblo	Pueblo
12	KFRY	87050	FM	Family Stations Inc	b	Pueblo	Pueblo
13	KNKN	25526	FM	JaneGary Inc	b	Pueblo	Pueblo
14	KRMX	69871	AM	JaneGary Inc	b	Pueblo	Pueblo
15	KFEL	23151	AM	Kansas City Catholic Network Inc	b	Pueblo	Pueblo
16	KAVA	54259	AM	Latino Communications	b	Pueblo	Pueblo
17	KGFT	20579	FM	Salem Communications Corporation	g	Pueblo	Pueblo

Interim Contour-Overlap Analysis

Because the proposed principal community contour of the station to be modified intersects the principal community contour of a station under common ownership or attribution whose community of license is located outside any Arbitron Metro, an interim contour-overlap analysis is also set forth in this statement.

Interim Contour-Based Radio Markets

A "radio market" under the interim contour-overlap method is the area encompassed by the mutually overlapping principal community contours of the stations under common-ownership or attribution. Here, such mutually

⁵ Source: BIA.

overlapping contours form one "radio market" for interim contour-overlap analysis under the Commission's rules.

The interim contour-overlap "radio market" is defined by the mutually overlapping principal community contours of KDZA-FM, KCCY(FM), KVUU(FM), KPHT(FM), KCSJ(AM) and KGHF(AM). The predicted principal community contours of these stations (2 AM / 4 FM), as well as other stations whose principal community contours overlap this combination, are shown in *Figure 2*. *Figure 3* is the tabulation of some of the radio stations identified in the interim contour-overlap "radio market."

Count of Stations in Defined Markets

The number of radio stations in a contour-overlap "radio market" is determined by counting the operating stations having principal community contours which overlap or intersect the principal community contours which define the radio market, plus the subject commonly owned or attributable stations, excluding any stations whose transmitter sites are further than 92 kilometers from the perimeter of mutual overlap, and excluding any commonly owned or attributable stations that do not serve to define the market.

In the interim contour-overlap "radio market" studied herein, there are at least 22 radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio market." *Figure 3* is the tabulation of some of the radio stations identified in the contour-overlap "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.

Conclusions

In the Arbitron Metro market studied herein, there are at least 17 radio stations, including the subject commonly-owned 2-AM / 3-FM stations, which are home to the Pueblo, CO Metro. This proposal does not affect the existing number of commonly-owned stations in the subject Arbitron Metro.

In the interim contour-overlap "radio market" studied herein, there are at least 22 stations, including the commonly-owned 2-AM / 4-FM stations.

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

Respectfully submitted,

Lance Nelms
FCC Engineer
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Figure 1

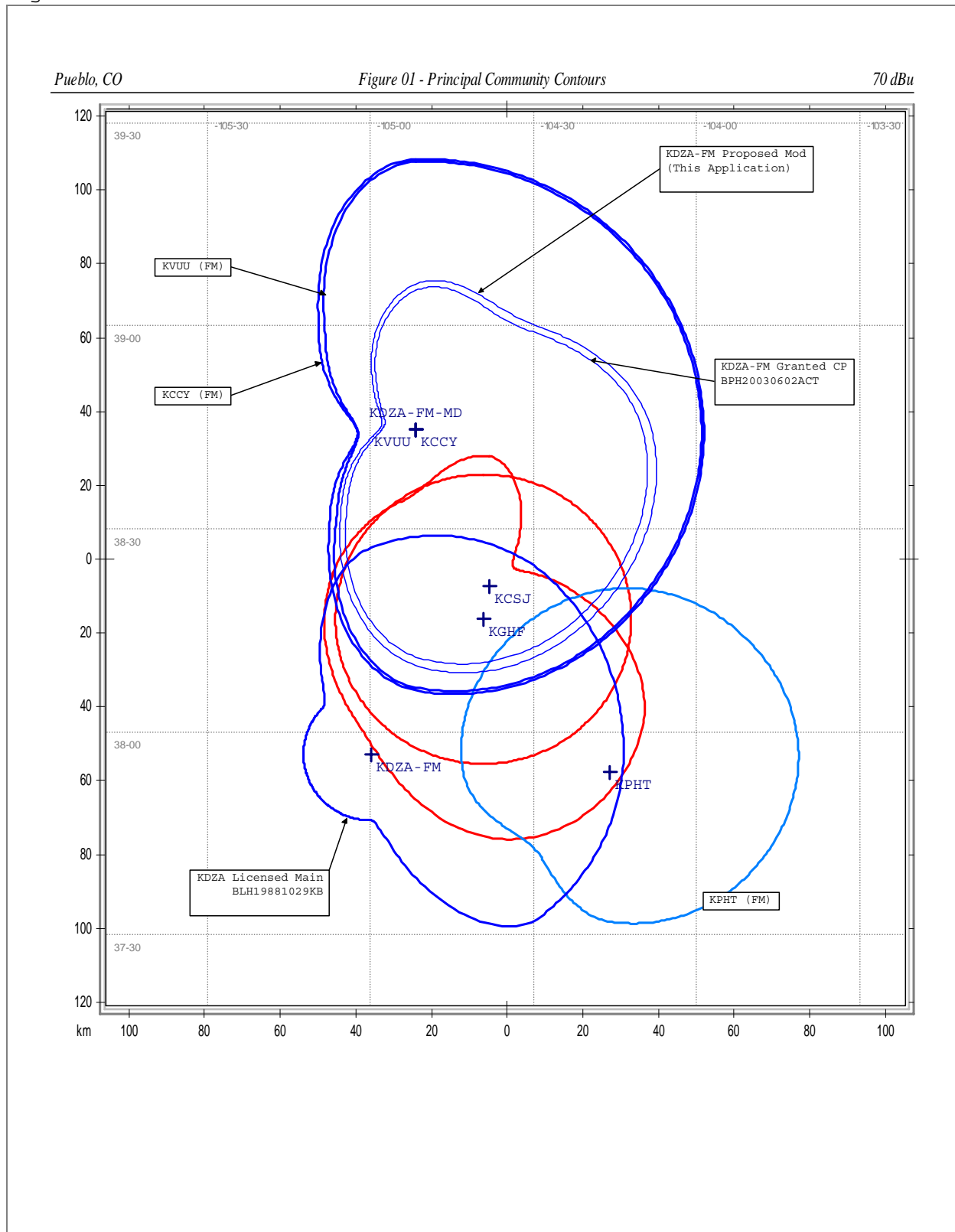


Figure 2

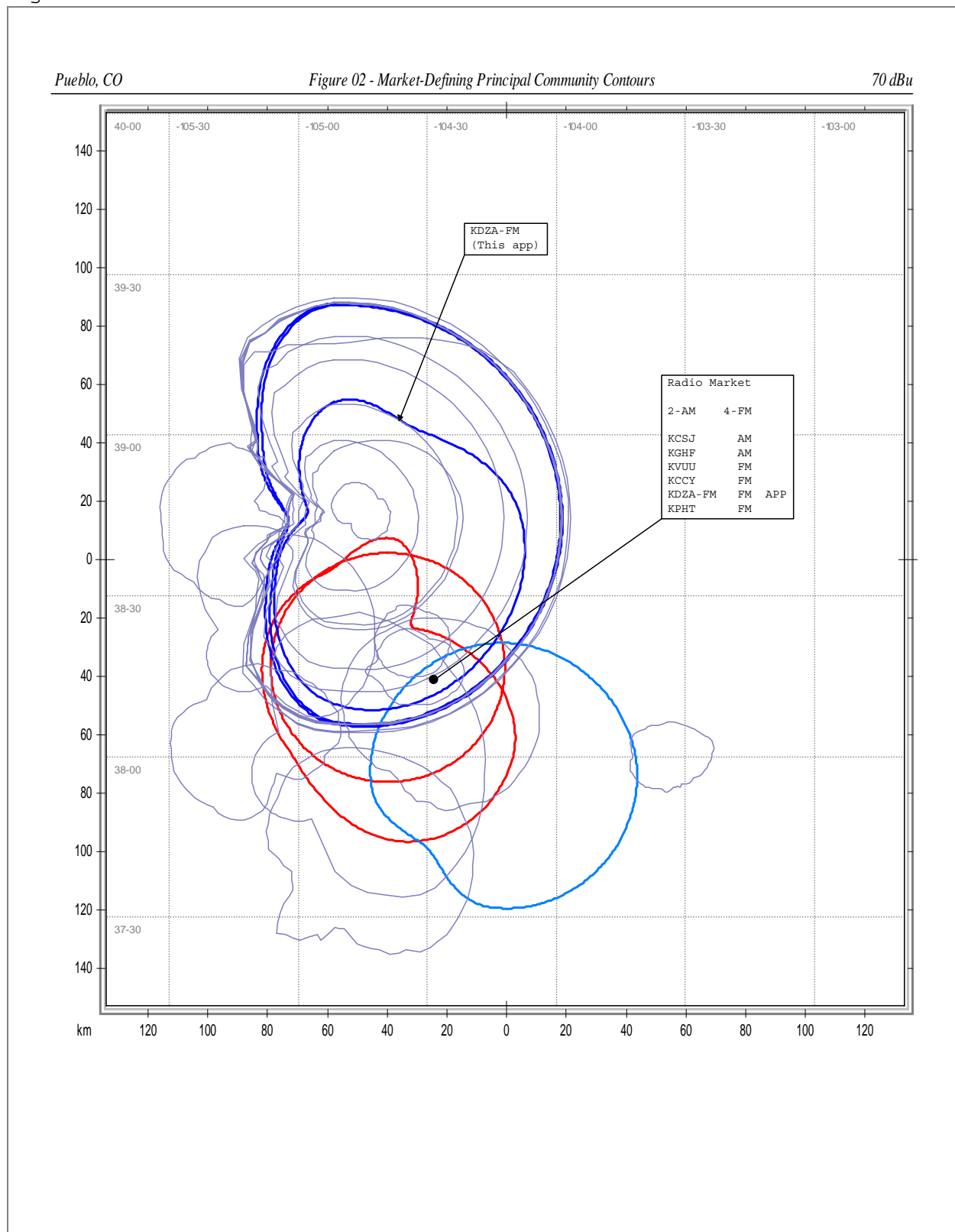


Figure 3 - Tabulation of stations in Radio Market 1

Count	Call Sign	Fac ID	Licensee	Dist_km
1	KTSC-FM	69148	COLORADO STATE UNIVERSITY - PUEBLO	47.29
2	KNKN	25526	METROPOLITAN RADIO GROUP, INC.	62.1
3	KCFP	12326	PUBLIC BROADCASTING OF COLORADO, INC.	41.47
4	KPHT	87658	CAPSTAR TX LIMITED PARTNERSHIP	79.71
5	KEPC	52595	PIKES PEAK COMMUNITY COLLEGE	52.98
6	KKFM	11237	CITADEL BROADCASTING COMPANY	58.98
7	KCME	10791	CHEYENNE MOUNTAIN PUBLIC BROADCAST HOUSE, INC	58.93
8	KRDO-FM	50402	OPTIMA COMMUNICATIONS, INC.	58.93
9	KATC-FM	66249	CITADEL BROADCASTING COMPANY	58.91
10	KBIQ	73073	BISON MEDIA, INC.	58.91
11	KGFT	20579	BISON MEDIA, INC	58.91
12	KTLF	18796	EDUCATIONAL COMMUNICATIONS OF COLORADO SPRINGS, INC.	58.91
13	KCCY	40847	CAPSTAR TX LIMITED PARTNERSHIP	58.96
14	KKMG	11229	CITADEL BROADCASTING COMPANY	58.96
15	KDZA-FM	40848	CAPSTAR TX LIMITED PARTNERSHIP	59.06
16	KRCC	65563	THE COLORADO COLLEGE	58.98
17	KILO	12367	COLORADO SPRINGS RADIO BROADCASTERS, INC.	58.99
18	KKPK	62038	CITADEL BROADCASTING COMPANY	58.99
19	KVUU	35868	CAPSTAR TX LIMITED PARTNERSHIP	58.99
20	KYZX	53845	COLORADO SPRINGS RADIO BROADCASTERS, INC	58.99
21	KTHN	7046	CCR-LA JUNTA IV, LLC	89.46
22	KTLC	88201	MAKE A DIFFERENCE FOUNDATION, INC.	89.52