

ORIGINAL

DOCKET FILE COPY ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

MAY - 9 2006

| | | |
|-------------------------------------|---|-----------------------------------|
| In the Matter of |) | |
| |) | Federal Communications Commission |
| |) | Office of Secretary |
| Amendment of Section 73.202(b), |) | MB Docket No. 02-266 |
| Table of Allotments, |) | RM-10557 |
| FM Broadcast Stations |) | |
| (Chillicothe, Dublin, Hillsboro and |) | |
| Marion, Ohio) |) | |

To: Office of the Secretary
Attn: Media Bureau

**OPPOSITION TO MOTION FOR LEAVE TO SUPPLEMENT
PETITION FOR RECONSIDERATION**

Citicasters Licenses, L.P., licensee of Station WMRN-FM, Dublin, Ohio (formerly, Marion, Ohio) and CC Licenses, LLC, licensee of Station WSRW-FM, Chillicothe, Ohio (formerly, Hillsboro, Ohio) (jointly "Clear Channel"), by their counsel, hereby oppose the "Motion for Leave to Supplement Petition for Reconsideration" filed on April 24, 2006 (the "Motion"), by the Committee for Competitive Columbus Radio (the "Committee").¹ The Committee's Motion and attached Opposition attempt to raise multiple ownership issues as part of this rule making proceeding. However, as Clear Channel has repeatedly stated and, as the Commission has expressly declared in this proceeding, "the Committee's concentration of control and multiple ownership issues are prematurely raised. It is established policy not to consider such issues in conjunction with an allotment rulemaking proceeding."² Rather, any issue

¹ The Committee also filed an "Objection to Amendment" on April 24, 2006, and Sandyworld filed an "Objection to Minor Amendment" on April 21, 2006 to the minor change application to implement the Bureau's decision in this rule making proceeding. See BPH-20050726ALM. Clear Channel filed a "Consolidated Opposition" to the objections on May 4, 2006. A copy of the Consolidated Opposition is attached hereto.

² See *Chillicothe and Ashville, Ohio*, 17 FCC Rcd 22410 (MB 2002), *recon. denied*, 18 FCC Rcd 22410 (MB 2003), *application for review pending*. See also, *Detroit Lakes and Barnesville, Minnesota, and Enderlin, North Dakota*, 17

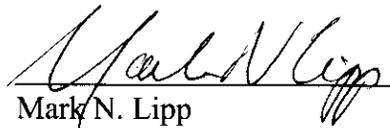
No. of Pages 0+4
List ABOVE

with respect to compliance with Section 73.3555 of the Rules will be considered in conjunction with the applications to implement the reallocation.”³ As noted, this issue has been raised in connection with the pending application of WMRN-FM to implement the rule making and the issues have been fully briefed in that forum. Accordingly, Clear Channel respectfully requests that the Commission deny The Committee’s Motion and not consider it or The Committee’s Opposition in this proceeding.

Respectfully submitted,

CITICASTERS LICENSES, L.P.

CC LICENSES, LLC

By: 

Mark N. Lipp
Scott Woodworth
Vinson & Elkins L.L.P.
1455 Pennsylvania Ave, NW, Suite 600
Washington, DC 20004-1008
(202) 639-6500

Their Counsel

May 9, 2006

FCC Rcd 25055 (MMB 2002); and Letter from Peter H. Doyle, Acting Chief, Audio Services Division, to Paul A. Cicelski, Esq. et al., File No. BAPH-20011101ABD (May 24, 2001).

³ See *Chillicothe, Dublin, Hillsboro, and Marion, Ohio*, 20 FCC Rcd 6305, ¶ 16 (MB 2005).

RECEIVED

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

MAY - 4 2006
Federal Communications Commission
Office of Secretary

In re Application of)
)
Citicasters Licenses, L.P.) Facility ID No. 40170
)
For Construction Permit for) File No. BPH-20050726ALM
Minor Change in Licensed Facility)
Station WMRN-FM, Dublin, Ohio)

To: Office of the Secretary, to forward to Media Bureau

CONSOLIDATED OPPOSITION TO OBJECTIONS TO AMENDMENT

Citicasters Licenses, L.P. ("Citicasters"), the licensee of Station WMRN-FM, Dublin, Ohio (formerly Marion, Ohio) (Facility ID No. 40170), by its attorneys, hereby files this Consolidated Opposition to the Objection to Amendment dated April 24, 2006 (the "Committee Objection") submitted by The Committee for Competitive Columbus Radio (the "Committee") and the Objection to Minor Amendment (the "Sandyworld Objection") dated April 21, 2006, submitted by Sandyworld, Inc. ("Sandyworld" and together with the Committee, the "Objectors").

Both the Committee and Sandyworld previously filed informal objections against the above-captioned application of Citicasters for a construction permit for a minor change in the authorization for WMRN-FM, File No. BPH-20050726ALM (the "Application"), and have filed comments in the underlying rule making proceeding, MB Docket No. 02-266. Both objections assert that the Application would violate the multiple ownership rules on the theory that WMRN-FM should be counted in the Columbus Arbitron Metro for purposes of the "numerator"

(number of stations under common ownership or attribution), but not for the purposes of the “denominator” (the size of the market). Citicasters has opposed these misguided oppositions, both in this application proceeding, and in MB Docket No. 02-266, noting the logical inconsistency of such positions and that the Commission specifically excluded from the two-year waiting period those stations whose communities of license are located within the Metro, which is the case with Dublin, Ohio. ^{1/}

On April 10, 2006, Citicasters filed an amendment to the Application (the “April 10 Amendment”). The April 10 Amendment provided a supplemental radio ownership analysis, based on the interim contour-overlap method, in addition to the previously-filed Arbitron Metro ownership study, and concluded that the proposed modification of WMRN-FM also complies with the local radio ownership limits under the interim contour-overlap method. The April 10 Amendment was filed in response to a request by the staff of the Audio Division for an interim contour-overlap study.

In their Objections to the April 10 Amendment, the Committee and Sandyworld attack the Amendment and find admissions by Citicasters where there are none. Failing to see the contradiction to their prior contentions that WMRN-FM should not count as part of the Columbus Arbitron Metro, the Objectors now assert that since WMRN-FM as a Dublin station is located within the geographic boundaries of the Columbus Arbitron, it must be counted as part of that Arbitron Metro and only an Arbitron Metro ownership study is relevant. Moreover, the

^{1/} 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 13620, 13,726 [¶ 278] (2003) (“Ownership Order”), *aff'd in part and remanded in part, Prometheus Radio Project, et al. v. F.C.C.*, 373 F.3d 372 (2004), *stay modified on rehearing*, No. 03-3388 (3d Cir. Sept. 3, 2004), *cert. denied*, 73 U.S.L.W. 3466 (U.S. June 13, 2005) (Nos. 04-1020, 04-1033, 04-1036, 04-1045, 04-1168 and 04-1177).

Objectors try to put “concessions” in Citicasters’ mouth that it is appropriate to use a contour overlap analysis here instead of an Arbitron Metro analysis.

As noted above, the April 10 Amendment was filed by Citicasters in response to a staff request. Citicasters filed the interim contour-overlap analysis as a supplement to, and not in lieu of, its previously-filed Arbitron Metro study which demonstrated full compliance with the FCC’s multiple ownership rules upon the association of WMRN-FM with the Columbus, Ohio Arbitron Metro. ^{2/} Citicasters has made no concessions as to which is the appropriate methodology to determine compliance with the radio ownership rules. In any event, it is up to the Commission, not Citicasters, to decide whether one, the other, or both multiple ownership analyses are relevant to the Commission’s determination of compliance. ^{3/}

^{2/} Counting WMRN-FM in both the numerator and the denominator, the Application is still in compliance with the local radio ownership limits pursuant to an Arbitron Metro-based analysis, as illustrated by the FCC Geographic Market Definition for Columbus, OH generated by BIA (May 3, 2006) (Attachment A).

^{3/} Sandyworld makes several other confused arguments in its Objection. First, Sandyworld states that it “was provided, as usual, nearly late notification of Citicasters’ latest submission.” See Sandyworld Objection at 1. However Citicasters’ counsel served both Sandyworld and the Committee with the April 10 Amendment by mail service on April 10, 2006 (see April 10 Amendment with certificate of service at Attachment B). Next, Sandyworld appears to believe that the existing contour of WMRN-FM, rather than the contour proposed in the Application, should be shown in an interim contour-overlap analysis. See *id.* at 2. Using the existing station contour rather than the proposed contour would be contrary to the procedure used by Citicasters, and endorsed by Commission with permit grants, in every contour overlap study submitted by Citicasters and its affiliates. Sandyworld also argues with the inclusion of WTVN(AM), which has a large signal reach, as one of the market defining stations. See *id.* at 1. Philosophical issues as to market-defining contours are not only more appropriately addressed in rule making proceedings rather than individual applications, this very issue was addressed in the *Ownership Order*. In that *Order*, the Commission excluded from the contour-overlap market stations located more than 92 kilometers from the perimeter of the mutual overlap area. 18 FCC Rcd at 13,729-30 [¶ 287]. Citicasters’ interim contour-overlap analysis applies this 92 kilometer exclusion. Also, Sandyworld appears confused by the title of Clear Channel’s in-house engineer, who completed the Preparer’s Certification. While noting that this Clear Channel employee gives a Clear Channel e-mail address (and if he had checked, he would have discerned the stated

For the same reasons set forth herein and in the previous filings by the licensee in this proceeding and in MB Docket No. 02-266, the objections against the Application should be dismissed or denied and the Commission should promptly grant the Application.

Respectfully submitted,

CITICASTERS LICENSES, L.P.

By: 
Marissa G. Ropp

HOGAN & HARTSON L.L.P.
555 Thirteenth Street, N.W.
Washington, DC 20004-1109
(202) 637-6845

Its Attorneys

May 4, 2006

mailing address is also that of the licensee), Sandyworld's principal somehow was confused because of the title "FCC Engineering Supervisor." Since Mr. Langham supervises and/or prepares himself engineering filed by Clear Channel and its affiliates with the FCC, his title accurately describes his duties. Mr. Langham has filed countless applications under this title and has not been confused before with an FCC employee. Lastly, not every question to the Form 301 was answered because the Instructions to Form 301 issued by the Commission instruct applicants for minor changes in facilities to complete only certain questions. Those are the questions that were answered and certified by Mr. Davis.

DECLARATION

I, Stephen G. Davis, Senior Vice President of the General Partner of Citicasters Licenses, L.P., have reviewed the foregoing Consolidated Opposition To Objections To Amendment and hereby declare under penalty of perjury that the statements set forth therein are true and accurate to the best of my knowledge, information and belief.



Stephen G. Davis

Executed on May ⁴, 2006

ATTACHMENT A

BIA FCC GEOGRAPHIC MARKET DEFINITION
FOR COLUMBUS, OH (May 3, 2006)



FCC Geographic Market Definition for Columbus, OH

| Call Letters | AM/FM | Freq | Station Type | Format | Home Market | Market Designn Date | Home Mkt Rank | Owner | City & State of License | County of License |
|--------------|-------|-------|--------------|-------------|--------------|---------------------|---------------|--------------------------------------|-------------------------|-------------------|
| WLOH | AM | 1320 | C | Oldies | Columbus, OH | 07/02/2003 | 38 | WLOH Radio Company | Lancaster, OH | Fairfield |
| WBNS | AM | 1460 | C | Sports | Columbus, OH | 07/02/2003 | 38 | RadiOhio Inc. | Columbus, OH | Franklin |
| WBNS | FM | 97.1 | C | Hot AC | Columbus, OH | 07/02/2003 | 38 | RadiOhio Inc. | Columbus, OH | Franklin |
| WJYD | FM | 106.3 | C | Gospel | Columbus, OH | 07/02/2003 | 38 | Radio One Inc | London, OH | Madison |
| WCLT | AM | 1430 | C | Nws/Tlk/Spt | Columbus, OH | 07/02/2003 | 38 | WCLT Radio Inc | Newark, OH | Licking |
| WCLT | FM | 100.3 | C | Country | Columbus, OH | 07/02/2003 | 38 | WCLT Radio Inc | Newark, OH | Licking |
| WTPG | AM | 1230 | C | Sprts/Talk | Columbus, OH | 07/02/2003 | 38 | Clear Channel Communications | Columbus, OH | Franklin |
| WCVO | FM | 104.9 | C | Religion | Columbus, OH | 07/02/2003 | 38 | Christian Voice of Central Ohio, Inc | Gahanna, OH | Franklin |
| WXOL | AM | 1550 | C | Spanish AC | Columbus, OH | 07/02/2003 | 38 | Fifteen Fifty Corporation | Delaware, OH | Delaware |
| WLZT | FM | 93.3 | C | AC | Columbus, OH | 07/02/2003 | 38 | Clear Channel Communications | Chillicothe, OH | Ross |
| WHOK | FM | 95.5 | C | Country | Columbus, OH | 07/02/2003 | 38 | CBS Radio | Lancaster, OH | Fairfield |
| WHTH | AM | 790 | C | Talk | Columbus, OH | 07/02/2003 | 38 | Runnymede Corp | Heath, OH | Licking |
| WLWQ | FM | 96.3 | C | AOR/CIRck | Columbus, OH | 07/02/2003 | 38 | CBS Radio | Columbus, OH | Franklin |
| WMNI | AM | 920 | C | Adlt Stndrd | Columbus, OH | 07/02/2003 | 38 | North American Broadcasting Company | Columbus, OH | Franklin |
| WQJO | FM | 93.7 | C | Soft AC | Columbus, OH | 07/02/2003 | 38 | BAS Broadcasting Inc | Mount Vernon, OH | Knox |
| WNCI | FM | 97.9 | C | CHR | Columbus, OH | 07/02/2003 | 38 | Clear Channel Communications | Columbus, OH | Franklin |
| WNKO | FM | 101.7 | C | Oldies | Columbus, OH | 07/02/2003 | 38 | Runnymede Corp | Newark, OH | Licking |
| WAZU | FM | 107.1 | C | Rock | Columbus, OH | 07/02/2003 | 38 | CBS Radio | Circleville, OH | Pickaway |
| WOBN | FM | 101.5 | NC | Variety | Columbus, OH | 07/02/2003 | 38 | Otterbein College | Westerville, OH | Franklin |
| WOSU | AM | 820 | NC | News/Talk | Columbus, OH | 07/02/2003 | 38 | Ohio State University | Columbus, OH | Franklin |
| WRFD | AM | 880 | C | Chrst/Talk | Columbus, OH | 07/02/2003 | 38 | Salem Communications Corporation | Columbus-Worthington, | Franklin |
| WBZX | FM | 99.7 | C | Rock | Columbus, OH | 07/02/2003 | 38 | North American Broadcasting Company | Columbus, OH | Franklin |
| WSLN | FM | 98.7 | NC | Variety | Columbus, OH | 07/02/2003 | 38 | Ohio Wesleyan University | Delaware, OH | Delaware |
| WSNY | FM | 94.7 | C | Lite Rock | Columbus, OH | 07/02/2003 | 38 | Saga Communications Inc | Columbus, OH | Franklin |
| WTVN | AM | 610 | C | Nws/Tlk/Spt | Columbus, OH | 07/02/2003 | 38 | Clear Channel Communications | Columbus, OH | Franklin |
| WUCO | AM | 1270 | C | Relig Music | Columbus, OH | 07/02/2003 | 38 | St. Gabriel Radio Inc | Marysville, OH | Union |
| WVKO | AM | 1580 | C | Gosp/Inspr | Columbus, OH | 07/02/2003 | 38 | p D.B. Zwirn & Co LP | Columbus, OH | Franklin |
| WCOL | FM | 92.3 | C | Country | Columbus, OH | 07/02/2003 | 38 | Clear Channel Communications | Columbus, OH | Franklin |
| WVKO | FM | 103.1 | C | Urban | Columbus, OH | 07/02/2003 | 38 | p D.B. Zwirn & Co LP | Johnstown, OH | Licking |
| WWCD | FM | 101.1 | C | Alternative | Columbus, OH | 07/02/2003 | 38 | Ingleside Radio Inc | Grove City, OH | Franklin |
| WXMG | FM | 98.9 | C | R&B Oldies | Columbus, OH | 07/02/2003 | 38 | Radio One Inc | Upper Arlington, OH | Franklin |
| WJZA | FM | 103.5 | C | Smooth | Columbus, OH | 07/02/2003 | 38 | Saga Communications Inc | Lancaster, OH | Fairfield |

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

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for Columbus, OH

| Call Letters | AM/FM | Freq | Type Station | Format | Home Market | Market Designtn Date | Home Mkt Rank | Owner | City & State of License | County of License |
|--------------|-------|-------|--------------|-------------|--------------|----------------------|---------------|---|-------------------------|-------------------|
| WBWR | FM | 105.7 | C | Rock | Columbus, OH | 07/02/2003 | 38 | Clear Channel Communications | Hilliard, OH | Franklin |
| WODB | FM | 107.9 | C | Oldies | Columbus, OH | 07/02/2003 | 38 | Saga Communications Inc | Delaware, OH | Delaware |
| WCKX | FM | 107.5 | C | Urban | Columbus, OH | 07/02/2003 | 38 | Radio One Inc | Columbus, OH | Franklin |
| WJZK | FM | 104.3 | C | Smooth | Columbus, OH | 07/02/2003 | 38 | Saga Communications Inc | Richwood, OH | Union |
| WTDA | FM | 103.9 | C | Clisc Hits | Columbus, OH | 07/02/2003 | 38 | North American Broadcasting Company | Westerville, OH | Franklin |
| WCBE | FM | 90.5 | NC | News/Altve | Columbus, OH | 07/02/2003 | 38 | Columbus City School District | Columbus, OH | Franklin |
| WDUB | FM | 91.1 | NC | AOR | Columbus, OH | 07/02/2003 | 38 | Denison University | Granville, OH | Licking |
| WFCO | FM | 90.9 | NC | Inspiration | Columbus, OH | 07/02/2003 | 38 | Lancaster Education Broadcasting Foundation | Lancaster, OH | Fairfield |
| WLRY | FM | 88.5 | NC | ChrsContem | Columbus, OH | 07/02/2003 | 38 | Arcangel Broadcasting Foundation | Rushville, OH | Fairfield |
| WOSU | FM | 89.7 | NC | Classical | Columbus, OH | 07/02/2003 | 38 | Ohio State University | Columbus, OH | Franklin |
| WJFM | FM | 88.7 | NC | New Rock | Columbus, OH | 07/02/2003 | 38 | Spirit Communications | Columbus, OH | Franklin |
| WJJE | FM | 89.1 | NC | Relig Music | Columbus, OH | 10/27/2003 | 38 | American Family Association Incorporated | Delaware, OH | Delaware |

Number of Stations in Geographic Market **44**

Previous Stations in Geographic Market

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

"p" indicates pending sale to owner listed

ATTACHMENT B

APRIL 10, 2006 AMENDMENT WITH CERTIFICATE OF SERVICE

| | |
|---|---|
| Federal Communications Commission Washington, D.C. 20554 FCC 301 | Approved by OMB 3060-0027 (September 2004) FOR FCC USE ONLY |
| APPLICATION FOR CONSTRUCTION PERMIT FOR COMMERCIAL BROADCAST STATION Read INSTRUCTIONS Before Filling Out Form | FOR COMMISSION USE ONLY FILE NO. - 20050726ALM |

Section I - General Information

| | | | |
|----|--|--|---|
| 1. | Legal Name of the Applicant CITICASTERS LICENSES, L.P. | | |
| | Mailing Address 2625 S. MEMORIAL DRIVE, SUITE A | | |
| | City TULSA | State or Country (if foreign address) OK | ZIP Code 74129 - |
| | Telephone Number (include area code) 9186644581 | E-Mail Address (if available) FCCCONTACT@CLEARCHANNEL.COM | |
| | FCC Registration Number: 0004953659 | Call Sign WMRN-FM | Facility ID Number 40170 |
| 2. | Contact Representative (if other than Applicant) MARISSA G. REPP | | Firm or Company Name HOGAN & HARTSON LLP |
| | Telephone Number (include area code) 2026376845 | E-Mail Address (if available) MGREPP@HHLAW.COM | |
| 3. | If this application has been submitted without a fee, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114): <input type="radio"/> Governmental Entity <input type="radio"/> Other | | |
| 4. | Application Purpose <input type="radio"/> New station <input type="radio"/> Major Change in licensed facility <input type="radio"/> Minor Change in licensed facility <input type="radio"/> Major Modification of construction permit <input type="radio"/> Minor Modification of construction permit <input type="radio"/> Major Amendment to pending application <input checked="" type="radio"/> Minor Amendment to pending application (a) File number of original construction permit: BPH-20050726ALM <input type="checkbox"/> NA (b) Service Type: <input type="radio"/> AM <input checked="" type="radio"/> FM <input type="radio"/> TV <input type="radio"/> DTV (c) Community of License: City: DUBLIN State: OH (d) Facility Type <input checked="" type="radio"/> Main <input type="radio"/> Auxiliary If an amendment, submit as an Exhibit a listing by [Exhibit 1] Section and Question Number the portions of the pending application that are being revised. | | |

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

Section II - Legal

| | |
|---|---|
| 1. Certification. Applicant certifies that it has answered each question in this application based on its review of the application instructions and worksheets. Applicant further certifies that where it has made an affirmative certification below, this certification constitutes its | <input checked="" type="radio"/> Yes <input type="radio"/> No |
|---|---|

| | |
|--|--|
| | |
| <p>2. Parties to the Application. a. List the applicant, and, if other than a natural person, its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. If a corporation or partnership holds an attributable interest in the applicant, list separately its officers, directors, stockholders with attributable interests, non-insulated partners and/or members. Create a separate row for each individual or entity. Attach additional pages if necessary.</p> <p>(1) Name and address of the applicant and each party to the application holding an attributable interest (if other than individual also show name, address and citizenship of natural person authorized to vote the stock or holding the attributable interest). List the applicant first, officers next, then directors and, thereafter, remaining stockholders and other entities with attributable interests, and partners. (2) Citizenship. (3) Positional Interest: Officer, director, general partner, limited partner, LLC member, investor/creditor attributable under the Commission's equity/debt plus standard, etc. (4) Percentage of votes. (5) Percentage of total assets (equity plus debt).</p> <p>[Enter Parties/Owners Information]</p> <hr/> <p>b. Applicant certifies that equity and financial interests not set forth above are non-attributable.</p> | <p><input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A See Explanation in [Exhibit 2]</p> |
| <p>3. Other Authorizations. List call signs, locations, and facility identifiers of all other broadcast stations in which applicant or any party to the application has an attributable interest.</p> | <p><input type="checkbox"/> N/A [Exhibit 3]</p> |
| <p>4. Multiple Ownership. a. Is the applicant or any party to the application the holder of an attributable radio joint sales agreement or an attributable radio or television time brokerage agreement in the same market as the station subject to this application? If "YES," radio applicants must submit as an Exhibit a copy of each such agreement for radio stations.</p> <p>b. Applicant certifies that the proposed facility complies with the Commission's multiple ownership rules and cross-ownership rules. Radio applicants only: If "Yes," submit an Exhibit providing information regarding the market, broadcast station(s), and other information necessary to demonstrate compliance with 47 C.F.R. § 73.3555(a). All Applicants: If "No," submit as an Exhibit a detailed explanation in support of an exemption from, or waiver of, 47 C.F.R. § 73.3555.</p> <p>c. Applicant certifies that the proposed facility:</p> <ol style="list-style-type: none"> does not present an issue under the Commission's policies relating to media interests of immediate family members; complies with the Commission's policies relating to future ownership interests; and complies with the Commission's restrictions relating to the insulation and non-participation of non-party investors and creditors. | <p><input type="radio"/> Yes <input checked="" type="radio"/> No [Exhibit 4]</p> <p><input checked="" type="radio"/> Yes <input type="radio"/> No [Exhibit 5]</p> <p><input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 6]</p> |
| <p>5. Character Issues. Applicant certifies that neither applicant nor any party to the application has or has had any interest in or connection with:</p> <ol style="list-style-type: none"> any broadcast application in any proceeding where character issues were left unresolved or were resolved adversely against the applicant or party to the application; or any pending broadcast application in which character issues have been raised. | <p><input type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 7]</p> |
| <p>6. Adverse Findings. Applicant certifies that, with respect to the applicant and any party to the application, no adverse finding has been made, nor has an adverse final action been taken by</p> | <p><input type="radio"/> Yes <input type="radio"/> No</p> |

| | | |
|-----|---|---|
| | any court or administrative body in a civil or criminal proceeding brought under the provisions of any law related to any of the following: any felony; mass media-related antitrust or unfair competition; fraudulent statements to another government unit; or discrimination. | See Explanation in [Exhibit 8] |
| 7. | Alien Ownership and Control. Applicant certifies that it complies with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments. | <input type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 9] |
| 8. | Program Service Certification. Applicant certifies that it is cognizant of and will comply with its obligations as a commission licensee to present a program service responsive to the issues of public concern facing the station's community of license and service area. | <input type="radio"/> Yes <input type="radio"/> No |
| 9. | Local Public Notice. Applicant certifies that it has or will comply with the public notice requirements of 47 C.F.R. Section 73.3580. | <input type="radio"/> Yes <input type="radio"/> No |
| 10. | Auction Authorization. If the application is being submitted to obtain a construction permit for which the applicant was the winning bidder in an auction, then the applicant certifies, pursuant to 47 C.F.R. Section 73.5005(a), that it has attached an exhibit containing the information required by 47 C.F.R. Sections 1.2107(d), 1.2110(i), 1.2112(a) and 1.2112(b), if applicable. An exhibit is required unless this question is inapplicable. | <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A [Exhibit 10] |
| 11. | Anti-Drug Abuse Act Certification. Applicant certifies that neither applicant nor any party to the application is subject to denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862. | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 12. | Equal Employment Opportunity (EEO). If the applicant proposes to employ five or more full-time employees, applicant certifies that it is filing simultaneously with this application a Model EEO Program Report on FCC Form 396-A. | <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A |

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith. I acknowledge that all certifications and attached Exhibits are considered material representations. I hereby waive any claim to the use of any particular frequency as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and request an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

| | |
|---|---|
| Typed or Printed Name of Person Signing STEPHEN G. DAVIS | Typed or Printed Title of Person Signing SENIOR VP, ENGINEERING & CAPITAL MANAGEMENT, OF GP |
| Signature | Date 4/10/2006 |

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

| | |
|---|--|
| Section III-B - FM Engineering | |
| TECHNICAL SPECIFICATIONS | |
| Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable. | |
| TECH BOX | |
| 1. | Channel Number: 294 |
| 2. | Class (select one): <input type="radio"/> A <input checked="" type="radio"/> B1 <input type="radio"/> B <input type="radio"/> C3 <input type="radio"/> C2 <input type="radio"/> C1 <input type="radio"/> C0 <input type="radio"/> C <input type="radio"/> D |
| 3. | Antenna Location Coordinates: (NAD 27) Latitude: Degrees 40 Minutes 9 Seconds 33 <input checked="" type="radio"/> North <input type="radio"/> South Longitude: |

| | |
|---|---|
| Degrees 82 Minutes 55 Seconds 23 <input checked="" type="radio"/> West <input type="radio"/> East | |
| 4. | One Step Proposal Allotment Coordinates: (NAD 27) <input checked="" type="checkbox"/> Not Applicable Latitude: Degrees Minutes Seconds <input type="radio"/> North <input type="radio"/> South Longitude: Degrees Minutes Seconds <input type="radio"/> West <input type="radio"/> East |
| 5. | Antenna Structure Registration Number: 1054358 <input type="checkbox"/> Not Applicable <input type="checkbox"/> Notification filed with FAA |
| 6. | Overall Tower Height Above Ground Level: 343meters |
| 7. | Height of Radiation Center Above Mean Sea Level: 461 meters(H) 461 meters(V) |
| 8. | Height of Radiation Center Above Ground Level: 180meters(H) 180meters(V) |
| 9. | Height of Radiation Center Above Average Terrain: 180meters(H) 180meters(V) |
| 10. | Effective Radiated Power: 7.3 kW(H) 7.3 kW(V) |
| 11. | Maximum Effective Radiated Power: <input checked="" type="checkbox"/> Not Applicable (Beam-Tilt Antenna ONLY) kW(H) kW(V) |
| 12. | Directional Antenna Relative Field Values: <input checked="" type="checkbox"/> Not applicable (Nondirectional) Rotation (Degrees): <input type="checkbox"/> No Rotation |

| Degrees | Value | Degrees | Value | Degrees | Value | Degrees | Value | Degrees | Value | Degrees | Value |
|---------------------|-------|---------|-------|---------|-------|---------|-------|---------|-------|---------|-------|
| 0 | | 10 | | 20 | | 30 | | 40 | | 50 | |
| 60 | | 70 | | 80 | | 90 | | 100 | | 110 | |
| 120 | | 130 | | 140 | | 150 | | 160 | | 170 | |
| 180 | | 190 | | 200 | | 210 | | 220 | | 230 | |
| 240 | | 250 | | 260 | | 270 | | 280 | | 290 | |
| 300 | | 310 | | 320 | | 330 | | 340 | | 350 | |
| Additional Azimuths | | | | | | | | | | | |

Relative Field Polar Plot

NOTE: In addition to the information called for in this section, an explanatory exhibit providing full particulars must be submitted for each question for which a "No" response is provided.

CERTIFICATION

AUXILIARY ANTENNA APPLICANTS ARE NOT REQUIRED TO RESPOND TO ITEMS 13-16. PROCEED TO ITEM 17.

| | | |
|-----|---|--|
| 13. | Allotment. The proposed facility complies with the allotment requirements of 47 C.F.R. Section 73.203. | <input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 22] |
| 14. | Community Coverage. The proposed facility complies with 47 C.F.R. Section 73.315. | <input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 23] |
| 15. | Main Studio Location. The proposed main studio location complies with 47 C.F.R. Section 73.1125. | <input checked="" type="radio"/> Yes <input type="radio"/> No See Explanation in [Exhibit 24] |

| | |
|--|---|
| <p>16. Interference. The proposed facility complies with all of the following applicable rule sections: Check all those that apply:</p> <p>Separation Requirements. <input checked="" type="checkbox"/> a) 47 C.F.R. Section 73.207</p> <p>Grandfathered Short-Spaced.</p> <p><input type="checkbox"/> b) 47 C.F.R. Section 73.213(a) with respect to station(s): [Exhibit 26] Exhibit required</p> <p><input type="checkbox"/> c) 47 C.F.R. Section 73.213(b) with respect to station(s): [Exhibit 27] Exhibit required</p> <p><input type="checkbox"/> d) 47 C.F.R. Section 73.213(c) with respect to station(s): [Exhibit 28] Exhibit required.</p> <p>Contour Protection</p> <p><input checked="" type="checkbox"/> e) 47 C.F.R. Section 73.215 with respect to station(s): [Exhibit 29] Exhibit required.</p> | <p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 25]</p> |
| <p>17. Environmental Protection Act. The proposed facility is excluded from environmental processing under 47. C.F.R. Section 1.1306 (i.e., The facility will not have a significant environmental impact and complies with the maximum permissible radiofrequency electromagnetic exposure limits for controlled and uncontrolled environments). Unless the applicant can determine compliance through the use of the RF worksheets in Appendix A, an Exhibit is required.</p> <p>By checking "Yes" above, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.</p> | <p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>See Explanation in [Exhibit 30]</p> |
| <p>PREPARERS CERTIFICATION ON PAGE 3 MUST BE COMPLETED AND SIGNED.</p> | |

SECTION III - PREPARER'S CERTIFICATION

I certify that I have prepared Section III (Engineering Data) on behalf of the applicant, and that after such preparation, I have examined and found it to be accurate and true to the best of my knowledge and belief.

| | | |
|--|--|-------------------------|
| Name TROY LANGHAM | Relationship to Applicant (e.g., Consulting Engineer) FCC ENGINEER SUPERVISOR | |
| Signature | Date 7/26/2005 | |
| Mailing Address 2625 S. MEMORIAL DR. SUITE A | | |
| City TULSA | State or Country (if foreign address) OK | Zip Code 74129 -2623 |
| Telephone Number (include area code) 9186644581 | E-Mail Address (if available) TROYLANGHAM@CLEARCHANNEL.COM | |

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Exhibits

Exhibit 1

Description: PURPOSE OF AMENDMENTS

4/10/06: THIS AMENDMENT PROVIDES, AT ATTACHMENT 5, A SUPPLEMENTAL RADIO OWNERSHIP ANALYSIS. A COPY OF THIS AMENDMENT IS BEING SERVED ON THE INFORMAL OBJECTORS TO THIS APPLICATION.

11/17/05: THIS AMENDMENT RELATES TO THE RADIO MULTIPLE OWNERSHIP ANALYSIS AT ATTACHMENT 5. FOOTNOTE 5 OF SUCH ANALYSIS NOTED THAT WQIO(FM), MOUNT VERNON, OHIO, WHICH WAS THEN LICENSED TO AN AFFILIATE OF THE APPLICANT, WAS BEING SOLD TO A THIRD PARTY. SEE FCC FILE NO. BALH-20050726ACU. THIS AMENDMENT NOTES THAT SUCH SALE WAS CONSUMMATED AS OF OCTOBER 1, 2005.

Attachment 1

Attachment 5

| Description |
|---------------------------------------|
| Radio Multiple Ownership Analysis |
| Supplemental Radio Ownership Analysis |

Attachment 30

| Description |
|---------------------|
| Engineering Exhibit |

SUPPLEMENTAL TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CITICASTERS LICENSES L.P.

This statement and the attached figures were prepared on behalf of Citicasters Licenses, L.P. ("CCLP"), a licensee subsidiary of Clear Channel Communications, Inc. ("CCC"). CCLP proposes to modify the facilities of WMRN-FM, and to implement the change of community of license from Marion, Ohio, to Dublin, Ohio, approved in MB Docket No. 02-266. A multiple ownership analysis was previously submitted with File No. BPH-20050726ALM in which WMRN-FM was considered as part of the Columbus, Ohio Arbitron Metro for analysis under the local radio ownership rules. This Supplemental Technical Statement demonstrates that the proposed modification of WMRN-FM complies with the local radio ownership rules pursuant to an interim contour-overlap analysis.

Interim Contour-Overlap Analysis

Because the principal community contour of the station to be modified currently is located outside the geographic boundary of any Arbitron Metro, and the station currently is not listed by BIA as home to any Arbitron Metro, an interim contour-overlap analysis is 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.

A total of one "radio market" is defined by the mutually overlapping principal community contours of the stations in which CCC has an ownership or attributable interest. Table 1 is a listing of the one market in tabular form, Figure 1 is a map depicting market defined in Table 1.

Table 1

Radio Market

5-FM 2-AM

| | | |
|---------|----|--------------|
| WCOL-FM | FM | Columbus, OH |
| WMRN-FM | FM | Dublin, OH |
| WNCI | FM | Columbus, OH |
| WLZT | FM | Ashville, OH |
| WBWR | FM | Hilliard, OH |
| WTVN | AM | Columbus, OH |
| WTPG | AM | Columbus, OH |

Count of Stations in Defined Contour-Overlap 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 controlled 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 63 radio stations which overlap or intersect with the defined "radio market." With at least 45 stations in a market, the applicable ownership limit is a combination of no more eight stations, up to five in one service.

Figure 2 is the tabulation of the radio stations identified in the "radio market." Figure 3 is a map depicting the stations so identified. 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 5 degrees of azimuth.

Conclusions

In the interim contour-overlap "radio market" studied herein, there are at least 63 stations. With at least 45 stations in a market, the applicable ownership limit is a combination of no more eight stations, up to five in one service. In this interim contour-overlap "radio market," CCC has an ownership or attributable interest in five FM and two AM stations, which is within the permissible limits.

Respectfully submitted,

Troy G. Langham
FCC Engineering Supervisor
April 7, 2006

Figure 01 - Market-Defining Principal Community Contours

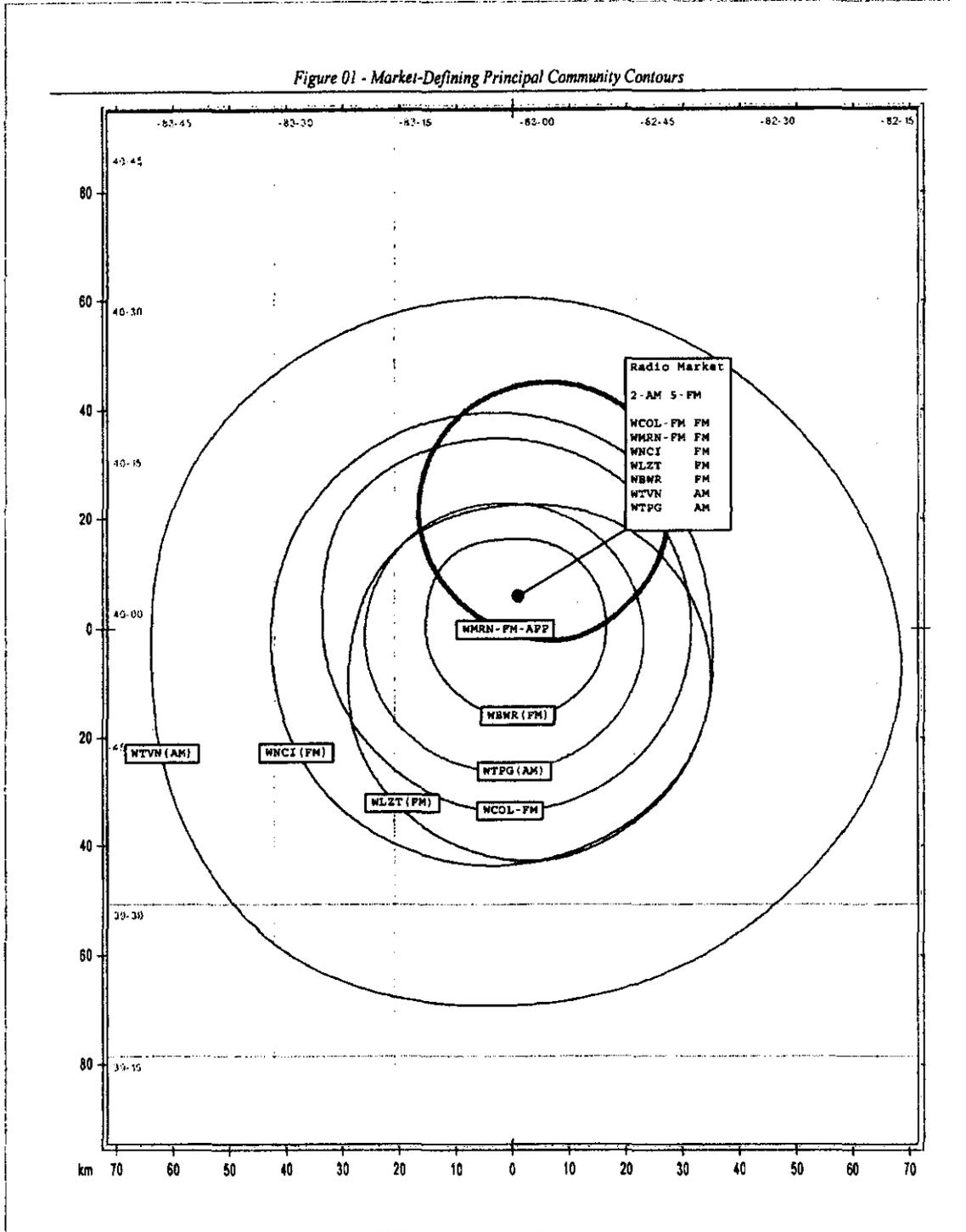
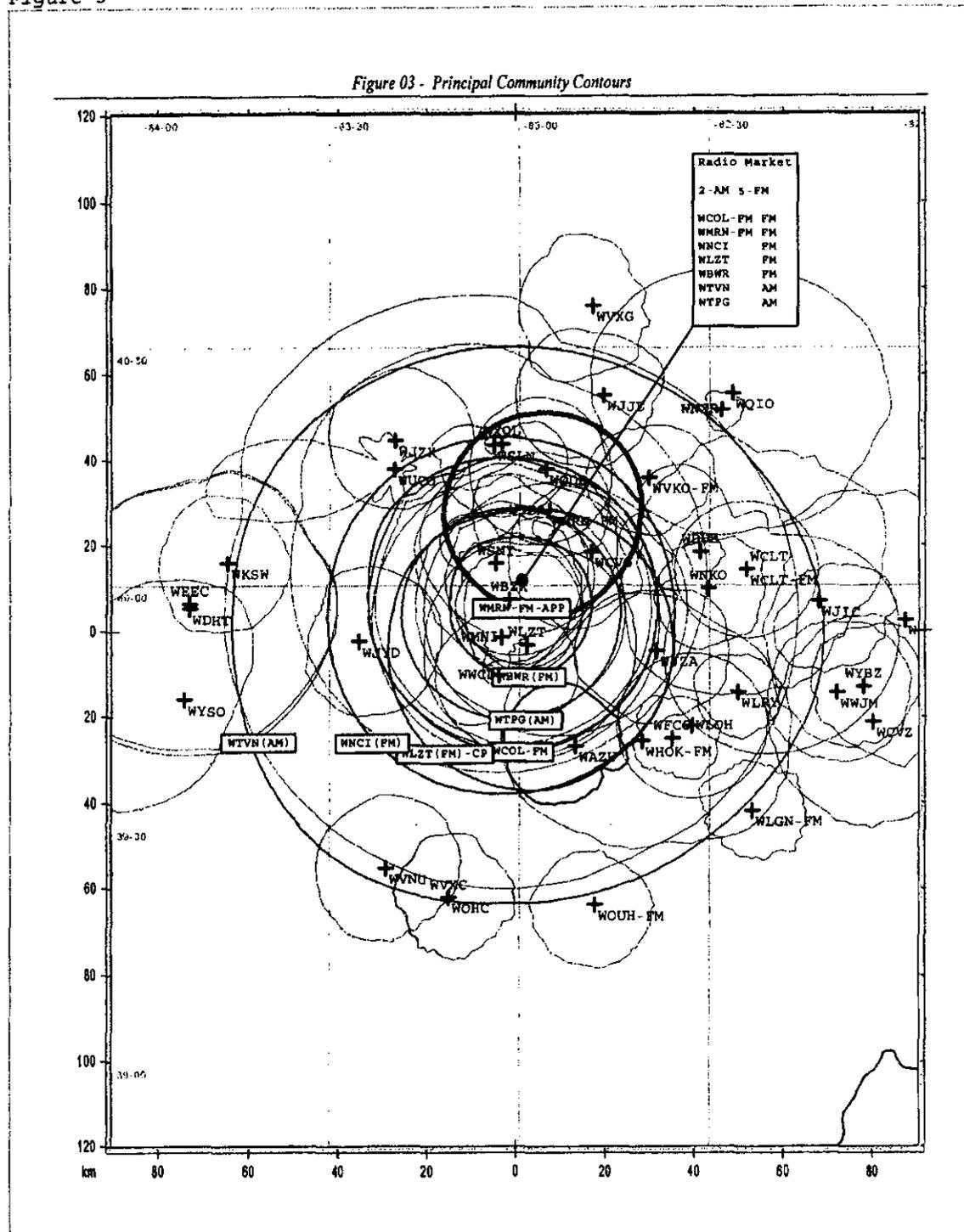


Figure 2 - List of Stations in Radio Market

| Count | Call Sign | Facility_id | Licensee | Dist_km |
|-------|------------------------|-------------|---|---------|
| 1 | WYSO | 2374 | ANTIOCH UNIVERSITY | 80.97 |
| 2 | WCBE | 4325 | BD.OF EDUC., CITY SCH.DIST., COLUMBUS | 5.41 |
| 3 | WKSX | 10113 | BLUE CHIP BROADCASTING LICENSES, LTD | 66.31 |
| 4 | WCVZ | 11126 | CHRISTIAN VOICE OF CENTRAL OHIO, INC. | 85.62 |
| 5 | WCVO | 11138 | CHRISTIAN VOICE OF CENTRAL OHIO, INC. | 17 |
| 6 | WTVN | 11269 | CITICASTERS LICENSES, L.P. | 15.31 |
| 7 | WLVQ | 11277 | INFINITY RADIO INC. | 5.35 |
| 8 | WDUB | 16595 | DENISON UNIVERSITY | 40.64 |
| 9 | WUFM | 20758 | SPIRIT COMMUNICATIONS, INC | 8.5 |
| 10 | WSNY | 22339 | FRANKLIN COMMUNICATIONS, INC. | 5.35 |
| 11 | WVVO | 22341 | STOP 26 RIVERBEND LICENSES, LLC, DEBTOR-IN-POSSESSION | 7.48 |
| 12 | WCOL-FM | 25037 | CITICASTERS LICENSES, L.P. | 5.35 |
| 13 | WTPG | 25038 | CITICASTERS LICENSES, L.P. | 8.08 |
| 14 | WCKX | 27645 | BLUE CHIP BROADCASTING LICENSES, LTD | 5.38 |
| 15 | WWCD | 28644 | FUN WITH RADIO, LLC | 22.54 |
| 16 | WUCO | 29636 | ST. GABRIEL RADIO, INC. | 38.83 |
| 17 | WJZK | 30563 | FRANKLIN COMMUNICATIONS, INC. | 43.5 |
| 18 | WFCO | 36478 | LANCASTER EDUCATIONAL BROADCASTING FOUNDATION | 49.96 |
| 19 | WLGN-FM WMRN- FM | 38270 | EDWARD A. BAKER | 74.58 |
| 20 | FM | 40170 | CITICASTERS LICENSES, L.P. | 17.48 |
| 21 | WNZR | 46748 | MOUNT VERNON NAZARENE UNIVERSITY | 59.93 |
| 22 | WNCI | 47741 | CITICASTERS LICENSES, L.P. | 4.71 |
| 23 | WBZX | 49107 | NORTH AMERICAN BROADCASTING COMPANY, INC | 5.35 |
| 24 | WMNI WOUH- FM | 49110 | NORTH AMERICAN BROADCASTING COMPANY, INC. | 14 |
| 25 | FM | 50143 | OHIO UNIVERSITY | 77.44 |
| 26 | WSLN | 50151 | OHIO WESLEYAN UNIVERSITY | 32.28 |
| 27 | WOBX | 50761 | OTTERBEIN COLLEGE | 13.44 |
| 28 | WLZT | 52042 | CC LICENSES, LLC | 15.04 |
| 29 | WWJM | 52322 | PERRY COUNTY BROADCASTING CO., INC. | 75.45 |
| 30 | WODB | 54556 | FRANKLIN COMMUNICATIONS, INC. | 26.54 |
| 31 | WXOL | 54557 | THE FIFTEEN FIFTY CORPORATION | 32.26 |
| 32 | WBNS-FM | 54701 | RADIOHIO, INCORPORATED | 5.35 |
| 33 | WBNS | 54901 | RADIOHIO, INCORPORATED | 9.92 |
| 34 | WNKO | 57936 | RUNNYMEDE, INC. | 41.84 |
| 35 | WHTH | 57937 | RUNNYMEDE, INC. | 44.96 |
| 36 | WRFD | 58630 | SALEM MEDIA OF OHIO, INC. | 8.08 |
| 37 | WVVO-FM | 58633 | STOP 26 RIVERBEND LICENSES, LLC, DEBTOR-IN-POSSESSION QUORUM RADIO PARTNERS OF VIRGINIA INC., DEBTOR-IN- POSSESSION | 37.36 |
| 38 | WSLW | 59678 | POSSESSION | 7.13 |
| 39 | WTDA | 60099 | NORTH AMERICAN BROADCASTING COMPANY, INC. | 17.48 |
| 40 | WDHT | 60252 | BLUE CHIP BROADCASTING LICENSES, LTD | 75.07 |
| 41 | WJZA | 60590 | FRANKLIN COMMUNICATIONS, INC. | 34.4 |
| 42 | WHIZ-FM | 61230 | SOUTHEASTERN OHIO BROADCASTING SYSTEM, INC. | 86.59 |
| 43 | WVNU | 61331 | SOUTHERN OHIO BROADCASTING, INC. | 73.81 |
| 44 | WJYD | 63949 | BLUE CHIP BROADCASTING LICENSES, LTD | 39.34 |
| 45 | WBWR | 64716 | CITICASTERS LICENSES, L.P. | 4.71 |
| 46 | WAZU | 64717 | INFINITY RADIO INC. | 40.37 |
| 47 | WOHC | 65503 | THE CEDARVILLE UNIVERSITY | 75.73 |
| 48 | WOSU | 66186 | THE OHIO STATE UNIVERSITY | 5.73 |
| 49 | WOSU-FM | 66191 | THE OHIO STATE UNIVERSITY | 8.5 |
| 50 | WBLL | 69627 | V-TECK COMMUNICATIONS, INC. | 5.75 |

| Count | Call Sign | Facility_id | Licensee | Dist_km |
|-------|-----------|-------------|--------------------------------------|---------|
| 51 | WCLT | 71284 | WCLT RADIO, INC. | 50.5 |
| 52 | WCLT-FM | 71285 | WCLT RADIO, INC. | 50.5 |
| 53 | WHOK-FM | 72311 | CBS RADIO HOLDINGS INC. | 46.09 |
| 54 | WLOH | 73217 | WLOH RADIO COMPANY | 51.14 |
| 55 | WEEC | 73726 | WORLD EVANGELISTIC ENTERPRISE CORP. | 74.94 |
| 56 | WXMG | 73972 | BLUE CHIP BROADCASTING LICENSES, LTD | 5.35 |
| 57 | WVXC | 74298 | CINCINNATI PUBLIC RADIO, INC. | 75.73 |
| 58 | WVXG | 74300 | ICS HOLDINGS INC. | 65.95 |
| 59 | WYBZ | 74317 | Y BRIDGE BROADCASTING, INC. | 80.71 |
| 60 | WQIO | 74475 | BAS BROADCASTING, INC. | 64.33 |
| 61 | WJIC | 85074 | VCY AMERICA, INC. | 66.75 |
| 62 | WLRY | 86826 | ARCANGEL BROADCASTING FOUNDATION | 55.13 |
| 63 | WJJE | 91080 | AMERICAN FAMILY ASSOCIATION | 46.93 |

Figure 3



Federal Communications Commission

FCC MB - CDBS Electronic Filing

Account number:

Description: WMRN-FM AMENDMENT 4/2006

Application Reference Number: 20050726ALM

Successfully filed at Apr 10 2006 3:11PM

Based on the information supplied, no fee is required.

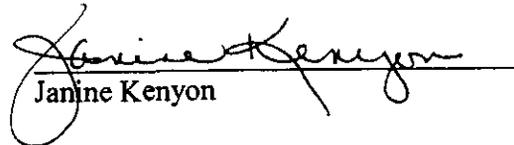
[Menu](#)

Certificate of Service

I, Janine Kenyon do hereby certify that a copy of the attached Amendment to Application is being sent via first class, U.S. Mail, postage prepaid, this 10th day of April, 2006, to the following:

Kurt W. Tuckerman
President
Sandyworld, Inc.
P.O. Box 837
Chokoloskee, FL 34138

Lauren A. Colby, Esq.
Law Office of Lauren A. Colby
10 East Fourth Street
P.O. Box 113
Frederick, MD 21701
Counsel to The Committee for Competitive
Columbus Radio


Janine Kenyon

Certificate of Service

I, Janine L. Kenyon, do hereby certify that a copy of the foregoing **Consolidated Opposition To Objections To Amendment** is being sent via first class, U.S. Mail, postage prepaid, this 4th day of May, 2006, to the following:

Peter Doyle, Chief *
Audio Division
Media Bureau
Federal Communications Commission
445 - 12th Street, S.W.
Room 2-A320
Washington, D.C. 20554

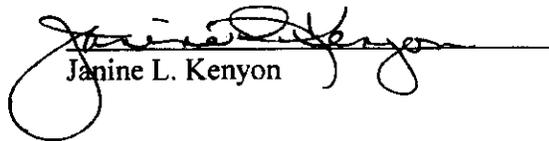
Lauren A. Colby, Esq.
Law Office of Lauren A. Colby
10 East Fourth Street
P.O. Box 113
Frederick, MD 21701
Counsel to The Committee for Competitive
Columbus Radio

James Bradshaw, Deputy Division Chief*
Audio Division
Media Bureau
Federal Communications Commission
445 - 12th Street, S.W.
Room 2-A262
Washington, D.C. 20554

Mark N. Lipp, Esq.
Scott Woodworth, Esq.
Vinson & Elkins L.L.P.
1455 Pennsylvania Ave, NW, Suite 600
Washington, DC 20004-1008
Counsel to Citicasters Licenses, L.P. and
Clear Channel Broadcasting Licenses, Inc.

Kurt W. Tuckerman
President
Sandyworld, Inc.
P.O. Box 837
Chokoloskee, FL 34138

* Indicates delivery by hand.


Janine L. Kenyon

CERTIFICATE OF SERVICE

I, Scott Woodworth, in the law firm of Vinson & Elkins, do hereby certify that I have on this 9th day of May, 2006, unless otherwise noted, caused to be mailed by first class mail, postage prepaid, copies of the foregoing "**Opposition**" to the following:

*Andrew J. Rhodes
Audio Division, Media Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

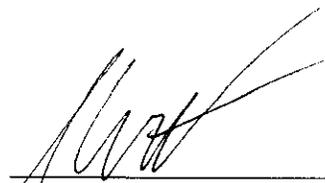
Lauren A. Colby
Law Office of Lauren A. Colby
10 East 4th Street
P.O. Box 113
Frederick, MD 21701
(Counsel to The Committee for Competitive Columbus Radio)

Jerrold D. Miller
Miller and Neely, PC
6900 Wisconsin Avenue
Suite 704
Bethesda, MD 20815
(Counsel to Sandyworld, Inc.)

Kurt W. Tuckerman
Sandyworld, Inc.
P.O. Box 837
Chokoloskee, FL 34138

Dennis Corbett
Leventhal Senter & Lerman PLLC
2000 K Street, NW
Suite 600
Washington, DC 20006
(Counsel to Infinity Broadcasting Operations, Inc.)

Marissa G. Repp
Hogan & Hartson, L.L.P.
555 Thirteenth Street, N.W.
Washington, DC 20004-1109



Scott Woodworth

* HAND DELIVERED