

**ONE-STEP UPGRADE/
MINOR CHANGE APPLICATION
CUMULUS LICENSING LLC
KACL RADIO STATION
CH 254C0 - 98.7 MHZ - 100.0 KW
BISMARCK, NORTH DAKOTA
March 2006**

TECHNICAL STATEMENT

This Technical Statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC ("Cumulus"), licensee of station KACL, Channel 254C1, Bismarck, North Dakota.¹ Cumulus herein proposes to increase the height above average terrain of the KACL facility at its existing site, and upgrade to Channel 254C0.² At the proposed application site, Channel 254C0 meets the Commission's minimum distance separation requirements; provides a 70 dBu contour over the entire community of Bismarck, North Dakota; and the proposed location is an existing structure. As such, this proposal meets the necessary criteria for a one-step upgrade.

Since the existing KACL tower height is to be increased in height, the Federal Aviation Administration ("FAA") has been apprised of this proposal. Once the FAA has issued its revised determination, the Antenna Structure Registration will be updated. Since the KACL antenna system is to be co-located with other higher power FM stations on a relatively short tower, and due to the fact there are TV stations within 315 meters of this proposal, certification of compliance with the radio frequency radiation levels using the worksheets associated with FCC

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- 1) Cumulus has also submitted an application to correct the present KACL licensed parameters to agree with the tower registration of the KACL tower, and slightly adjust the center of radiation of the KACL antenna. That application is to be considered independent of this instant upgrade application.
 - 2) It is noted that Cumulus is also submitting applications to upgrade co-owned and co-located stations KBZY and KKCT to Class C0 facilities. As such, the proposed facilities of KBZY and KKCT will be considered in this instant application, as the upgrades of these facilities will be implemented at the same time. Additionally, KACL will share an antenna system with KBZY and KKCT.

Form 301-FM was not possible. Therefore a study has been conducted to show this proposal complies with the Commission's radio frequency limits and is attached as Exhibit A.

All of the remaining exhibits used to certify the information on Form 301 have been forwarded to Cumulus and are available for submission to the Commission on request.