

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CAPSTAR TX, LLC

This statement and the attached figures were prepared on behalf of Capstar TX, LLC ("CTL"), a licensee subsidiary of iHeartMedia, Inc. ("IHM"). CTL proposes to modify the facilities of KDZA(AM), Pueblo, 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 Nielsen Metro² Information

Calls	Fac ID	Band	Community	County	Geographic Nielsen Market	Declared Nielsen Market
KCCY	53850	AM	Pueblo	Pueblo	Pueblo, CO	Colorado Springs, CO
KCSJ	53846	AM	Pueblo	Pueblo	Pueblo, CO	Pueblo, CO
KVUU	35868	FM	Pueblo	Pueblo	Pueblo, CO	Colorado Springs, CO
KPHT	87658	FM	Rocky Ford	Otero	Non-Metro	Pueblo, CO
KDZA-FM	40848	FM	Pueblo	Pueblo	Pueblo, CO	Colorado Springs, CO
KCCY	40847	FM	Pueblo	Pueblo	Pueblo, CO	Pueblo, 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 Nielsen Metro market, an ownership study has been prepared in accordance with the Federal Communications Commission's local radio ownership rule.³

IHM does not have an attributable interest in any other station with a principal community contour that overlaps or intersects the principal community contour of KDZA-FM, as proposed, which is not located in a Nielsen market, or regardless of contour overlap, which is located in the same Nielsen Metro⁴ as KDZA-FM. The community of license of KDZA-FM is located within the Pueblo, CO Nielsen Metro, and KDZA-FM is reported by BIA as being "Home" to the Colorado Springs, CO 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 Pueblo, CO Nielsen Metro market, Colorado Springs, CO, and commonly owned stations whose communities of license are located outside any Nielsen Metro market.

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

² Nielsen 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 a Nielsen 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.

Nielsen Market Study

KDZA-FM is reported by BIA as being geographically in the **Pueblo, CO** Metro. This proposal is in compliance with the local radio ownership rules for that Nielsen Metro, as evidenced by Table 2 below.

KDZA-FM is reported by BIA as being "Home" to the **Colorado Springs, CO** Metro. **This proposal is not in compliance with the local radio ownership rules for that Nielsen Metro**, as evidenced by Table 2a below. However, the existing KDZA-FM licensed facility was also not in compliance with the Nielsen metro-based rules. This proposal maintains the *status quo* in the Colorado Springs, CO Nielsen Metro -- no stations are added to or removed from the Metro, nor is KDZA-FM(FM)'s "Home" Nielsen Metro changed, by virtue of this instant application. Because this modification would not create a "new violation" of the ownership rules, this existing combination of radio stations qualifies for grandfathering. See *Note 4 to 47 C.F.R. Section 73.3555* (minor modification applications are subject to ownership restrictions only if implementing a change in an FM radio station's community of license or if new or increased concentration of ownership among commonly-owned media would be created); accord *2002 Biennial Regulatory Review--Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996*, 18 FCC Rcd 13,620 at fn. 1033 (2003) (modifications of facilities in a grandfathered combination are prohibited if the proposed modification would create a new violation of the ownership rules).

Table 2 - Stations Considered to be in the
Pueblo, CO Nielsen Metro⁵

FCC Geographic Market Definition for Pueblo, CO									
Call Letters	AM/ FM	Type	Station Format	Home Market	Market		Owner	City & State of License	County of License
					Designn Date	Home Mkt Rank			
KRXP	FM	103.9	C Alternative	Colorado Springs, CO	07/02/2003	90	Bahakel Communications Limited	Pueblo West, CO	Pueblo
KICN	FM	103.3	C Mexican	Pueblo, CO	04/22/2011	235	Bartholomew, Steven	Colorado City, CO	Pueblo
KFEL	AM	970	NC Religion	Pueblo, CO	07/02/2003	235	Catholic Radio Network Inc	Pueblo, CO	Pueblo
KCFP	FM	91.9	NC Classical	Pueblo, CO	07/02/2003	235	Colorado Public Radio	Pueblo, CO	Pueblo
KKPC	AM	1230	NC Nws/Tlk/Inf	Pueblo, CO	07/02/2003	235	Colorado Public Radio	Pueblo, CO	Pueblo
KTSC	FM	88.5	NC CHR	Pueblo, CO	07/02/2003	235	Colorado State University - Pueblo	Pueblo, CO	Pueblo
KKMG	FM	98.9	C CHR	Colorado Springs, CO	07/02/2003	90	Cumulus Media Holdings Inc	Pueblo, CO	Pueblo
Number of Stations in Geographic Market 7									
Previous Stations in Geographic Market									
KCEG	AM	780	C Country	Colorado Springs, CO	12/22/2011	90	Cutforth, Timothy C	Fountain, CO	El Paso
KTPL	FM	88.3	NC Talk	Colorado Springs, CO	04/24/2006	90	Educational Communications of Colorado Springs	Pueblo, CO	Pueblo
KLCX	FM	106.9	NC ChrsContem	Pueblo, CO	07/02/2003	235	Educational Media Foundation	Pueblo, CO	Pueblo
KFRY	FM	89.9	NC Religion	Pueblo, CO	10/11/2006	235	Family Stations Incorporated	Pueblo, CO	Pueblo
KFVR	FM	94.7	C DARK	Pueblo, CO	01/06/2009	235	Greeley Broadcasting Corporation	Beulah, CO	Pueblo
KCCY	FM	96.9	C Country	Colorado Springs, CO	08/06/2004	90	iHeartMedia	Pueblo, CO	Pueblo
KCCY	AM	1350	C Sports	Pueblo, CO	07/02/2003	235	iHeartMedia	Pueblo, CO	Pueblo
KCSJ	AM	590	C Nws/Tlk/Spt	Pueblo, CO	07/02/2003	235	iHeartMedia	Pueblo, CO	Pueblo
KDZA	FM	107.9	C Clsc Rock	Colorado Springs, CO	10/01/2012	90	iHeartMedia	Pueblo, CO	Pueblo
KPHT	FM	95.5	C Clsc Hits	Pueblo, CO	01/31/2006	235	iHeartMedia	Rocky Ford, CO	Otero
KVUU	FM	98.9	C Hot AC	Colorado Springs, CO	07/02/2003	90	iHeartMedia	Pueblo, CO	Pueblo
KAVA	AM	1480	C Mexican	Pueblo, CO	07/02/2003	235	Latino Communications	Pueblo, CO	Pueblo
KSPK	FM	102.3	C Country	Pueblo, CO	07/02/2003	235	Mainstreet Broadcasting Co Inc	Walsenburg, CO	Huerfano
KSTY	FM	104.5	C Country	Pueblo, CO	11/05/2007	235	Royal Gorge Broadcasting LLC	Canon City, CO	Fremont
KGFT	FM	100.7	C Chrs/Talk	Colorado Springs, CO	07/02/2003	90	Salem Media Group Inc	Pueblo, CO	Pueblo
KRYE	FM	104.9	C Mexican	Pueblo, CO	04/15/2008	235	United States CP LLC	Rye, CO	Pueblo
KRWA	FM	90.9	NC Xmas/CCtm	Pueblo, CO	04/22/2005	235	WAY-FM Media Group Inc	Rye, CO	Pueblo
KWRP	AM	690	C Oldies	Pueblo, CO	07/02/2003	235	Western Radio Ltd	Pueblo, CO	Pueblo
Number of Stations in Geographic Market 25									
Previous Stations in Geographic Market									

C - Commercial Station; *NC* - Non Commercial Station

p indicates pending sale to owner listed

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⁵ Source: BIA.

Table 2b - Stations Considered to be in the
Colorado Springs, CO Nielsen Metro⁶

FCC Geographic Market Definition for Colorado Springs, CO										
Call Letters	AM/FM	Type	Station Format	Home Market	Market		Owner	City & State of License	County of License	
					Designm	Home Mkt				
KILO	FM	94.3 C	Rock	Colorado Springs, CO	07/02/2003	90	Bahakel Communications Limited	Colorado Springs, CO	El Paso	
KRXP	FM	103.9 C	Alternative	Colorado Springs, CO	07/02/2003	90	Bahakel Communications Limited	Pueblo West, CO	Pueblo	
KXCL	FM	101.7 NC	Religion	Colorado Springs, CO		90	Calvary Chapel Aurora	Rock Creek Park, CO	El Paso	
KCME	FM	88.7 NC	Classical	Colorado Springs, CO	07/02/2003	90	Cheyenne Mountain Public Broadcast House	Manitou Springs, CO	El Paso	
KMPZ	FM	88.1 NC	Classical	Colorado Springs, CO		90	Cheyenne Mountain Public Broadcast House	Salida, CO	Chaffee	
KRCC	FM	91.5 NC	NPR/Vary	Colorado Springs, CO	07/02/2003	90	Colorado College	Colorado Springs, CO	El Paso	
KXRE	AM	1490 NC	Nws/Tlk/Inf	Colorado Springs, CO	07/02/2003	90	Colorado Public Radio	Manitou Springs, CO	El Paso	
KATC	FM	95.1 C	Country	Colorado Springs, CO	07/02/2003	90	Cumulus Media Holdings Inc	Colorado Springs, CO	El Paso	
KCSF	AM	1300 C	Sports	Colorado Springs, CO	07/02/2003	90	Cumulus Media Holdings Inc	Colorado Springs, CO	El Paso	
KKFM	FM	98.1 C	Clsc Rock	Colorado Springs, CO	07/02/2003	90	Cumulus Media Holdings Inc	Colorado Springs, CO	El Paso	
KKMG	FM	98.9 C	CHR	Colorado Springs, CO	07/02/2003	90	Cumulus Media Holdings Inc	Pueblo, CO	Pueblo	
KKPK	FM	92.9 C	AC	Colorado Springs, CO	07/02/2003	90	Cumulus Media Holdings Inc	Colorado Springs, CO	El Paso	
KVOR	AM	740 C	News/Talk	Colorado Springs, CO	07/02/2003	90	Cumulus Media Holdings Inc	Colorado Springs, CO	El Paso	
KCEG	AM	780 C	Country	Colorado Springs, CO	07/02/2003	90	Cumulus Media Holdings Inc	Colorado Springs, CO	El Paso	
KJME	AM	890 C	Oldies	Colorado Springs, CO	12/22/2011	90	Cutforth, Timothy C	Fountain, CO	El Paso	
KTLE	FM	90.5 NC	Xms/Cst/Inp	Colorado Springs, CO	01/06/2012	90	Cutforth, Timothy C	Fountain, CO	El Paso	
KTPL	FM	88.3 NC	Talk	Colorado Springs, CO	07/02/2003	90	Educational Communications of Colorado Springs	Colorado Springs, CO	El Paso	
KFGS	AM	1580 C	Christian	Colorado Springs, CO	04/24/2006	90	Educational Communications of Colorado Springs	Pueblo, CO	Pueblo	
KCCY	FM	96.9 C	Country	Colorado Springs, CO	07/02/2003	90	Gabriele Broadcasting Licensee LLC	Colorado Springs, CO	El Paso	
KDZA	FM	107.9 C	Clsc Rock	Colorado Springs, CO	08/06/2004	90	iHeartMedia	Pueblo, CO	Pueblo	
KIBT	FM	96.1 C	Urban/HpHo	Colorado Springs, CO	10/01/2012	90	iHeartMedia	Pueblo, CO	Pueblo	
KKLI	FM	106.3 C	Xmas/AC	Colorado Springs, CO	07/02/2003	90	iHeartMedia	Fountain, CO	El Paso	
KVUU	FM	99.9 C	Hot AC	Colorado Springs, CO	07/02/2003	90	iHeartMedia	Widefield, CO	El Paso	
KQSC	AM	1530 C	Country	Colorado Springs, CO	07/02/2003	90	iHeartMedia	Pueblo, CO	Pueblo	
KRDO	AM	1240 C	News/Talk	Colorado Springs, CO	07/02/2003	90	Mountain Radio Group Inc	Colorado Springs, CO	El Paso	
KRDO	FM	105.5 C	News/Talk	Colorado Springs, CO	07/02/2003	90	News-Press & Gazette Company	Colorado Springs, CO	El Paso	
KEPC	FM	88.7 NC	Alternative	Colorado Springs, CO	07/02/2003	90	News-Press & Gazette Company	Security, CO	El Paso	
					07/02/2003	90	Pikes Peak Community College	Colorado Springs, CO	El Paso	
Number of Stations in Geographic Market 27										
Previous Stations in Geographic Market										
KSTY	FM	104.5 C	Country	Pueblo, CO	11/05/2007	235	Royal Gorge Broadcasting LLC	Canon City, CO	Fremont	
KBIQ	FM	102.7 C	Xmas/CClm	Colorado Springs, CO	07/02/2003	90	Salem Media Group Inc	Manitou Springs, CO	El Paso	
KGFT	FM	100.7 C	Chrst/Talk	Colorado Springs, CO	07/02/2003	90	Salem Media Group Inc	Pueblo, CO	Pueblo	
KZNT	AM	1460 C	News/Talk	Colorado Springs, CO	07/02/2003	90	Salem Media Group Inc	Colorado Springs, CO	El Paso	
KCBR	AM	1040 C	Hip Hop	Colorado Springs, CO	07/02/2003	90	United States CP LLC	Monument, CO	El Paso	
C - Commercial Station; *NC* - Non Commercial Station										
p indicates pending sale to owner listed										
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⁶ Source: BIA.

Table 2b -Continued - Stations Considered to be in the
Colorado Springs, CO Nielsen Metro⁷

FCC Geographic Market Definition for Colorado Springs, CO									
Call Letters		AM/ FM	Type	Freq	Station Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner
KKCS		FM	104.7 NC	DARK		Colorado Springs, CO	05/18/2009	90	United States CP LLC
Number of Stations in Geographic Market 33									
Previous Stations in Geographic Market									
KXWA		FM	101.9 NC	Xmas/CCtm	Denver-Boulder, CO		08/01/2008	18	WAY-FM Media Group Inc
									Centennial, CO
									El Paso
									Arapahoe

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

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⁷ Source: BIA.

Interim Contour-Overlap Analysis

Because the proposed principal community contour of the station to be modified intersects the principal community contour of a station under common ownership or attribution whose community of license is located outside any Nielsen Metro, an interim contour-overlap analysis is also set forth in this statement.

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.

In *Figure 1* the "radio market" is defined by the mutually overlapping principal community contours of KCCY(AM), KCSJ(AM), KVUU(FM), KPHT(FM), KDZA-FM, and KCCY(FM). The predicted principal community contours of these stations, (2 AM / 4 FM), as well as other stations whose principal community contours overlap this combination, are shown in *Figure 2*. *Figure 3* is the tabulation of some of the radio stations so identified in the contour-overlap "radio market."

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.

In the interim contour-overlap "radio market" studied herein, there are at least 49 radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio market." *Figure 3* is the tabulation of some of the radio stations identified in the contour-overlap "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 Nielsen Metro market studied herein, there are at least 25 radio stations, including the subject commonly-owned 2-AM / 4-FM stations, which are home to the Pueblo, CO Metro. This proposal does not affect the existing number of commonly-owned stations in the subject Nielsen Metro.

In the Nielsen Metro market studied herein, there are at least 33 radio stations, including the subject commonly-owned 5-FM stations, which are home to the Pueblo, CO Metro and **is non-compliant**. However, this proposal does not

affect the existing number of commonly-owned stations in the subject Nielsen Metro.

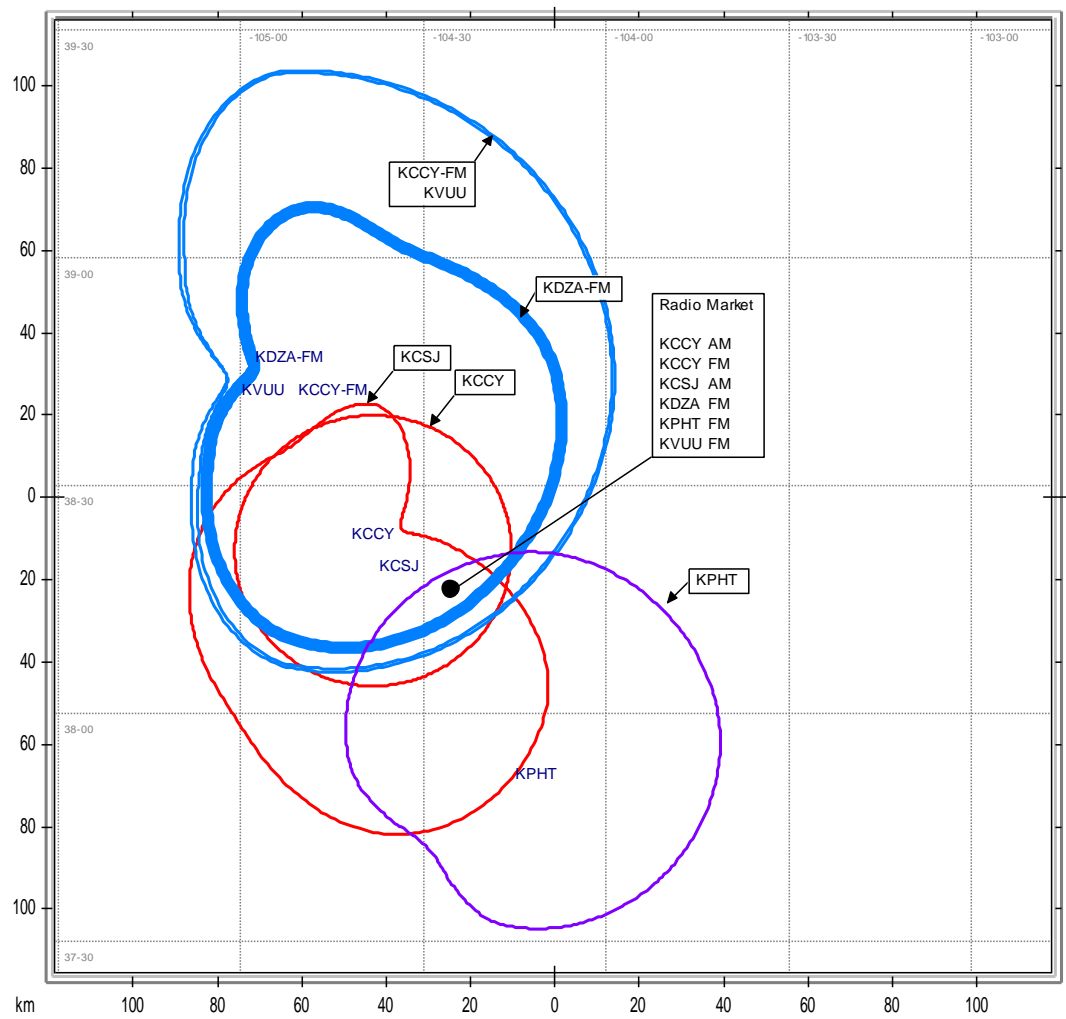
In the interim contour-overlap "radio market" studied herein, there are at least 34 stations, including the commonly-owned 2-AM / 4-FM stations.

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
December 2017

Figure 1



State Borders Lat/Lon Grid

Figure 2

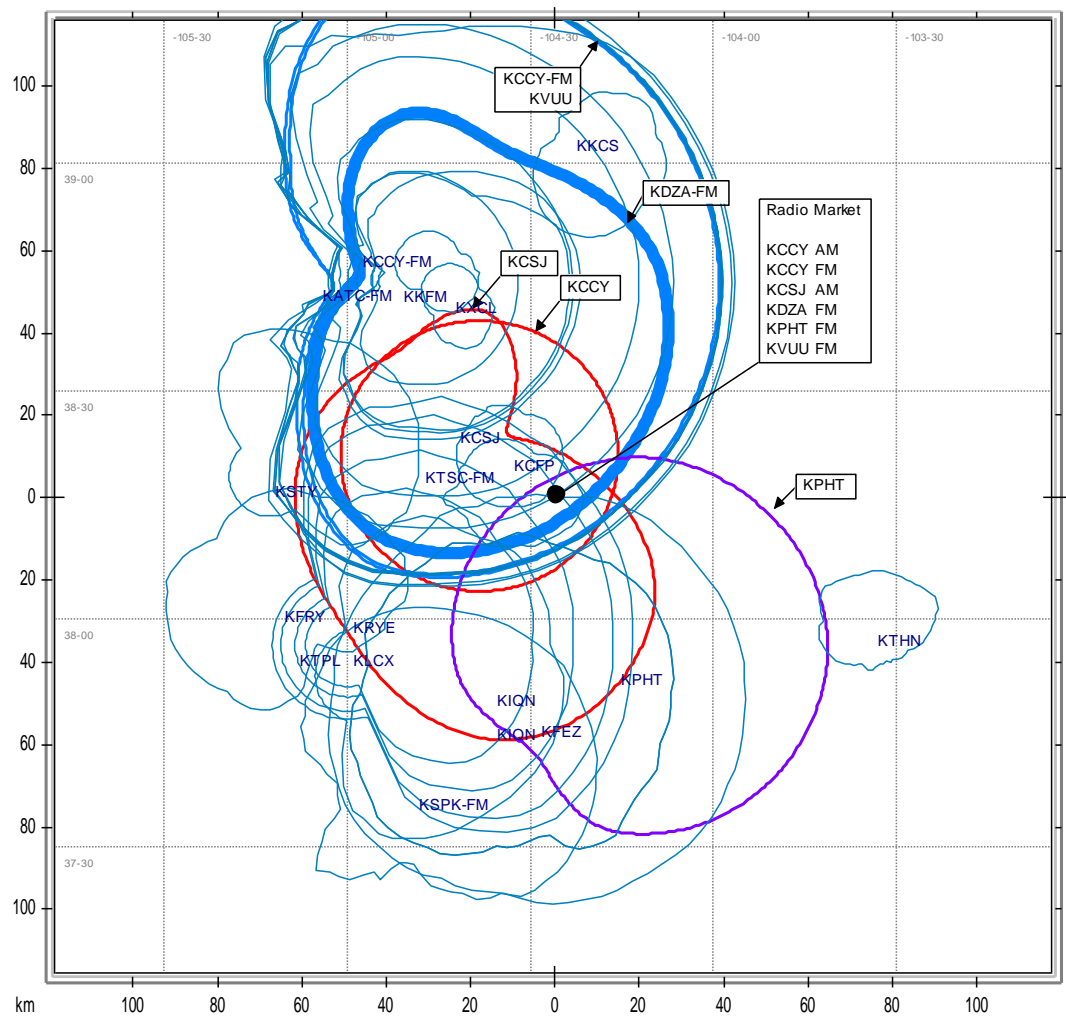


Figure 3 - Tabulation of stations in Radio Market

Count	Call Sign	Faci_id	Licensee	Dist_km
1	KGFT	20579	BISON MEDIA, INC	64.12
2	KBIQ	73073	BISON MEDIA, INC.	64.12
3	KTSC-FM	69148	BOARD OF GOVERNORS OF THE COLORADO STATE UNIV	12.79
4	KXCL	164277	CALVARY CHAPEL AURORA	55.45
5	KCCY-FM	40847	CAPSTAR TX, LLC	64.14
6	KDZA-FM	40848	CAPSTAR TX, LLC	64.16
7	KPHT	87658	CAPSTAR TX, LLC	43.74
8	KVUU	35868	CAPSTAR TX, LLC	64.18
9	KCCY	53850	CC LICENSES, LLC	19.82
10	KCSJ	53846	CC LICENSES, LLC	19.72
11	KTHN	7046	CCR-LA JUNTA IV, LLC	82.78
12	KCME	10791	CHEYENNE MOUNTAIN PUBLIC BROADCAST HOUSE, INC	64.07
13	KRXP	53845	COLORADO SPRINGS RADIO BROADCASTERS, INC	64.18
14	KILO	12367	COLORADO SPRINGS RADIO BROADCASTERS, INC.	64.18
15	KTLF	18796	EDUCATIONAL COMMUNICATIONS OF COLORADO SPRINGS, INC	64.12
16	KTPL	12362	EDUCATIONAL COMMUNICATIONS OF COLORADO SPRINGS, INC	61
17	KLCX	25526	EDUCATIONAL MEDIA FOUNDATION	61
18	KFEZ	164170	EDWARD MAGNUS	53.74
19	KFRY	87050	FAMILY STATIONS, INC.	70.09
20	KFVR-FM	81305	GREELEY BROADCASTING CORPORATION	62.89
21	KSPK-FM	39677	MAINSTREET BROADCASTING COMPANY, INC	78.96
22	KEPC	52595	PIKES PEAK COMMUNITY COLLEGE	62.11
23	KRDO-FM	50402	PIKES PEAK TELEVISION, INC.	64.14
24	KCFP	12326	PUBLIC BROADCASTING OF COLORADO, INC.	15.48
25	KIQN	164269	PUEBLO BROADCASTING GROUP LLC	55.07
26	KATC-FM	66249	RADIO LICENSE HOLDING CBC, LLC	64.12
27	KKFM	11237	RADIO LICENSE HOLDING CBC, LLC	64.01
28	KKMG	11229	RADIO LICENSE HOLDING CBC, LLC	64.14
29	KKPK	62038	RADIO LICENSE HOLDING CBC, LLC	64.18
30	KSTY	35551	ROYAL GORGE BROADCASTING, LLC	67.62
31	KRCC	65563	THE COLORADO COLLEGE	64.16
32	KKCS	166010	UNITED STATES CP, LLC	81.51
33	KRYE	164276	UNITED STATES CP, LLC	61
34	KRWA	87409	WAY MEDIA, INC.	61