

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CITADEL BROADCASTING COMPANY

This radio multiple ownership analysis was prepared on behalf of Citadel Broadcasting Company, which proposes the following radio stations to be considered under present or proposed common ownership or control in the area of Stockton and Modesto, California in consideration of the acquisition of KWIN(FM), KJOY(FM) and KWNN(FM):

Call Sign	City of License	Facilities
KESP(AM)	Modesto-CA	970 kHz, 1 kW, U, DA-2
KHOP(FM)	Oakdale-CA	Channel 236B, 29.5 kW, 193 m
KWIN(FM)	Lodi-CA	Channel 249A, 3 kW, 91 m (License) Channel 249A, 6 kW, 91 m (Construction Permit)
KWNN(FM)	Turlock-CA	Channel 252A, 2 kW, 119 m
KJOY(FM)	Stockton-CA	Channel 257A, 4 kW, 98 m
KATM(FM)	Modesto-CA	Channel 277B, 50 kW, 152 m
KHKK(FM)	Modesto-CA	Channel 281B, 50 kW, 152 m

The principal community contours of all of these stations are depicted on a map included herein as Figure 1. The radio multiple ownership analysis considers only those stations with overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations). An ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

Radio Markets

The “radio market” applicable to common ownership 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.* As listed in the table below, there are two defined “radio markets” formed by the subject stations:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	KESP	KWIN (Lic or CP), KJOY, KATM, KHKK
Market 2	KESP	KHOP, KWNN, KATM, KHKK

Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating, commercial stations having principal community contours which overlap or intersect the principal community contours which define the radio market, plus the subject stations to be co-owned. Only those stations having principal community contour overlap with the defined market area were employed in the count of stations.† The results of the analysis are tabulated below:

* See Order in Implementation of Section 202(a) and 202(b)(1) of the Telecommunications Act of 1996 (Broadcast Radio Ownership) FCC 96-90, released March 8, 1996 and Memorandum Opinion and Order in Revision of Radio Rules and Policies 7 FCC Rcd 6387, 6395 para. 39 (1992).

† In the case of KWIN, only those principal community contours overlapping both the KWIN licensed and construction permit facility contours were employed in the count of stations. Therefore, the conclusion of this study is the same considering either the KWIN license or construction permit facility.

Defined Radio Market	Number of Stations in Radio Market
Market 1	24 AM, 17 FM; 41 total
Market 2	26 AM, 25 FM; 51 total

Figure 2 is a tabulation of the radio stations identified in the defined radio markets. Only known licensed, operating, commercial stations were employed for the study. 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 described in Section 73.184 of the FCC Rules. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method outlined in Section 73.313 of the FCC Rules. Terrain data were derived from the U.S.G.S. 3-second computer database for each of the FM stations using radials evenly-spaced every 2 degrees of azimuth.

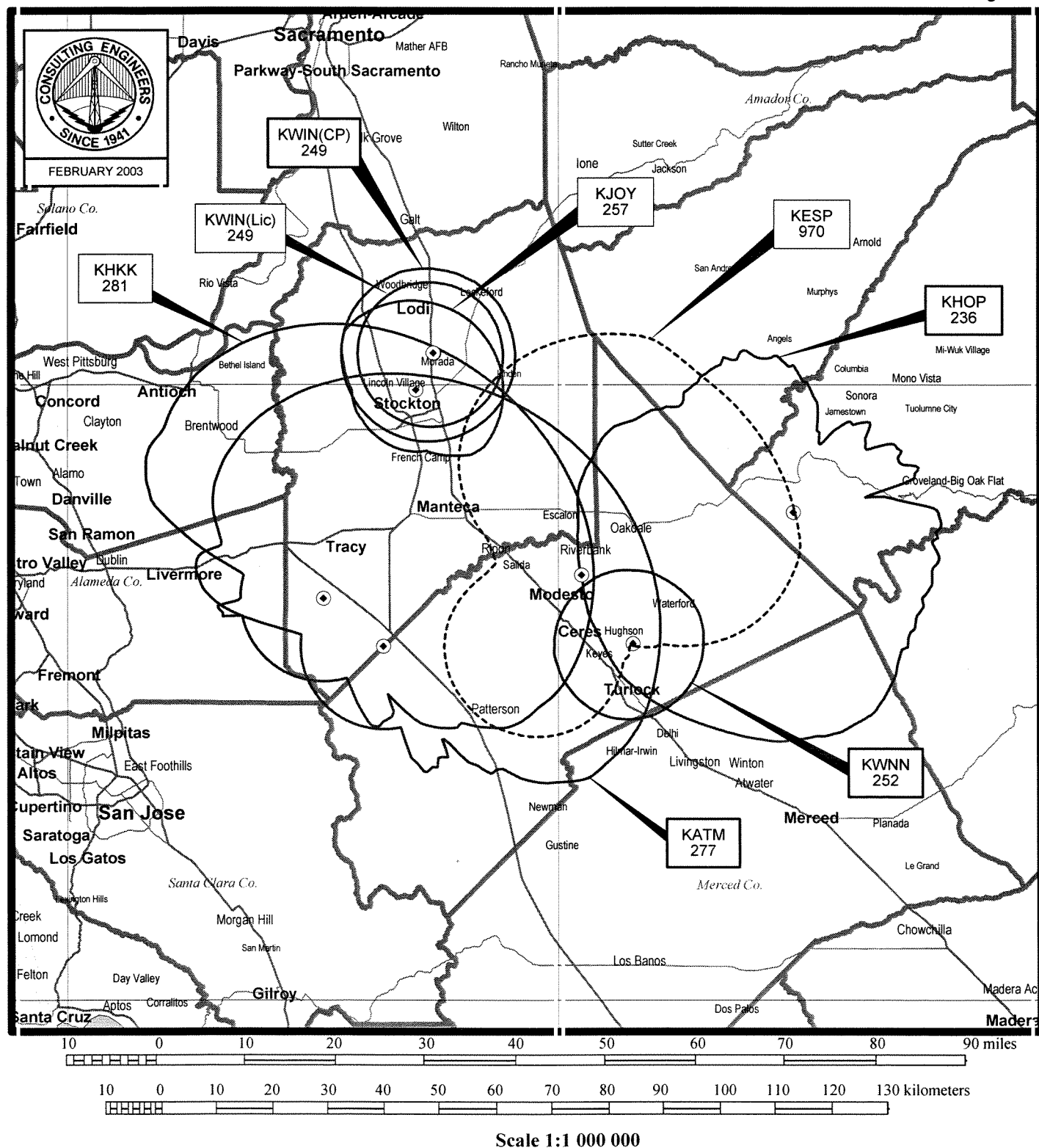
Based on the above, it is concluded that the proposed combination of the stations to be owned complies with Section 73.3555(a) of the FCC Rules.

Louis Robert du Treil, Jr.

du Treil, Lundin & Rackley, Inc.
201 Fletcher Ave.
Sarasota, Florida 34237
(941)329-6000

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Figure 1



PREDICTED PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

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Tabulation of Stations in Radio Markets

Market 1	
Number	Station
AM Stations	
1	KSFO, SAN FRANCISCO, CA, 560 kHz
2	KFRC, SAN FRANCISCO, CA, 610 kHz
3	KSTE, RANCHO CORDOVA, CA, 650 kHz
4	KNBR, SAN FRANCISCO, CA, 680 kHz
5	KCBC, RIVERBANK, CA, 770 kHz
6	KGO, SAN FRANCISCO, CA, 810 kHz
7	KTRB, MODESTO, CA, 860 kHz
8	KNEW, OAKLAND, CA, 910 kHz
9	KLOC, CERES, CA, 920 kHz
10	KESP, MODESTO, CA, 970 kHz
11	KATD, PITTSBURG, CA, 990 kHz
12	KTCT, SAN MATEO, CA, 1050 kHz
13	KFAX, SAN FRANCISCO, CA, 1100 kHz
14	KHTK, SACRAMENTO, CA, 1140 kHz
15	KLOK, SAN JOSE, CA, 1170 kHz
16	KSFB, PALO ALTO, CA, 1220 kHz
17	KUYL, STOCKTON, CA, 1280 kHz
18	KFIV, MODESTO, CA, 1360 kHz
19	KVIN, TURLOCK, CA, 1390 kHz
20	KSTN, STOCKTON, CA, 1420 kHz
21	KYOS, MERCED, CA, 1480 kHz
22	KSJX, SAN JOSE, CA, 1500 kHz
23	KCVR, LODI, CA, 1570 kHz
24	KLIV, SAN JOSE, CA, 1590 kHz
FM Stations	
1	KOSO, PATTERSON, CA, Channel 226
2	KEJC, MODESTO, CA, Channel 230

Market 1	
Number	Station
3	KHOP, OAKDALE, CA, Channel 236
4	KMRQ, MANTECA, CA, Channel 244
5	KTSE-F, PATTERSON, CA, Channel 246
6	KWIN, LODI, CA, Channel 249
7	KWNN, TURLOCK, CA, Channel 252
8	KCVR-F, COLUMBIA, CA, Channel 255
9	KJOY, STOCKTON, CA, Channel 257
10	KQOD, STOCKTON, CA, Channel 261
11	KMIX, TRACY, CA, Channel 265
12	KKIQ, LIVERMORE, CA, Channel 269
13	KJSN, MODESTO, CA, Channel 272
14	KATM, MODESTO, CA, Channel 277
15	KHKK, MODESTO, CA, Channel 281
16	KRVR, COPPEROPOLIS, CA, Channel 288
17	KSTN-F, STOCKTON, CA, Channel 297

Market 2	
Number	Station
AM Stations	
1	KSFO, SAN FRANCISCO, CA, 560 kHz
2	KFRC, SAN FRANCISCO, CA, 610 kHz
3	KSTE, RANCHO CORDOVA, CA, 650 kHz
4	KNBR, SAN FRANCISCO, CA, 680 kHz
5	KCBC, RIVERBANK, CA, 770 kHz
6	KGO, SAN FRANCISCO, CA, 810 kHz
7	KTRB, MODESTO, CA, 860 kHz
8	KNEW, OAKLAND, CA, 910 kHz
9	KLOC, CERES, CA, 920 kHz
10	KESP, MODESTO, CA, 970 kHz
11	KATD, PITTSBURG, CA, 990 kHz
12	KTCT, SAN MATEO, CA, 1050 kHz
13	KFAX, SAN FRANCISCO, CA, 1100 kHz
14	KHTK, SACRAMENTO, CA, 1140 kHz
15	KLOK, SAN JOSE, CA, 1170 kHz
16	KSFB, PALO ALTO, CA, 1220 kHz
17	KUYL, STOCKTON, CA, 1280 kHz
18	KFIV, MODESTO, CA, 1360 kHz
19	KVIN, TURLOCK, CA, 1390 kHz
20	KSTN, STOCKTON, CA, 1420 kHz
21	KVML, SONORA, CA, 1450 kHz
22	KYOS, MERCED, CA, 1480 kHz
23	KSJX, SAN JOSE, CA, 1500 kHz
24	KCVR, LODI, CA, 1570 kHz
25	KVVY, MERCED, CA, 1580 kHz
26	KLIV, SAN JOSE, CA, 1590 kHz
FM Stations	
1	KZSQ-F, SONORA, CA, Channel 224
2	KOSO, PATTERSON, CA, Channel 226
3	KKBN, TWAIN HARTE, CA, Channel 228
4	KEJC, MODESTO, CA, Channel 230
5	KBKY, MERCED, CA, Channel 231
6	KHOP, OAKDALE, CA, Channel 236
7	KUBB, MARIPOSA, CA, Channel 242
8	KMRQ, MANTECA, CA, Channel 244
9	KTSE-F, PATTERSON, CA, Channel 246
10	KABX-F, MERCED, CA, Channel 248
11	KWIN, LODI, CA, Channel 249
12	KWNN, TURLOCK, CA, Channel 252

Market 2	
Number	Station
13	KCVR-F, COLUMBIA, CA, Channel 255
14	KJOY, STOCKTON, CA, Channel 257
15	KCIV, MOUNT BULLION, CA, Channel 260
16	KQOD, STOCKTON, CA, Channel 261
17	KMIX, TRACY, CA, Channel 265
18	KKIQ, LIVERMORE, CA, Channel 269
19	KJSN, MODESTO, CA, Channel 272
20	KATM, MODESTO, CA, Channel 277
21	KHKK, MODESTO, CA, Channel 281
22	KHTN, LOS BANOS, CA, Channel 284
23	KRVR, COPPEROPOLIS, CA, Channel 288
24	KIBG, MERCED, CA, Channel 292
25	KSTN-F, STOCKTON, CA, Channel 297