

Exhibit 5-B

Request for Temporary Waiver of Newspaper/Radio Cross-Ownership Rule

Cox Radio, Inc. (“Cox”)¹ hereby requests a temporary waiver of Section 73.3555(d) to remain in place until the date six months after the Commission resolves its pending proceeding in MM Docket No. 06-121 concerning the radio/newspaper cross-ownership rule.² A temporary waiver is necessary because the proposed 1 mV/m contour for WSRV(FM) encompasses the City of Atlanta where the Atlanta Newspapers Division of CEI publishes *The Atlanta Journal-Constitution*.³

A. Cox’s Request for a Temporary Waiver of the Radio/Newspaper Cross-Ownership Rule is Consistent with Commission Precedent.

The Commission should grant the instant waiver request because it is consistent with past Commission decisions to grant temporary waivers of its radio/newspaper cross-ownership rule.⁴ In fact, the Commission has already granted a waiver that, except for the community of license involved, is identical to Cox’s request herein. In 1997, the FCC granted a temporary waiver permitting Cox’s combined ownership the *Atlanta Journal-Constitution* and radio station WALR-FM (formerly WJZF), the 1 mV/m contour of which encompasses Atlanta.⁵ The

¹ Cox is an indirect subsidiary of Cox Enterprises, Inc. (“CEI”). For ease of references, except when a specific reference to a particular CEI subsidiary is appropriate to the context, “Cox” will refer to CEI and its subsidiaries.

² See 2006 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, *Further Notice of Proposed Rulemaking*, 21 FCC Rcd 8834 (2006).

³ See Attachment 1.

⁴ See, e.g., *See Letter to Joel Rosenbloom*, Ref No. 1800E1-DB (MMB, October 24, 1996) (granting a temporary waiver of the radio/newspaper cross-ownership rule pending the outcome of the Commission’s on-going proceeding examining the radio/newspaper cross-ownership waiver policy); *Newspaper/Radio Cross-Ownership Waiver Policy*, MM Docket No. 96-197, 11 FCC Rcd 13,003 (1996); *Capital Cities/ABC, Inc.*, 2 FCC Rcd 2539 (1987).

⁵ See *NewCity Communications, Inc.*, 12 FCC Rcd 3929, ¶¶ 56-57 (1997).

Commission's decision in that case authorized a temporary waiver of Section 73.3555(d) for a period ending "six months from the date of a final order in the radio-newspaper docket, MM Docket No. 96-197."⁶ Cox seeks an identical waiver for the same market.

In the *NewCity* decision, the Commission concluded that abundant competition and diversity would remain in the Atlanta market despite Cox's combined ownership of a radio station and a daily newspaper. In particular, the Commission held:

In light of the multiplicity of media outlets serving the Atlanta market, we see no reason to believe that the combined ownership of WJZF and the *Atlanta Journal* and the *Atlanta Constitution* will be unduly harmful to diversity or competition in the Atlanta market during this temporary period.⁷

The level of diversity in the Atlanta media market has exploded since the *NewCity* decision almost ten years ago. Today, at least ninety-seven television and radio broadcast stations owned by fifty-nine separate parties and twelve daily newspapers serve the Atlanta Radio Metro Market.⁸ "The public is better informed, better connected, and better entertained than they were just a decade ago."⁹ Today's media marketplace is far more robust and diverse than when the Commission decided *NewCity*:

Ten years ago the world wide web was still nascent and was used primarily by technology enthusiasts. "Digital" was a term largely used to describe the abstract world of zeros and ones; DVD players had not yet hit the commercial market; and satellite television was available only via analog C-Band dishes that were almost eight feet in diameter. Cable television was also an analog transmission, resulting in 87% of cable systems offering fewer than 53 channels. Video programming was available 24-hours a day, seven days a week, but there were far fewer choices for news and entertainment than there are today.¹⁰

⁶ *Id.* at ¶ 57.

⁷ *Id.*

⁸ See Attachments 2, 3.

⁹ 2002 *Biennial Review*, 18 FCC Rcd at ¶ 86.

¹⁰ *Id.* at ¶ 87.

Thus, consistent with precedent, a temporary waiver for Cox would not unduly impact diversity or competition in the relevant markets. Accordingly, Cox submits that a temporary waiver of the radio/newspaper cross-ownership rule is warranted in this case.

B. A Blanket Ban on Radio/Newspaper Cross-Ownership in the Atlanta Market Does Not Serve the Public Interest.

In addition to the *NewCity* decision, recent Commission authority also supports a temporary waiver of the radio/newspaper cross-ownership rule. The Commission already has concluded, and the Third Circuit agreed, “that the blanket ban on newspaper/broadcast cross-ownership [is] no longer in the public interest.”¹¹ In the *2002 Biennial Review*, the Commission declared that the cross-ownership rule (1) does not promote competition, (2) harms localism, and (3) was unnecessary in most markets to protect viewpoint diversity.¹² Importantly, the Third Circuit agreed and described the Commission’s decision to repeal the newspaper/broadcast cross-ownership rule as “reasoned analysis.”¹³ This analysis applies with even greater force to the Atlanta market, the ninth largest in the country, and specifically to WSRV(FM) and the *Atlanta Journal-Constitution*.

1. The Radio/Newspaper Ban Does Not Protect Competition in the Atlanta Market

The Commission has found that a “newspaper-broadcast combination . . . cannot adversely affect competition in any relevant product market.”¹⁴ Newspapers and radio stations both earn revenue by selling advertising, but advertisers do not view radio and newspaper as

¹¹ *Prometheus Radio Project v. FCC*, 373 F.3d 372, 398 (3rd Cir. 2004).

¹² *See 2002 Biennial Regulatory Review*, 18 FCC Rcd at ¶ 330.

¹³ *Prometheus Radio Project*, 373 F.3d at 398. In the *2006 Quadrennial Review Further Notice*, the Commission continues to recognize that the blanket ban should be abolished and therefore has focused the *Notice* on what cross-ownership limits, if any, should be adopted. *See 2006 Quadrennial Review*, 21 FCC Rcd at ¶ 32.

¹⁴ *2002 Biennial Review*, 18 FCC Rcd at ¶ 341.

close substitutes.¹⁵ If a radio station raises its advertising rates, advertisers will migrate to other local radio stations, not to local newspapers. Newspapers and radio stations do not compete against each other for advertising dollars. They compete in different markets for different advertisers. Accordingly, combining a newspaper with a radio station will have no effect on competition.¹⁶

Cox's continued ownership of WSRV(FM) and the *Atlanta Journal-Constitution* will not increase Cox's market share in any relevant product market. WSRV(FM) plays classic rock music. The *Atlanta Journal-Constitution* is the premiere daily newspaper in the southeast United States. Advertisers do not view WSRV(FM) as an alternative means to reach the readers of the *Atlanta Journal-Constitution*. Moreover, WSRV(FM) already competes in the Atlanta market. Granting Cox's minor change application for WSRV(FM) will not increase media concentration in the already hypercompetitive Atlanta media market.

2. The Radio/Newspaper Ban Does Not Advance the Commission's
Localism Goals.

The newspaper/broadcast cross-ownership ban undermines localism.¹⁷ In the 2002 *Biennial Review*, the Commission produced "overwhelming evidence" that newspaper-broadcast combinations promote the public interest and localism,¹⁸ and the Third Circuit upheld this conclusion.¹⁹ As the Commission has acknowledged on several occasions, the cross-ownership ban prevents local broadcast stations from combining operations with a local newspaper and

¹⁵ *Id.* at ¶ 332.

¹⁶ *Id.* at ¶ 341.

¹⁷ *See Prometheus Radio Project*, 373 F.3d at 399.

¹⁸ 2002 *Biennial Review*, 18 FCC Rcd at ¶ 354.

¹⁹ *See Prometheus Radio Project*, 373 F.3d at 399.

eliminating certain duplicative functions.²⁰ Broadcasters then could use the cost savings to create an improved product for the local audience.

3. The Radio/Newspaper Ban Is Unnecessary to Protect Viewpoint and Program Diversity in the Atlanta Market.

Common ownership of a radio station and newspaper does not threaten viewpoint or programming diversity. “The average American has a far richer and more varied range of media voices from which to choose today than at any time in history.”²¹ Given the magnitude of voices and media options available, it is no wonder that the Commission concluded, and the Third Circuit agreed, that a blanket ban on newspaper-radio cross-ownership is no longer necessary to protect viewpoint and programming diversity.²²

Cox’s continued ownership of WSRV(FM) and the *Atlanta Journal-Constitution* will not harm viewpoint diversity in the already well served Atlanta market. In fact, unlike many of its industry competitors, Cox operates its newspaper and radio divisions completely separately. There is no overlap in personnel or operations. As a result, these media properties speak with different voices.²³

Regardless, the amount of voices in the Atlanta market remains extraordinary. The Atlanta Designated Market Area (“Atlanta DMA”) includes communities to which the FCC has licensed twelve full-power television stations other than Cox’s WSB-TV,²⁴ and those stations offer

²⁰ See, e.g., *2002 Biennial Review*, 18 FCC Rcd at ¶ 343 (discussing the benefits of collocating a newspaper and a broadcast station).

²¹ See *id.* at ¶ 366.

²² See *Prometheus Radio Project*, 373 F.3d at 399-400; *2002 Biennial Review*, 18 FCC Rcd at ¶ 366-67.

²³ *NewCity Communications, Inc.*, 12 FCC Rcd 3929, ¶ 55 (1997) (discussing *Atlanta Journal-Constitution* stories critical of other Cox media properties); see also Comments of Cox Enterprises, Inc., MB Docket No. 06-121, at 19-20 (filed Oct. 23, 2006) (same).

²⁴ Cox’s television newspaper cross-ownership is grandfathered because it existed prior to the FCC’s adoption of the cross-ownership rule.

eleven additional multicast programming streams through their digital channel.²⁵ Seventy-nine radio stations (other than Cox's five radio stations) serve the Atlanta Radio Metro Market.²⁶ Twelve of these stations offer a total of fourteen new multicast channels using digital IBOC technology.²⁷ Over the next few years as more radio and television stations begin offering more multicast programming, the number of radio and television programming options available to the public will increase.

Cable and satellite television also contribute to the diversity of media in the Atlanta market. According to Nielsen Media Research, as of November 2006, 92.0% of all television households in the Atlanta DMA subscribe to cable or some other multichannel video provider such as DIRECTV or EchoStar.²⁸ In the Atlanta Metro Market, twenty-four cable systems serve at least 851,744 basic subscribers, and twenty one of these systems operate digitally with an channel capacity exceeding several hundred channels.²⁹ DIRECTV's most popular programming package, Total Choice, offers consumers 107 video programming channels and 49 commercial-free music channels, and EchoStar offers an equivalent package, America's Top 120, with over one hundred video channels and more than thirty commercial free music

²⁵ See Attachment 2. According to the TV listings available at <http://www.zap2it.com>, WHSG-TV offers four multicast programming channels; WGCL(TV) and WPXA(TV) each offer two multicast channels; and WTBS(TV), WUVG-TV and WXIA(TV) each offer one multicast channel. These multicast channels are all in addition to each station's analog and primary digital channel.

²⁶ See Attachment 2.

²⁷ See HD Digital Radio, Stations on the Air, at http://www.hdradio.com/stations_on_the_air.php. (last visited Jan. 17, 2007). In addition, Cox's four FM stations in the Atlanta market also offer multicast programming.

²⁸ See Television Bureau of Advertising, *Cable and ADS Penetration By DMA*, available at http://www.tvb.org/rcentral/markettrack/Cable_and_ADS_Penetration_by_DMA.asp (last visited Jan. 17, 2007).

²⁹ See TELEVISION AND CABLE FACTBOOK, VOL. 1 (2006). See Attachment 5.

channels.³⁰ Moreover, AT&T and Verizon are unveiling competing video delivery systems using IP technology. This may further expand the already impressive number of programming choices available to residents in the Atlanta market.

Newspapers and other print media provide additional sources of information in the Atlanta market. At least six companies (other than Cox) publish eleven different daily newspapers in the Atlanta Radio Metro Market (other than the *Atlanta Journal-Constitution*); at least thirty weekly newspapers are published by twelve different owners in that area.³¹

These figures conservatively reflect the level of diversity and competition in the area in which WSRV(FM) operates. The number of media outlets identified above does not include other television stations whose signals may be received by residents in the Atlanta DMA but which are not licensed to communities within the market. The figures also do not include newspapers circulated within the Atlanta Radio Metro Market that are published outside of that area. Similarly, the figures do not include any magazines, newsletters or other periodicals with measurable circulation in the market.

In addition to the abundance of traditional media in the Atlanta market, the Internet significantly adds to the media voices in the Atlanta market. The Internet offers countless sources of local and national news. For example, the recent advent of blogs demonstrate the extraordinary level of diversity of information that is available on the Internet. Furthermore, Internet penetration now reaches 73 percent of American adults.³² The number of Americans with broadband access at home has leapt from 20 million in March 2002 to 74 million by

³⁰ See <http://www.directv.com/DTVAPP/packProg/channelChart1.jsp?assetID=900039>; <http://www.dishnetwork.com/content/programming/packages>.

³¹ See EDITOR AND PUBLISHER INTERNATIONAL YEARBOOK (2006). See Attachments 3, 4.

³² Data Memorandum by Mary Madden, Pew Internet & American Life Project Research Specialist, *Internet Penetration and Impact* (April 2006).

December 2005,³³ growing by forty percent in the one year prior to March 2006.³⁴ Significantly, growth in broadband access has been very strong in middle-income households, and particularly fast for African Americans and those with lower levels of education on average.³⁵ In short, the explosion of the Internet alone mandates that the combined ownership of a newspaper and a classic rock radio station cannot threaten the extraordinary abundance of media that is available in the Atlanta market.

Conclusion. Almost ten years ago the Commission granted the same waiver for the same market. Developments since that time only further support Cox's waiver request. Media diversity in the Atlanta market and elsewhere has exploded, and as a result, the Commission declared that the radio/newspaper cross-ownership rule does not serve the public interest. Where, as here, diversity is and will remain remarkably high, a temporary waiver of restrictions intended as a safety-net to ensure diversity is appropriate. A temporary waiver of the radio/newspaper cross-ownership rule would be consistent with the public interest because it would permit Cox to better serve the residents of its community of license and the surrounding areas, without adversely affecting diversity or competition in the relevant markets. Accordingly, the Commission should approve the instant application and grant Cox a temporary waiver of

³³ John B. Horrigan, Pew Internet & American Life Project, *Online News*, at 2 (2006).

³⁴ John B. Horrigan, Pew Internet & American Life Project, *Home Broadband Adoption 2006* (2006).

³⁵ *Id.*

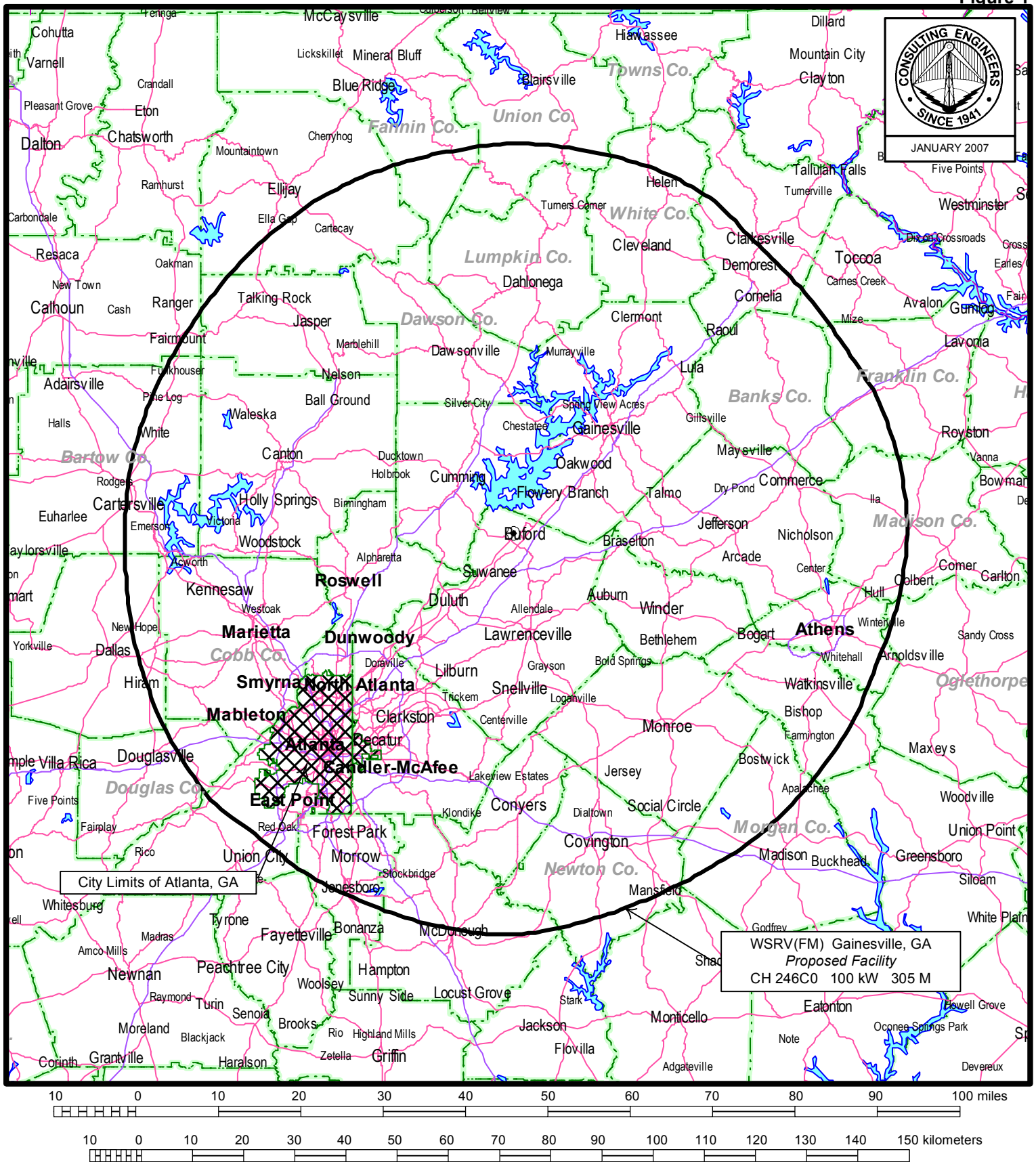
Section 73.3555(d) for a period ending “six months from the date of a final order in the radio-newspaper docket, [MB Docket No. 06-121].”³⁶

³⁶ *New City*, 12 FCC Rcd. at ¶ 57.

ATTACHMENT 1

Map of Proposed 1 mV/m Contour for WSRV(FM)

Figure 1



TV/RADIO/NEWSPAPER OWNERSHIP SERVICE CONTOUR OF SUBJECT STATION

CXR HOLDINGS, L.L.C.

du Treil, Lundin & Rackley, Inc., Sarasota, Florida

ATTACHMENT 2

Broadcast Stations Serving the Atlanta Market

**Radio Stations in Atlanta, GA Metro Market¹ and
Television Stations in Atlanta, GA DMA²**

	Licensee (Group Owner)	Call Sign	Location
1	Georgia Television Company (Cox Broadcasting, Inc.)	WSB-TV	Atlanta, Georgia
	Cox Radio, Inc. (Cox Broadcasting, Inc.)	WSB(AM)	Atlanta, Georgia
	Cox Radio, Inc. (Cox Broadcasting, Inc.)	WSB-FM	Atlanta, Georgia
	Cox Radio, Inc. (Cox Broadcasting, Inc.)	WALR-FM	La Grange, Georgia <i>(outside the radio metro market, but ranked by BIA)</i>
	Cox Radio, Inc. (Cox Broadcasting, Inc.)	WBTS(FM)	Doraville, Georgia
	Cox Radio, Inc. (Cox Broadcasting, Inc.)	WSRV(FM)	Gainesville, Georgia <i>(outside the radio metro market, but ranked by BIA)</i>
2	Dickey Broadcasting Co. (Dickey Brothers Broadcasting, LLC)	WCNN(AM)	N. Atlanta, Georgia
	Dickey Broadcasting Co. (Dickey Brothers Broadcasting, LLC)	WALR(AM)	Atlanta, Georgia
	Dickey Broadcasting Co. (Dickey Brothers Broadcasting, LLC)	WFOM(AM)	Marietta, Georgia
3	Citicasters Licenses, LP (Clear Channel)	WCOH(AM)	Newnan, Georgia
	Citicasters Licenses, LP (Clear Channel)	WKLS(FM)	Atlanta, Georgia
	Citicasters Licenses, LP (Clear Channel)	WLTM(FM)	Peachtree City, Georgia
	Citicasters Licenses, LP (Clear Channel)	WGST(AM)	Atlanta, Georgia
	Citicasters Licenses, LP (Clear Channel)	WUBL(FM)	Atlanta, Georgia
	CC Licenses, LLC (Clear Channel)	WWVA-FM	Canton, Georgia
	CC Licenses, LLC (Clear Channel)	WBZY(FM)	Bowdon, Georgia
4	CBS Radio East, Inc. (CBS Radio)	WVEE(FM)	Atlanta, Georgia
	CBS Radio East, Inc. (CBS Radio)	WAOK(AM)	Atlanta, Georgia
	CBS Radio Inc. of Atlanta (CBS Radio)	WZGC(FM)	Atlanta, Georgia
5	Radio Disney Atlanta, LLC (ABC, Inc.)	WDWD(AM)	Atlanta, Georgia
	Radio License Holding II, LLC (ABC, Inc.) <i>Pending Sale to Citadel</i>	WYAY(FM)	Gainesville, Georgia <i>(outside the radio metro market, but ranked by BIA)</i>

¹ Atlanta Radio Metro Market: Barrow, Bartow, Carroll, Cherokee, Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Forsyth, Fulton, Gwinnett, Henry, Newton, Paulding, Pickens, Rockdale, Spalding & Walton Counties, GA.

² Atlanta, GA DMA: all counties in the Radio Metro Market, plus Cleburne & Randolph Counties, AL; Banks, Butts, Clarke, Dawson, Fannin, Floyd, Gilmer, Gordon, Greene, Habersham, Hall, Haralson, Heard, Jackson, Jasper, Lamar, Lumpkin, Madison, Meriwether, Morgan, Oconee, Oglethorpe, Pike, Polk, Putnam, Rabun, Towns, Troup, Union, Upson, & White Counties, GA; Clay County, NC

	Licensee (Group Owner)	Call Sign	Location
	Radio License Holding II, LLC (ABC, Inc.) <i>Pending Sale to Citadel</i>	WKHX-FM	Marietta, Georgia
6	Cherokee Broadcasting Co., Inc. (Columbus Television Inc.)	WCHK(AM)	Canton, Georgia
	Cherokee Broadcasting Co., Inc. (Columbus Television Inc.)	WNSY(FM)	Talking Rock, Georgia
7	WGUN, Inc. (Rivers Group)	WGUN(AM)	Atlanta, Georgia
8	ROA Licenses, LLC (RadioOne, Inc.)	WJZZ-FM	Roswell, Georgia
	ROA Licenses, LLC (RadioOne, Inc.)	WPZE(FM)	Fayetteville, Georgia
	Radio One Licenses, LLC (RadioOne, Inc.)	WHTA(FM)	Hampton, Georgia
	New Mableton Broadcasting Corporation (Radio One, Inc.)	WAMJ(FM)	Mableton, Georgia
9	WAEC Limited Partnership (Beasley Broadcast Group)	WWWE(AM)	Hapeville, Georgia
	WAEC Limited Partnership (Beasley Broadcast Group)	WAEC(AM)	Atlanta, Georgia
10	GA-MEX Broadcasting, Inc. (Javier Macias)	WAZX(AM)	Smyrna, Georgia
11	WYZE Radio, Inc. (George Buck, Jr)	WYZE(AM)	Atlanta, Georgia
12	Mr. Mark Hellinger (Hellinger Broadcasting Company)	WYYZ(AM)	Jasper, Georgia
13	Lincoln Financial Media Co. of GA (Lincoln Financial Media)	WQXI(AM)	Atlanta, Georgia
	Lincoln Financial Media Co. of GA (Lincoln Financial Media)	WSTR(FM)	Smyrna, Georgia
14	Pennsylvania Media Associates, Inc. (Salem Communications Corporation)	WGKA(AM)	Atlanta, Georgia
	South Texas Broadcasting, Inc. (Salem Communications Corporation)	WAFS(AM)	Atlanta, Georgia
	South Texas Broadcasting, Inc. (Salem Communications Corporation)	WNIV(AM)	Atlanta, Georgia
	South Texas Broadcasting, Inc. (Salem Communications Corporation)	WLTA(AM)	Alpharetta, Georgia
	South Texas Broadcasting, Inc. (Salem Communications Corporation)	WFSH-FM	Athens, Georgia (outside the radio metro market, but ranked by BIA)
15	La Favorita, Inc.	WAOS(AM)	Austell, Georgia
	La Favorita, Inc.	WXEM(AM)	Buford, Georgia
	La Favorita, Inc.	WLBA(AM)	Gainesville, Georgia (outside the radio metro market, but ranked by BIA)
16	Davis Broadcasting of Atlanta, LLC (Davis Broadcasting, Inc.)	WLKQ(FM)	Buford, Georgia
17	Anverse, Inc.	WBHF(AM)	Cartersville, Georgia
18	Pacific Star Broadcasting, Inc. (Charles Kim)	WPBS(AM)	Conyers, Georgia
19	Hanmi Broadcasting, Inc. (Chang Soo Kim)	WPBC(AM)	Decatur, Georgia
20	Teresa Prieto	WPLO(AM)	Grayson, Georgia
21	Prieto Enterprises, Inc. (Filiberto Prieto)	WFTD(AM)	Marietta, Georgia
22	Mark Myers	WIMO(AM)	Winder, Georgia
23	WLT & Associates	WKEU(AM)	Griffin, Georgia

	Licensee (Group Owner)	Call Sign	Location
24	WNNX LICO, Inc. (Cumulus Media Partners, LLC)	WNNX(FM)	Atlanta, Georgia
	WNNX LICO, Inc. (Cumulus Media Partners, LLC)	WWWQ(FM)	College Park, Georgia
25	BR Anderson	WKUN(AM)	Monroe, Georgia
26	Word Christian Broadcasting, Inc.	WDCY(AM)	Douglasville, Georgia
	Word Christian Broadcasting, Inc.	WDPC(AM)	Dallas, Georgia
	Word Christian Broadcasting, Inc.	WNEA(AM)	Newnan, Georgia
27	Chappell Communications, LLC	WHIE(AM)	Griffin, Georgia
28	WYAI, Inc. (Steven L. Gradick)	WLBB(AM)	Carrollton, Georgia
	WYAI, Inc. (Steven L. Gradick)	WBTR-FM	Carrollton, Georgia
29	Way Broadcasting Licensee, LLC (Multicultural Radio Broadcasting, Inc.)	WATB(AM)	Decatur, Georgia
	Multicultural Radio Broadcasting Licensee, LLC (Multicultural Radio Broadcasting, Inc.)	WGFS(AM)	Covington, Georgia
30	WIGOCO, LLC (Sheridan Broadcasting Corp.)	WSSA(AM)	Morrow, Georgia
31	Christian Broadcasting of East Point, Inc. (Levi Willis)	WTJH(AM)	East Point, Georgia
32	Provident Broadcasting Company, Inc. (Watkins Associated Industries)	WVFJ-FM	Manchester, Georgia (outside the radio metro market, but ranked by BIA)
33	Clarion Communications, Inc.	WYXC(AM)	Cartersville, Georgia
34	Henry County Radio, Inc. (S./D. Earnhart)	WKKP(AM)	McDonough, Georgia
35	Women's World Broadcasting, Inc. (S. Stone/B. Fox)	WTSH-FM	Rockmart, Georgia (outside the radio metro market, but ranked by BIA)
36	JW Broadcasting, Inc. (Joseph Weber)	WCFO(AM)	East Point, Georgia
	JW Broadcasting, Inc. (Joseph Weber)	WMLB(AM)	Avondale Estates, Georgia
37	Immanuel Broadcasting Network, Inc.	WCCV(FM) [#]	Cartersville, Georgia
38	Clark Atlanta University	WCLK(FM) [#]	Atlanta, Georgia
39	Life Radio Ministries, Inc.	WMVV(FM) [#]	Griffin, Georgia
40	Georgia State University	WRAS(FM) [#]	Atlanta, Georgia
41	Radio Communications Board, Georgia Institute of Technology	WREK(FM) [#]	Atlanta, Georgia
42	Radio Free Georgia Broadcasting Foundation	WRFG(FM) [#]	Atlanta, Georgia
43	Curriculum Development Foundation	WWEV-FM [#]	Cumming, Georgia
44	Bible Broadcasting Network, Inc.	WYFW(FM) [#]	Winder, Georgia
45	Community Public Radio, Inc.	WNEE(FM) [#]	Jasper, Georgia
46	Sandy Springs Radio, LLC	WFGM(AM)	Sandy Springs, Georgia CP-not yet on air

[#] Indicates a non-commercial station.

	Licensee (Group Owner)	Call Sign	Location
47	Tugart Properties, LLC (D. Sutton/T. Carter)	WVOF(AM)	Walhalla, SC (outside the radio metro market, but ranked by BIA) CP at Lithia Springs, GA (within the radio metro market)
48	Roberts Communications, Inc.	WXJO(AM)	Gordon, Georgia (This station is licensed and silent)
49	WAGA License, Inc. (Fox Television Stations, Inc.)	WAGA(TV)	Atlanta, Georgia
50	Georgia Public Telecommunications Commission	WGTV(TV) [#]	Athens, Georgia
	Georgia Public Telecommunications Commission	WUWG(FM) [#]	Carrollton, Georgia
51	Gannett Georgia, L.P. (Gannett Co., Inc.)	WXIA-TV	Atlanta, Georgia
	Gannett Georgia, L.P. (Gannett Co., Inc.)	WATL(TV)	Atlanta, Georgia
52	Paxson Atlanta License, Inc. (Paxson Communications Corp.)	WPXA(TV)	Rome, Georgia
53	Superstation, Inc. (Turner Broadcasting)	WTBS(TV)	Atlanta, Georgia
54	Univision Atlanta LLC (Univision Communications, Inc.)	WUVG-TV	Athens, Georgia
55	Meredith Corporation	WGCL(TV)	Atlanta, Georgia
56	Community Television, Inc.	WATC(TV)	Atlanta, Georgia
57	Trinity Broadcast Network, Inc.	WHSG-TV	Monroe, Georgia
58	Atlanta Television Station WUPA Inc. (Viacom, Inc.)	WUPA(TV)	Atlanta, Georgia
59	Board of Education of the City of Atlanta	WPBA(TV) [#]	Atlanta, Georgia
	Board of Education of the City of Atlanta	WABE(FM) [#]	Atlanta, Georgia

Sources: BIA Financial Network, “Atlanta, GA Market Overview” and “FCC Geographic Market Definition for Atlanta, GA,” *available at* BIA Media Access Pro Database.
Broadcasting & Cable Yearbook 2007 at B-32 – B-33 and B-136.

ATTACHMENT 3

Daily Newspapers Serving the Atlanta Metro Market

Daily Newspapers Published in Counties Within the Atlanta Metro Market

Name	City Published	County	Publisher/Owner
<i>The Daily Tribune News</i>	Cartersville, GA	Bartow County	Cleveland Newspapers, Inc.
<i>The Atlanta Journal-Constitution</i>	Atlanta, GA	Fulton County DeKalb County	Cox Newspapers, Inc.
<i>News Daily</i>	Jonesboro, GA	Clayton County	Community Newspapers Holdings Inc.
<i>The Rockdale Citizen</i> (Mon to Fri) <i>Saturday Citizen</i> (Sat) <i>Sunday Citizen</i> (S)	Conyers, GA	Rockdale County	Gray Television, Inc.
<i>The Newton Citizen</i> (Mon to Fri) <i>Saturday Citizen</i> (Sat) <i>Sunday Citizen</i> (S)	Covington, GA	Newton County	Gray Television, Inc.
<i>Gwinnett Daily Post</i>	Lawrenceville, GA	Gwinnett County	Gray Television, Inc.
<i>Griffin Daily News</i>	Griffin, GA	Spalding County	Paxton Media Group, L.L.C.
<i>Douglas County Sentinel</i>	Douglasville, GA	Douglas County	Paxton Media Group, L.L.C.
<i>Times-Georgian</i>	Carrollton, GA	Carroll County	Paxton Media Group, L.L.C.
<i>The Times-Herald</i>	Newnan, GA	Coweta County	The Times-Herald
<i>Marietta Daily Journal</i>	Marietta, GA	Cobb County	Times-Journal, Inc.
<i>Cherokee Tribune</i>	Canton, GA	Cherokee County	Times-Journal, Inc.

Source: *Editor and Publisher International Yearbook, 2006.*

ATTACHMENT 4

Weekly Newspapers Serving the Atlanta Metro Market

Weekly Newspapers Published in Counties Within the Atlanta Metro Market

Name	City Published	County	Publisher/Owner
<i>The Revue & News</i>	Alpharetta, GA	Fulton County	Appen Newspapers, Inc.
<i>Carroll Star News</i>	Carrollton, GA	Carroll County	Carroll Star News
<i>The North Bartow News</i>	Adairsville, GA	Bartow County	Cartersville Newspapers
<i>The Herald-Tribune</i>	Cartersville, GA	Bartow County	Cleveland Newspapers
<i>Dallas New Era</i>	Dallas, GA	Paulding County	Dallas New Era
<i>The Citizen</i>	Fayetteville, GA	Fayette County	Fayette Publishing, Inc.
<i>Forsyth County News</i>	Cumming, GA	Forsyth County	Forsyth County News
<i>The Covington News</i>	Covington, GA	Newton County	Morris Multimedia, Inc.
<i>Paulding County Sentinel</i>	Douglasville, GA	Douglas County Paulding County	Paxton Media Group, L.L.C.
<i>News Review</i>	Griffin, GA	Spaulding County	Paxton Media Group, L.L.C.
<i>The Villa Rican</i>	Villa Rica, GA	Douglas County	Paxton Media Group, L.L.C.
<i>Bowden Bulletin</i>	Carrollton, GA	Carroll County	Paxton Media Group, L.L.C.
<i>Dunwoody Crier</i>	Atlanta, GA	DeKalb County	The Dunwoody Crier
<i>Austell Neighbor</i>	Marietta, GA	Cobb County	Times-Journal, Inc.
<i>The Douglas Neighbor</i>	Douglasville, GA	Douglas County	Times-Journal, Inc.
<i>East Cobb Neighbor</i>	Marietta, GA	Cobb County	Times-Journal, Inc.
<i>Fayette Neighbor</i>	Fayetteville, GA	Fayette County	Times-Journal, Inc.
<i>South Fulton Neighbor</i>	Forest Park, GA	Clayton County	Times-Journal, Inc.
<i>De Kalb Neighbor</i>	Atlanta, GA	DeKalb County	Times-Journal, Inc.
<i>Henry Neighbor</i>	Forest Park, GA	Henry County	Times-Journal, Inc.
<i>The Clayton Neighbor</i>	Forest Park, GA	Clayton County	Times-Journal, Inc.
<i>Kennesaw-Acworth-Neighbor</i>	Marietta, GA	Cobb County	Times-Journal, Inc.
<i>The Rockdale Neighbor</i>	Conyers, GA	Fulton County	Times-Journal, Inc.
<i>The Smyrna/Vinings Neighbor</i>	Marietta, GA	Cobb County	Times-Journal, Inc.
<i>North De Kalb Neighbor</i>	Atlanta, GA	DeKalb County	Times-Journal, Inc.
<i>Northside-Sandy Springs Neighbor</i>	Atlanta, GA	Cobb County	Times-Journal, Inc.
<i>Paulding Neighbor</i>	Dallas, GA	Paulding County	Times-Journal, Inc.
<i>The North Fulton Neighbor</i>	Roswell, GA	Fulton County	Times-Journal, Inc.
<i>Bartow Neighbor</i>	Cartersville, GA	Carroll County	Times-Journal, Inc.
<i>The Barrow County News</i>	Winder County	Barrow County	Towns County Herald

Source: *Editor and Publisher International Yearbook, 2006.*

ATTACHMENT 5

Cable Systems Serving the Atlanta Metro Market

Cable Systems Serving the Atlanta Metro Market

CABLE SYSTEM	OWNER	COMMUNITIES SERVED	SUBSCRIBERS	DIGITAL SYSTEM
Acworth	KLiP Interactive	Cobb	3,255	Digital
Atlanta	BellSouth Entertainment, Inc.	Cherokee, Cobb, DeKalb, Fulton, Gwinnett Counties; Chamblee (DeKalb), Duluth (Gwinnett), Lawrenceville (Gwinnett), Roswell (Fulton), & Woodstock (Cherokee)	Data Not Available	Digital
Atlanta (Central Portion)	Comcast Cable Communications, Inc.	Clayton, DeKalb, Fulton Counties; Avondale Estates (DeKalb), Chamblee (DeKalb), Clarkston (DeKalb), College Park (Fulton), Decatur (DeKalb), Doraville (DeKalb), Druid Hills (DeKalb), Dunwoody (DeKalb), East Point (Fulton), Fairburn (Fulton), Hapeville (Fulton), Lithonia (DeKalb), North Druid Hills (DeKalb), Palmetto (Fulton), Pine Lake (DeKalb), Stone Mountain (DeKalb), Union City (Fulton)	600,000 (Includes Atlanta northern portion and Atlanta perimeter)	Digital
Atlanta (Northern Portion)	Comcast Cable Communications, Inc.	Bartow, Cherokee, Cobb, Fulton, Gwinnett Counties; Acworth (Cobb), Alpharetta (Fulton), Austell (Cobb), Bartow, Berkeley Lake (Gwinnett), Grayson (Gwinnett), Holly Springs (Cherokee), Kennesaw (Cobb), Lilburn (Gwinnett), Mableton (Cobb), Marietta (Cobb), Norcross (Gwinnett), Powder Springs (Cobb), Robins AFB (Houston), Roswell (Fulton), Sandy Spring (Fulton), Snellville (Gwinnett), Vinings (Cobb), Woodstock (Cherokee)	Data Not Available	Digital

CABLE SYSTEM	OWNER	COMMUNITIES SERVED	SUBSCRIBERS	DIGITAL SYSTEM
Atlanta (Perimeter)	Comcast Cable Communications, Inc.	Carroll, Clayton, Coweta, Douglas, Fayette, Floyd, Gordon, Jasper, Newton, Paulding, Rockdale, Troup, Walton Counties; Brooks (Fayette), Calhoun (Gordon), Conley (Clayton), Conyers (Rockdale), Covington (Newton), Dallas (Paulding), Douglasville (Douglas), Ellenwood (Clayton), Fairfield Plantation (Camden), Fairmount (Gordon), Fayetteville (Fayette), Fort Gillem (Clayton), Forest Park (Clayton), Good Hope (Walton), Grantville (Coweta), Hampton (Henry), Hiram (Paulding), Jersey (Walton), Jonesboro (Clayton), Lake City (Clayton), Loganville (Walton), Lovejoy (Clayton), Monticello (Jasper), Morrow (Clayton), Mount Zion (Carroll), Peachtree City (Fayette), Resaca (Gordon), Riverdale (Clayton), Rome (Floyd), Senoia (Coweta), Social Circle (Walton), Tyrone (Fayette), Walnut Grove (Walton), Whitesburg (Carroll), Woolsey (Fayette)	Data Not Available	Digital
Big Canoe	Alltel Corp.	Dawson, Pickens Counties	1,362	Data Not Available
Bishop	KLiP Interactive	Morgan, Oconee, Walton Counties; Good Hope (Walton), High Shoals (Oconee), Watkinsville (Oconee)	89	Analog
Canton	Comcast Cable Communications, Inc.	Bartow, Cherokee, Forsyth, Polk Counties; Adairsville (Bartow), Ball Ground (Cherokee), Cartersville (Bartow), Cumming (Forsyth), Emerson (Bartow), Euaharlee (Bartow), Holly Springs (Cherokee), Kingston (Bartow), Taylorsville (Bartow), White (Bartow)	33,623	Digital

CABLE SYSTEM	OWNER	COMMUNITIES SERVED	SUBSCRIBERS	DIGITAL SYSTEM
Carrollton	Charter Communications	Carroll, Heard Counties; West Georgia College	Data Not Available	Digital
Covington	Covington Cable TV	Newton County; Oxford (Newton), Porterdale (Newton)	10,701	Digital
Ellijay	Ellijay Telephone Company	Cherokee, Fannin, Gilmer & Pickens; Ball Ground (Cherokee), Bent Tree (Pickens), East Ellijay (Gilmer), Jasper (Pickens), Nelson (Pickens)	3,624	Digital
Fairburn	Fairburn Utilities	Fulton County	Data Not Available	Digital
Gainesville	Charter Communications, Inc.	Gwinnett, Hall Counties; Chestnut Mountain (Hall), Buford (Gwinnett), Flowery Branch (Hall), Murrayville (Hall), Oakwood (Hall)	27,247	Digital
Griffin	Comcast Cable Communications, Inc.	Spalding County; Orchard Hill (Spalding), Sunny Side (Spalding)	11,800	Digital
Gwinnett County (portions)	Charter Communications, Inc.	Gwinnett County; Buford (Gwinnett), Dacula (Gwinnett), Duluth (Gwinnett), Lawrenceville (Gwinnett), Rest Haven (Gwinnett), Sugar Hill (Gwinnett), Suwanee (Gwinnett)	39,790	Digital
Monroe	Monroe Utilities Network	Walton County; Good Hope (Walton), Social Circle (Walton)	5,658	Digital
Newnan	Charter Communications, Inc.	Coweta, Meriwether Counties; Lone Oak (Meriwether), Luthersville (Meriwether), Moreland (Coweta), Sharpsburg (Coweta), Turin (Coweta)	12,265	Digital
Newnan	Newnan Utilities Commission	Coweta	17,500	Digital

CABLE SYSTEM	OWNER	COMMUNITIES SERVED	SUBSCRIBERS	DIGITAL SYSTEM
Newton County (Southern Portion)	KLiP Interactive	Butts, Jasper, Newton Counties	571	Data Not Available
Roswell	Charter Communications, Inc.	Fulton, Gwinnett Counties; Mountain Park (Fulton)	16,379	Digital
Smyrna	Charter Communications, Inc.	Cobb, DeKalb, Douglas, Fulton Counties; Atlanta (Fulton), Austell (Cobb), Mableton (Cobb)	30,939	Digital
Stockbridge	Charter Communications, Inc.	Butts, Clayton, Henry, Lamar, Meriwether, Monroe, Pike, Rockdale Counties; Aldora (Lamar), Barnesville (Lamar), Concord (Pike), Flovilla (Butts), Greenville (Meriwether), Hampton (Clayton), High-falls (Monroe), Indian Springs (Butts), Jackson (Jackson), Jenkinsburg (Butts), Locust Grove (Henry), McDonough (Henry), Meansville (Pike), Milner (Lamar), Molena (Pike), Williamson (Pike), Woodbury (Meriwether), Zebulon (Pike)	26,271	Digital
Villa Rica	Charter Communications, Inc.	Carroll, Haralson Counties; Bowdon (Carroll), Bremen (Haralson), Buchanan (Haralson), Temple (Carroll)	6,242	Digital
Winder	Comcast Cable Communications, Inc.	Banks, Barrow, Gwinnett, Hall, Jackson Counties; Braselton (Jackson), Clermont (Hall), Hoschton (Jackson), Lula (Hall), Maysville (Banks), Pendergrass (Jackson), Statham (Barrow), Talmo (Jackson)	4,428	Digital
Total: 24 Systems			851,744 Subscribers	Total Digital Systems: 21

Satellite MVPDs Serving the Atlanta Metro Market

COMPANY	NAME	ESTIMATED SUBSCRIBERS
DIRECTV	DIRECTV	319,789
EchoStar Communications Corp.	DISH NETWORK	237,361

Source: Television and Cable Factbook, Vol. 1 (2007)