

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
 CITICASTERS LICENSES, INC.

This statement and the attached figures were prepared on behalf of Citicasters Licenses, Inc. ("CLI"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CLI proposes to modify the facilities of KWMG(FM), Anamosa, IA. 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
KKRQ	29076	FM	Iowa City	Johnson	Non Metro	Cedar Rapids, IA
KWMG	162475	FM	Anamosa	Jones	Non Metro	Cedar Rapids, IA
KMJM	54164	AM	Cedar Rapids	Linn	Cedar Rapids, IA	Cedar Rapids, IA
KXIC	29075	AM	Iowa City	Johnson	Non Metro	Cedar Rapids, IA
WMT	73593	AM	Cedar Rapids	Linn	Cedar Rapids, IA	Cedar Rapids, IA
KKSY-FM	73594	FM	Cedar Rapids	Linn	Cedar Rapids, IA	Cedar Rapids, IA

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 KWMG(FM), as proposed, which is not located in an Arbitron market, or regardless of contour overlap, which is located in the same Arbitron Metro⁴ as KWMG(FM). The community of license of KWMG(FM) is not located within any Arbitron Metro. KWMG(FM) is reported by BIA as being "Home" to the Cedar Rapids, IA 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 Cedar Rapids, IA Arbitron Metro market, and commonly owned stations whose communities 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

KWVG(FM) is reported by BIA as being "Home" to the Cedar Rapids, IA 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 Cedar Rapids, IA Arbitron Metro⁵

Count	Call	Band	Owner
1	KKRQ	FM	Clear Channel Communications Inc
2	KKSY-FM	FM	Clear Channel Communications Inc
3	KMJM	AM	Clear Channel Communications Inc
4	KWVG	FM	Clear Channel Communications Inc
5	KXIC	AM	Clear Channel Communications Inc
6	WMT	AM	Clear Channel Communications Inc
7	KRNL-FM	FM	Cornell College
8	KDAT	FM	Cumulus Media Holdings Inc
9	KHAK	FM	Cumulus Media Holdings Inc
10	KRNA	FM	Cumulus Media Holdings Inc
11	KRQN	FM	Flinn Broadcasting Corporation
12	KXGM-FM	FM	Educational Media Foundation
13	KCCK-FM	FM	Kirkwood Community College
14	KGYM	AM	KZIA Inc
15	KZIA	FM	KZIA Inc
16	KMRY	AM	Sellers Broadcasting Inc

Interim Contour-Overlap Analysis

Because the stations community of license is located outside any Arbitron Metro, an interim contour-overlap analysis is also set forth in this statement.

⁵ Source: BIA.

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 (1) "radio markets" for interim contour-overlap analysis under the Commission's rules as shown below in *Table 3*.

TABLE 3, TABLE OF CONTOUR MARKETS

Radio Market	
3-AM 3-FM	
KXIC	AM
KMJM	AM
WMT	AM
KKRQ	FM
KKSY-FM	FM
KWVG PrP	FM

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. For simplicity of analysis only stations which overlap KWVG as proposed have been considered, as depicted in *Figure 2*.

In the interim contour-overlap "radio market" studied herein, there are the required count of radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio market." *Figure 3* is a tabulation of the radio stations identified in the contour-overlap "radio market", and Table 4 is a summary of that data.

TABLE 4, TABLE OF MARKET STATION COUNT

Market	
Count	45

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 16 radio stations, including the subject commonly-owned 3-AM / 3-FM stations, which are home to the Cedar Rapids, IA Metro. This proposal does not affect the existing number of commonly-owned stations in the subject Arbitron Metro.

In each interim contour-overlap "radio markets" studied herein, there is at least the minimum required count, including the commonly-owned 3-AM / 3-FM stations, which are which are part of the "Radio Market".

Based on the above, it is concluded that the proposed modification complies with Section 73.3555(a) of the FCC Rules.

Respectfully submitted,

Troy G. Langham
FCC Engineering Supervisor
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Figure 1 - Map of Market Defining Principal Community Contours

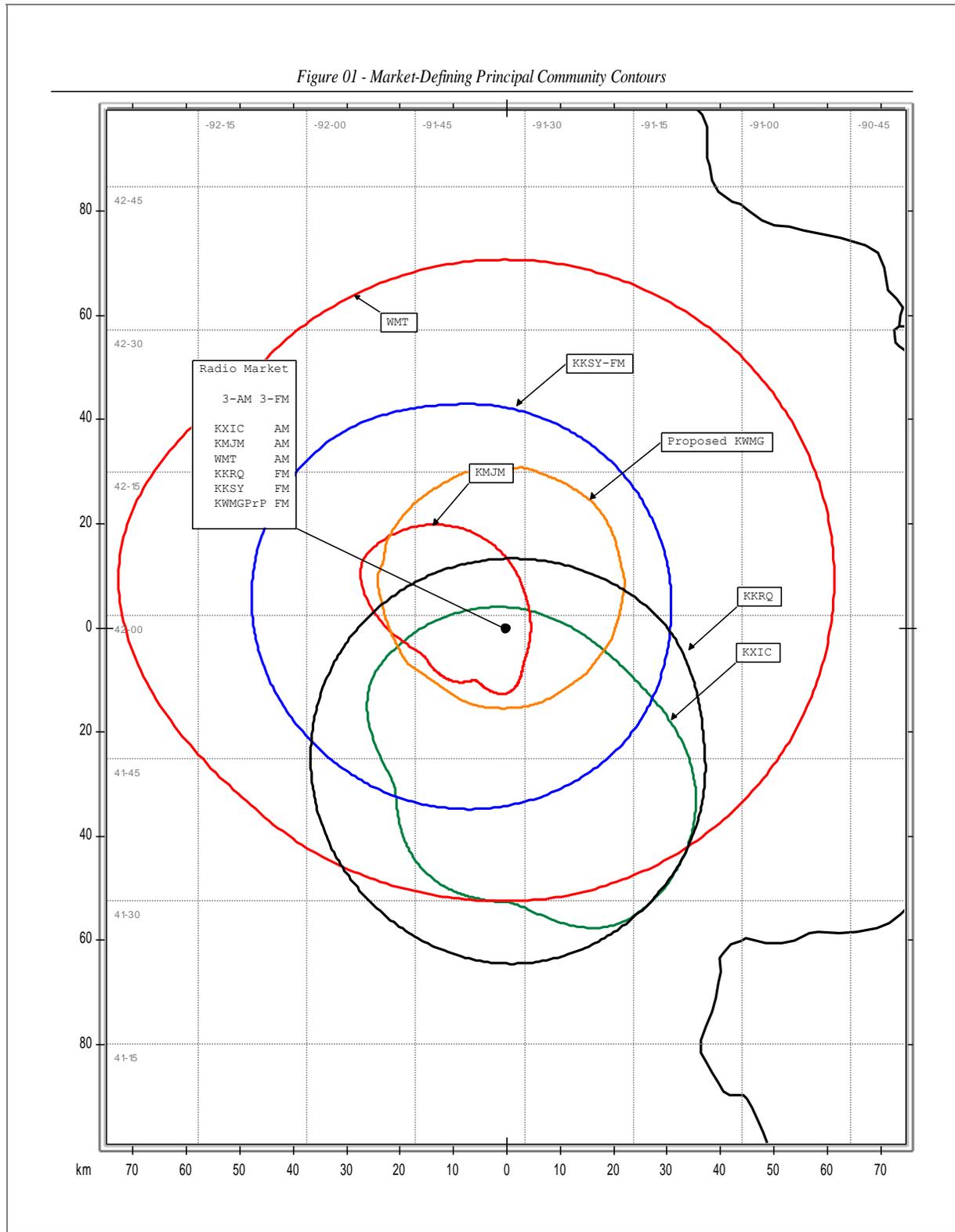


Figure 2 - Map of Market Overlapping/Intersecting Contours

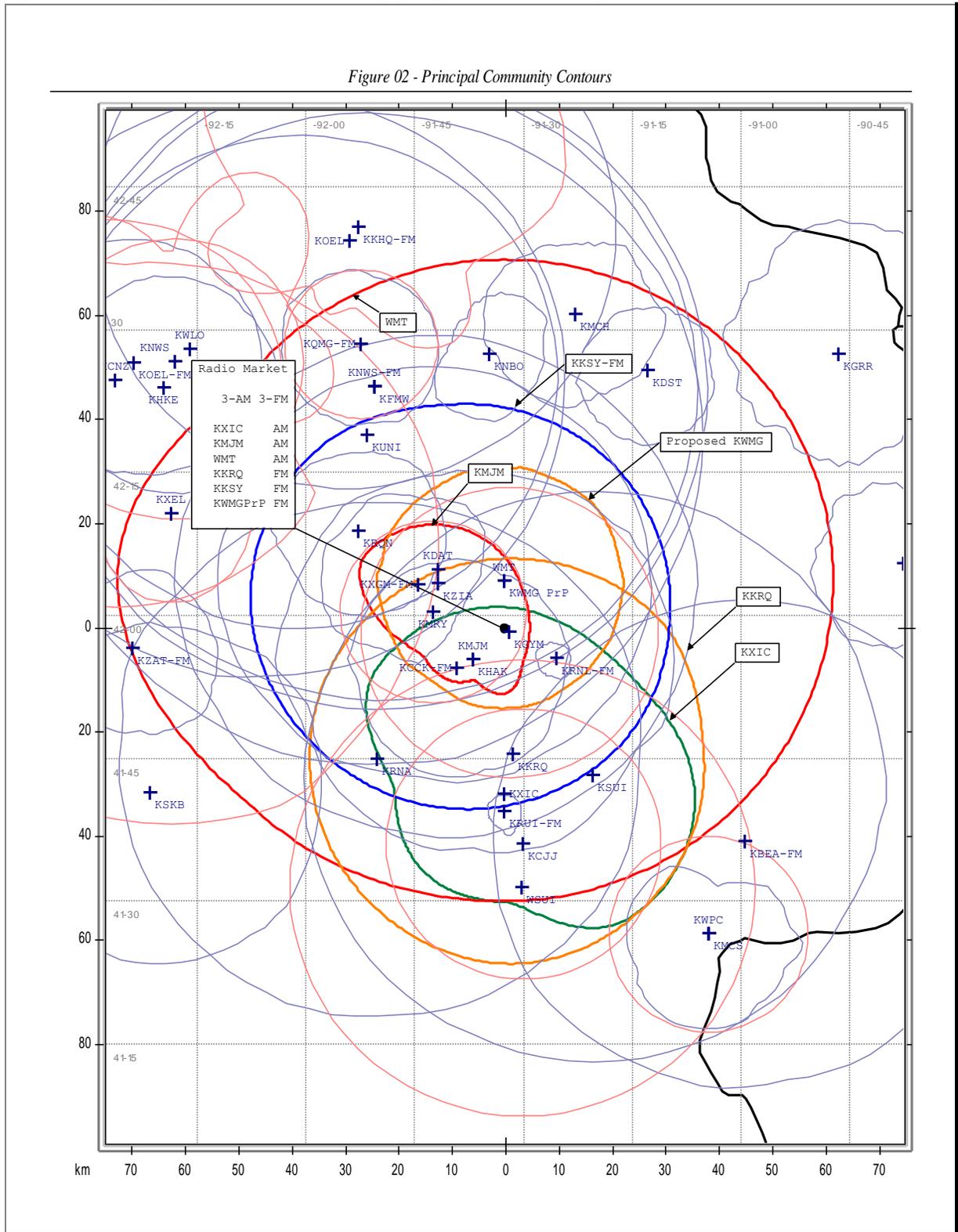


Figure 3 - Tabulation of stations in Radio Market

Count	Call Sign	Fac_id	Licensee	Dist_km
1	KXIC	29075	CITICASTERS LICENSES, INC.	32.92
2	KMJM	54164	CAPSTAR TX LLC	8.7
3	WMT	73593	CITICASTERS LICENSES, INC.	8.58
4	KKRQ	29076	CITICASTERS LICENSES, INC.	25.24
5	WMT-FM	73594	CITICASTERS LICENSES, INC.	9.15
6	KWVG PrP	162475	CITICASTERS LICENSES, INC.	8.55
7	KSKB	21790	FLORIDA PUBLIC RADIO, INC.	74.93
8	KZAT-FM	14846	GRUPO ROBLE, LLC	70.66
9	KOEL-FM	66780	CUMULUS LICENSING LLC	86.7
10	KNWS-FM	49786	NORTHWESTERN COLLEGE	61.22
11	KOKZ	35949	WOODWARD COMMUNICATIONS, INC.	64.97
12	KHKE	69027	UNIVERSITY OF NORTHERN IOWA	79.15
13	KMCS	47086	WPW BROADCASTING, INC.	71.75
14	KRNA	35555	CUMULUS LICENSING LLC	35.47
15	KHAK	54163	CUMULUS LICENSING LLC	8.7
16	KRNL-FM	13908	CORNELL COLLEGE	11.93
17	KRUI-FM	63560	STUDENT BROADCASTERS INC.	36.19
18	KCCK-FM	34954	KIRKWOOD COMMUNITY COLLEGE	12.2
19	KSUI	66626	THE UNIVERSITY OF IOWA	33.82
20	KFMW	51664	WOODWARD COMMUNICATIONS, INC.	52.36
21	KQMG-FM	42080	KM RADIO OF INDEPENDENCE, L.L.C.	60.92
22	KNWS-FM	49786	NORTHWESTERN COLLEGE	52.36
23	KMCH	64125	COLOFF MEDIA LLC	62
24	KKHQ-FM	28472	CUMULUS LICENSING LLC	82.23
25	KDST	16778	DESIGN HOMES, INC.	56.54
26	KDAT	54165	CUMULUS LICENSING LLC	16.37
27	KUNI	69158	UNIVERSITY OF NORTHERN IOWA	45.03
28	KZIA	35556	KZIA, INC.	14.71
29	KXGM-FM	85165	EDUCATIONAL MEDIA FOUNDATION	18
30	KRQN	89113	GEORGE S. FLINN, JR.	33.15
31	KNBO	174923	NEW BOHEMIA GROUP, INC	52.65
32	KBEA-FM	13666	CUMULUS LICENSING LLC	62.29
33	KGRR	26898	RADIO DUBUQUE, INC.	82.5
34	KMAQ-FM	39857	MAQUOKETA BROADCASTING COMPANY	76.95
35	KWLO	51662	WOODWARD COMMUNICATIONS, INC.	80.05
36	KCNZ	87158	FIFE COMMUNICATION CO., LLC	87.66
37	KNWS	49784	NORTHWESTERN COLLEGE	80.45
38	KXEL	35950	WOODWARD COMMUNICATIONS, INC.	66.83
39	WSUI	63119	THE UNIVERSITY OF IOWA	51.22
40	KGYM	9718	KZIA, INC.	1.82
41	KCJJ	87115	RIVER CITY RADIO, INC.	42.71
42	KWPC	47085	WPW BROADCASTING, INC.	71.75
43	KOEL	28475	CUMULUS LICENSING LLC	80.13
44	KQMG	42077	KM RADIO OF INDEPENDENCE, L.L.C.	60.92
45	KMRY	17697	SELLERS BROADCASTING, INC.	13.6