

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CLEAR CHANNEL BROADCASTING LICENSES INC.

This statement and the attached figures were prepared on behalf of Clear Channel Broadcasting Licenses Inc. ("CCBL"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CCBL proposes to modify the facilities of WYNT(FM) to specify the community of Caledonia, Ohio per DA 04-361 in MB Docket No. 03-7. 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	Service	Community	County	State	Geographic Arbitron Market	Declared Arbitron Market
WYNT-Mod	68681	FM	CALEDONIA FROM UPPER SANDUSKI	MARION FROM WYANDOT	OH	NON METRO	NON METRO
WMRN-FM	40170	FM	MARION	MARION	OH	NON METRO	NON METRO
WDIF	59282	FM	MARION	MARION	OH	NON METRO	NON METRO
WMRN	40169	AM	MARION	MARION	OH	NON METRO	NON METRO
WFXN	39730	FM	GALION	CRAWFORD	OH	NON METRO	NON METRO

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 local radio ownership rule.³ The proposed commonly owned stations are not located within any Arbitron Metro.

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 WYNT(FM) as proposed, or which is located in the same Arbitron Metro⁴ as WYNT(FM).

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.

Interim Contour-Overlap Analysis

Because the principal community contour of the station to be modified intersects the principal community contour of an attributable station located outside any Arbitron Metro, and the subject station is itself located outside any Arbitron Metro, an interim contour-overlap analysis is 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 which form 2 markets as shown in the table below:

Market 1	Market 2
1- AM 3-FM	1-AM 3- FM
WMRN-FM	WFXN-FM
WDIF	WMRN-FM
WYNT-Mod	WYNT-Mod
WMRN	WMRN

The predicted principal community contours of these stations (1 AM / 3 FM), as well as other stations whose principal community contours overlap this combination, are shown in *Figure 1*. *Figure 2 and 3* is the mapping and tabulation of some of the radio stations identified in the "radio markets." Please note that only stations that overlap or intersect with WMRN-FM have been identified.

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 21 radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio markets." *Figure 3* is the tabulation of some of the radio stations identified in the "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 interim contour-overlap "radio markets" studied herein, there are at least 12 stations, including the commonly-owned 1-AM / 3-FM stations in each market.

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 01 - Market-Defining Principal Community Contours

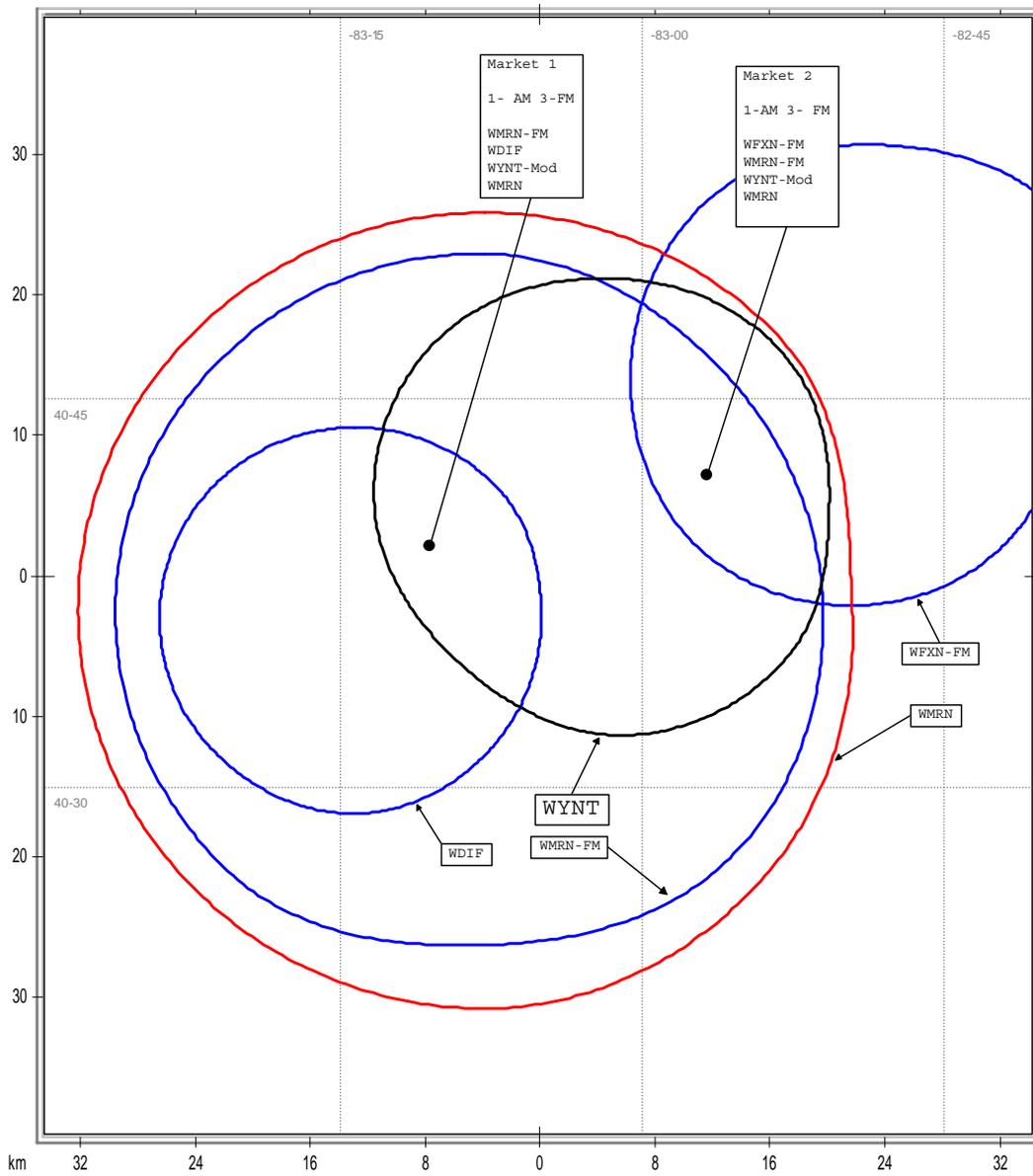


Figure 2

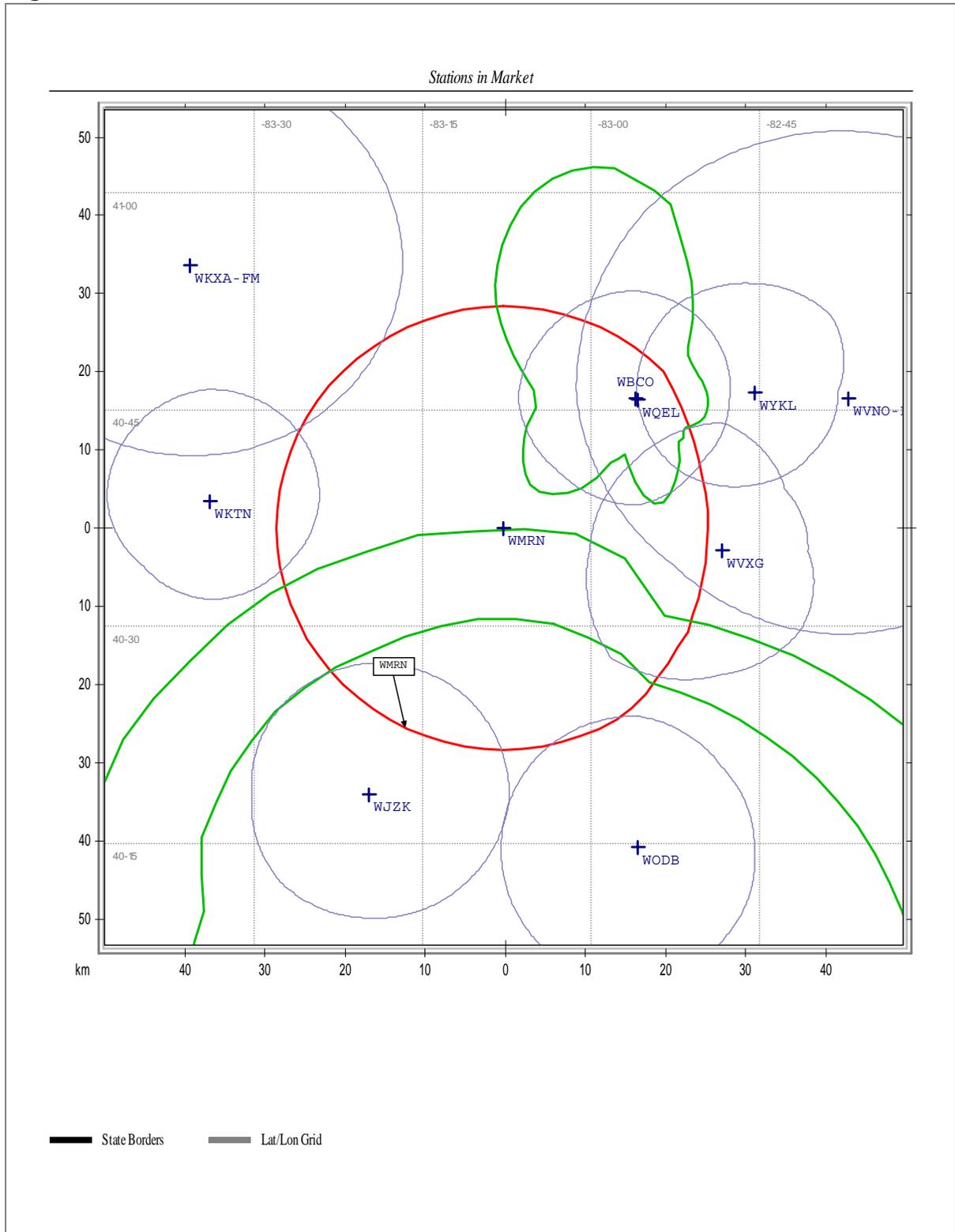


Figure 3 List of Stations in Radio Market 1 and 2

Count	Call Sign	Facility_id	Licensee	Dist_km
1	WMRN	40169	CITICASTERS LICENSES, L.P.	0.06
2	WRFD	58630	SALEM MEDIA OF OHIO, INC.	75.2
3	WOSU	66186	THE OHIO STATE UNIVERSITY	65.29
4	WBCO	7111	FRANKLIN COMMUNICATIONS, INC.	23.31
5	WKTN	54588	RADIO GENERAL, LTD.	37.15
6	WJZK	30563	FRANKLIN COMMUNICATIONS, INC.	38.18
7	WKXA-FM	5849	BLANCHARD RIVER BROADCASTING COMPANY	51.78
8	WYKL	41880	EDUCATIONAL MEDIA FOUNDATION	35.96
9	WVNO-FM	31855	JOHNNY APPLESEED BROADCASTING CO.	46.31
10	WODB	54556	FRANKLIN COMMUNICATIONS, INC.	44.31
11	WQEL	7112	FRANKLIN COMMUNICATIONS, INC.	23.52
12	WVXG	74300	ICS HOLDINGS INC.	27.55