

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 KDZA(AM), Pueblo, CO. 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	Geographic Arbitron Market	Declared Arbitron Market
KDZA	53850	AM	Pueblo	Pueblo	Pueblo, CO	Pueblo, CO
KCSJ	53846	AM	Pueblo	Pueblo	Pueblo, CO	Pueblo, CO
KVUU	35868	FM	Pueblo	Pueblo	Pueblo, CO	Pueblo, CO
KPHT	87658	FM	Rocky Ford	Otero	Non-Metro	Non-Metro
KDZA-FM	40848	FM	Pueblo	Pueblo	Pueblo, CO	Pueblo, CO
KCCY	40847	FM	Pueblo	Pueblo	Pueblo, CO	Pueblo, CO

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 KDZA(AM), as proposed, which is not located in an Arbitron market, or regardless of contour overlap, which is located in the same Arbitron Metro⁴ as KDZA(AM). The community of license of KDZA(AM) is located within the Pueblo, CO Arbitron Metro, and KDZA(AM) 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 in the Pueblo, CO Arbitron Metro market, and commonly owned stations whose communities of license are located outside any Arbitron Metro market.

Arbitron Market Study

KDZA(AM) is reported by BIA as being "Home" to the Pueblo, CO Metro. This proposal is in compliance with the local radio ownership rules for that Arbitron Metro, as evidenced by Table 2 below:

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.

Table 2 – Stations Considered to be in the
Pueblo, CO Arbitron Metro⁵

Count	Calls	Fac ID	Band	Owner	Status ⁶	Join Date	Community	County
1	KRXP	53845	FM	Bahakel Communications Limited	g	7/2/03	Pueblo West	Pueblo
2	KFEL	23151	AM	Catholic Radio Network Inc	b	7/2/03	Pueblo	Pueblo
3	KCCY	40847	FM	Clear Channel Communications Inc	g	8/6/04	Pueblo	Pueblo
4	KCSJ	53846	AM	Clear Channel Communications Inc	b	7/2/03	Pueblo	Pueblo
5	KDZA	53850	AM	Clear Channel Communications Inc	b	7/2/03	Pueblo	Pueblo
6	KDZA-FM	40848	FM	Clear Channel Communications Inc	b	7/2/03	Pueblo	Pueblo
7	KVUU	35868	FM	Clear Channel Communications Inc	g	7/2/03	Pueblo	Pueblo
8	KKMG	11229	FM	Citadel Broadcasting Company	g	7/2/03	Pueblo	Pueblo
9	KCFP	12326	FM	Colorado Public Radio	b	7/2/03	Pueblo	Pueblo
10	KKPC	53851	AM	Colorado Public Radio	b	7/2/03	Pueblo	Pueblo
11	KTSC-FM	69148	FM	Colorado State University - Pueblo	b	7/2/03	Pueblo	Pueblo
12	KTPL	12362	FM	Educational Communications of Colorado Springs Inc	g	4/24/06	Pueblo	Pueblo
13	KIQN	25526	FM	Exodus Broadcasting LLC	b	7/2/03	Pueblo	Pueblo
14	KWRP	69871	AM	Exodus Broadcasting LLC	b	7/2/03	Pueblo	Pueblo
15	KFRY	87050	FM	Family Stations Inc	b	10/11/06	Pueblo	Pueblo
16	KFVR-FM	81305	FM	Greeley Broadcasting Corporation	a	1/6/09	La Junta	Otero
17	KAVA	54259	AM	Latino Communications	b	7/2/03	Pueblo	Pueblo
18	KGFT	20579	FM	Salem Communications Corporation	g	7/2/03	Pueblo	Pueblo
19	KSTY	35551	FM	Royal Gorge Broadcasting LLC	a	11/5/07	Canon City	Fremont
20	KRYE	164276	FM	United States CP LLC	b	4/15/08	Rye	Pueblo
21	KRWA	87409	FM	WAY-FM Media Group Inc	b	4/22/05	Rye	Pueblo

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, 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.

In *Figure 1* the "radio market" is defined by the mutually overlapping principal community contours of KDZA(AM), KCSJ(AM), KVUU(FM), KPHT(FM), KDZA-FM, and KCCY(FM). 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 so 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 49 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 21 radio stations, including the subject commonly-owned 2-AM / 3-FM stations, which are home to the Pueblo, CO 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 49 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

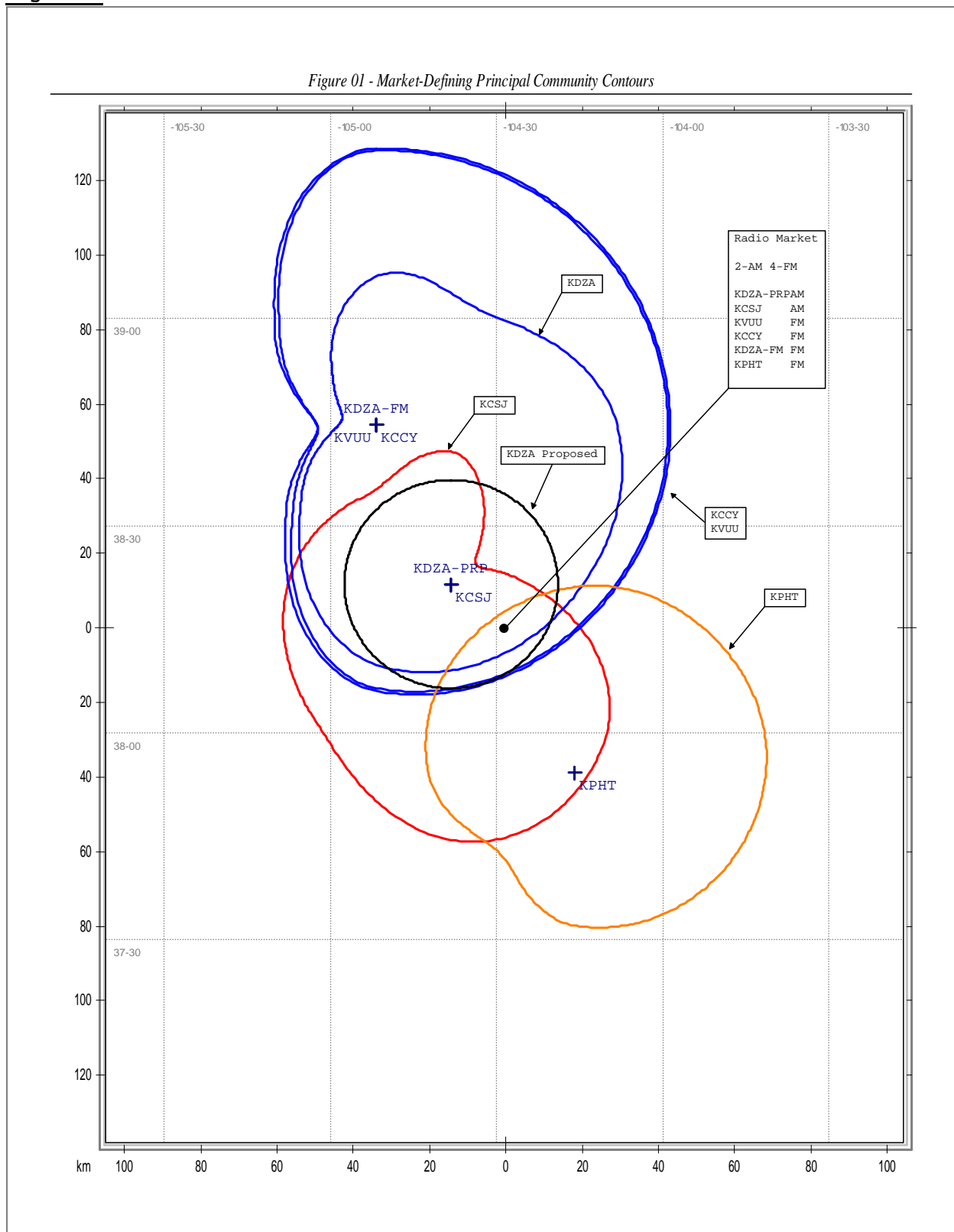


Figure 2

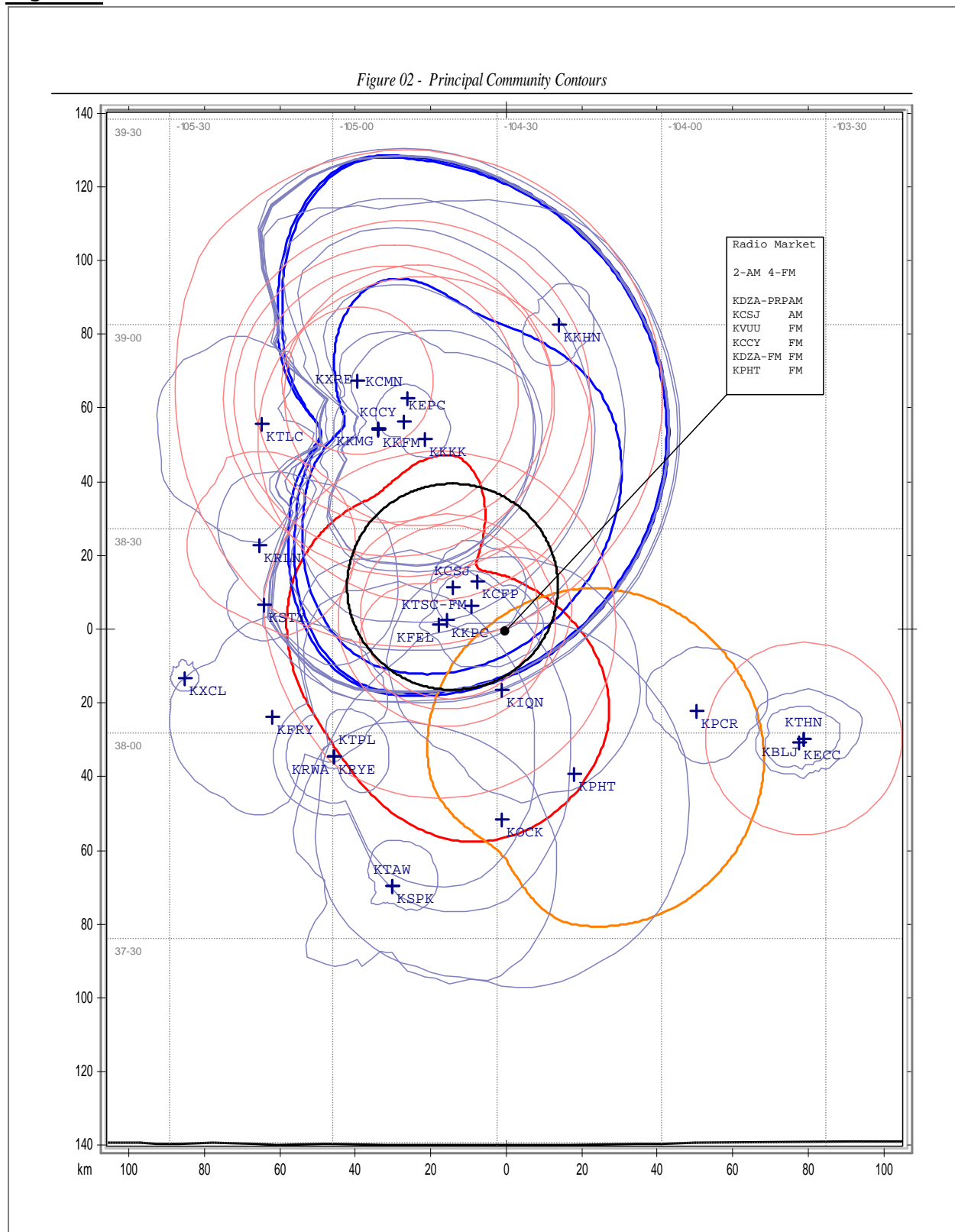


Figure 3 - Tabulation of stations in Radio Market

Count	Call Sign	Fac_id	Licensee	Dist_km
1	KCSJ	53846	CC LICENSES, LLC	18.01
2	KDZA-PRP	53850	CC LICENSES, LLC	18.01
3	KVUU	35868	CAPSTAR TX LLC	63.89
4	KCCY	40847	CAPSTAR TX LLC	63.85
5	KDZA-FM	40848	CAPSTAR TX LLC	63.86
6	KPHT	87658	CAPSTAR TX LLC	43.36
7	KFRY	87050	FAMILY STATIONS, INC.	66.35
8	KSTY	35551	ROYAL GORGE BROADCASTING, LLC	64.49
9	KTLC	88201	EDUCATIONAL COMMUNICATIONS OF COLORADO SPRINGS, INC.	85.12
10	KXCL	164277	UNITED STATES CP, LLC	86.35
11	KTAW	89073	EDUCATIONAL COMMUNICATIONS OF COLORADO SPRINGS, INC.	75.95
12	KSPK	39677	MAINSTREET BROADCASTING COMPANY, INC	75.95
13	KRYE	164276	UNITED STATES CP, LLC	57.26
14	KOCK	164170	EDWARD MAGNUS	51.78
15	KRWA	87409	WAY-FM MEDIA GROUP, INC.	57.26
16	KTPL	12362	EDUCATIONAL COMMUNICATIONS OF COLORADO SPRINGS, INC.	57.26
17	KGFT	20579	BISON MEDIA, INC	63.82
18	KTSC-FM	69148	COLORADO STATE UNIVERSITY - PUEBLO	10.67
19	KRDO-FM	50402	OPTIMA COMMUNICATIONS, INC.	63.77
20	KKPK	62038	RADIO LICENSE HOLDING CBC, LLC	63.89
21	KCME	10791	CHEYENNE MOUNTAIN PUBLIC BROADCAST HOUSE, INC	63.77
22	KIQN	25526	EXODUS BROADCASTING, LLC	16.59
23	KKMG	11229	RADIO LICENSE HOLDING CBC, LLC	63.85
24	KBIQ	73073	BISON MEDIA, INC.	63.82
25	KRXP	53845	COLORADO SPRINGS RADIO BROADCASTERS, INC	63.89
26	KILO	12367	COLORADO SPRINGS RADIO BROADCASTERS, INC.	63.89
27	KEPC	52595	PIKES PEAK COMMUNITY COLLEGE	62.21
28	KKHN	166010	CALHAN RADIO, LLC	83.81
29	KRCC	65563	THE COLORADO COLLEGE	63.86
30	KATC-FM	66249	RADIO LICENSE HOLDING CBC, LLC	63.82
31	KCFP	12326	PUBLIC BROADCASTING OF COLORADO, INC.	14.98
32	KKFM	11237	RADIO LICENSE HOLDING CBC, LLC	63.7
33	KTLF	18796	EDUCATIONAL COMMUNICATIONS OF COLORADO SPRINGS, INC.	63.82
34	KTHN	7046	CCR-LA JUNTA IV, LLC	85.21
35	KECC	90782	THE COLORADO COLLEGE	84.52
36	KPCR	165960	YOUNGERS COLORADO BROADCASTING LLC	55.88
37	KRLN	35552	ROYAL GORGE BROADCASTING, LLC	69.04
38	KZNT	70825	BISON MEDIA, INC.	67.39
39	KCMN	33731	DJR BROADCASTING, LLC	67.73
40	KKPC	53851	PUBLIC BROADCASTING OF COLORADO, INC.	15.57
41	KCBR	10846	DJR BROADCASTING, LLC	67.73
42	KXRE	54258	LATINO COMMUNICATIONS, LLC	77.82
43	KRDO	66250	PIKES PEAK RADIO, LLC	70.99
44	KWRP	69871	EXODUS BROADCASTING, LLC	15.44
45	KFEL	23151	CATHOLIC RADIO NETWORK, INC.	17.63
46	KKKK	51816	PILGRIM COMMUNICATIONS, INC.	55.74
47	KAVA	54259	LATINO COMMUNICATIONS, LLC	13.92
48	KCSF	62039	RADIO LICENSE HOLDING CBC, LLC	68.47
49	KBLJ	7047	CCR-LA JUNTA IV, LLC	85.25