

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CITICASTERS LICENSES, L.P.

This statement and the attached figures were prepared on behalf of Citicasters Licenses, L.P. ("CLLP"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CLLP proposes to construct the facilities of a new FM station on Channel 282, Chehalis, Washington. 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	Community	Service	Geographic Arbitron Market	Declared Arbitron Market
		CENTRALIA-			
KELA	32996	CHEHALIS	AM	Non- Metro	Non- Metro
KMNT	33829	CENTRALIA	FM CP	Non- Metro	Non- Metro
KMNT	33829	CENTRALIA	FM	Non- Metro	Non- Metro
NEW	162476	CHEHALIS	FM	Non- Metro	N/A -- NEW

Since certain of these stations have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) an ownership study has been prepared in accordance with the Federal Communications Commission's local radio ownership rule.³ The proposed commonly owned stations are not located within any Arbitron Metro.

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 Channel 282 Chehalis as proposed, or which is located in the same Arbitron Metro⁴ as Channel 282 Chehalis.

Interim Contour-Overlap Analysis

Because the principal community contour of the station to be constructed intersects the principal community contour of a station located outside any Arbitron Metro, and the subject station is itself located outside any Arbitron Metro, an interim contour-overlap analysis is set forth in this statement.

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 taken 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.

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.

The "radio market" is defined by the mutually overlapping principal community contours of Channel 282 Chehalis (APP) (this instant application), KMNT(FM) and KELA(AM). The predicted principal community contours of these stations (1 AM / 2 FM), as well as other stations whose principal community contours overlap this combination, are shown in *Figure 1*. *Figure 2* is the tabulation of some of the radio stations identified in the "radio market."

Count of Stations in Defined Markets

The number of radio stations in a "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 controlled 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 21 radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio market." *Figure 2* is the tabulation of some of the radio stations identified in the "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 interim contour-overlap "radio market" studied herein, there are at least 18 stations, including the commonly-owned 1-AM / 2-FM stations.

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

Respectfully submitted,

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Figure 01 - Market-Defining Principal Community Contours

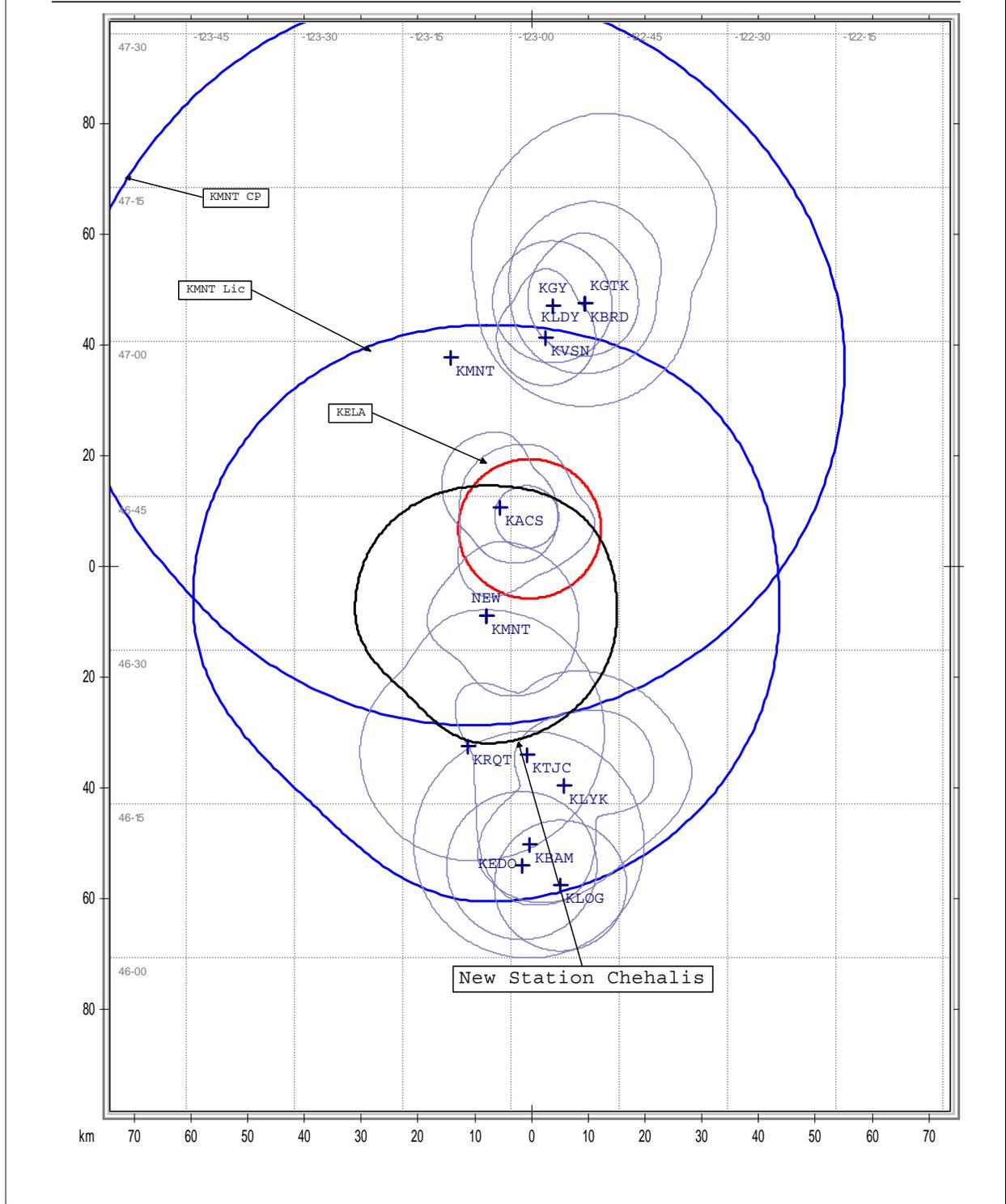


Figure 2 - List of Stations in Radio Market 1

Count	Call Sign	Facility_id	Licensee	Distance_km
1	KELA	32996	CITICASTERS LICENSES, L.P.	17.52
2	KMNT	33829	CITICASTERS LICENSES, L.P.	0
3	NEW	162476	CITICASTERS, L.P.	0
4	KITI	53398	PREMIER BROADCASTERS, INC.	18.95
5	KBAM	2814	ENTERCOM LONGVIEW LICENSE, LLC	42.05
6	KEDO	38379	ENTERCOM LONGVIEW LICENSE, LLC WASHINGTON INTERSTATE BRDCASTING CO, INC.	45.56
7	KLOG	70647	INC.	50.5
8	KBRD	26893	SKIP MARROW	58.99
9	KGY	34486	KGY, INC.	57.22
10	KGTK	47567	KITZ RADIO, INC.	58.99
11	KVSN	20298	EVERGREEN BROADCASTING INCORPORATED	51.35
12	KLDY	3711	SKIP MARROW	58.99
13	KACS	10685	CHEHALIS VALLEY EDUCATIONAL FOUNDATION	19.74
14	KRQT	2813	ENTERCOM LONGVIEW LICENSE, LLC	23.77
15	KITI- FM	53396	PREMIER BROADCASTERS, INC.	3.13
16	KCED	63026	STATE OF WASH. CENTRALIA COLLEGE	19.25
17	KLYK	71007	ENTERCOM LONGVIEW LICENSE, LLC	33.57
18	KTJC	92487	CSN INTERNATIONAL	26.08