

TECHNICAL STATEMENT
CITICASTERS LICENSES, L.P.
RADIO MULTIPLE OWNERSHIP ANALYSIS -10/24/2003

This statement and the attached figures were prepared on behalf of Citicasters Licenses, L.P.(CL), a licensee subsidiary of Clear Channel Communications, Inc. CC proposes to acquire the facilities of WNCD(FM), WAKZ(FM), and WNIO(AM). A multiple ownership analysis was prepared considering the following radio stations under present or proposed common ownership or time brokerage:

Table 1: Proposed Commonly Owned or Controlled Stations Studied

Call Sign	Facility_id	City	State
WAKZ	74468	SHARPSVILLE	PA
WBBG	73309	NILES	OH
WBZY	24997	NEW CASTLE	PA
WHLO	43858	AKRON	OH
WJST	24999	ELLWOOD CITY	PA
WKBN	70519	YOUNGSTOWN	OH
WKST	71246	NEW CASTLE	PA
WMXY	73154	YOUNGSTOWN	OH
WNCD	13668	YOUNGSTOWN	OH
WNIO	13669	YOUNGSTOWN	OH
WTAM	59595	CLEVELAND	OH

Since certain of these stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations), an ownership study has been prepared in accordance with the Federal Communications Commission's multiple ownership rules¹.

CL does not have an attributable interest in any other station with a principal community contour that overlaps or intersects the proposed stations.

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 proposed commonly owned stations. These mutually overlapping contours form five "radio markets", as shown in *Figure 1*, for analysis under the Commission's rules.

¹ See 47 C.F.R. § 73.3555 (2001).

Listing of "Markets"

Market 1	Market 2	Market 3	Market 4	Market 5
2-AM 4-FM	4-AM 3-FM	4-AM 3-FM	4-AM 2-FM	3-AM 3-FM
WKBN(AM)	WBZY(AM)	WBZY(AM)	WHLO(AM)	WKBN(AM)
WNIO(AM)	WKBN(AM)	WKBN(AM)	WKBN(AM)	WNIO(AM)
WAKZ(FM)LIC&CP	WKST(AM)	WKST(AM)	WNIO(AM)	WTAM(AM)
WBBG(FM)	WNIO(AM)	WNIO(AM)	WTAM(AM)	WBBG(FM)
WNCD(FM)	WAKZ(FM)CP&LIC	WNCD(FM)	WMXY(FM)	WMXY(FM)
WMXY(FM)	WNCD(FM)	WJST(FM)	WNCD(FM)	WNCD(FM)
	WMXY(FM)	WMXY(FM)		

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 that overlap or intersect the principal community contours that define the radio market, plus the subject commonly owned or controlled stations.

For simplicity of analysis it has been determined that station WKBN(AM) is common to all five markets and a count only of stations overlapping or intersecting the contour of WKBN has been tabulated.

There are at least 45 stations that are not attributable to Clear Channel Communications, Inc. or its licensee subsidiaries that are counted as being "in" each of the 5 markets identified.

Only known licensed, operating commercial 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 10 degrees of azimuth.

Based on the above, it is concluded that the proposed modifications comply with § 73.3555(a) of the FCC Rules.

Sincerely,

Troy G. Langham
FCC Specialist
Clear Channel Broadcasting Licenses, Inc.

Figure 1

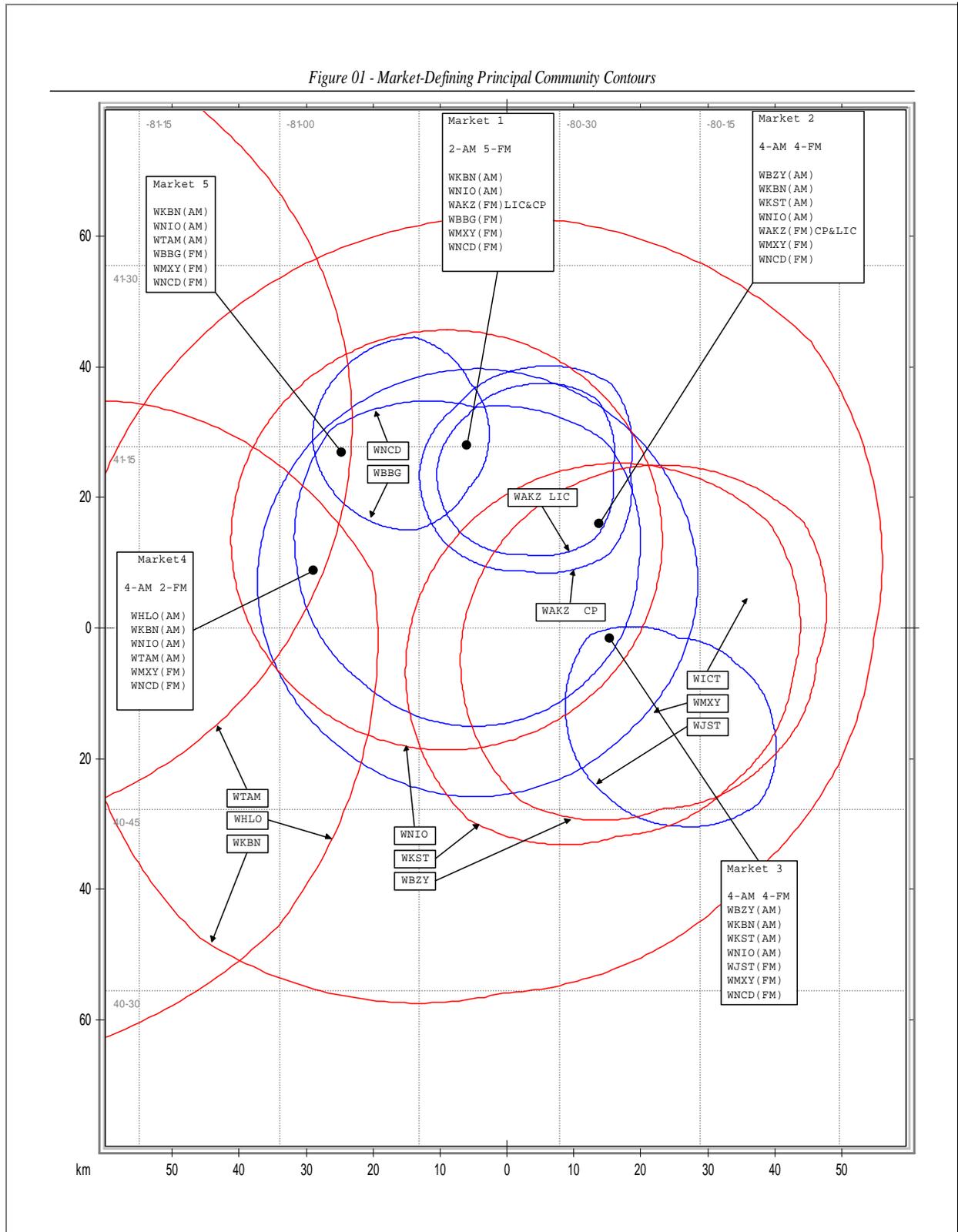


Table 1

Count	Call Sign	Facility_id	City	State	Licensee
1	WRCW	2649	CANTON	OH	ARCEY BROADCASTING, INC.
2	WGRP	25227	GREENVILLE	PA	BEACON BROADCASTING, INC.
3	WANR	70531	WARREN	OH	BEACON BROADCASTING, INC.
4	WEXC	25225	GREENVILLE	PA	BEACON BROADCASTING, INC.
5	WASN	74164	CAMPBELL	OH	CAMPBELL RADIO COMPANY, LLC
6	WHK	14772	CLEVELAND	OH	CARON BROADCASTING, INC.
7	WKNR	28509	CLEVELAND	OH	CARON BROADCASTING, INC.
8	WKBN	70519	YOUNGSTOWN	OH	CITICASTERS LICENSES, L.P.
9	WSOM	37547	SALEM	OH	CUMULUS LICENSING CORP.
10	WPIC	60005	SHARON	PA	CUMULUS LICENSING CORP.
11	WBBW	13667	YOUNGSTOWN	OH	CUMULUS LICENSING CORP.
12	WRQK-FM	8550	CANTON	OH	CUMULUS LICENSING CORP.
13	WQXK	37548	SALEM	OH	CUMULUS LICENSING CORP.
14	WYFM	60006	SHARON	PA	CUMULUS LICENSING CORP.
15	WLLF	6653	MERCER	PA	CUMULUS LICENSING CORP.
16	WHOT-FM	13670	YOUNGSTOWN	OH	CUMULUS LICENSING CORP.
17	WWIZ	23437	MERCER	PA	CUMULUS LICENSING CORP.
18	WRTK	73308	NILES	OH	D & E COMMUNICATIONS OF OHIO, INC.
19	WDPN	14913	ALLIANCE	OH	D. A. PETERSON, INC.
20	WZKL	14914	ALLIANCE	OH	D. A. PETERSON, INC.
21	WGFT	72100	YOUNGSTOWN CUYAHOGA	OH	ESQUIRE COMMUNICATIONS, INC.
22	WCUE	20674	FALLS	OH	FAMILY STATIONS, INC.
23	WMGW	24942	MEADVILLE	PA	FOREVER BROADCASTING, LLC
24	WGYY	24940	MEADVILLE	PA	FOREVER BROADCASTING, LLC
25	WOXX	49789	FRANKLIN	PA	FOREVER BROADCASTING, LLC
26	WSAJ	25462	GROVE CITY	PA	GROVE CITY COLLEGE
27	WLOA	47569	FARRELL	PA	HOLY FAMILY COMMUNICATIONS
28	KDKA	25443	PITTSBURGH	PA	INFINITY BROADCASTING OPERATIONS, INC.
29	WBZZ	20350	PITTSBURGH	PA	INFINITY RADIO SUBSIDIARY OPERATIONS INC.
30	WDSY-FM	18525	PITTSBURGH	PA	INFINITY RADIO SUBSIDIARY OPERATIONS INC.
31	WBVP	52746	BEAVER FALLS	PA	IORIO BROADCASTING, INC.
32	WMBA	17266	AMBRIDGE EAST	PA	IORIO BROADCASTING, INC.
33	WOHI	13710	LIVERPOOL	OH	KEYMARKET LICENSES, LLC
34	WOGH	65408	BURGETTSTOWN EAST	PA	KEYMARKET LICENSES, LLC
35	WOGF	13711	LIVERPOOL	OH	KEYMARKET LICENSES, LLC
36	WAMO-FM	52747	BEAVER FALLS	PA	MCL/MCM-INC
37	WJMP	41075	KENT	OH	MEDIA-COM, INC.
38	WNIR	41077	KENT	OH	MEDIA-COM, INC.
39	WCER	41131	CANTON	OH	MELODYNAMIC BROADCASTING CORPORATION
40	WKTX	42365	CORTLAND	OH	MIKLOS KOSSANYI, MARIA KOSSANYI
41	WHBC	4489	CANTON	OH	NM LICENSING, LLC
42	WHBC-FM	4488	CANTON	OH	NM LICENSING, LLC
43	WPIT	58624	PITTSBURGH	PA	PENNSYLVANIA MEDIA ASSOCIATES, INC.
44	WORD-FM	58627	PITTSBURGH	PA	PENNSYLVANIA MEDIA ASSOCIATES, INC.
45	WINW	8549	CANTON	OH	PINEBROOK CORPORATION
46	WEIR	40873	WEIRTON	WV	PRIORITY COMMUNICATIONS OHIO, LLC
47	WZAK	74465	CLEVELAND	OH	RADIO ONE LICENSES, LLC

48	WENZ	2685	CLEVELAND	OH	RADIO ONE LICENSES, LLC
49	WSHH	55709	PITTSBURGH	PA	RENDA B/CING CORP. OF NEVADA
50	WQMX	43872	MEDINA	OH	RUBBER CITY RADIO GROUP, INC
51	WAKR WONE- FM	43871	AKRON	OH	RUBBER CITY RADIO GROUP, INC.
52	43873	AKRON	OH	RUBBER CITY RADIO GROUP, INC.	
53	WHKW WFHM- FM	57235	WARREN	OH	SCA LICENSE CORPORATION
54	54778	CLEVELAND	OH	SCA LICENSE CORPORATION	
55	WWNL	18517	PITTSBURGH	PA	STEEL CITY RADIO, INC.
56	WRBP WCRF- FM	63498	HUBBARD	OH	STOP 26-RIVERBEND, INC.
57	66101	CLEVELAND	OH	THE MOODY BIBLE INSTITUTE OF CHICAGO	
58	WBUT WLER- FM	71241	BUTLER	PA	WBUT, INC.
59	71242	BUTLER	PA	WBUT, INC.	
60	WISR	7900	BUTLER	PA	WBUT, INCORPORATED
61	WDIG	73769	STEUBENVILLE	OH	WORLD WITNESS FOR CHRIST MINIST.,INC
62	WRRK	72333	BRADDOCK	PA	WPNT INC
63	WLTJ	73889	PITTSBURGH	PA	WPNT, INC.