

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
Jacor Broadcasting of Colorado, Inc.

This statement and the attached figures were prepared on behalf of Jacor Broadcasting of Colorado, Inc ("JBC"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). JBC proposes to modify the facilities of KTCL(FM) BC proposes to modify the facilities of KTCL(FM), from its former community of license, Fort Collins, Colorado, to its new community of license, Wheat Ridge, Colorado.<sup>1</sup> A multiple ownership analysis was prepared considering the following radio stations under present or proposed common ownership, time brokerage or joint sales:<sup>2</sup>

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

| Call Sign | Band | Fac. Id. | Community                 | Geographic Arbitron Market | Declared Arbitron Market |
|-----------|------|----------|---------------------------|----------------------------|--------------------------|
| KHOW      | AM   | 48962    | DENVER                    | Denver-Boulder, CO         | Denver-Boulder, CO       |
| KKZN      | AM   | 29740    | THORNTON                  | Denver-Boulder, CO         | Denver-Boulder, CO       |
| KOA       | AM   | 29738    | DENVER                    | Denver-Boulder, CO         | Denver-Boulder, CO       |
| KBCO-FM   | FM   | 48966    | BOULDER                   | Denver-Boulder, CO         | Denver-Boulder, CO       |
| KBPI      | FM   | 29739    | DENVER                    | Denver-Boulder, CO         | Denver-Boulder, CO       |
| KFMD      | FM   | 48967    | DENVER                    | Denver-Boulder, CO         | Denver-Boulder, CO       |
| KRFX      | FM   | 29731    | DENVER                    | Denver-Boulder, CO         | Denver-Boulder, CO       |
| KTCL      | FM   | 68684    | FORT COLLINS <sup>4</sup> | Ft. Collins-Greeley, CO    | Denver-Boulder, 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 Markets, an ownership study has been prepared in accordance with the Federal Communications Commission's local radio ownership rule.<sup>5</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 KTCL(FM) as proposed to be modified, or which is located in the same Arbitron Metro<sup>6</sup> as KTCL(FM), as modified. Wheat Ridge, the new community of license of KTCL(FM), is located within the Denver - Boulder, CO

<sup>1</sup> Effective May 3, 2004, the FM Table of Allotments was amended to add Channel 227C0 at Wheat Ridge, Colorado, in lieu of Channel 227C at Fort Collins, Colorado, pursuant to the *Report and Order* in MB Docket No. 03-57, 19 FCC Rcd 4821 (MB 2004).

<sup>2</sup> None of the following stations are attributable by virtue of a time brokerage agreement or joint sales agreement.

<sup>3</sup> Arbitron data presented herein is taken from BIA's "Media Access Pro."

<sup>4</sup> BIA currently lists KTCL under its former community of license, Fort Collins, Colorado.

<sup>5</sup> See 47 C.F.R. § 73.3555(a).

<sup>6</sup> A station is considered to be "located in an Arbitron Metro" if the station's city of license is located within the boundaries of that Metro, or, the station is listed as "Home" to that Metro by Arbitron.

Arbitron Metro. Notwithstanding that Fort Collins, the former community of license of KTCL(FM), is geographically located in the Ft. Collins - Greeley, CO Arbitron Metro, KTCL(FM) is reported by BIA as being "Home" to the Denver - Boulder, CO Arbitron Metro. Contour overlap of the station to be modified, as depicted in Figure 1, occurs with commonly-owned stations whose communities of license are located in the nearby Pueblo, CO, Colorado Springs, CO and Ft. Collins - Greeley, CO Arbitron Metro markets.

Arbitron Market Study

The community of license of KTCL(FM), as proposed to be modified, is located within the Denver-Boulder, CO Arbitron Metro, and KTCL(FM) currently is declared "Home" to that Metro. This proposal is in compliance with the local radio ownership rules for the Denver-Boulder, CO Arbitron Metro, as evidenced by Table 2 below:

Table 2 - Stations Considered to be in the  
Denver - Boulder, CO Arbitron Metro<sup>7</sup>

| <b>Calls</b> | <b>Fac. Id.</b> | <b>Band</b> | <b>Owner</b>                    | <b>Status<sup>8</sup></b> | <b>Community</b> | <b>County</b> |
|--------------|-----------------|-------------|---------------------------------|---------------------------|------------------|---------------|
| KBCO-FM      | 48966           | FM          | Clear Channel Communications    | b                         | Boulder          | Boulder       |
| KBPI         | 29739           | FM          | Clear Channel Communications    | b                         | Denver           | Arapahoe      |
| KFMD         | 48967           | FM          | Clear Channel Communications    | b                         | Denver           | Arapahoe      |
| KHOW         | 48962           | AM          | Clear Channel Communications    | b                         | Denver           | Arapahoe      |
| KKZN         | 29740           | AM          | Clear Channel Communications    | b                         | Thornton         | Adams         |
| KOA          | 29738           | AM          | Clear Channel Communications    | b                         | Denver           | Arapahoe      |
| KRFX         | 29731           | FM          | Clear Channel Communications    | b                         | Denver           | Arapahoe      |
| KTCL         | 68684           | FM          | Clear Channel Communications    | a                         | Fort Collins     | Larimer       |
| KCFC         | 70405           | AM          | Colorado Public Radio           | b                         | Boulder          | Boulder       |
| KCFR         | 34585           | AM          | Colorado Public Radio           | b                         | Denver           | Arapahoe      |
| KVOD         | 53777           | FM          | Colorado Public Radio           | b                         | Denver           | Arapahoe      |
| KLDC         | 35089           | AM          | Crawford Broadcasting Company   | b                         | Brighton         | Adams         |
| KLTT         | 35191           | AM          | Crawford Broadcasting Company   | b                         | Commerce City    | Adams         |
| KLVZ         | 12364           | AM          | Crawford Broadcasting Company   | b                         | Denver           | Arapahoe      |
| KLZ          | 35088           | AM          | Crawford Broadcasting Company   | b                         | Denver           | Arapahoe      |
| KUVO         | 16687           | FM          | Denver Educational Broadcasting | b                         | Denver           | Arapahoe      |
| KFDN         | 83535           | FM          | Educational Media Foundation    | b                         | Lakewood         | Jefferson     |
| KLDV         | 12354           | FM          | Educational Media Foundation    | b                         | Morrison         | Jefferson     |
| KALC         | 59601           | FM          | Entercom                        | b                         | Denver           | Arapahoe      |
| KEZW         | 67843           | AM          | Entercom                        | b                         | Aurora           | Adams         |
| KOSI         | 67844           | FM          | Entercom                        | b                         | Denver           | Arapahoe      |
| KQMT         | 26929           | FM          | Entercom                        | b                         | Denver           | Arapahoe      |
| KJMN         | 10056           | FM          | Entravision Holdings LLC        | b                         | Castle Rock      | Douglas       |
| KMXA         | 10057           | AM          | Entravision Holdings LLC        | b                         | Aurora           | Adams         |
| KXPK         | 20300           | FM          | Entravision Holdings LLC        | b                         | Evergreen        | Jefferson     |
| KDJM         | 59972           | FM          | Infinity Broadcasting           | b                         | Broomfield       | Jefferson     |
| KIMN         | 59597           | FM          | Infinity Broadcasting           | b                         | Denver           | Arapahoe      |

<sup>7</sup> Source: BIA.

<sup>8</sup> 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.

| <b>Calls</b> | <b>Fac. Id.</b> | <b>Band</b> | <b>Owner</b>                           | <b>Status<sup>8</sup></b> | <b>Community</b> | <b>County</b> |
|--------------|-----------------|-------------|--|---------------------------|------------------|---------------|
| KXKL-FM      | 59959           | FM          | Infinity Broadcasting                  | b                         | Denver           | Arapahoe      |
| KCKK         | 30823           | AM          | Jefferson-Pilot Communications Company | b                         | Lakewood         | Jefferson     |
| KJCD         | 71767           | FM          | Jefferson-Pilot Communications Company | b                         | Longmont         | Boulder       |
| KKFN         | 30839           | AM          | Jefferson-Pilot Communications Company | b                         | Denver           | Arapahoe      |
| KQKS         | 35574           | FM          | Jefferson-Pilot Communications Company | b                         | Lakewood         | Jefferson     |
| KYGO-FM      | 30829           | FM          | Jefferson-Pilot Communications Company | b                         | Denver           | Arapahoe      |
| KJME         | 31349           | AM          | Jo-Mor Communications Inc              | b                         | Denver           | Arapahoe      |
| KBNO         | 59956           | AM          | Latino Communications                  | b                         | Denver           | Arapahoe      |
| KGUD         | 62178           | FM          | Longmont Community Radio               | b                         | Longmont         | Boulder       |
| KSIR-FM      | 35023           | FM          | New Directions Media                   | b                         | Bennett          | Adams         |
| KCUV         | 52249           | AM          | NRC Broadcasting Inc                   | b                         | Littleton        | Arapahoe      |
| KNRC         | 56643           | AM          | NRC Broadcasting Inc                   | b                         | Englewood        | Arapahoe      |
| KRCN         | 70625           | AM          | Pilgrim Communications LLC             | b                         | Longmont         | Boulder       |
| KPOF         | 52600           | AM          | Pillar of Fire                         | b                         | Denver           | Arapahoe      |
| KBJD         | 87151           | AM          | Salem Communications Corporation       | b                         | Denver           | Arapahoe      |
| KNUS         | 42377           | AM          | Salem Communications Corporation       | b                         | Denver           | Arapahoe      |
| KRKS         | 58632           | AM          | Salem Communications Corporation       | b                         | Denver           | Arapahoe      |
| KRKS-FM      | 58631           | FM          | Salem Communications Corporation       | b                         | Lafayette        | Boulder       |
| KAGM         | 37028           | FM          | Seeger, Guest & Fort                   | b                         | Strasburg        | Arapahoe      |
| KXDC         | 76780           | FM          | Superior Broadcasting                  | a                         | Estes Park       | Larimer       |
| KVCU         | 48965           | AM          | University of Colorado                 | b                         | Boulder          | Boulder       |

### Contour-Based Radio Markets

Because KTCL(FM), as proposed to be modified, does not overlap any commonly-owned stations that are not part of an Arbitron Metro, an interim contour-overlap study is not required.

### Conclusions

In the radio market studied herein, there are at least 45 radio stations, including the subject commonly-owned 3-AM / 5-FM stations, which are home to the Denver - Boulder, CO Arbitron Metro.

Since KTCL(FM) was already listed by BIA as "Home" to the Denver - Boulder, CO Arbitron Metro, this proposed modification does not affect the existing number of commonly-owned stations in the subject Arbitron Metro.

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

