

EXHIBIT 2

(Technical Exhibit)

TECHNICAL EXHIBIT
PETITION FOR RULE MAKING
TO AMEND THE FM TABLE OF ALLOTMENTS
FREMONT AND SUNNYVALE, CALIFORNIA

Technical Narrative

This technical narrative and associated exhibits have been prepared on behalf of station KCNL(FM) in support of a Petition for Rule Making to amend 47 C.F.R. Section 73.202(b) by the reallocation of channel 285A (104.9 MHz) from Fremont, California to Sunnyvale, California and the modification of the station's license (BLH-990614KA) accordingly. As the requested change is mutually exclusive with the allotment of channel 285A at Fremont, Petitioner invokes the provisions of Section 1.420(i).

The following is a summary of the reallocation proposal:

- The community of Sunnyvale (1990 Census population 117,229 persons) will be provided with its first local aural transmission service and the community of Fremont (1990 Census population 173,339) will continue to have local aural service from full time FM station KOHL.
- The proposed class A allotment coordinates are fully spaced from all other facilities and allotments under §73.207, allowing for full 6 kW class A operation at maximum facilities at that location.
- Station KCNL is currently a "grandfathered short-spaced" class A station, being 28 kilometers short to radio station KITS, channel 287B, San Francisco; 24 kilometers short to radio station KFOG, channel 283B, San Francisco; and 7 km short to radio station KRPQ, channel 285A, Rohnert Park. The current KCNL facility does not provide contour protection under the provisions of section 73.215 to any of these stations. It is believed that this proposal complies with the FCC's policy concerning short-spaced stations changing community of license as no new short-spacings will be created, three existing short-spacings will be eliminated, and the overall potential for interference from this facility to all others will be decreased.

Proposed Change in Table of Allotments

Station KCNL is currently licensed to operate on channel 285A at Fremont, California with an effective radiated power (ERP) of 5.7 kW and an antenna height above average terrain (HAAT) of 103 meters.

Fremont is located in Alameda County, California, and has a 1990 U.S. Census population of 173,339 persons. Non-commercial educational FM station KOHL is currently licensed (BLED930503KA) to serve Fremont. Therefore, adoption of the proposal will not deprive Fremont of its sole "existing" local service.

Sunnyvale is located in Santa Clara County, California, and has a 1990 U.S. Census population of 117,229 persons. Sunnyvale has no local FM or AM aural broadcast service and, therefore, Petitioner's proposal would bring a first local aural broadcast service to Sunnyvale. Accordingly, Petitioner requests modification of the FM allocation table as follows:

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Fremont, CA	285A	---
Sunnyvale, CA	---	285A

Compliance With FCC Rules

The attached figure 1 is a tabulation of required separations pertinent to use of channel 285A at Sunnyvale, California.¹ The reference site complies with the Commission's minimum distance separations contained in Section 73.207 of the FCC's rules to all existing, authorized and proposed stations and allotments. Operation from the reference site will provide the requisite city grade signal to all of Sunnyvale.

Figure 2 is a tabulation of the separation situation on channel 285A from the current site allotted to Fremont, California, demonstrating the numerous short spacings in existence at that site.

¹ The geographic coordinates for channel 285A at Sunnyvale are 37-18-41 North Longitude, 121-48-58 West Longitude, an existing tower site.

Figure 3 is a map which was developed using the 1990 U.S. Census Topologically Integrated Geographic Encoding and Referencing (TIGER) Line files which depicts the city grade coverage (70 dbu) contours based on maximum class A facilities (ERP 6 kW/HAAT 100 meters) at the proposed allotment site. As shown, all (100%) of Sunnyvale is located within the 70 dBu contour.

Urbanized Area Considerations

The proposed KCNL 70 dbu contour will encompass 88% of the San Jose urbanized area, and 1% of the San Francisco/Oakland urbanized area.

60 dbu Gain and Loss Areas

Figure 4 is a map showing the FM 1 mV/m primary service contours for the current and proposed operations of KCNL. The current facility, and the proposed allotment facility, were utilized to determine these contour locations. The 1 mV/m "gain" and "loss" areas are also indicated. It has been determined that the loss area contains 582,481 persons and the gain area contains 189,593 persons. Adoption of the Petitioner's proposal will result in a "net" decrease in 1 mV/m coverage to 392,888 persons. However most of the loss area is within the San Francisco Oakland Urbanized area, and is well served by a variety of radio stations².

Coverage Contours

The FM predicted coverage contours were calculated in accordance with the provisions of Section 73.313.

Population and Area

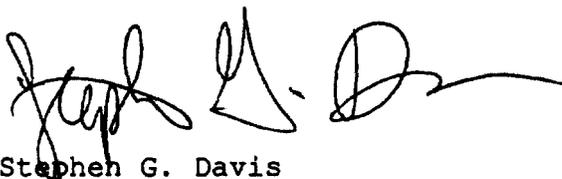
The population within each FM primary service contour (1 mV/m) and gain and loss areas was calculated using a computer program that utilizes the 1990 U.S. Census database of "population centroids". The program adds the

² The 60 dbu loss area is encompassed by the 60 dbu FM or 2 mv AM contours of approximately 54 radio stations.

populations of those U.S. Census designated areas whose centroid lies within each service area.

Conclusion

Channel 285A can be reallocated from Fremont, California to Sunnyvale, California in compliance with all applicable Commission rules. The community of Sunnyvale (1990 Census population 117,229) will be provided with a first local aural transmission service and the community of Fremont (1990 Census population 173,339) will continue to have local aural service. Therefore, Petitioner requests the reallocation of channel 285A from Fremont to Sunnyvale, California and the modification of the KCNL license (BLH-990614KA) accordingly.



Stephen G. Davis
Vice President, Engineering
Citicasters Co.
5801 E. 41st St., Suite 715
Tulsa, Oklahoma 74135

May 1, 2001

Figure 1

73.207 Allocations Spacing Study

KCNL Proposed Reference Site

Citicasters Co.
5801 E. 41st St. Suite 715 Tulsa OK 74135

KCNL from Reference Site

REFERENCE
37 18 41 N CLASS = A DISPLAY DATES
121 48 58 W Current Spacings DATA 01-21-00
SEARCH 02-23-00
----- Channel 285 - 104.9 MHz -----

Call	Channel	Location	Dist	Azi	FCC	Margin
KCNL	LI 285A	Fremont ¹	CA 33.87	333.9	114.5	-80.63
KOCN.C	CP 286B1	Pacific Grove ²	CA 89.18	175.2	95.5	-6.32
KITS	LI 287B	San Francisco	CA 68.94	307.7	68.5	0.44
KITS	LI 287B	San Francisco	CA 68.94	307.7	68.5	0.44
KHTN	LI 284B	Los Banos	CA 114.51	96.3	112.5	2.01
KFOG	LI 283B	San Francisco	CA 74.72	311.6	68.5	6.22
KFOG	LI 283B	San Francisco	CA 74.72	311.6	68.5	6.22
KFOG.C	CP 283B	San Francisco	CA 74.72	311.6	68.5	6.22
KOCN	LI 286A	Pacific Grove	CA 84.25	178.3	71.5	12.75
KRPQ	LI 285A	Rohnert Park	CA 141.90	328.1	114.5	27.40
KMBYFM	LI 282A	Gonzales	CA 76.10	159.7	30.5	45.60
KNCI	LI 286B	Sacramento	CA 160.86	23.0	112.5	48.36
KNCI	LI 286B	Sacramento	CA 160.86	23.0	112.5	48.36
KPFA	LI 231B	Berkeley	CA 71.07	330.1	14.5	56.57
KPFA	LI 231B	Berkeley	CA 71.07	330.1	14.5	56.57

¹ This will be substituted for 285A at Sunnyvale, this instant proposal.

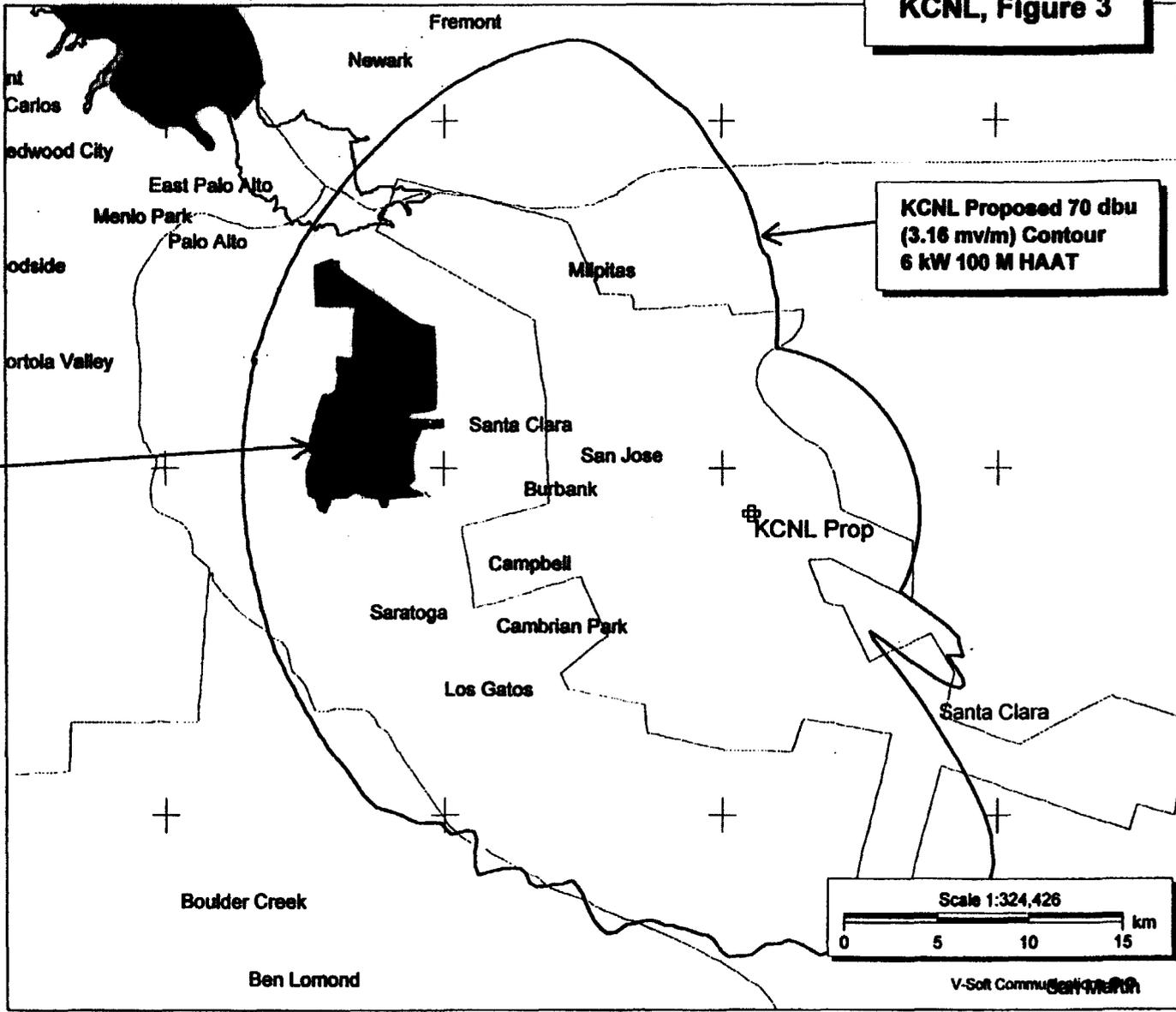
² The licensee of this station, Clear Channel Broadcasting Licenses, Inc., has submitted this construction permit for cancellation.

KCNL Proposed
Latitude: 37-18-41 N
Longitude: 121-48-58 W
Power: 6.00 kW
Frequency: 104.9 MHz
Channel: 285
AMSL Height: 324 m
Elevation: 30.0 m

KCNL, Figure 3

**KCNL Proposed 70 dbu
(3.16 mv/m) Contour
6 kW 100 M HAAT**

**Sunnyvale
KCNL Proposed
City of License**



Scale 1:324,426
0 5 10 15 km

V-Soft Commu San Mar



Exhibit 3

**FCC Letter Returning KCNL's
Original Petition**



Federal Communications Commission
Washington, D.C. 20554

July 19, 2000

Harry C. Martin, Esq.
Fletcher, Heald & Hildreth, P.L.C.
1300 North 17th Street, 11th Floor
Arlington, VA 22209-3801

Dear Mr. Martin:

This is in response to the petition for rule making filed on behalf of Chase Radio Properties, L.L.C., proposed assignee of Station KCNL, Channel 285A, Fremont, California, seeking the reallocation of Channel 285A from Fremont to Sunnyvale, California, and modification of the license accordingly.

A staff engineering review of the proposal reveals that Channel 285A cannot be reallocated to Sunnyvale in conformity with the technical requirements of the Commission's Rules. Specifically, at the transmitter site specified in the petition, coordinates 37-18-41 NL and 121-48-58 WL, the Sunnyvale proposal does not comply with the minimum distance separation requirements of Section 73.207(b) of the Commission's Rules. It is 6.8 kilometers (4.2 miles) short spaced to the reference coordinates for Channel 286B1 at Pacific Grove, California, at coordinates 36-30-38 NL and 121-43-57 WL.

Secondly, employing the above specified coordinates for requested Channel 285A at Sunnyvale, the transmitter for Station KCNL is 20.6 kilometers (12.8 miles) east of the community. In order to provide a 70 dBu signal over the entire community of Sunnyvale, as required by Section 73.315(a) of the Rules, the transmitter for Channel 285A could not be located more than 16.2 kilometers (10 miles) from the farthest point of the city.

In determining predicted coverage in allotment proceedings, we use the standard methodology, employing the F(50,50) curves, which assumes a circular city-grade contour over uniform average terrain in all directions from a hypothetical reference site. In the event such methodology determines that a 70 dBu signal could not envelop the entire proposed community of license, the Commission may permit the use of actual terrain data along a specific radial toward the principal city to determine the range of the signal along a specific azimuth. See Woodstock and Broadway, Virginia, 3 FCC Rcd 6398 (1988). Woodstock is a limited exception to our standard methodology. Moreover, under this exception, in addition to depicting actual terrain, the proponent must demonstrate a reasonable assurance of the continued availability of the proposed transmitter site and that FAA approval of the tower has been obtained. Although you indicate that the coordinates for Channel 285A at Sunnyvale at 37-18-41 NL and 121-48-58 WL are those of an existing tower, that statement alone does not meet the requirements of the Woodstock exception.

The underlying requirement for an allotment is the reasonable expectation that a useable site is available complying with the minimum distance separation and technical requirements of the Commission's Rules. Based upon the information presented, coupled with our engineering

review, we find that the petition for rule making which you submitted on behalf of Chase Radio Properties, L.L.C., requesting the reallocation of Channel 285A from Fremont to Sunnyvale, California, is unacceptable for consideration.

Sincerely,

John A Karousos
JK

John A. Karousos
Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

Exhibit 4

**Evidence of Cancellation of
KOCN's Short-Spaced Construction Permit**



Clear Channel Broadcasting Licenses, Inc.
5801 East 41st Street, Suite 715
Tulsa, OK 74135

Steve Davis
VP, Capital Management
SteveDavis@clearchannel.com

May 2, 2001

RECEIVED

MAY - 7 2001

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

The Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

**Re: Clear Channel Broadcasting Licenses, Inc.
Surrender of Construction Permit
KOCN(FM), Pacific Grove, CA; Facility ID No. 8082
Permit File No. BPH-19971114JA**

Dear Madam Secretary:

Clear Channel Broadcasting Licenses, Inc. ("CCBL"), licensee of KOCN(FM), Pacific Grove, California (the "Station"), hereby surrenders the construction permit for a same-channel upgrade of the licensed facilities for the Station, to the extent that permit has not already expired by its own terms. See FCC File No. BPH-19971114JA. CCBL will continue to operate the Station pursuant to the Station's existing license.

Please direct communications concerning this matter to:

F. William LeBeau, Esq.
Hogan & Hartson L.L.P.
555 13th Street, N.W.
Washington, DC 20004-1109.

Brad Jeffers
BradJeffers@clearchannel.com

Melita Townsend
MelitaTownsend@clearchannel.com

Tina March
TinaMarch@clearchannel.com

Phone: (918) 664-4581

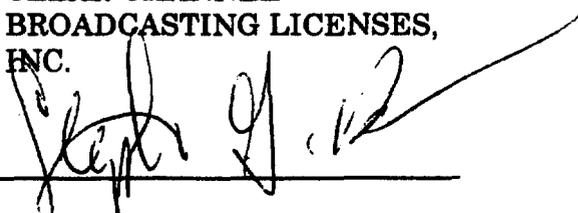
Fax: (918) 664-3066

Thank you for your attention to this submission.

Respectfully submitted,

**CLEAR CHANNEL
BROADCASTING LICENSES,
INC.**

By:

A handwritten signature in black ink, appearing to read 'Stephen Davis', is written over a horizontal line. The signature is stylized and extends to the right of the line.

**Stephen Davis
Vice President, Engineering**



United States of America

8082

**FEDERAL COMMUNICATIONS COMMISSION
FM BROADCAST STATION CONSTRUCTION PERMIT**

Official Mailing Address:

C.R. PASQUIER PROPERTIES, INC.
P. O. BOX KOCN
PACIFIC GROVE, CA 93950

Authorizing Official:

Dale E. Bickel
Dale E. Bickel
Supervisory Engineer
Audio Services Division
Mass Media Bureau

Grant Date: APR 15 1985

Call Sign: KOCN

This permit expires 3:00 a.m.
local time, 18 months after
grant date specified above.

Permit File No.: BPH-950801IC

Subject to the provisions of the Communications Act of 1934, as amended, subsequent acts and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions set forth in this permit, the permittee is hereby authorized to construct the radio transmitting apparatus herein described. Installation and adjustment of equipment not specifically set forth herein shall be in accordance with representations contained in the permittee's application for construction permit except for such modifications as are presently permitted, without application, by the Commission's Rules.

This permit shall be automatically forfeited if the station is not ready for operation within the time specified (date of expiration) or within such further time as the Commission may allow, unless completion of the station is prevented by causes not under the control of the permittee. See Sections 73.3598, 73.3599 and 73.3534 of the Commission's Rules.

Equipment and program tests shall be conducted only pursuant to Sections 73.1610 and 73.1620 of the Commission's Rules.

Name of permittee:

C.R. PASQUIER PROPERTIES, INC.

Station Location:

CA-PACIFIC GROVE

Frequency (MHz): 105.1

Channel: 236

Class: B1

Hours of Operation: Unlimited

Transmitter location (address or description):
APPROX. 3.2 KM NORTH OF CARMEL VALLEY AIRPORT,
MONTEREY COUNTY, CALIFORNIA.

Transmitter: Type Accepted. See Sections 73.1660, 73.1665 and 73.1670
of the Commission's Rules.

Transmitter output power: As required to achieve authorized ERP.

Antenna type: (directional or non-directional): Non-Directional

Antenna Coordinates: North Latitude : 36 30 38
West Longitude : 121 43 57

	Horizontally Polarized Antenna	Vertically Polarized Antenna
Effective radiated power in the Horizontal Plane (kW).....:	4.2	4.2
Height of radiation center above ground (Meters).....:	41	41
Height of radiation center above mean sea level (Meters).....:	594	584
Height of radiation center above average terrain (Meters).....:	241	241
Overall height of antenna structure above ground (including obstruction lighting if any):	47 Meters	

Obstruction marking and lighting specifications for antenna structure:

It is to be expressly understood that the issuance of these specifications is in no way to be considered as precluding additional or modified marking or lighting as may hereafter be required under the provisions of Section 303(q) of the Communications Act of 1934, as amended.

None Required

Special operating conditions or restrictions:

1. The permittee/licensee must reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency radiation in excess of FCC guidelines.

2. FAA INTERFERENCE CONDITION:

Upon receipt of notification from the Commission that harmful interference is being caused by the operation of the permittee's / licensee's transmitter, the permittee / licensee shall either immediately reduce the power to the point of no interference, cease operation, or take such immediate corrective action as is necessary to eliminate the harmful interference. This condition expires after one year of interference-free operation.

*** END OF AUTHORIZATION ***

Exhibit 5

Declaration of Van H. Archer, III

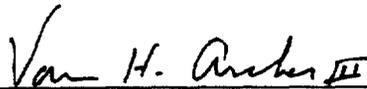
DECLARATION

I, Van H. Archer, III, declare as follows:

1. I am Operating Manager of Chase Radio Properties, L.L.C. ("Chase"), licensee of KCNL(FM), Channel 285A, Fremont, California (the "Station").
2. Chase will apply for a construction permit for Channel 285A at Sunnyvale upon modification of its license in accordance with its Petition.
3. Chase has reasonable assurance from EXCL Communications, the owner of the tower site, that the site remains available for Station KCNL.
4. Chase has FAA approval for the proposed modification. Such approval is attached.
5. Once its construction permit for Channel 285A at Sunnyvale is approved, Chase promptly will construct and operate such facilities.

I hereby declare under penalty of perjury that the statements made in this declaration are true and accurate to the best of my knowledge, information and belief.

Signed and dated this 14th day of May, 2001.



Van H. Archer, III

Federal Aviation Administration
Western/Pacific Region, AWP-520
P. O. Box 92007
Los Angeles, CA 90009

AERONAUTICAL STUDY
No: 00-AWP-3383-OE

ISSUED DATE: 03/05/01

JOHN BURGER
EXCL COMMUNICATIONS
2905 SOUTH KING RD.
SAN JOSE, CA 95122

**** DETERMINATION OF NO HAZARD TO AIR NAVIGATION ****

The Federal Aviation Administration has completed an aeronautical study under the provisions of 49 U.S.C., Section 44718 and, if applicable, Title 14 of the Code of Federal Regulations, part 77, concerning:

Description: SIDE-MOUNT FM ANTENNA 104.9 MHZ @ 6 kW ON TOWER #1
OF EXISTING KLOK AM 1170 KHZ THREE-TOWER ARRAY
Location: SAN JOSE CA
Latitude: 37-18-40.79 NAD 83
Longitude: 121-49-01.82
Heights: 262 feet above ground level (AGL)
360 feet above mean sea level (AMSL)

This aeronautical study revealed that the structure does exceed obstruction standards but would not be a hazard to air navigation provided the following condition(s), if any, is(are) met:

-As a condition to this determination, the structure should be marked and/or lighted in accordance with FAA Advisory Circular 70/7460-1K, Obstruction Marking and Lighting, Chapters 3 (Marked), 4, 5 (Red), & 12.

This determination expires on 09/05/01 unless:

- (a) extended, revised or terminated by the issuing office or
- (b) the construction is subject to the licensing authority of the Federal Communications Commission (FCC) and an application for a construction permit has been filed, as required by the FCC, within 6 months of the date of this determination. In such case the determination expires on the date prescribed by the FCC for completion of construction or on the date the FCC denies the application.

This determination is based, in part, on the foregoing description which includes specific coordinates, heights, frequency(ies) and power. Any changes in coordinates, heights, frequency(ies) or use of greater power will void this determination. Any future construction or alteration, including increase in heights, power, or the addition of other transmitters, requires separate notice to the FAA.

This determination does include temporary construction equipment such as cranes, derricks, etc., which may be used during actual construction of the structure. However, this equipment shall not exceed the overall heights as indicated above. Equipment which has a height greater than the studied structure requires separate notice to the FAA.

This determination concerns the effect of this structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

A copy of this determination will be forwarded to the Federal Communications Commission if the structure is subject to their licensing authority.

If we can be of further assistance, please contact our office at 310 725-6557. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 00-AWP-3383-OE.


Karen Mc Donald
Specialist, Airspace Branch

(EBO)

The proposal is acceptable provided the following conditions are met:

The transmission system will provide the additional 9dB of attenuation in the 108-137, 225-400 MHz frequency bands as follows: The proponents will provide 3 resonant bandpass cavity systems with attenuation > 9dB.

