

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 ("CTLP"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CTLP proposes to modify the facilities of WKXJ(FM), Signal Mountain, TN. 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 |
|---------------|--------|------|-----------------|----------|-------|----------------------------|--------------------------|
| WUUS | 72374 | AM | Rossville | Walker | GA | Chattanooga, TN | Chattanooga, TN |
| WTUN | 4059 | FM | Ringgold | Catoosa | GA | Chattanooga, TN | Chattanooga, TN |
| WTUN (APP) | 4059 | FM | Ringgold | Catoosa | GA | Chattanooga, TN | Chattanooga, TN |
| WUSY | 12315 | FM | Cleveland | Bradley | TN | non-metro Chattanooga, | Chattanooga, TN |
| WTRZ-FM (APP) | 14735 | FM | Walden | Hamilton | TN | TN ³ | non-metro |
| WMXF-FM | 40469 | FM | South Pittsburg | Marion | TN | Chattanooga, TN | Chattanooga, TN |
| WKXJ | 72371 | FM | Signal Mountain | Hamilton | TN | Chattanooga, TN | Chattanooga, TN |
| WRXR-FM | 72375 | FM | Rossville | Walker | GA | Chattanooga, TN | Chattanooga, TN |
| WRXR-FM (APP) | 72375 | FM | Rossville | Walker | GA | Chattanooga, TN | Chattanooga, TN |

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 Markets, an ownership study has been prepared in accordance with the Federal Communications Commission's local radio ownership rule.⁴

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 DA-2099 reallocated channel 279C3, the allotment assigned to WTRZ-FM, from McMinnville, TN to Walden, TN. McMinnville is not geographically located within, nor is WTRZ-FM currently listed by BIA as "Home" to, the Chattanooga, TN Arbitron Metro. However, consistent with DA-2099, there is an application pending before the Commission to specify Walden as the community of license of WTRZ-FM. Walden is geographically located within the Chattanooga, TN Arbitron Metro. Also, principal community contour overlap occurs between WKXJ(FM) as proposed in this application and the WTRZ-FM application. Thus the WTRZ-FM application is listed here in Table 1. WTRZ-FM is not listed by BIA as being located in the Chattanooga, TN Arbitron Metro; thus, it does not appear in Table 2 herein. This station was included in the analysis performed under the Interim Contour Method.

⁴ See 47 C.F.R. § 73.3555(a).

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 WKXJ(FM) as proposed, or which is located in the same Arbitron Metro⁵ as WKXJ(FM). The community of license of WKXJ(FM) is located within the Chattanooga, TN Arbitron Metro, and WKXJ(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 outside any Arbitron Metro markets.

Arbitron Market Study

WKXJ(FM) is reported by BIA as being "Home" to the Chattanooga, TN Arbitron Metro. This proposal is not in compliance with the local radio ownership rules for that Arbitron Metro, as evidenced by Table 2 below. However, the existing WKXJ(FM) licensed facility was also not in compliance with the Arbitron Metro-based rules. This proposal maintains the *status quo* in the Chattanooga, TN Arbitron Metro -- no stations are added to or removed from the Metro, nor is WKXJ(FM)'s "Home" Arbitron Metro changed, by virtue of this instant application. Because this modification would not create a "new violation" of the ownership rules, this existing combination of radio stations qualifies for grandfathering. See Note 4 to 47 C.F.R. Section 73.3555 (minor modification applications are subject to ownership restrictions only if implementing a change in an FM radio station's community of license or if new or increased concentration of ownership among commonly-owned media would be created); accord 2002 Biennial Regulatory Review--Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, 18 FCC Rcd 13,620 at fn. 1033 (2003) (modifications of facilities in a grandfathered combination are prohibited if the proposed modification would create a new violation of the ownership rules).

Table 2 - Stations Considered to be in the Chattanooga, TN Arbitron Metro⁶

| Count | Calls | Fac ID | Band | Owner | Status ⁷ | Community | County | State |
|-------|---------|--------|------|---|---------------------|-------------|----------|-------|
| 1 | WDEF | 57845 | AM | Bahakel Communications Limited | b | Chattanooga | Hamilton | TN |
| 2 | WDEF-FM | 57827 | FM | Bahakel Communications Limited | b | Chattanooga | Hamilton | TN |
| 3 | WDOD | 71349 | AM | Bahakel Communications Limited | b | Chattanooga | Hamilton | TN |
| 4 | WDOD-FM | 71351 | FM | Bahakel Communications Limited | b | Chattanooga | Hamilton | TN |
| 5 | WJTT | 6752 | FM | Brewer Broadcasting Corporation | b | Red Bank | Hamilton | TN |
| 6 | WMPZ | 60659 | FM | Brewer Broadcasting Corporation | b | Ringgold | Catoosa | GA |
| 7 | WAWL-FM | 10670 | FM | Chattanooga State Technical Community College | b | Red Bank | Hamilton | TN |

⁵ 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.

⁶ Source: BIA.

⁷ Status: "a" -- the station is reported by BIA as "Home" to this Arbitron Metro; "g" -- the station's community of license is located within the geographic boundaries of this Arbitron Metro; "b" -- the station is both listed by BIA as "Home" to this Arbitron Metro, and its community of license is located in this Arbitron Metro.

| Count | Calls | Fac ID | Band | Owner | Status ⁷ | Community | County | State |
|-------|---------|--------|------|---|---------------------|------------------|------------|-------|
| 8 | WGOW | 54526 | AM | Citadel Broadcasting Corp | b | Chattanooga | Hamilton | TN |
| 9 | WGOW-FM | 53956 | FM | Citadel Broadcasting Corp | b | Soddy-Daisy | Hamilton | TN |
| 10 | WOGT | 54527 | FM | Citadel Broadcasting Corp | b | East Ridge | Hamilton | TN |
| 11 | WSKZ | 54525 | FM | Citadel Broadcasting Corp | b | Chattanooga | Hamilton | TN |
| 12 | WKXJ | 72371 | FM | Clear Channel Communications | b | Signal Mountain | Hamilton | TN |
| 13 | WMXF-FM | 40469 | FM | Clear Channel Communications | b | South Pittsburg | Marion | TN |
| 14 | WRXR-FM | 72375 | FM | Clear Channel Communications | b | Rossville | Walker | GA |
| 15 | WTUN | 4059 | FM | Clear Channel Communications | b | Ringgold | Catoosa | GA |
| 16 | WUSY | 12315 | FM | Clear Channel Communications | a | Cleveland | Bradley | TN |
| 17 | WUUS | 72374 | AM | Clear Channel Communications | b | Rossville | Walker | GA |
| 18 | WKWN | 54444 | AM | Dade County Broadcasting Incorporated | b | Trenton | Dade | GA |
| 19 | WLLJ | 7932 | FM | Friendship Broadcasting LLC | a | Etowah | Mc Minn | TN |
| 20 | WJOC | 31861 | AM | Fryar, Sarah Margaret | b | Chattanooga | Hamilton | TN |
| 21 | WQCH | 54912 | AM | Gwyn, Charles | b | Lafayette | Walker | GA |
| 22 | WMBW | 66021 | FM | Moody Bible Institute of Chicago Incorporated | b | Chattanooga | Hamilton | TN |
| 23 | WBDX | 54445 | FM | Partners for Christian Media Incorporated | b | Trenton | Dade | GA |
| 24 | WNOO | 53955 | AM | RA-AD of Trenton Incorporated | b | Chattanooga | Hamilton | TN |
| 25 | WWAM | 51856 | AM | Shelton Broadcasting System | b | Jasper | Marion | TN |
| 26 | WSMC-FM | 61269 | FM | Southern Adventist University | b | Collegedale | Hamilton | TN |
| 27 | WEPG | 40154 | AM | Stone/Collins Communications Inc | b | South Pittsburg | Marion | TN |
| 28 | WSDQ | 67280 | AM | Stone/Collins Communications Inc | b | Dunlap | Sequatchie | TN |
| 29 | WDYN | 65216 | FM | Tennessee Temple University | b | Chattanooga | Hamilton | TN |
| 30 | WUTC | 69325 | FM | University of Tennessee | b | Chattanooga | Hamilton | TN |
| 31 | WFLI | 72061 | AM | WFLI, Inc. | b | Lookout Mountain | Hamilton | TN |
| 32 | WLMR | 24721 | AM | Wilkins Communications Network Inc | b | Chattanooga | Hamilton | TN |
| 33 | WSDT | 31863 | AM | Willis Broadcasting Corporation | b | Soddy-Daisy | Hamilton | TN |

Interim Contour-Overlap Analysis

Because the proposed principal community contour of the station to be modified intersects 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 overlapping contours form two "radio markets" for interim contour-overlap analysis under the Commission's rules.

The "radio markets" are defined by the mutually overlapping principal community contours of:

| Market 1 | Market 2 |
|-------------|-------------|
| 1-AM 5-FM | 1-AM 5-FM |
| WKXJ-App | WKXJ-App |
| WMXF-FM-Lic | WRXR-FM APP |
| WRXR-FM APP | WRXR-FM-Lic |
| WRXR-FM-Lic | WTRZ-FM-App |
| WTRZ-FM-App | WTUN-Lic |
| WUSY-Lic | WUSY-Lic |
| WUUS-Lic | WUUS-Lic |

The predicted principal community contours of these stations, as well as other stations whose principal community contours overlap this combination, are shown in *Figure 2*. *Figures 3 and 4* is the tabulation of some of the radio stations identified in the 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 markets" studied herein, there are at least 45 radio stations, including the subject co-owned stations, which overlap or intersect with each defined "radio market." *Figures 3 and 4* are the tabulation of some of the radio stations identified in the two contour-overlap "radio markets."

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 33 radio stations, including the subject commonly-owned 1-AM / 5-FM stations, which currently are home to the Chattanooga, TN Arbitron Metro.

This proposal is not in compliance with the local radio ownership rules for the Arbitron Metro. However, the existing WKXJ(FM) licensed facility was also not in compliance with the Arbitron Metro-based rules. This proposal does not affect the existing number of commonly-owned stations in the subject Arbitron Metro; it maintains the *status quo* in the Chattanooga, TN Arbitron Metro.

In interim contour-overlap "radio markets" studied herein, there are at least 45 stations in each market, including the commonly-owned 1-AM and 5-FM stations.

Respectfully submitted,

Troy G. Langham
FCC Engineering Supervisor
November 2, 2004

Figure 1: All Commonly Owned Stations In Markets in Common with WKXJ (FM)

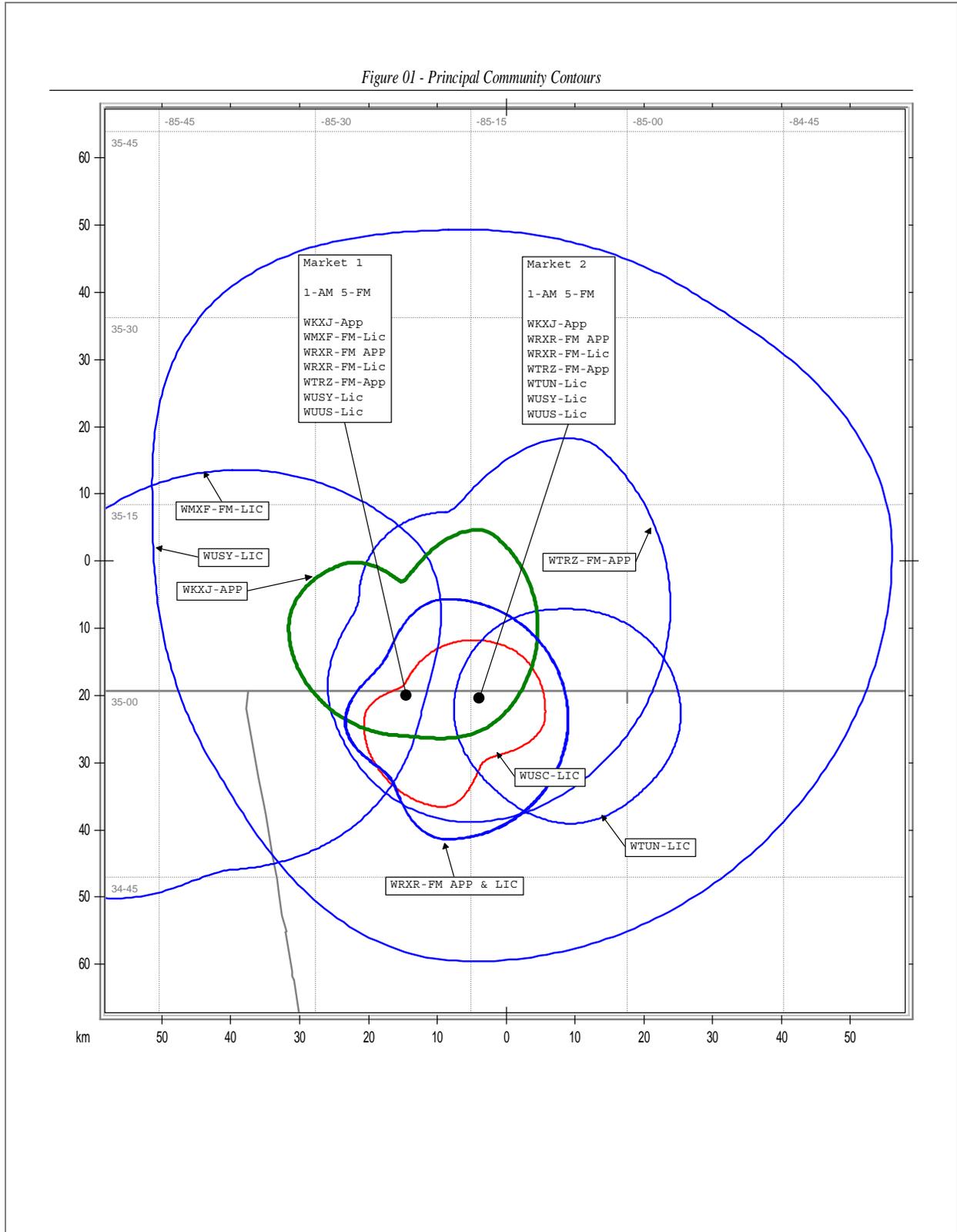


Figure 3 - Tabulation of Selected Radio Stations in Radio Market 1

Market 1

| Count | Call Sign | Facility_id | Licensee | Dist_km from Ref. Point |
|-------|-------------|-------------|--|-------------------------------|
| 1 | WGTA | 67648 | AZTECA COMMUNICATIONS, INC. | 58.91 |
| 2 | WZQZ | 16590 | BARINOWSKI INVESTMENT COMPANY | 58.08 |
| 3 | WQRX | 60648 | BARINOWSKI INVESTMENT COMPANY | 54.49 |
| 4 | WJTT | 6752 | BREWER BROADCASTING OF CHATTANOOGA, INC. | 15.63 |
| 5 | WAWL- FM | 10670 | CHATTANOOGA STATE TECHNICAL COMMUNITY COLLEGE | 7.7 |
| 6 | WGOW- FM | 53956 | CITADEL BROADCASTING COMPANY | 25.03 |
| 7 | WSKZ | 54525 | CITADEL BROADCASTING COMPANY | 18.72 |
| 8 | WGOW | 54526 | CITADEL BROADCASTING COMPANY | 8.26 |
| 9 | WOGT | 54527 | CITADEL BROADCASTING COMPANY | 18.72 |
| 10 | WSGM | 14730 | CUMBERLAND COMMUNICATION CORPORATION | 46.62 |
| 11 | WKWN | 54444 | DADE COUNTY BROADCASTING, INC. | 19.82 |
| 12 | WYMR | 57794 | DADE COUNTY BROADCASTING, INC. | 32.61 |
| 13 | WAYB- FM | 71148 | FAMILY WORSHIP CENTER CHURCH, INC. | 50.38 |
| 14 | WLLJ | 7932 | FRIENDSHIP BROADCASTING LLC. | 80.11 |
| 15 | WLMR | 24721 | GRACE MEDIA, INC. | 9.49 |
| 16 | WBAC | 66955 | J. L. BREWER BROADCASTING OF CLEVELAND, LLC | 49.51 |
| 17 | WALV | 66956 | J. L. BREWER BROADCASTING OF CLEVELAND, LLC | 34.78 |
| 18 | WAYA | 70782 | J. L. BREWER BROADCASTING OF CLEVELAND, LLC | 83.04 |
| 19 | WDNT | 70783 | J. L. BREWER BROADCASTING OF CLEVELAND, LLC | 65.27 |
| 20 | WDNT- FM | 70784 | J. L. BREWER BROADCASTING OF CLEVELAND, LLC | 61.7 |
| 21 | WMPZ | 60659 | J.L. BREWER BROADCASTING, LLC | 20.14 |
| 22 | WDEF | 57845 | JACKSON TELECASTERS, INC | 5.19 |
| 23 | WDEF- FM | 57827 | JACKSON TELECASTERS, INC. | 15.73 |
| 24 | WBIN | 63492 | JOHN A. SINES AND L. JANE SINES, JTWROS | 68.93 |
| 25 | WUAT | 10397 | JOYCE V. BOWNDS | 69.31 |
| 26 | WMXN- FM | 33780 | KEA RADIO, INC. | 41.76 |
| 27 | WOCE | 63493 | LB RADIO OF CHATTANOOGA, LLC | 53.8 |
| 28 | WBDX | 54445 | PARTNERS FOR CHRISTIAN RADIO, INC. | 15.08 |
| 29 | WNOO | 53955 | PYE BROADCASTING, INC. | 9.84 |
| 30 | WTTI | 53957 | PYE WILSON BROADCASTING, INC. | 36.78 |
| 31 | WEBS | 54881 | RADIO WEBS, INC. | 68.95 |
| 32 | WQCH | 54912 | RADIX BROADCASTING, INC. | 32.07 |
| 33 | WSDQ | 67280 | RODGSON, INC. | 40.61 |
| 34 | WJOC | 31861 | SARAH MARGARETT FRYAR | 9.78 |
| 35 | WWAM | 51856 | SHELTON BROADCASTING SYSTEM | 26.22 |
| 36 | WSMC- FM | 61269 | SOUTHERN ADVENTIST UNIVERSITY | 31.16 |

| | | | | |
|----|-------------|-------|--------------------------------------|-------|
| 37 | WEPG | 40154 | STONE/COLLINS COMMUNICATIONS, INC. | 31.49 |
| 38 | WDYN | 65216 | TENNESSEE TEMPLE UNIVERSITY | 19.82 |
| 39 | WMBW | 66021 | THE MOODY BIBLE INSTITUTE OF CHICAGO | 4.25 |
| 40 | WUTC | 69325 | UNIVERSITY OF TENNESSEE | 24.43 |
| 41 | WDOD | 71349 | WDOD OF CHATTANOOGA, INC. | 9.68 |
| 42 | WDOD- FM | 71351 | WDOD OF CHATTANOOGA, INC. | 18.7 |
| 43 | WFLI | 72061 | WFLI, INC. | 5.49 |
| 44 | WCLE | 55098 | WILLIAMS COMMUNICATIONS, INC. | 50.67 |
| 45 | WCLE- FM | 55099 | WILLIAMS COMMUNICATIONS, INC. | 55.81 |
| 46 | WSDT | 31863 | WILLIS BROADCASTING CORPORATION | 34.74 |

Figure 4 - Tabulation of Selected Radio Stations in Radio Market 2

Market 1

| Count | Call Sign | Facility_id | Licensee | Dist_km from Ref. Point |
|-------|-------------|-------------|--|-------------------------------|
| 1 | WGTA | 67648 | AZTECA COMMUNICATIONS, INC. | 58.91 |
| 2 | WZQZ | 16590 | BARINOWSKI INVESTMENT COMPANY | 58.08 |
| 3 | WQRX | 60648 | BARINOWSKI INVESTMENT COMPANY | 54.49 |
| 4 | WJTT | 6752 | BREWER BROADCASTING OF CHATTANOOGA, INC. | 15.63 |
| 5 | WAWL- FM | 10670 | CHATTANOOGA STATE TECHNICAL COMMUNITY COLLEGE | 7.7 |
| 6 | WGOW- FM | 53956 | CITADEL BROADCASTING COMPANY | 25.03 |
| 7 | WSKZ | 54525 | CITADEL BROADCASTING COMPANY | 18.72 |
| 8 | WGOW | 54526 | CITADEL BROADCASTING COMPANY | 8.26 |
| 9 | WOGT | 54527 | CITADEL BROADCASTING COMPANY | 18.72 |
| 10 | WSGM | 14730 | CUMBERLAND COMMUNICATION CORPORATION | 46.62 |
| 11 | WKWN | 54444 | DADE COUNTY BROADCASTING, INC. | 19.82 |
| 12 | WYMR | 57794 | DADE COUNTY BROADCASTING, INC. | 32.61 |
| 13 | WAYB- FM | 71148 | FAMILY WORSHIP CENTER CHURCH, INC. | 50.38 |
| 14 | WLLJ | 7932 | FRIENDSHIP BROADCASTING LLC. | 80.11 |
| 15 | WLMR | 24721 | GRACE MEDIA, INC. | 9.49 |
| 16 | WBAC | 66955 | J. L. BREWER BROADCASTING OF CLEVELAND, LLC | 49.51 |
| 17 | WALV | 66956 | J. L. BREWER BROADCASTING OF CLEVELAND, LLC | 34.78 |
| 18 | WAYA | 70782 | J. L. BREWER BROADCASTING OF CLEVELAND, LLC | 83.04 |
| 19 | WDNT | 70783 | J. L. BREWER BROADCASTING OF CLEVELAND, LLC | 65.27 |
| 20 | WDNT- FM | 70784 | J. L. BREWER BROADCASTING OF CLEVELAND, LLC | 61.7 |
| 21 | WMPZ | 60659 | J.L. BREWER BROADCASTING, LLC | 20.14 |
| 22 | WDEF | 57845 | JACKSON TELECASTERS, INC | 5.19 |
| 23 | WDEF- FM | 57827 | JACKSON TELECASTERS, INC. | 15.73 |
| 24 | WBIN | 63492 | JOHN A. SINES AND L. JANE SINES, JTWROS | 68.93 |
| 25 | WUAT | 10397 | JOYCE V. BOWNDS | 69.31 |
| 26 | WMXN- FM | 33780 | KEA RADIO, INC. | 41.76 |
| 27 | WOCE | 63493 | LB RADIO OF CHATTANOOGA, LLC | 53.8 |
| 28 | WBDX | 54445 | PARTNERS FOR CHRISTIAN RADIO, INC. | 15.08 |
| 29 | WNOO | 53955 | PYE BROADCASTING, INC. | 9.84 |
| 30 | WTTI | 53957 | PYE WILSON BROADCASTING, INC. | 36.78 |
| 31 | WEBS | 54881 | RADIO WEBS, INC. | 68.95 |
| 32 | WQCH | 54912 | RADIX BROADCASTING, INC. | 32.07 |
| 33 | WSDQ | 67280 | RODGSON, INC. | 40.61 |
| 34 | WJOC | 31861 | SARAH MARGARETT FRYAR | 9.78 |
| 35 | WWAM | 51856 | SHELTON BROADCASTING SYSTEM | 26.22 |
| 36 | WSMC- FM | 61269 | SOUTHERN ADVENTIST UNIVERSITY | 31.16 |
| 37 | WEPG | 40154 | STONE/COLLINS COMMUNICATIONS, INC. | 31.49 |
| 38 | WDYN | 65216 | TENNESSEE TEMPLE UNIVERSITY | 19.82 |

| | | | | |
|----|-------------|-------|--------------------------------------|-------|
| 39 | WMBW | 66021 | THE MOODY BIBLE INSTITUTE OF CHICAGO | 4.25 |
| 40 | WUTC | 69325 | UNIVERSITY OF TENNESSEE | 24.43 |
| 41 | WDOD | 71349 | WDOD OF CHATTANOOGA, INC. | 9.68 |
| 42 | WDOD- FM | 71351 | WDOD OF CHATTANOOGA, INC. | 18.7 |
| 43 | WFLI | 72061 | WFLI, INC. | 5.49 |
| 44 | WCLE | 55098 | WILLIAMS COMMUNICATIONS, INC. | 50.67 |
| 45 | WCLE- FM | 55099 | WILLIAMS COMMUNICATIONS, INC. | 55.81 |
| 46 | WSDT | 31863 | WILLIS BROADCASTING CORPORATION | 34.74 |