

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,

Troy G. Langham  
FCC Engineering Supervisor  
October 8, 2004

Figure 1

