

RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
KENG RADIO STATION
PARACHUTE, COLORADO
March 2008

TECHNICAL STATEMENT

1. This Technical Statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC, permittee of KENG, Channel 266A, Parachute, Colorado.¹ Cumulus is proposing to upgrade KENG and is submitting a minor change application. As such, a Radio Market Analysis is needed. Parachute, the proposed community of license, is not located in a metro county within any rated market. Cumulus is also the licensee of stations KEKB, Channel 260C, Fruita, Colorado; KEXO, 1230 kHz, KBKL², Channel 300C, and KMXV, Channel 282C0, Grand Junction, Colorado; and KKNN³, Channel 236C, Delta, Colorado. The 3.16 mV/m contours of KENG, KEKB, KBKL, and KMXV overlap. This results in Cumulus having attributable interests in four FM stations in the same market. Therefore, a revised contour overlap analysis is necessary. Exhibit #1 is a map depicting the subject stations.⁴

2. A study, therefore, has been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission's rules. The contours of the four subject stations will be used to define the market boundary, hereinafter referred to as the "Radio Market". The

-
- 1) Cumulus is operating KENG with the facilities authorized in BMPH-20080102ACI. A license application to cover the permit has been submitted to the Commission.
 - 2) KBKL also has an outstanding permit which is considered in this instant review.
 - 3) KKNN has a pending application which is considered in this instant review.
 - 4) As the KENG proposed 3.16 mV/m contour does not overlap with either KEXO or KKNN, these two facilities are not discussed further in this review.

study will determine the number of other commercial AM and FM stations that either have transmitter sites within or provide coverage to the subject radio market. Only those stations with transmitter sites within 92.0 kilometers will be considered as contributors to the market. No other stations in which Cumulus has interests will be considered, unless it was a subject station in the market under review.

3. Exhibit #2 is a depiction of the stations within, or providing service, to the Radio Market boundary. A total of seventeen stations are depicted, including the four subject stations. Exhibit #3 is a tabulation of the stations in the Radio Market. The number of stations depicted falls in the fifteen to twenty nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.⁵ At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service is permissible. Based on Cumulus's interests in the above referenced stations, it is demonstrated herein that the proposed minor change application for KENG is in compliance with the Commission's multiple ownership rules, as detailed in §73.3555 of the rules.

4. The foregoing technical statement was prepared on behalf of Cumulus Licensing LLC by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities was extracted from the CDBS database. All data relating to AM and FM facilities in the relevant

5) There are additional stations; however, they were not considered since the number of stations shown was sufficient to demonstrate to compliance, based on the number of stations to be commonly held.

BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.2. BIA database. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.

Graham Brock, Inc. - Broadcast Technical Consultants

KENG

Latitude: 39-28-35 N
Longitude: 107-48-13 W
ERP: 3.20 kW
Channel: 267C3
Frequency: 101.3 MHz

KMXY

BLH-19960402KD
Latitude: 39-03-56 N
Longitude: 108-44-52 W
ERP: 100.00 kW
Channel: 282C0
Frequency: 104.3 MHz

KBKL

BLH-19980304KI
Latitude: 39-03-56 N
Longitude: 108-44-52 W
ERP: 100.00 kW
Channel: 300C
Frequency: 107.9 MHz

KEKB

BLH-19980304KJ
Latitude: 39-03-56 N
Longitude: 108-44-52 W
ERP: 79.00 kW
Channel: 260C
Frequency: 99.9 MHz

KBKL.C

BPH-20040513AAQ
Latitude: 39-03-56 N
Longitude: 108-44-52 W
ERP: 100.00 kW
Channel: 300C
Frequency: 107.9 MHz

KBKL/KMXY 3.16 mV/m

KENG 3.16 mV/m

KEKB 3.16 mV/m

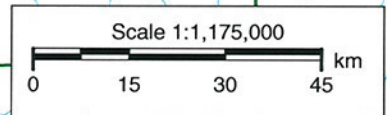
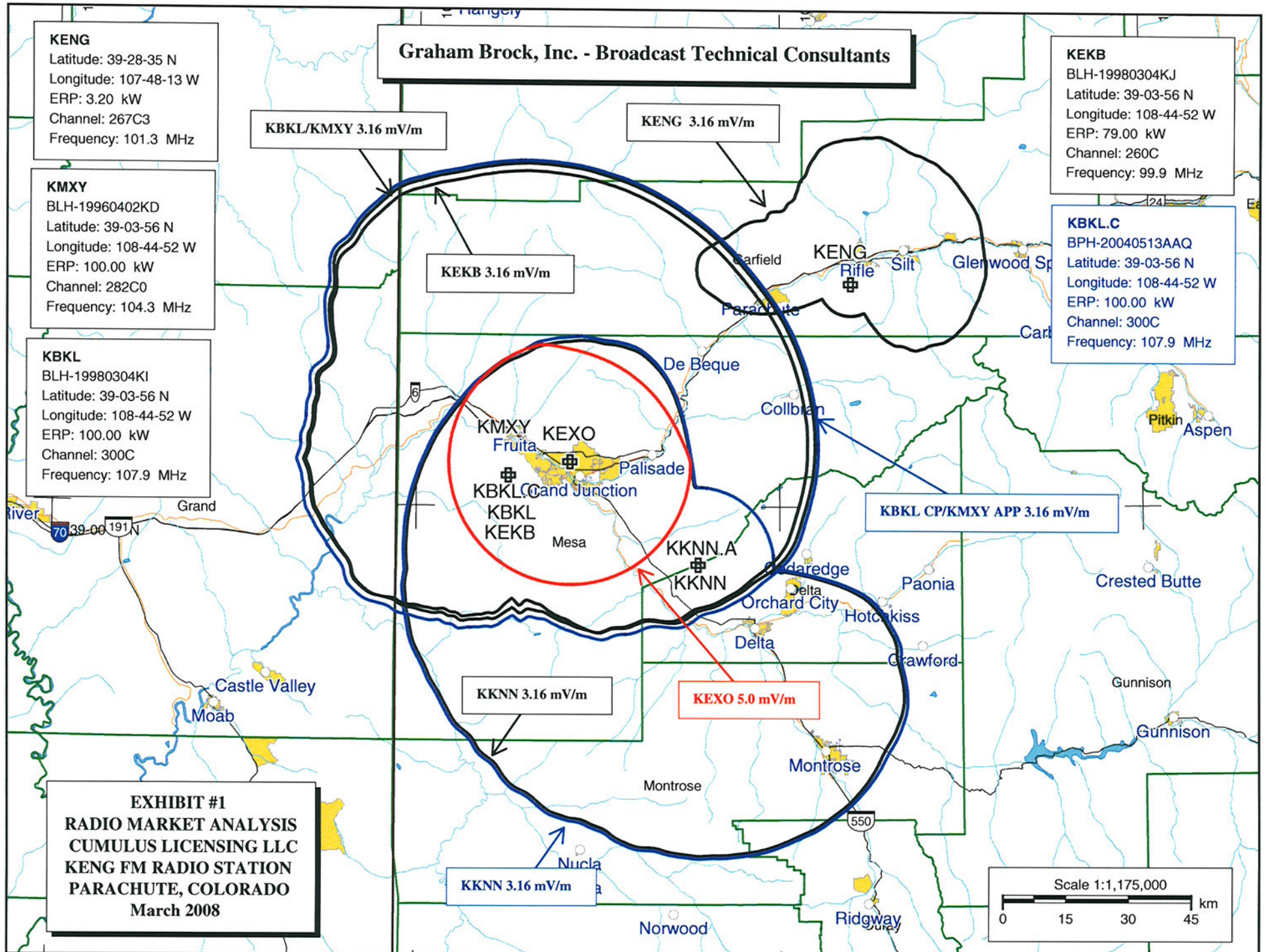
KBKL CP/KMXY APP 3.16 mV/m

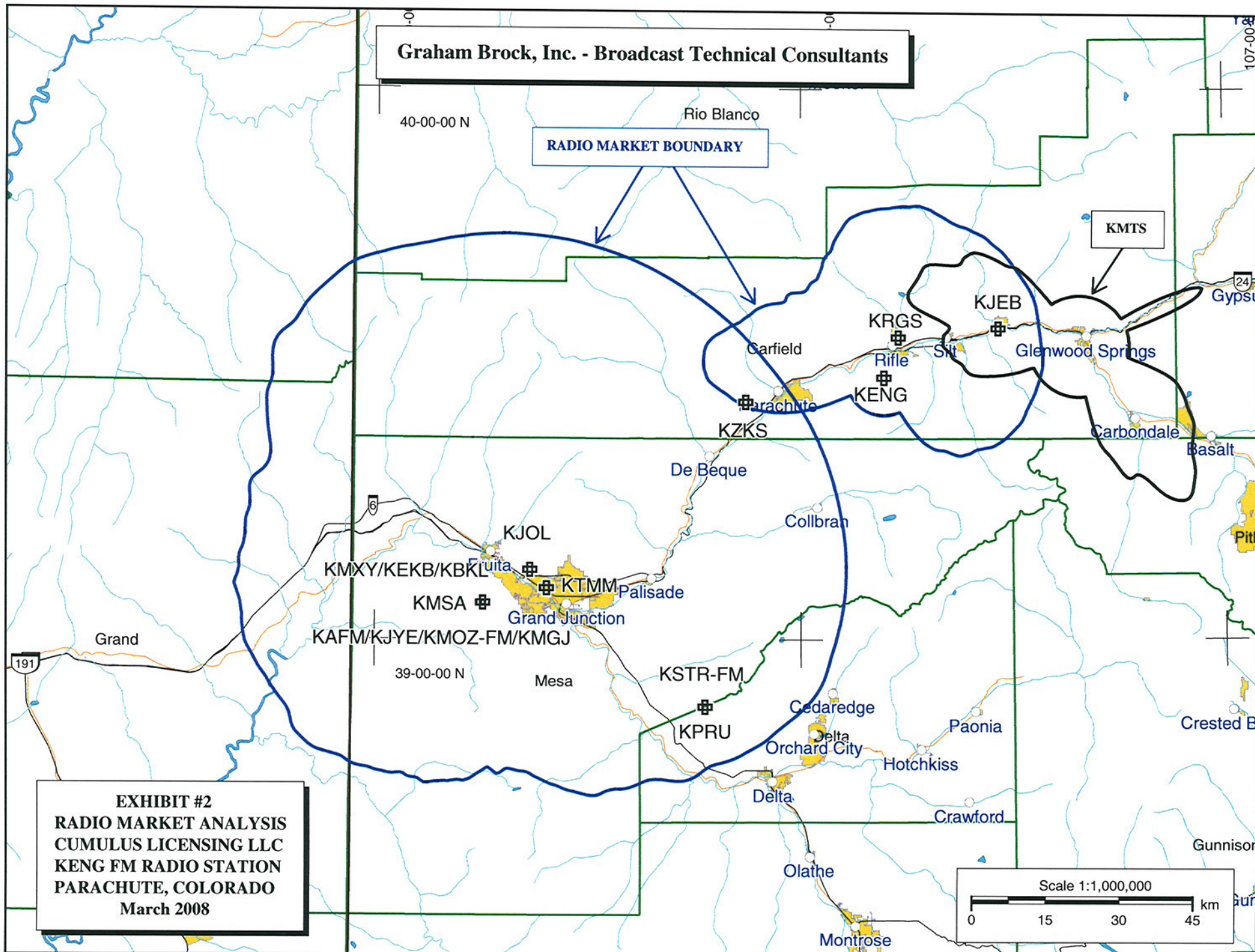
KKNN 3.16 mV/m

KEXO 5.0 mV/m

KKNN 3.16 mV/m

EXHIBIT #1
RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
KENG FM RADIO STATION
PARACHUTE, COLORADO
March 2008





RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
KENG FM RADIO STATION
PARACHUTE, COLORADO

March 2008

EXHIBIT #3

Tabulation of Stations in Radio Market

AM Stations

KJOL	620 kHz	Grand Junction, Colorado
KRGS	690 kHz	Rifle, Colorado
KTMM	1340 kHz	Grand Junction, Colorado

Total AM Stations - 3

FM Stations

KAFM	Ch 201A	Grand Junction, Colorado
KMSA	Ch 217C2	Grand Junction, Colorado
KJYE	Ch 222C	Grand Junction, Colorado
KMGJ	Ch 226C0	Grand Junction, Colorado
KJEB	Ch 233C3	New Castle, Colorado
KSTR-FM	Ch 241C	Montrose, Colorado
+ KMTS	Ch 256C3	Glenwood Springs, Colorado
* KEKB	Ch 260C	Fruita, Colorado
KMOZ-FM	Ch 264C1	Grand Junction, Colorado
* KENG	Ch 267C3	Parachute, Colorado
KPRU	Ch 277C2	Delta, Colorado
* KMXV	Ch 282C0	Grand Junction, Colorado
KZKS	Ch 287C	Rifle, Colorado
* KBKL	Ch 300C	Grand Junction, Colorado

Total FM Stations - 14

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 17

- * Subject station.
- + Provides city grade coverage to radio market.

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

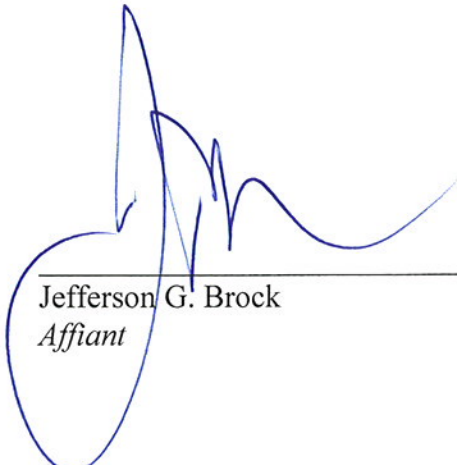
State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Cumulus Licensing LLC to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

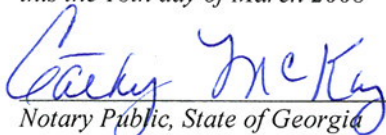
The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 18th day of March 2008.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 18th day of March 2008*



Notary Public, State of Georgia

My Commission Expires: March 18, 2011