

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CC LICENSES, LLC

This statement and the attached figures were prepared on behalf of CC Licenses, LLC ("CCL"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CCL proposes to modify the facilities of WVRK (FM) Columbus, GA. 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
WAGH	60656	FM	Smiths	Lee	AL	Non-Metro	Columbus, GA
WDAK	60764	AM	Columbus	Muscogee	GA	Columbus, GA	Columbus, GA
WGSY	66668	FM	Phenix City	Russell	AL	Columbus, GA	Columbus, GA
WHAL	32383	AM	Phenix City	Russell	AL	Columbus, GA	Columbus, GA
WSTH-FM	60763	FM	Alexander City	Tallapoosa	AL	Non-Metro	Columbus, GA
WVRK	39457	FM	Columbus	Muscogee	GA	Columbus, GA	Columbus, GA

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 WVRK(FM) as proposed which is located in an Arbitron market, or, or which is located in the same Arbitron Metro⁴ as WVRK(FM). The community of license of WVRK(FM) is located in an Arbitron Metro, and WVRK(FM) is reported by BIA as being "Home" to the Columbus, GA 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 Columbus, GA Arbitron Metro market, and commonly owned stations whose community of license are 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

WVRK(FM) is reported by BIA as being "Home" to the Columbus, GA 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
Columbus, GA Arbitron Metro⁵

Count	Calls	FacID	Band	Owner	Status ⁶	Community	County
1	WBFA	43093	FM	Aloha Station Trust LLC	b	Fort Mitchell	Russell
2	WSHE	36685	AM	Aloha Station Trust LLC	b	Columbus	Muscogee
3	WYFK	5144	FM	Bible Broadcasting Network Inc	b	Columbus	Muscogee
4	WAGH	60656	FM	CC Media Holdings Inc	a	Smiths	Lee
5	WDAK	60764	AM	CC Media Holdings Inc	b	Columbus	Muscogee
6	WGSY	66668	FM	CC Media Holdings Inc	b	Phenix City	Russell
7	WHAL	32383	AM	CC Media Holdings Inc	b	Phenix City	Russell
8	WSTH-FM	60763	FM	CC Media Holdings Inc	a	Alexander City	Tallapoosa
9	WVRK	39457	FM	CC Media Holdings Inc	b	Columbus	Muscogee
10	WEAM-FM	89045	FM	Davis Broadcasting Inc	a	Buena Vista	Marion
11	WFXE	15847	FM	Davis Broadcasting Inc	b	Columbus	Muscogee
12	WIOI	47088	AM	Davis Broadcasting Inc	b	Columbus	Muscogee
13	WIOI-FM	50534	FM	Davis Broadcasting Inc	a	Waverly Hall	Harris
14	WKZJ	36307	FM	Davis Broadcasting Inc	a	Eufaula	Barbour
15	WOKS	15846	AM	Davis Broadcasting Inc	b	Columbus	Muscogee
16	WJEP	177011	FM	Edgewater Broadcasting Inc	b	Cusseta	Chattahoochee
17	WFRC	20810	FM	Family Stations Inc	b	Columbus	Muscogee
18	WCGQ	72089	FM	PMB Broadcasting LLC	b	Columbus	Muscogee
19	WKN	54670	FM	PMB Broadcasting LLC	b	Ft Benning South	Chattahoochee
20	WLTC	60372	FM	PMB Broadcasting LLC	b	Cusseta	Chattahoochee
21	WRCG	72090	AM	PMB Broadcasting LLC	b	Columbus	Muscogee
22	WRLD	52040	FM	PMB Broadcasting LLC	a	Valley	Chambers
23	WTJB	68186	FM	Troy University	b	Columbus	Muscogee

⁵ Source: BIA.

⁶ 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.

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, and the station itself 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 one "radio market" for interim contour-overlap analysis under the Commission's rules.

The "radio market" is defined by the mutually overlapping principal community contours of WAGH(FM), WGSY(FM), WSTH-FM, WVRK(FM), WDAK(AM), and WHAL(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 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 60 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 23 radio stations, including the subject commonly-owned 2-AM / 4-FM stations, which are home to the Columbus, GA 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 42 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,

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Figure 1

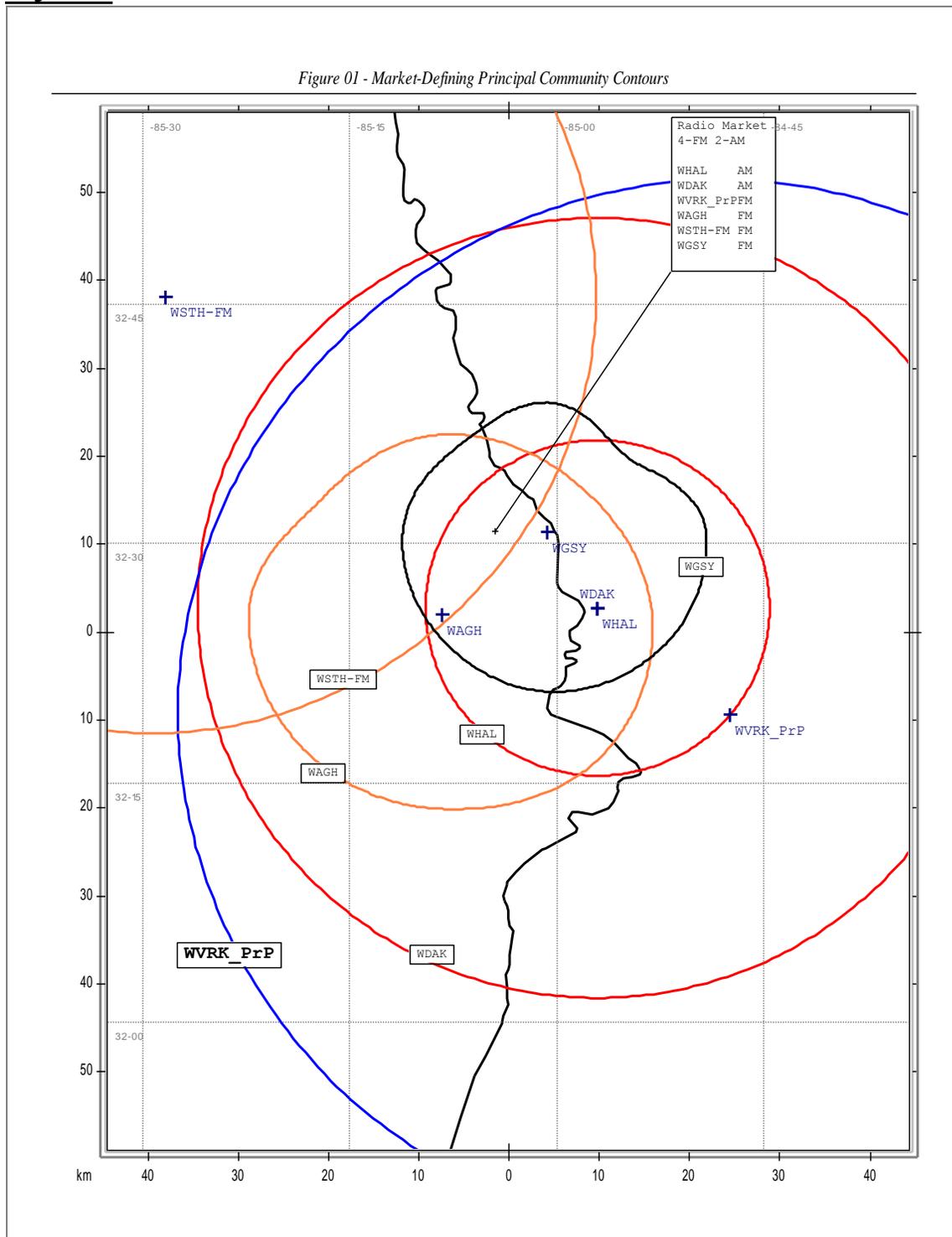


Figure 3 - Tabulation of stations in Radio Market

Count	Call Sign	Fac_id	Licensee	Dist_km
1	WHAL	32383	CC LICENSES, LLC	15.09
2	WDAK	60764	CC LICENSES, LLC	15.09
3	WVRK_PrP	39457	CC LICENSES, LLC	34.54
4	WAGH	60656	CC LICENSES, LLC	11.83
5	WSTH-FM	60763	CC LICENSES, LLC	45.77
6	WGSY	66668	CC LICENSES, LLC	6.05
7	WYDK	15939	SOUND IDEAS, LLC	65.95
8	WFXE	15847	DAVIS BROADCASTING, INC. OF COLUMBUS	6.05
9	WMXA	22877	QANTUM OF AUBURN LICENSE COMPANY, LLC	28.18
10	WKKR	22875	QANTUM OF AUBURN LICENSE COMPANY, LLC	28.18
11	WGZZ	15283	AUBURN NETWORK, INC.	46.47
12	WELL-FM	64562	ALABAMA CHRISTIAN RADIO, INC.	46.48
13	WKN	54670	PMB BROADCASTING, LLC	6.05
14	WBFA	43093	ALOHA STATION TRUST, LLC	17.34
15	WEBT	36527	LANGDALE EDUCATIONAL BROADCASTING FOU	33.13
16	WKZJ	36307	DAVIS BROADCASTING, INC. OF COLUMBUS	42.77
17	WTGZ	9782	TIGER COMMUNICATIONS, INC.	60.3
18	WCJM-FM	54863	QANTUM OF AUBURN LICENSE COMPANY, LLC	37.44
19	WTJB	68186	TROY UNIVERSITY	11.47
20	WQNR	68310	TIGER COMMUNICATIONS, INC.	67.81
21	WRLD	52040	PMB BROADCASTING, LLC	25.01
22	WEGL	6107	BOARD OF TRUSTEES AUBURN UNIVERSITY	39.75
23	WCGQ	72089	PMB BROADCASTING, LLC	6.03
24	WQSI	48682	NEW WORLD COMMUNICATIONS, INC.	47.2
25	WBRQ	90858	BEN JORDAN COMMUNICATIONS CORPORATION	54.94
26	WELR-FM	18135	EAGLE'S NEST, INC.	63.26
27	WHJS	171621	ALABAMA CHRISTIAN RADIO, INC.	81.01
28	WBOJ	88005	88.5 THE TRUTH, INC.	60.26
29	WFRP	90111	FAMILY STATIONS, INC.	88.36
30	WFDR-FM	171035	PLOENER RADIO GROUP, LLC	55.69
31	WVOL-FM	50534	DAVIS BROADCASTING, INC. OF COLUMBUS	37.6
32	WLEL	165968	SUMMER ROSE BROADCASTING	84.77
33	WJSP-FM	23927	GEORGIA PUBLIC TELECOMMUNICATIONS COM	51.01
34	WISK-FM	63784	SUMTER BROADCASTING CO., INC.	91.19
35	WYFK	5144	BIBLE BROADCASTING NETWORK, INC.	20.01
36	WJEP	177011	EDGEWATER BROADCASTING, INC.	55.8
37	WEAM-FM	89045	DAVIS BROADCASTING INC., OF COLUMBUS	44.08
38	WLTC	60372	PMB BROADCASTING, LLC	19.05
39	WOAK	49942	OAKSIDE CHRISTIAN SCHOOL	50.32
40	WFRC	20810	FAMILY STATIONS, INC.	15.09
41	WVJ-FM	53679	RADIO TRAINING NETWORK, INC.	69.17
42	WMGP	39619	CITICASTERS LICENSES, INC.	61.63