

**RADIO MARKET ANALYSIS**  
**BROADCAST SOUTH, LLC**  
**WVOH-FM RADIO STATION**  
**NICHOLLS, GEORGIA**  
**October 2010**

**TECHNICAL STATEMENT**

1. This Technical Statement and attached exhibits were prepared on behalf of Broadcast South, LLC (“BSL”), licensee of WVOH-FM, Channel 228C3, Hazlehurst, Georgia, with a permit for Channel 228C2 at Nicholls, Georgia. BSL is submitting an application to modify the outstanding permit for WVOH-FM. BSL is also the licensee of WVOH, 920 kHz, Hazlehurst, Georgia; WBHB, 1240 kHz, and WRDO, Channel 245A, Fitzgerald, Georgia; WKZZ, Channel 223C3, Tifton, Georgia; WDMG, 860 kHz, Douglas, Georgia; WDMG-FM, Channel 250A, Ambrose, Georgia; and WPNG, Channel 270C3, Pearson, Georgia. None of these stations are located nor considered “home” in any Arbitron market. Therefore, a multiple ownership study for a non-rated market is necessary. Exhibit #1 is a map depicting the subject stations.

2. As a result of the overlap of contours, two distinct radio markets are created. Market #1 consists of FM station WVOH-FM and AM stations WVOH and WDMG. Market #2 consists of FM stations WVOH-FM, WDMG-FM, WPNG and AM station WDMG.<sup>1</sup> A study, therefore, has been conducted to determine if ownership of these facilities in two separate markets complies with §73.3555 of the Commission’s rules. The WDMG AM city grade contour will be used to determine the number of other stations serving its contour and will be considered the

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1) As noted in Exhibit #1, the proposed WVOH-FM does not have city grade overlap with WRDO, WBHB, or WKZZ. As such, these stations are not considered further.

Radio Market Boundary. The study will determine the number of other commercial AM and FM stations that either have transmitter sites within or provide coverage to the subject radio market. The subject stations in the respective market will then be added to that number to arrive at the total number of stations in each market. Only those stations with transmitter sites within 92.0 kilometers will be considered as contributors to the market. No other stations in which BSL has an interest will be considered, unless it is a subject station in the market under review.

3. Exhibit #2 is a depiction of the stations within, or providing service to, the WDMG AM / Radio Market boundary. A total of six stations are depicted. Exhibit #3 is a tabulation of the stations in Radio Market #1, which shows a total of nine stations, when the three subject stations are included. The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules. At the fourteen or fewer stations level, common ownership or control of up to five stations, with no more than three in the same service, is permissible, provided the number of stations to be commonly held does not exceed 50% of the stations in the market. As such, Radio Market #1 is in compliance with the contour overlap rules.

4. Exhibit #4 is a tabulation of the stations in Radio Market #2, which shows a total of ten stations, when the four subject stations are included. The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules. At the fourteen or fewer stations level, common ownership or control of up to five stations, with no

more than three in the same service, is permissible, provided the number of stations to be commonly held does not exceed 50% of the stations in the market. As such, Radio Market #2 is in compliance with the contour overlap rules.

5. Based on BSL's interests in the above referenced stations in two non-rated markets, it is demonstrated herein that the proposed application for WVOH-FM is in compliance with the Commission's multiple ownership rules, as detailed in §73.3555.

6. The foregoing technical statement was prepared on behalf of Broadcast South, LLC, by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.5. BIA database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.

**Graham Brock, Inc. - Broadcast Technical Consultants**

**WVOH-FM Proposed**  
 Latitude: 31-29-08.60 N  
 Longitude: 082-41-28.10 W  
 ERP: 50.00 kW  
 Channel: 228C2  
 Frequency: 93.5 MHz

**WPNG**  
 BLH-20100722CZW  
 Latitude: 31-19-36 N  
 Longitude: 082-51-54 W  
 ERP: 13.00 kW  
 Channel: 270C3  
 Frequency: 101.9 MHz

**WDMG-FM**  
 BLH20041104AUI  
 Latitude: 31-31-51 N  
 Longitude: 082-54-34 W  
 ERP: 3.50 kW  
 Channel: 250A  
 Frequency: 97.9 MHz

**WRDO**  
 BLH-20020425ABO  
 Latitude: 31-44-33 N  
 Longitude: 083-14-39 W  
 ERP: 6.00 kW  
 Channel: 245A  
 Frequency: 96.9 MHz

**WKZZ**  
 BLH-19990913AAW  
 Latitude: 31-31-40 N  
 Longitude: 083-20-01 W  
 ERP: 20.50 kW  
 Channel: 223C3  
 Frequency: 92.5 MHz

**WDMG**  
 Latitude: 31-30-23 N  
 Longitude: 082-49-10 W  
 ERP: 5.0 kW  
 Frequency: 860 kHz

**WBHB**  
 Latitude: 31-42-23 N  
 Longitude: 083-15-40 W  
 ERP: 1.0 kW  
 Frequency: 1240 kHz

**WVOH**  
 Latitude: 31-51-15 N  
 Longitude: 082-34-00 W  
 ERP: 0.5 kW  
 Frequency: 920 kHz

**WBHB 5.0 mV/m**

**WDMG-FM 3.16 mV/m**

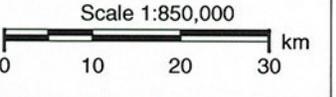
**WVOH 5.0 mV/m**

**WDMG 5.0 mV/m**

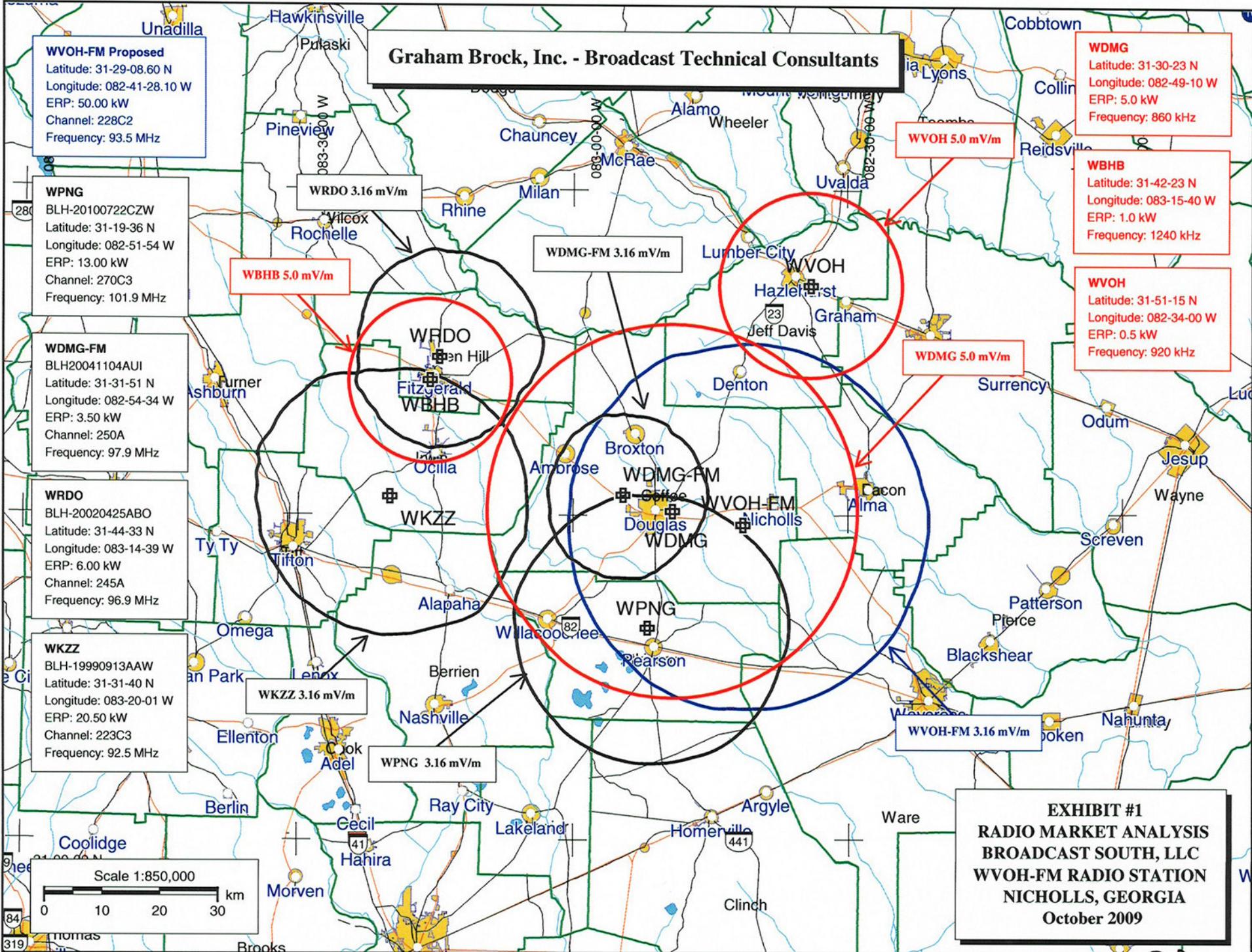
**WKZZ 3.16 mV/m**

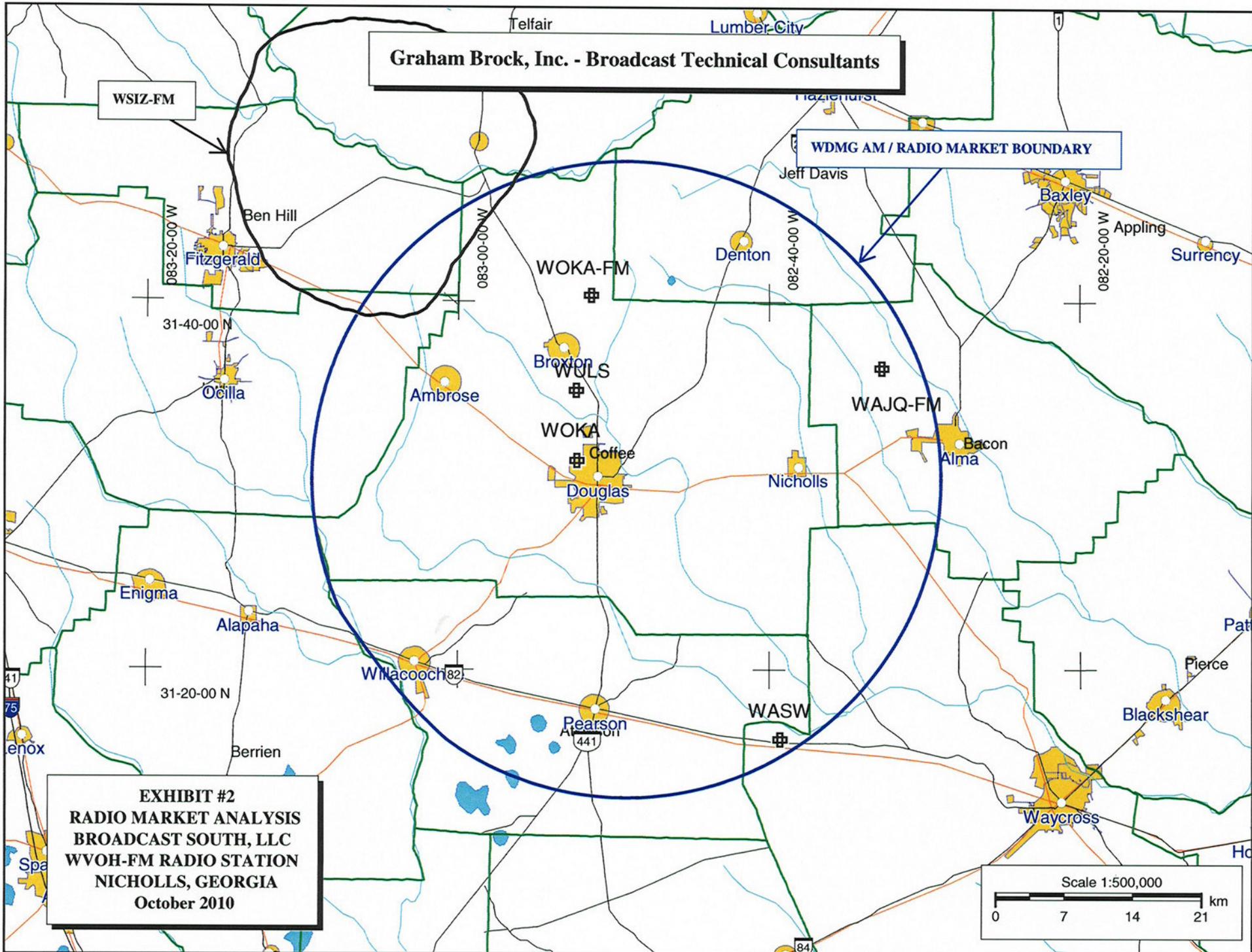
**WPNG 3.16 mV/m**

**WVOH-FM 3.16 mV/m**



**EXHIBIT #1**  
**RADIO MARKET ANALYSIS**  
**BROADCAST SOUTH, LLC**  
**WVOH-FM RADIO STATION**  
**NICHOLLS, GEORGIA**  
**October 2009**

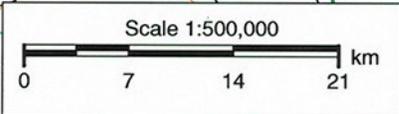




**Graham Brock, Inc. - Broadcast Technical Consultants**

**WDMG AM / RADIO MARKET BOUNDARY**

**EXHIBIT #2  
 RADIO MARKET ANALYSIS  
 BROADCAST SOUTH, LLC  
 WVOH-FM RADIO STATION  
 NICHOLLS, GEORGIA  
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**EXHIBIT #3**

**Tabulation of Stations in Radio Market #1**

**AM Stations**

* WDMG	860 kHz	Douglas, Georgia
* WVOH	920 kHz	Hazlehurst, Georgia
WOKA	1310 kHz	Douglas, Georgia

Total AM Stations - 3

**FM Stations**

WASW	Ch 220C3	Waycross, Georgia
* WVOH-FM	Ch 228C2	Nicholls, Georgia
+ WLPF	Ch 253A	Ocilla, Georgia
WULS	Ch 279A	Broxton, Georgia
WAJQ-FM	Ch 282A	Alma, Georgia
WOKA-FM	Ch 294C1	Douglas, Georgia

Total FM Stations - 6

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 9**

- \* Subject station.
- + Provides service to Radio Market.

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**EXHIBIT #4**

**Tabulation of Stations in Radio Market #2**

**AM Stations**

*	WDMG	860 kHz	Douglas, Georgia
	WOKA	1310 kHz	Douglas, Georgia

Total AM Stations - 2

**FM Stations**

	WASW	Ch 220C3	Waycross, Georgia
*	WVOH-FM	Ch 228C2	Nicholls, Georgia
*	WDMG-FM	Ch 250A	Ambrose, Georgia
+	WLPF	Ch 253A	Ocilla, Georgia
*	WPNG	Ch 270C3	Pearson, Georgia
	WULS	Ch 279A	Broxton, Georgia
	WAJQ-FM	Ch 282A	Alma, Georgia
	WOKA-FM	Ch 294C1	Douglas, Georgia

Total FM Stations - 8

**GRAND TOTAL OF STATION S CONSIDERED IN STUDY - 10**

- \* Subject station.
- + Provides service to Radio Market.

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

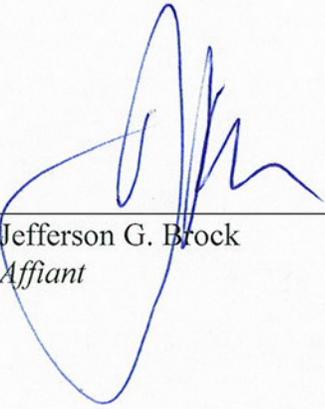
State of Georgia )  
St. Simons Island ) ss:  
County of Glynn )

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

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

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

*This the 20th day of October 2010.*

  
\_\_\_\_\_  
Jefferson G. Brock  
*Affiant*

*Sworn to and subscribed before me  
this the 20th day of October 2010*

  
\_\_\_\_\_  
Notary Public, State of Georgia  
My Commission Expires: June 16, 2012