

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,

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November 2, 2004

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

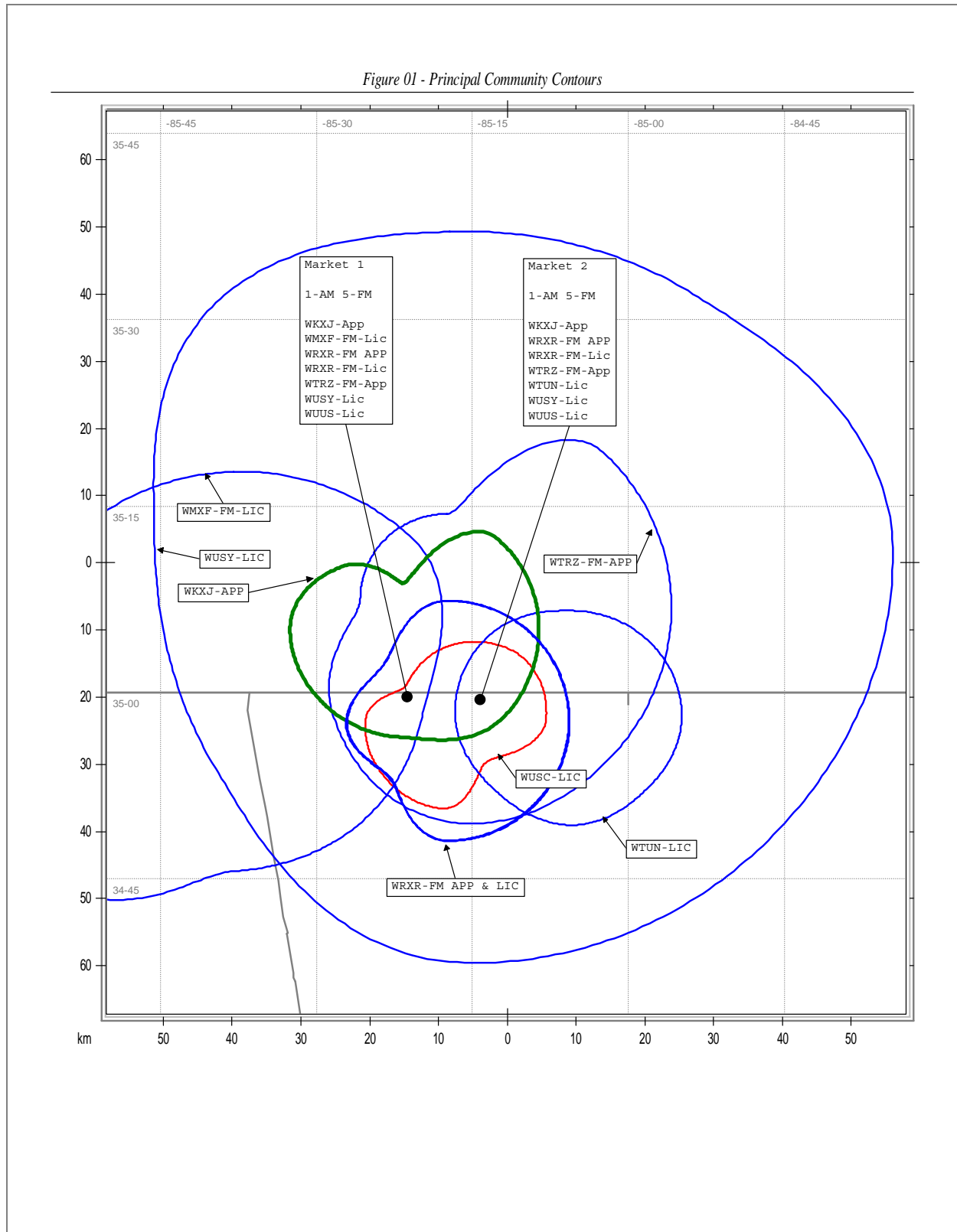


Figure 02 - Market-Defining Principal Community Contours

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
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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
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33	WSDQ	67280	RODGSON, INC.	40.61
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38	WDYN	65216	TENNESSEE TEMPLE UNIVERSITY	19.82

39	WMBW	66021	THE MOODY BIBLE INSTITUTE OF CHICAGO	4.25
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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