

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:<sup>1</sup>

**Table 1: Proposed Commonly Owned, Brokered or Jointly-Sold Stations Studied and Associated Arbitron Metro<sup>2</sup> 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.<sup>3</sup>

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 Metro<sup>4</sup> 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.

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<sup>1</sup> None of the following stations are attributable by virtue of a time brokerage agreement or joint sales agreement.

<sup>2</sup> Arbitron data presented herein is obtained from BIA's "Media Access Pro."

<sup>3</sup> See 47 C.F.R. § 73.3555(a).

<sup>4</sup> 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

KWMG(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 Metro<sup>5</sup>**

| 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     | KWMG    | 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    | KCKK-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.

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<sup>5</sup> 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 |
| KKSJ-FM      | FM |
| KWMG<br>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 KWMG 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.

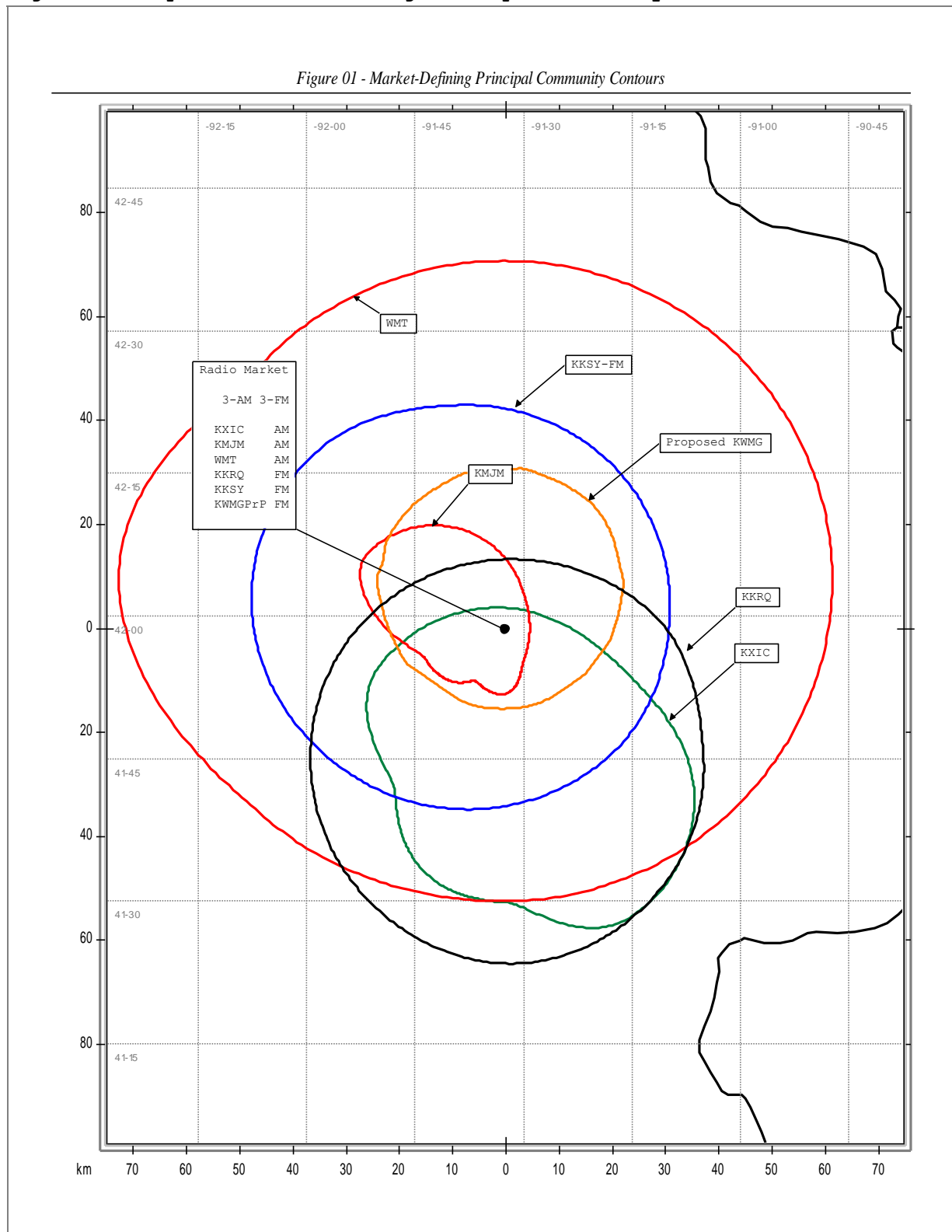
In each interim contour-overlap "radio markets" studied herein, there is at least the minimum required count, including the commonly-owned 3-AM / 3-FM stations, which are which are part of the "Radio Market".

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

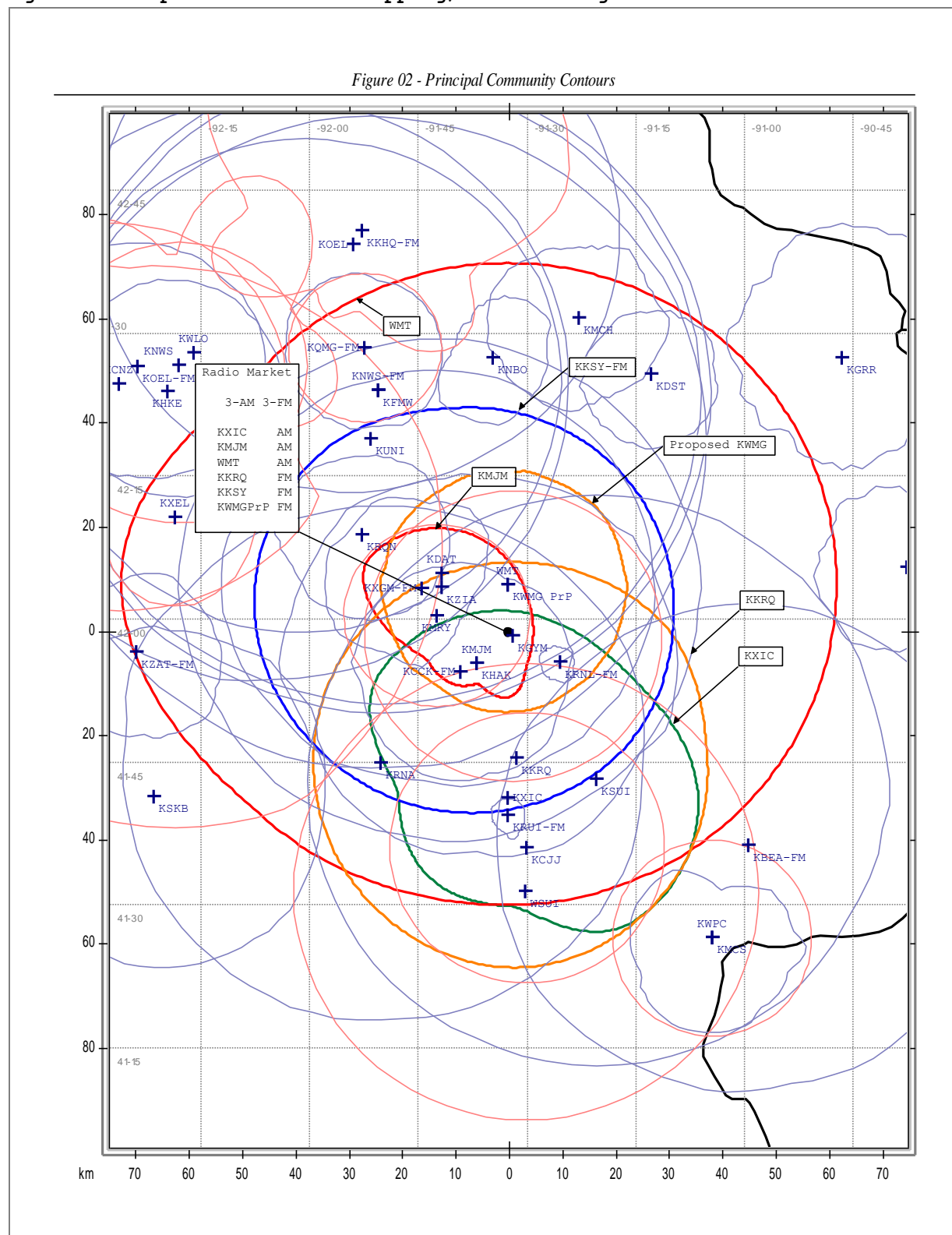
Respectfully submitted,

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    | KCKK-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    |