

**RADIO MARKET ANALYSIS**  
**WZKX RADIO STATION**  
**BAY ST. LOUIS, MISSISSIPPI**  
**WZNF RADIO STATION**  
**LUMBERTON, MISSISSIPPI**  
**November 2006**

**TECHNICAL STATEMENT**

1. This Technical Statement and attached exhibits were prepared on behalf of Dowdy and Dowdy Partnership, licensee of station WZKX, Channel 300C, Bay St. Louis, Mississippi and JMD, Inc., licensee of station WZNF, Channel 237C1, Lumberton, Mississippi. Principals of Dowdy and Dowdy Partnership have interest in JMD, Inc. As there is some cross attribution, both Dowdy and Dowdy Partnership and JMD, Inc., will be hereinafter referred to as Joint Parties (“Joint Parties”). Applications for minor changes for stations WZKX and WZNF are being submitted and an updated radio market analysis is necessary. Joint Parties also have interests in stations WROA, 1390 kHz, WGCM, 1240 kHz and WGCM-FM, Channel 272C2, Gulfport, Mississippi and WRPM, 1530 kHz, Poplarville, Mississippi.<sup>1</sup> WROA, WGCM, WGCM-FM and WZKX are all licensed to communities within metro counties in the Biloxi-Gulfport-Pascagoula, Mississippi Arbitron Market. WZNF is not licensed to any metro county, but is considered “home” to the Biloxi-Gulfport-Pascagoula, Mississippi Arbitron Market. WRPM is not licensed to any metro county or considered “home” in any Arbitron Market. As WZNF is a non-metro station, yet “home” to a rated market, an analysis for both rated and non-rated markets is needed.

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1) In addition to the licensed WRPM facility, there is an outstanding permit to change frequency to 1170 kHz and an application to modify the permit to 570 kHz. As such, the contours of the licensed, authorized and applied for facilities of WRPM are considered herein.

### **RATED MARKET REVIEW**

2. As shown on Exhibit #1, there are twenty-three AM and FM (commercial and non-commercial) stations listed in the Biloxi-Gulfport-Pascagoula, Mississippi Arbitron Market (Market #138). Joint Parties would be in control of three FM stations and two AM stations in the same market. The number of stations indicated falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules. At this level, common ownership or control of up to six stations, with no more than four in the same service, is permissible. Therefore, the Joint Parties ownership of three FM stations and two AM stations in the rated market would be in compliance with the Commission's rules. Therefore, the combination of WZKX, WZNF, WGCM, WGCM-FM and WROA in the rated market is in compliance with §73.3555.

### **NON-RATED MARKET REVIEW**

3. A map depicting the city grade contours of the six stations is attached as Exhibit #2. Based on the contours of the stations, two distinct markets are created. Market #1 consists of FM stations WZKX, WZNF and WGCM-FM and AM stations WGCM and WROA. Market #2 consists of FM stations WZKX and WZNF and AM station WRPM. A study, therefore, has been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission's rules. As WZKX is a subject station in both contour overlap markets, its contour will be used to define the market boundary, hereinafter referred to as the "Radio Market". Its contour will be used to determine the number of other AM and FM stations that are contributors to the market, to which will be added the subject stations in the relevant market. Only those

stations with transmitter sites within 92.0 kilometers will be considered as contributors to the subject markets. No other station in which Joint Parties have interests will be considered, unless it is a subject station in the market under review.

4. Exhibit #3 is a depiction of the eight other AM and FM stations within the city grade contour of the WZKX facility. Exhibit #4 is a tabulation of the stations in Radio Market #1, which totals thirteen when the five subject stations are added. The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules.<sup>2</sup> 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, Market #1 is in compliance with the rules.

5. Exhibit #5 is a tabulation of the number of stations in Radio Market #2, which totals eleven when the three subject stations are added. The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules.<sup>3</sup> 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, Market #2 is in compliance with the rules. Therefore, the Joint Parties interests in the above referenced stations, in two contour overlap markets, has been shown to be in compliance with the revised contour overlap rules.

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2) While there are numerous additional stations, they were not considered as there were more than a sufficient number of stations shown to accommodate the number to be commonly held.

3) See Footnote 2, supra.

6. As demonstrated above, control of WZKX, WZNF, WGCM-FM, WGCM, WROA and WRPM, in the rated and non-rated markets, is in compliance with §73.3555 of the rules. Therefore, the proposed minor change applications for WZKX and WZNF are in compliance with the rules.

7. The foregoing technical statement was prepared on behalf of both Dowdy and Dowdy Partnership and JMD, Inc., 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 4.0. BIA database. All other data was extracted from the CDBS database. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.



## FCC Geographic Market Definition for

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WAOY	FM	91.7	NC	Christian	Biloxi-Gulfport-Pascagoula, MS	07/02/2003	138	American Family Association Incorporated	Gulfport, MS	Harrison
WBSL	AM	1190	C	Rhythm/Blue	Biloxi-Gulfport-Pascagoula, MS	07/02/2003	138	Hancock Broadcasting	Bay St. Louis, MS	Hancock
WBUV	FM	104.9	C	Nws/Tik/Inf	Biloxi-Gulfport-Pascagoula, MS	07/23/2003	138	Clear Channel Communications	Moss Point, MS	Jackson
WCPR	FM	97.9	C	Modern Rock	Biloxi-Gulfport-Pascagoula, MS	07/02/2003	138	Triad Broadcasting Company	Wiggins, MS	Stone
WGCM	FM	102.3	C	Oldies	Biloxi-Gulfport-Pascagoula, MS	07/02/2003	138	Dowdy & Dowdy	Gulfport, MS	Harrison
WGCM	AM	1240	C	Cntry/Oldes	Biloxi-Gulfport-Pascagoula, MS	07/02/2003	138	Dowdy & Dowdy	Gulfport, MS	Harrison
WHGO	FM	105.9	C	Clsc Hits	Biloxi-Gulfport-Pascagoula, MS	07/02/2003	138	Triad Broadcasting Company	Pascagoula, MS	Jackson
WJZD	FM	94.5	C	Urban AC	Biloxi-Gulfport-Pascagoula, MS	07/02/2003	138	WJZD Inc	Long Beach, MS	Harrison
WKNN	FM	99.1	C	Country	Biloxi-Gulfport-Pascagoula, MS	07/02/2003	138	Clear Channel Communications	Pascagoula, MS	Jackson
WMAH	FM	90.3	NC	Clsc/News	Biloxi-Gulfport-Pascagoula, MS	07/02/2003	138	Mississippi Authority for Educational Television	Biloxi, MS	Harrison
WMJY	FM	93.7	C	AC	Biloxi-Gulfport-Pascagoula, MS	07/02/2003	138	Clear Channel Communications	Biloxi, MS	Harrison
WOSM	FM	103.1	C	Religion	Biloxi-Gulfport-Pascagoula, MS	07/02/2003	138	Cooper, Charles H	Ocean Springs, MS	Jackson
WPAS	FM	89.1	NC	Christian	Biloxi-Gulfport-Pascagoula, MS	08/03/2004	138	American Family Association Incorporated	Pascagoula, MS	Jackson
WPMP	AM	1580	C	News/Talk	Biloxi-Gulfport-Pascagoula, MS	07/02/2003	138	Flagship Radio Group Inc	Pascagoula-Moss Poin, MS	Jackson
WQFX	AM	1130	C	Gospel	Biloxi-Gulfport-Pascagoula, MS	07/02/2003	138	Walking by Faith Ministries Inc	Gulfport, MS	Harrison
WQYZ	FM	92.5	C	Gospel	Biloxi-Gulfport-Pascagoula, MS	07/02/2003	138	Clear Channel Communications	Ocean Springs, MS	Jackson
WROA	AM	1390	C	Easy	Biloxi-Gulfport-Pascagoula, MS	07/02/2003	138	Dowdy & Dowdy	Gulfport, MS	Harrison
WTNI	AM	1640	C	Nws/Tik/Inf	Biloxi-Gulfport-Pascagoula, MS	07/02/2003	138	Triad Broadcasting Company	Biloxi, MS	Harrison
WUJM	FM	96.7	C	Country	Biloxi-Gulfport-Pascagoula, MS	07/02/2003	138	Triad Broadcasting Company	Gulfport, MS	Harrison
WXBD	AM	1490	C	Sports	Biloxi-Gulfport-Pascagoula, MS	07/02/2003	138	Triad Broadcasting Company	Biloxi, MS	Harrison
WXYK	FM	107.1	C	CHR	Biloxi-Gulfport-Pascagoula, MS	07/02/2003	138	Triad Broadcasting Company	Gulfport, MS	Harrison
WZKX	FM	107.9	C	Country	Biloxi-Gulfport-Pascagoula, MS	07/02/2003	138	Dowdy & Dowdy	Bay St. Louis, MS	Hancock
WZNF	FM	95.3	C	Clsc Rock	Biloxi-Gulfport-Pascagoula, MS	07/02/2003	138	Dowdy & Dowdy	Lumberton, MS	Lamar

Number of Stations in Geographic Market 23

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

"p" indicates pending sale to owner listed

Printed: 11/13/2006 Data: 10/25/2006

(c) BIA Financial Network, Inc.

**EXHIBIT #1**

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

**WZKX**  
 Latitude: 30-45-05 N  
 Longitude: 089-03-24 W  
 ERP: 100.00 kW  
 Channel: 300C  
 Frequency: 107.9 MHz

**WZNF**  
 Latitude: 30-45-05 N  
 Longitude: 089-03-24 W  
 ERP: 100.00 kW  
 Channel: 237C0  
 Frequency: 95.3 MHz

**WGCM-FM**  
 BLH-20050131ATW  
 Latitude: 30-20-44 N  
 Longitude: 089-11-47 W  
 ERP: 50.00 kW  
 Channel: 272C2  
 Frequency: 102.3 MHz

**WROA**  
 Latitude: 30-27-30 N  
 Longitude: 089-04-45 W  
 ERP: 5.00 kW  
 Frequency: 1390.0 kHz

**WGCM**  
 Latitude: 30-25-45 N  
 Longitude: 089-01-10 W  
 ERP: 1.00 kW  
 Frequency: 1240.0 kHz

**WRPM**  
 Latitude: 30-48-55 N  
 Longitude: 089-30-24 W  
 ERP: 10.00 kW  
 Frequency: 1530.0 kHz

**WRPM App**  
 Latitude: 30-48-56 N  
 Longitude: 089-30-22 W  
 ERP: 1.00 kW  
 Frequency: 570.0 kHz

**WRPM CP**  
 Latitude: 30-48-56 N  
 Longitude: 089-30-22 W  
 ERP: 5.00 kW  
 Frequency: 1170.0 kHz

WRPM APP 5.0 mV/m

WZKX 3.16 mV/m

WZNF 3.16 mV/m

WRPM 5.0 mV/m

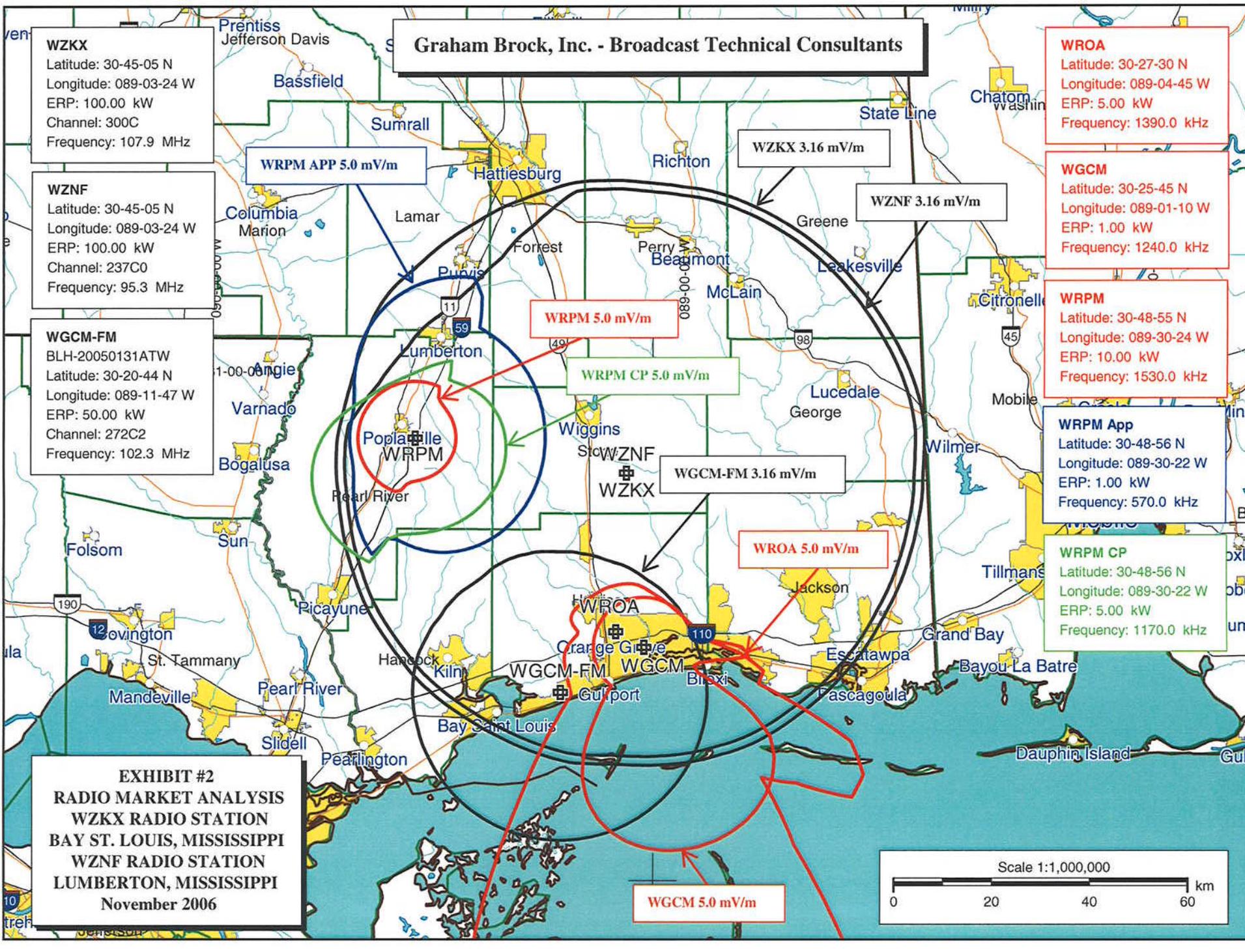
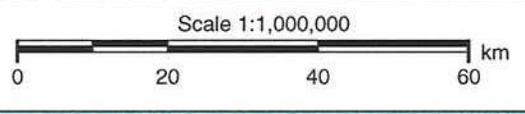
WRPM CP 5.0 mV/m

WGCM-FM 3.16 mV/m

WROA 5.0 mV/m

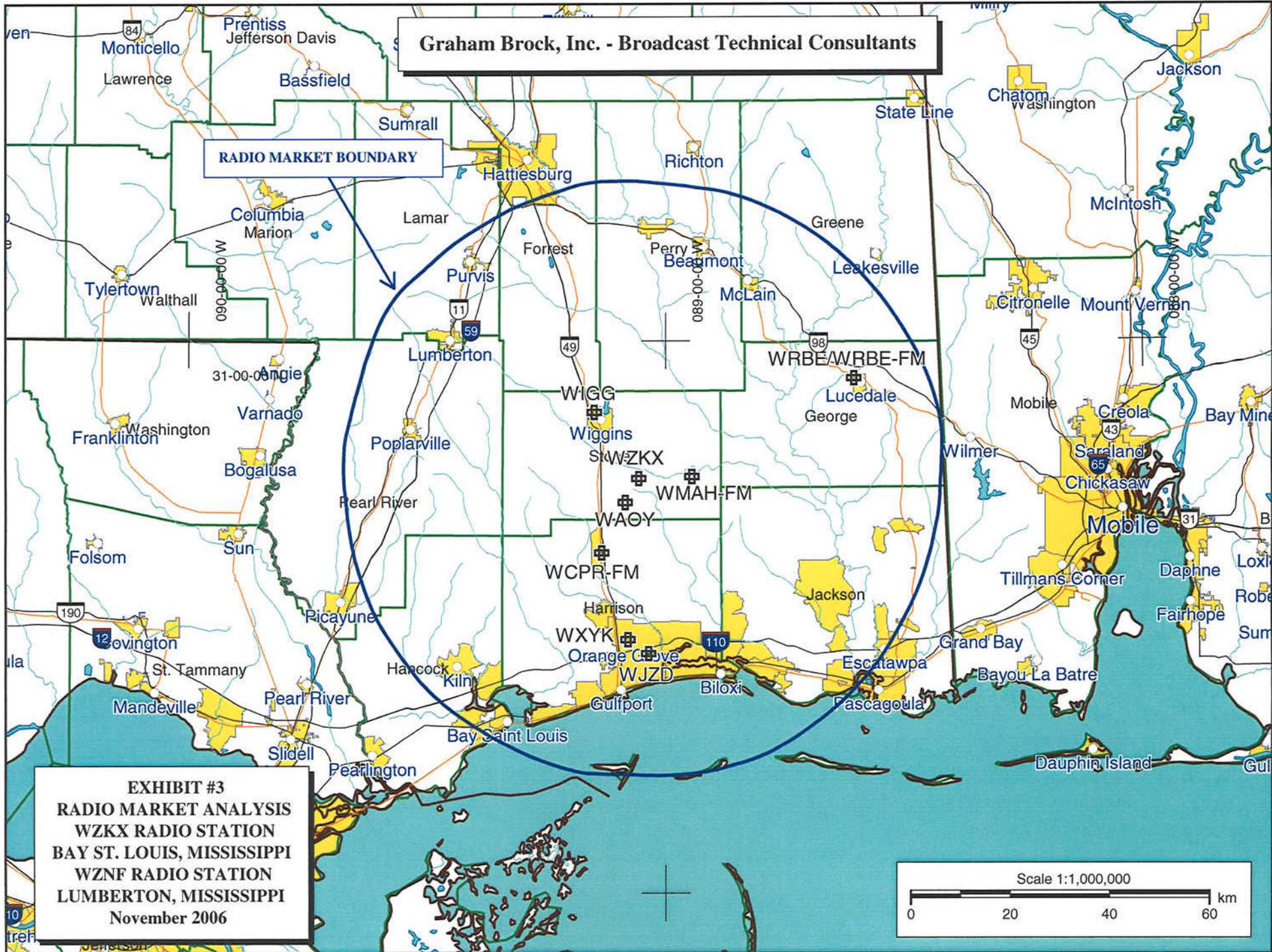
WGCM 5.0 mV/m

**EXHIBIT #2**  
**RADIO MARKET ANALYSIS**  
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**Graham Brock, Inc. - Broadcast Technical Consultants**

**RADIO MARKET BOUNDARY**



**EXHIBIT #3**  
**RADIO MARKET ANALYSIS**  
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**EXHIBIT #4**

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

**AM Stations**

* WGCM	1240 kHz	Gulfport, Mississippi
* WROA	1390 kHz	Gulfport, Mississippi
WIGG	1420 kHz	Wiggins, Mississippi
WRBE	1440 kHz	Lucedale, Mississippi

Total AM Stations - 4

**FM Stations**

WMAH-FM	Ch 212C	Biloxi, Mississippi
WAOY	Ch 219C1	Gulfport, Mississippi
WJZD	Ch 233A	Long Beach, Mississippi
* WZNF	Ch 237C0	Lumberton, Mississippi
WCPR-FM	Ch 250C2	Wiggins, Mississippi
* WGCM-FM	Ch 272C2	Gulfport, Mississippi
WRBE-FM	Ch 295A	Lucedale, Mississippi
WXYK	Ch 296A	Gulfport, Mississippi
* WZKX	Ch 300C	Bay St. Louis, Mississippi

Total FM Stations - 9

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 13**

\* Subject station.

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**EXHIBIT #5**

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

**AM Stations**

WIGG	1420 kHz	Wiggins, Mississippi
WRBE	1440 kHz	Lucedale, Mississippi
* WRPM	1530 kHz	Poplarville, Mississippi

Total AM Stations - 3

**FM Stations**

WMAH-FM	Ch 212C	Biloxi, Mississippi
WAOY	Ch 219C1	Gulfport, Mississippi
WJZD	Ch 233A	Long Beach, Mississippi
* WZNF	Ch 237C0	Lumberton, Mississippi
WCPR-FM	Ch 250C2	Wiggins, Mississippi
WRBE-FM	Ch 295A	Lucedale, Mississippi
WXYK	Ch 296A	Gulfport, Mississippi
* WZKX	Ch 300C	Bay St. Louis, Mississippi

Total FM Stations - 8

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 11**

\* Subject station.

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

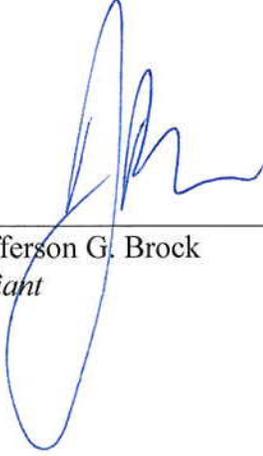
*State of Georgia )*  
*St. Simons Island ) ss:*  
*County of Glynn )*

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by JMD, Inc., 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 15<sup>th</sup> day of November 2006.*

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

*Sworn to and subscribed before me  
this the 15<sup>th</sup> day of November 2006*

  
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*Notary Public, State of Georgia  
My Commission Expires: September 3, 2007*