

TECHNICAL STATEMENT  
RADIO MULTIPLE OWNERSHIP ANALYSIS  
CLEAR CHANNEL BROADCASTING LICENSES, INC.

This statement and the attached figures were prepared on behalf of Clear Channel Broadcasting Licenses, Inc. ("CCBL"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CCBL proposes to modify the facilities of WKSJ-FM, Mobile, AL. A multiple ownership analysis was prepared considering the following broadcast stations under present or proposed common ownership, time brokerage or joint sales.<sup>1</sup>

Table 1: Proposed Commonly Owned, Brokered or Jointly-Sold Radio Stations Studied and Associated Arbitron Metro<sup>2</sup> Information

Calls	Fac ID	Band	Community	County	State	Geographic Arbitron Market <sup>3</sup>	Declared Arbitron Market
WMXC	8696	FM	Mobile	Mobile	AL	Mobile, AL	Mobile, AL
WBUV	29687	FM	Moss Point	Jackson	MS	Biloxi-Gulfport-Pascagoula, MS	Biloxi-Gulfport-Pascagoula, MS
WRKH	53142	FM	Mobile	Mobile	AL	Mobile, AL	Mobile, AL
WKSJ-FM	53145	FM	Mobile	Mobile	AL	Mobile, AL	Mobile, AL
WTKE <sup>4</sup>	56374	FM	Holt	Okaloosa	FL	Fort Walton Beach, FL	Fort Walton Beach, FL
WTKX-FM	61243	FM	Pensacola	Escambia	FL	Pensacola, FL	Pensacola, FL
WKNN-FM	61367	FM	Pascagoula	Jackson	MS	Biloxi-Gulfport-Pascagoula, MS	Biloxi-Gulfport-Pascagoula, MS
WMJY	61368	FM	Biloxi	Harrison	MS	Biloxi-Gulfport-Pascagoula, MS	Biloxi-Gulfport-Pascagoula, MS
WYCL	63931	FM	Pensacola	Escambia	FL	Pensacola, FL	Pensacola, FL
WPMI	8695	AM	Mobile	Mobile	AL	Mobile, AL	Mobile, AL
WPMI-TV	(n/a)	TV	Mobile	Mobile	AL	Mobile-Pensacola	Mobile-Pensacola
WJTC	(n/a)	TV	Pensacola	Escambia	AL	Mobile-Pensacola	Mobile-Pensacola

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

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

<sup>2</sup> Arbitron data presented herein is obtained from BIA's "Media Access Pro."

<sup>3</sup> For Television stations, the Nielsen DMA

<sup>4</sup> The licensee intends to assign this station to a third party.

<sup>5</sup> See 47 C.F.R. § 73.3555(a).

community contour of WKSJ-FM as proposed, or which is located in the same Arbitron Metro<sup>6</sup> as WKSJ-FM. The community of license of WKSJ-FM is located within the Mobile, AL Arbitron Metro, and WKSJ-FM is reported 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 Biloxi-Gulfport-Pascagoula, MS, and Fort Walton Beach, FL Arbitron Metro markets.

Arbitron Market Study

WKSJ-FM is reported by BIA as being "Home" to the Mobile, AL 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  
Mobile, AL Arbitron Metro<sup>7</sup>

Count	Calls	Fac ID	Band	Owner	Status <sup>8</sup>	Community	County
1	WNXP	21227	FM	.COM+Inc.	b	Bay Minette	Baldwin
2	WQUA	39293	FM	ABC/Disney	b	Citronelle	Mobile
3	WMOB	7740	AM	B Tucker Associates Inc	b	Mobile	Mobile
4	WZEW	74287	FM	Baldwin Broadcasting Company	b	Fairhope	Baldwin
5	WKSJ-FM	53145	FM	Clear Channel Communications	b	Mobile	Mobile
6	WMXC	8696	FM	Clear Channel Communications	b	Mobile	Mobile
7	WPMI	8695	AM	Clear Channel Communications	b	Mobile	Mobile
8	WRKH	53142	FM	Clear Channel Communications	b	Mobile	Mobile
9	WAVH	3636	FM	Cumulus Broadcasting Inc	b	Daphne	Baldwin
10	WBLX-FM	2540	FM	Cumulus Broadcasting Inc	b	Mobile	Mobile
11	WDLT	2541	AM	Cumulus Broadcasting Inc	b	Fairhope	Baldwin
12	WDLT-FM	68843	FM	Cumulus Broadcasting Inc	b	Chickasaw	Mobile
13	WGOK	56716	AM	Cumulus Broadcasting Inc	b	Mobile	Mobile
14	WYOK	8680	FM	Cumulus Broadcasting Inc	a	Atmore	Escambia
15	WABB	70656	AM	Dittman Group	b	Mobile	Mobile
16	WABB-FM	70657	FM	Dittman Group	b	Mobile	Mobile
17	WBHY	24453	AM	Goforth Media Inc	b	Mobile	Mobile
18	WBHY-FM	24452	FM	Goforth Media Inc	b	Mobile	Mobile
19	WLPR	24454	AM	Goforth Media Inc	b	Prichard	Mobile
20	WBCA	24653	AM	Great American Radio Network Inc	b	Bay Minette	Baldwin
21	WNSI	50377	AM	Great American Radio Network Inc	b	Robertsdale	Baldwin

<sup>6</sup> 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.

<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.

Count	Calls	Fac ID	Band	Owner	Status <sup>8</sup>	Community	County
22	WABF	32848	AM	Gulf Coast Broadcasting, Inc.	b	Fairhope	Baldwin
23	WCSN-FM	52820	FM	Gulf Coast Broadcasting, Inc.	b	Orange Beach	Baldwin
24	WLVV	854	AM	Martin Broadcasting	b	Mobile	Mobile
25	WIJD	53144	AM	Satellite Radio Network	b	Prichard	Mobile
26	WHIL-FM	61999	FM	Spring Hill College	b	Mobile	Mobile
27	WHEP	63429	AM	Stewart Broadcasting Co	b	Foley	Baldwin

### 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.

### Radio-Television Cross-Ownership Analysis

Because the WKSJ-FM community of license is encompassed within the Grade A contours of commonly owned television stations WPMI-TV, Mobile, Alabama, and WJTC(TV), Pensacola, Florida, a radio-television cross-ownership voice study was conducted in accordance with the provisions of 47 C.F.R. § 73.3555(c). The communities of license of commonly owned FM stations WMXC, WRKH, WTKX and WYCL, as well as the community of license of commonly owned AM station WPMI, are likewise encompassed within the Grade A contours of television stations WPMI-TV and WJTC(TV), for a total of 5 FM, 1 AM, and 2 TV commonly owned stations in the Mobile-Pensacola DMA.

As evidenced by Table 3, there are ten (10) independent television owner voices in the Mobile-Pensacola DMA. Additionally, as evidenced by Table 4, there are 13 additional independent radio owner voices in the Mobile Arbitron metro market, for a total of 23 independent broadcast media owner voices. No new radio or television stations will be commonly owned by CCC or its subsidiaries as a result of this instant application. In markets such as this with at least "20 independently owned voices," a party may have common ownership or attributable interests in up to two television and six radio stations (assuming compliance with the local radio ownership rule). Consequently, CCC's common ownership of 1-AM / 5-FM / 2-TV stations the Mobile-Pensacola DMA complies with the radio-television cross-ownership rule.

Table 3  
Independent Television Owner Voices in the Mobile-Pensacola DMA

Voice	Owner	CALLS	Channel
	Alabama Educational Television		
1	Commission	WEIQ	42
2	Beach TV Properties	WAWD	58
3	Christian TV Network	WHBR	33
4	Clear Channel Communications	WPMT-TV	15
4	Clear Channel Communications	WJTC	44
5	Emmis Communications	WBPG	55
5	Emmis Communications	WALA-TV	10
6	Franklin Media Inc	WPAN	53
7	Media General Inc	WKRG-TV	5
8	Pensacola Junior College	WSRE	23
9	Sinclair Broadcast Group Inc	WEAR-TV	3
9	Sinclair Broadcast Group Inc	WFGX	35
10	Trinity Broadcasting Network Inc	WMPV-TV	21

Table 4  
Independent Radio Owner Voices in the Mobile Arbitron Metro Market

Voice	Owner	CALLS	AM or FM	City of License	State of License
1	.COM+Inc.	WNSP	FM	Bay Minette	AL
2	ABC/Disney	WQUA	FM	Citronelle	AL
3	B Tucker Associates Inc	WMOB	AM	Mobile	AL
4	Baldwin Broadcasting Company	WZEW	FM	Fairhope	AL
5	Cumulus Broadcasting Inc	WBLX	FM	Mobile	AL
	Cumulus Broadcasting Inc	WDLT	FM	Chickasaw	AL
	Cumulus Broadcasting Inc	WGOK	AM	Mobile	AL
	Cumulus Broadcasting Inc	WYOK	FM	Atmore	AL
	Cumulus Broadcasting Inc	WDLT	AM	Fairhope	AL
	Cumulus Broadcasting Inc	WAVH	FM	Daphne	AL
6	Dittman Group	WABB	AM	Mobile	AL
	Dittman Group	WABB	FM	Mobile	AL
7	Goforth Media Inc	WBHY	AM	Mobile	AL
	Goforth Media Inc	WLPR	AM	Prichard	AL
	Goforth Media Inc	WBHY	FM	Mobile	AL
8	Great American Radio Network Inc	WBCA	AM	Bay Minette	AL
	Great American Radio Network Inc	WNSI	AM	Robertsdale	AL
9	Gulf Coast Broadcasting, Inc.	WABF	AM	Fairhope	AL
	Gulf Coast Broadcasting, Inc.	WCSN	FM	Orange Beach	AL
10	Martin Broadcasting	WLVV	AM	Mobile	AL
11	Satellite Radio Network	WIJD	AM	Prichard	AL
12	Spring Hill College	WHIL	FM	Mobile	AL
13	Stewart Broadcasting Co	WHEP	AM	Foley	AL

## Conclusions

In the Arbitron Metro Market studied herein, there are at least 27 radio stations, including the subject commonly-owned 1-AM / 3-FM stations, which are home to the Mobile, AL Arbitron Metro; consequently, common ownership of 1-AM / 3-FM stations complies with the local radio ownership rule. This proposal does not affect the existing number of commonly-owned radio stations in the subject Arbitron Metro.

In the Mobile-Pensacola DMA, there are at least 20 independently owned media voices; consequently, common ownership of 1-AM / 5-FM / 2-TV stations complies with the radio-television cross-ownership rule. This proposal does not affect the existing number of commonly-owned broadcast stations in the subject DMA.

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

Respectfully submitted,

Stephen G. Davis  
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Figure 1

