

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 KPAW(FM), Fort Collins, CO. 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	State	Geographic Arbitron Market	Declared Arbitron Market
KOA	29738	AM	Denver	Arapahoe	CO	Denver-Boulder, CO	Denver-Boulder, CO
KKZN	29740	AM	Thornton	Adams	CO	Denver-Boulder, CO	Denver-Boulder, CO
KGAB	30224	AM	Orchard Valley	Laramie	WY	Cheyenne, WY	Cheyenne, WY
KHOW	48962	AM	Denver	Arapahoe	CO	Denver-Boulder, CO	Denver-Boulder, CO
KCOL	68685	AM	Wellington	Larimer	CO	Ft. Collins-Greeley, CO	Ft. Collins-Greeley, CO
KIIX	68966	AM	Fort Collins	Larimer	CO	Ft. Collins-Greeley, CO	Ft. Collins-Greeley, CO
KQLF	7693	FM	Cheyenne	Laramie	WY	Cheyenne, WY	Ft. Collins-Greeley, CO
KSME	17626	FM	Greeley	Weld	CO	Ft. Collins-Greeley, CO	Ft. Collins-Greeley, CO
KBPI	29739	FM	Denver	Arapahoe	CO	Denver-Boulder, CO	Denver-Boulder, CO
KOLZ	30225	FM	Cheyenne	Laramie	WY	Cheyenne, WY	Cheyenne, WY
KBCO-FM	48966	FM	Boulder	Boulder	CO	Denver-Boulder, CO	Denver-Boulder, CO
KIGN	56234	FM	Burns	Laramie	WY	Cheyenne, WY	Cheyenne, WY
KTCL	68684	FM	Fort Collins	Larimer	CO	Ft. Collins-Greeley, CO	Denver-Boulder, CO
KPAW	68976	FM	Fort Collins	Larimer	CO	Ft. Collins-Greeley, CO	Ft. Collins-Greeley, 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.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 KPAW(FM) as proposed, or which is located in the same Arbitron Metro⁴ as KPAW(FM)). The community of license of KPAW(FM) is located within the Ft. Collins-Greeley, CO Arbitron Metro, and KPAW(FM) is reported

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.

by BIA as being "Home" to that Metro only. 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 nearby Denver-Boulder, CO, and Cheyenne, WY Arbitron Metro markets.

Arbitron Market Study

KPAW(FM) is reported by BIA as being "Home" to the Ft. Collins-Greeley, CO Arbitron 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
Ft. Collins-Greeley, CO Arbitron Metro⁵

Count	Calls	Fac ID	Band	Owner	Status ⁶	Community	County
1	KCOL	68685	AM	Clear Channel Communications	b	Wellington	Larimer
2	KIIX	68966	AM	Clear Channel Communications	b	Fort Collins	Larimer
3	KPAW	68976	FM	Clear Channel Communications	b	Fort Collins	Larimer
4	KQLF	7693	FM	Clear Channel Communications	a	Cheyenne	Laramie
5	KSME	17626	FM	Clear Channel Communications	b	Greeley	Weld
6	KTCL	68684	FM	Clear Channel Communications	g ⁷	Fort Collins	Larimer
7	KCSU-FM	62435	FM	Colorado State Board of Agriculture	b	Fort Collins	Larimer
8	KUNC-FM	68219	FM	Community Radio for Northern Colorado	b	Greeley	Weld
9	KLHV	84102	FM	Educational Media Foundation	b	Fort Collins	Larimer
10	KGRE	33821	AM	Greeley Broadcasting Corporation	b	Greeley	Weld
11	KEZZ	67483	AM	MK Inc	b	Estes Park	Larimer
12	KJMP	129513	AM	Mountain States Radio Inc	b	Pierce	Weld
13	KFKA	71443	AM	Music Ventures LLC dba Broadcast Media LLC	b	Greeley	Weld
14	KJAC	38345	FM	NRC Broadcasting Inc	b	Timnath	Larimer
15	KSXT	35517	AM	Pratt, OJ & Carol	b	Loveland	Larimer
16	KRFC	82804	FM	Public Radio for the Front Range	b	Fort Collins	Larimer
17	KKPL	54394	FM	Regent Communications, Inc	a	Cheyenne	Laramie
18	KKQZ	84497	FM	Regent Communications, Inc	b	Wellington	Larimer
19	KTRR	50375	FM	Regent Communications, Inc	b	Loveland	Larimer
20	KUAD-FM	49538	FM	Regent Communications, Inc	b	Windsor	Weld
21	KJJD	58940	AM	Rodriguez-Gallegos Communications	b	Windsor	Weld
22	KXDC	76780	FM	Superior Broadcasting	g	Estes Park	Larimer
23	KXWA	89401	FM	WAY FM Media Group Inc	b	Loveland	Larimer
24	KHNC	17183	AM	Wiedeman, Don & Sharon	b	Johnstown	Weld

⁵ Source: BIA.

⁶ 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.

⁷ The community of license of KTCL(FM) has been reallocated from Fort Collins to Wheat Ridge, Colorado, which is geographically located within the Denver-Boulder, CO Arbitron Metro.

Interim Contour-Overlap Analysis

Because the principal community of the station to be modified, and the communities of all commonly-owned or attributable stations with overlapping principal contours with the station to be modified, are located inside an Arbitron Metro, an interim contour-overlap analysis is not required.

Conclusions

In the Arbitron Radio Market studied herein, there are at least 23 radio stations, including the subject commonly-owned 2-AM / 4-FM stations, which are home to the Ft. Collins-Greeley, CO Metro. This proposal does not affect the existing number of commonly-owned stations in the subject BIA Metro.

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

Respectfully submitted,

Stephen G. Davis
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Figure 1

