

Galaxy Syracuse Licensee LLC (“Galaxy Syracuse”) is the licensee of the following full-power broadcast stations:

WTLA(AM)	54546	Syracuse, NY
WTKW(FM)	22234	Bridgeport, NY
WTKV(FM)	24131	Minetto, NY
WSGO(AM)	24130	Oswego, NY
WSCP(AM)	1046	Sandy Creek- Pulaski, NY
WKRL-FM	54547	North Syracuse, NY
WKRH(FM)	56996	Fair Haven, NY

The communities of licenses of all of these stations except for WKRH(FM) are located in counties that are part of the Syracuse, New York Nielsen Audio metro. In March 2015, Galaxy Syracuse completed construction of a new transmitter site to implement a community of license change for Station WKRH(FM) from Minetto to Fair Haven, New York and filed a license to cover application (File No. BLH-20150324AAS). Fair Haven is located in Cayuga County, which is not assigned to any Nielsen Audio metro.

As indicated on the BIA/Kelsey Media Access Pro FCC Geographic Market report for the Syracuse, New York Nielsen Audio metro attached hereto, WKRH is not considered home to the metro¹. The report shows that there are a total of 41 full-power commercial and non-commercial stations in the Syracuse metro. Section 73.3555 (a)(1)(ii) of the Commission’s rules provides that in markets with 30 to 44 full-power commercial and non-commercial radio stations, a single entity may not have a cognizable interest in more than seven commercial radio stations in total and not more than four stations in the same service. Galaxy Syracuse is currently the licensee of three AM and three FM stations that are included in the Syracuse market on the BIA/Kelsey report. Upon grant of the instant application, Galaxy Syracuse would have an interest in four FM stations and three AM stations, as permitted under the rule.

Because Fair Haven, NY is not part of the Syracuse metro, in accordance with Commission requirements, a contour-based multiple ownership analysis was prepared for the above-listed stations and Station WZUN(FM). The principal community contours of WKRH(FM) and WZUN(FM) do not overlap. As shown in the Technical Statement prepared by duTreil, Lundin & Rackley, Inc. attached hereto, the principal community contour of

¹ Station WKHR simulcasts the programming of Station WKRL(FM), licensed to North Syracuse. However, Galaxy has elected **not** to have the ratings of these stations aggregated as part of Total Line Reporting. The ratings of each station are reported individually.

WKRH(FM) has common overlap with the principal community contours of Stations WSCP(AM), WSGO(AM) and WTKV(FM). Accordingly, these four radio stations are deemed to be a single radio market. The attached Technical Statement shows the composite principal community contour for the contour-based market formed by these four radio stations. The exhibit also includes a tabulation of 20 radio stations whose transmitter sites are located within this composite contour. Galaxy Syracuse's ownership of four stations in this contour-based radio market therefore is consistent with Section 73.3555(a)(1)(iii) of the Commission's rules which provides that in markets with between 15 and 29 full-power commercial and non-commercial stations, an entity may have an attributable interest in up to six stations.

Because the WKRH community of license was changed from Minetto, which is in the Syracuse metro, to Fair Haven, which is not part of any Nielsen Audio metro, Galaxy should not be subject to the two-year waiting period for the removal of Station WKRH from the Syracuse metro and the instant application permitting Galaxy to acquire Station WZUN(FM) should be granted. In its decision in *Alan G. Moskowitz, Esq.*, the Bureau stated specifically that a licensee demonstrating compliance with the local radio ownership rule "may rely upon the removal of a station from BIA's list of home stations in a Metro, without a two-year waiting period, when the exclusion results from an FCC approved change in the community of license from within a Metro to outside the Metro." 28 FCC Rcd 16489, 16491 (2013). In addition, Worksheet #3 of the instructions to FCC Form 314 states specifically that an applicant may rely on the removal of a station from a market as reflected in a BIA Kelsey report without waiting two years if "the exclusion results from an FCC-approved change in the community of license of a station from within the Metro to outside the Metro."

FCC Geographic Market Definition for Syracuse, NY

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market	Home	Owner	City & State of License	County of License
						Designn	Mkt			
						Date	Rank			
WAER	FM	88.3	NC	Nws/Tlk/Jaz	Syracuse, NY	07/02/2003	89	Syracuse University	Syracuse, NY	Onondaga
WAQX	FM	95.7	C	AOR	Syracuse, NY	07/02/2003	89	Cumulus Media Holdings Inc	Manlius, NY	Onondaga
WBBS	FM	104.7	C	Country	Syracuse, NY	07/02/2003	89	iHeartMedia	Fulton, NY	Oswego
WBXL	FM	90.5	NC	AC	Syracuse, NY	07/02/2003	89	Baldwinsville Central School District	Baldwinsville, NY	Onondaga
WCNY	FM	91.3	NC	Classical	Syracuse, NY	07/02/2003	89	Public Broadcasting Council of Central NY Inc	Syracuse, NY	Onondaga
WFBL	AM	1390	C	Nws/Tlk/Inf	Syracuse, NY	07/02/2003	89	Leatherstocking Media Group Inc	Syracuse, NY	Onondaga
WGKV	FM	101.7	NC	ChrsContem	Syracuse, NY	07/02/2003	89	Educational Media Foundation	Pulaski, NY	Oswego
WHEN	AM	620	C	Urban AC	Syracuse, NY	07/02/2003	89	iHeartMedia	Syracuse, NY	Onondaga
WITC	FM	88.9	NC	Variety	Syracuse, NY	07/02/2003	89	Cazenovia College	Cazenovia, NY	Madison
WJPZ	FM	89.1	NC	Rhymc/CHR	Syracuse, NY	07/02/2003	89	WJPZ Radio Inc	Syracuse, NY	Onondaga
WKRL	FM	100.9	C	Rock	Syracuse, NY	07/02/2003	89	Galaxy Communications (NEW)	North Syracuse, NY	Onondaga
WMCR	AM	1600	C	Nws/Tlk/Inf	Syracuse, NY	07/02/2003	89	Leatherstocking Media Group Inc	Oneida, NY	Madison
WMCR	FM	106.3	C	Clsc Hits	Syracuse, NY	07/02/2003	89	Leatherstocking Media Group Inc	Oneida, NY	Madison
WMHR	FM	102.9	NC	Christian	Syracuse, NY	07/02/2003	89	Mars Hill Broadcasting Co Inc	Syracuse, NY	Onondaga
WMVN	FM	100.3	C	Rhymc/AC	Syracuse, NY	11/30/2009	89	Fox, Craig	Sylvan Beach, NY	Oneida
WNDR	FM	103.9	C	Clsc Hits	Syracuse, NY	11/13/2013	89	Fox, Craig	Mexico, NY	Oswego
WNTQ	FM	93.1	C	CHR	Syracuse, NY	07/02/2003	89	Cumulus Media Holdings Inc	Syracuse, NY	Onondaga
WNYO	FM	88.9	NC	Alt/Var/Tlk	Syracuse, NY	07/02/2003	89	State University of New York	Oswego, NY	Oswego
WOLF	AM	1490	C	Clsc Hits	Syracuse, NY	07/02/2003	89	Fox, Craig	Syracuse, NY	Onondaga
WOLF	FM	105.1	C	Country	Syracuse, NY	07/02/2003	89	Fox, Craig	Deruyter, NY	Madison
WOSW	AM	1300	C	Country	Syracuse, NY	07/02/2003	89	Fox, Craig	Fulton, NY	Oswego
WRCU	FM	90.1	NC	Variety	Syracuse, NY	07/02/2003	89	Colgate University	Hamilton, NY	Madison
WRVD	FM	90.3	NC	Nws/Tlk/Inf	Syracuse, NY	07/02/2003	89	State University of New York	Syracuse, NY	Onondaga
WRVO	FM	89.9	NC	Nws/Tlk/Inf	Syracuse, NY	07/02/2003	89	State University of New York	Oswego, NY	Oswego
WSCP	AM	1070	C	Span/Sprts	Syracuse, NY	07/02/2003	89	Galaxy Communications (NEW)	Sandy Creek-Pulaski, NY	Oswego
WSEN	AM	1050	C	Clsc Hits	Syracuse, NY	07/02/2003	89	Leatherstocking Media Group Inc	Baldwinsville, NY	Onondaga
WSEN	FM	92.1	C	Clsc Hits	Syracuse, NY	07/02/2003	89	Leatherstocking Media Group Inc	Baldwinsville, NY	Onondaga
WSGO	AM	1440	C	Sports	Syracuse, NY	07/02/2003	89	Galaxy Communications (NEW)	Oswego, NY	Oswego
WSIV	AM	1540	C	Christian	Syracuse, NY	07/02/2003	89	Fox, Craig	East Syracuse, NY	Onondaga
WSKO	AM	1260	C	Sports	Syracuse, NY	07/02/2003	89	Cumulus Media Holdings Inc	Syracuse, NY	Onondaga
WSYR	FM	106.9	C	News/Talk	Syracuse, NY	07/02/2003	89	iHeartMedia	Solvay, NY	Onondaga
WSYR	AM	570	C	News/Talk	Syracuse, NY	07/02/2003	89	iHeartMedia	Syracuse, NY	Onondaga
WTKV	FM	105.5	C	Clsc Rock	Syracuse, NY	07/02/2003	89	Galaxy Communications (NEW)	Minetto, NY	Oswego
WTKW	FM	99.5	C	Clsc Rock	Syracuse, NY	07/02/2003	89	Galaxy Communications (NEW)	Bridgeport, NY	Onondaga

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

"p" indicates pending sale to owner listed

FCC Geographic Market Definition for Syracuse, NY

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WTLA	AM	1200	C	Sports	Syracuse, NY	07/02/2003	89	Galaxy Communications (NEW)	North Syracuse, NY	Onondaga
WWHT	FM	107.9	C	CHR	Syracuse, NY	07/02/2003	89	iHeartMedia	Syracuse, NY	Onondaga
WWLF	FM	96.7	C	Country	Syracuse, NY	07/02/2003	89	Fox, Craig	Oswego, NY	Oswego
WXTL	FM	105.9	C	Clsc Rock	Syracuse, NY	07/02/2003	89	Cumulus Media Holdings Inc	Syracuse, NY	Onondaga
WXXE	FM	90.5	NC	Variety	Syracuse, NY	07/02/2003	89	p State University of New York	Fenner, NY	Madison
WYYY	FM	94.5	C	AC	Syracuse, NY	07/02/2003	89	iHeartMedia	Syracuse, NY	Onondaga
WZUN	FM	102.1	C	Clsc Hits	Syracuse, NY	07/02/2003	89	Maven Media LLC	Phoenix, NY	Oswego

Number of Stations in Geographic Market 41

Previous Stations in Geographic Market

WKRH	FM	106.5	C	Rock		08/10/2015	0	Galaxy Communications (NEW)	Fair Haven, NY	Cayuga
WRVN	FM	91.9	NC	Nws/Tlk/Inf	Utica-Rome, NY	08/27/2015	167	State University of New York	Utica, NY	Oneida

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
GALAXY SYRACUSE LICENSEE LLC

This radio multiple ownership analysis was prepared on behalf of Galaxy Syracuse Licensee LLC (herein “Galaxy”) concerning the ownership of the stations listed below.

Call Sign / Facility ID	Location	Facilities
WKRH(FM)/56996 <i>BLH-20150324AAS</i>	Fair Haven, NY	CH 293A 6 kW 98 M
WTKV(FM)/24131 <i>BLH-20150218ABK</i>	Minetto, NY	CH 288A 4 kW 121 M
WSCP(AM)/1046 <i>BL-19790814AD</i>	Sandy Creek-Pulaski, NY	1070 kHz 2.5 kW ND-D
WSGO(AM)/24130 <i>BL-19890629AB</i>	Oswego, NY	1440 kHz, 1 kW-D/0.045 kW-N U
WTLA(AM)/54546 <i>BL-19910604AB</i>	North Syracuse, NY	1200 kHz 1 kW-U DA-N
WKRL-FM/54547 <i>BLH-19911016KC</i>	North Syracuse, NY	CH 265A 6 kW 50 M
WTKW(FM)/22234 <i>BLH-20070319ACA</i>	Bridgeport, NY	CH 258A 5.7 kW 103 M
WZUN(FM)/60253 <i>BLH-19990819KC</i>	Phoenix, NY	CH 271A 6 kW 81 m

As Fair Haven, NY is not part of the Syracuse metro, in accordance with Commission requirements outlined in Section 73.3555, a contour based multiple ownership analysis was prepared for the above listed stations. Only those stations involved in contour overlap with WKRH(FM) have been considered. The principal community contours (3.16 mV/m for FM stations, 5 mV/m for AM stations) of the pertinent stations are depicted on a map included herein as Figure 1.

Radio Market

The “radio market” applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal

community contours of the stations proposed to be commonly owned.¹ There is one “radio market” defined for analysis under the Commission’s Rules. The table below lists the defined market:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	WSCP(AM)/WSGO(AM)	WKRH(FM)/WTKV(FM)

Count of Stations in Defined Market

The number of other radio stations in a “radio market” is determined by counting the operating stations having principal community contours that intersect the principal community contours which define the radio market, plus the subject stations that are co-owned. Only those stations located within 92 kilometers of the perimeter of the mutual overlap area of the respective defined market area were employed in the count of the stations. Commonly controlled stations were not considered in the count of stations in the defined markets. The results of the analysis are tabulated below:

Defined Radio Market	Minimum Number of Other Stations in Radio Market
Market 1	6 AM, 14 FM; 20 Total

Figure 2 is a tabulation of the radio stations identified in the defined radio markets tabulated above. It is noted that the tabulation is not a complete list of all of the other stations in the market, but rather enough stations to show compliance with the FCC’s radio multiple ownership rules. Only known licensed, operating stations were employed for the study.

Distances to the AM coverage contours 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 CFR 73.184. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR 73.313. Terrain data was derived from the N.G.D.C. 30-second computer database for each of the FM stations using radials evenly-spaced every 5 degrees of azimuth.

¹ See Order in Implementation of Section 202(a) and 202(b)(1) of the Telecommunications Act of 1996 (Broadcast Radio Ownership) FCC 96-90, released March 8, 1996 and Memorandum Opinion and Order in Revision of Radio Rules and Policies 7 FCC Rcd 6387, 6395 para. 39 (1992).

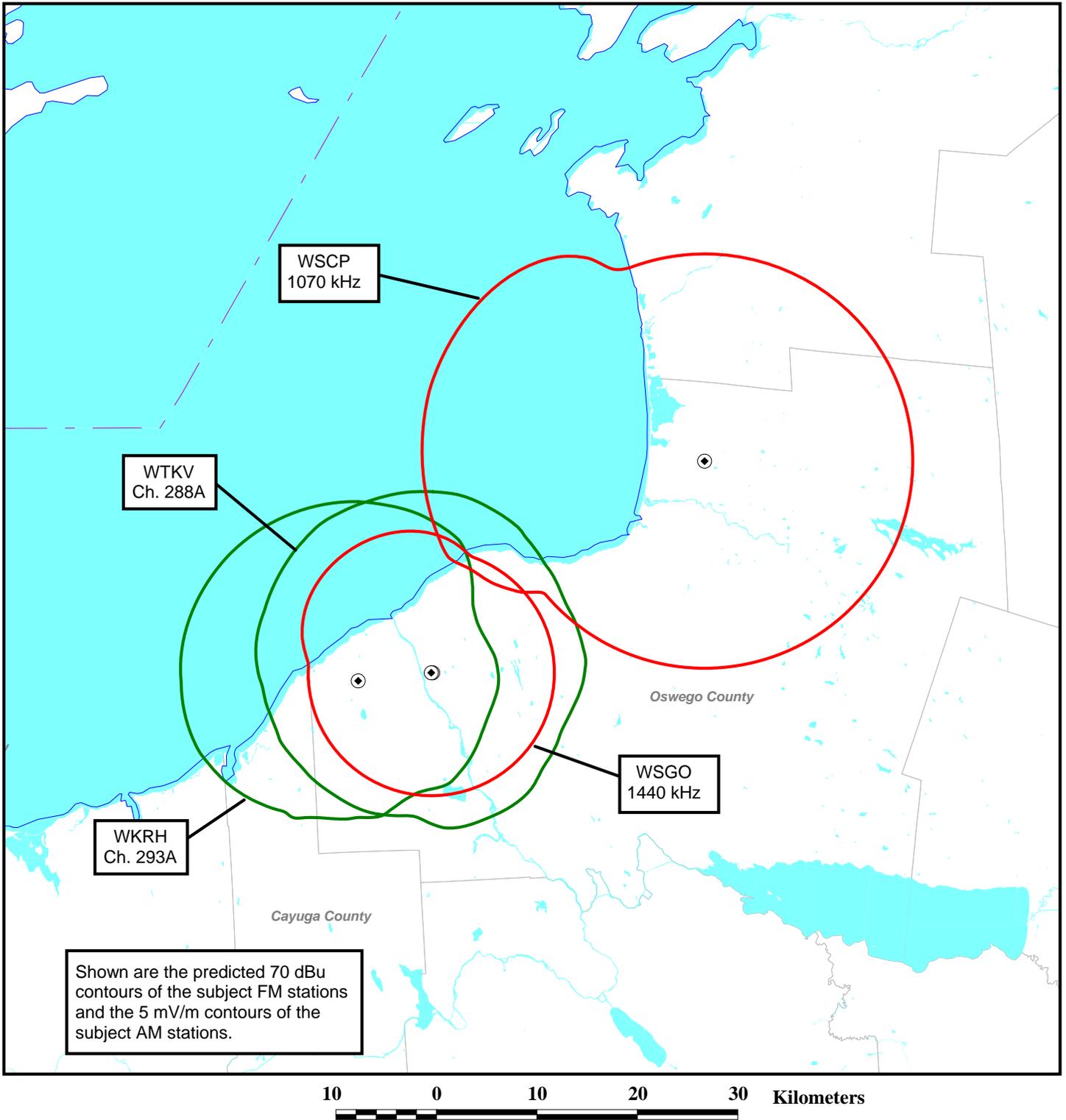
Based on the above, it is concluded that the Galaxy will be in compliance with the Section 73.3555(a) of the FCC Rules using the interim contour method.



W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
201 Fletcher Ave.
Sarasota, Florida 34237
(941)329-6000

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PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

du Treil, Lundin & Rackley, Inc. Sarasota, Florida 34237

TECHNICAL STATEMENT
 RADIO MULTIPLE OWNERSHIP ANALYSIS

Tabulation of Other Stations Defined in the Radio Market

<u>AM Stations</u>			
<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
WOSW	Fulton	NY	1300 kHz
WHEN	Syracuse	NY	620
WTNY	Watertown	NY	790
WSYR	Syracuse	NY	570
<u>FM Stations</u>			<u>Channel</u>
WGKV	Pulaski	NY	269A
WWLF-FM	Oswego	NY	244A
WSEN-FM	Baldwinsville	NY	221B1
WEFX	Henderson	NY	264A
WYYY	Syracuse	NY	233B
WBBS	Fulton	NY	284B
WNTQ	Syracuse	NY	226B
WWHT	Syracuse	NY	300B
WRVO	Oswego	NY	210B
WNYO	Oswego	NY	205A
WNDR-FM	Mexico	NY	280A
WFRY-FM	Watertown	NY	248C1