



**STATEMENT OF WILLIAM J. GETZ  
IN SUPPORT OF AN APPLICATION FOR  
CONSENT TO ASSIGNMENT  
OF BROADCAST LICENSE**

I am a Radio Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission.

This office has been authorized to prepare this statement and the associated exhibits in support of an Application for Consent to Assignment of Broadcast License (FCC Form 314). As a result of the proposed acquisition of three television stations, one entity will hold attributable interest multiple television stations and radio stations in the southern tier of New York. This material demonstrates that the proposed combination of stations satisfies the Commission's cross-ownership rules.

The subject television stations are: WKTV(TV), Utica, NY; WETM-TV, Elmira, NY, and WBNG-TV, Binghamton, NY. The subject FM stations are: WNKI(FM), Corning, NY; WPGI(FM), Horseheads, NY; WNGZ(FM), Montour Falls, NY; WWLZ(AM), Horseheads, NY, and WGMF(AM), Watkins Glen, NY. Exhibit 1 depicts the Grade A service contours of the three television stations relative to the principal communities of the radio stations.

The Grade A service contours of WKTV(TV) and WBNG-TV do not overlap the principal community of any of the radio stations listed above. Consequently, there are no cross-ownership implications involving WKTV(TV) and WBNG-TV.

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The Grade A service contour of WETM-TV encompasses the principal community of all five radio stations listed above. Exhibit 2 depicts an expanded view of the WETM-TV Grade A service contour and the principal communities of the radio stations. Exhibit 2 also lists each radio station's home market according to Arbitron. According to Arbitron data, four of the five radio stations are listed in the Elmira-Corning radio market (the only station not listed in the market is WGMF(AM), Watkins, Glen, NY)<sup>1</sup>. Because the proposed combination of stations involves radio stations in different radio markets, pursuant to Section 73.3555(c)(3)(ii)(B) of the FCC Rules, the cross-ownership study must consider each market separately. The first market (the Elmira-Corning rated market) consists of 1 TV and 4 Radio stations. The second market ("Market 2") consists of 1 TV and 1 Radio station (in an un-rated market). There is no prohibition on owning 1 TV and 1 Radio station in a market. Consequently, "Market 2" satisfies the FCC's cross-ownership rules.

Pursuant to Section 73.3555(c)(2)(ii) of the FCC Rules, a single entity may hold attributable interest in 1 TV and 4 Radio stations in the same market provided there are at least 10 independent voices remaining post-merger. Our studies indicate that there will be at least 13 independent voices remaining in the post-merger market (See Table1, attached). Consequently, the common ownership of WETM-TV and the four radio stations in the Elmira-Corning market is also in compliance with the FCC's cross-ownership rules.

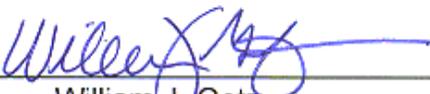
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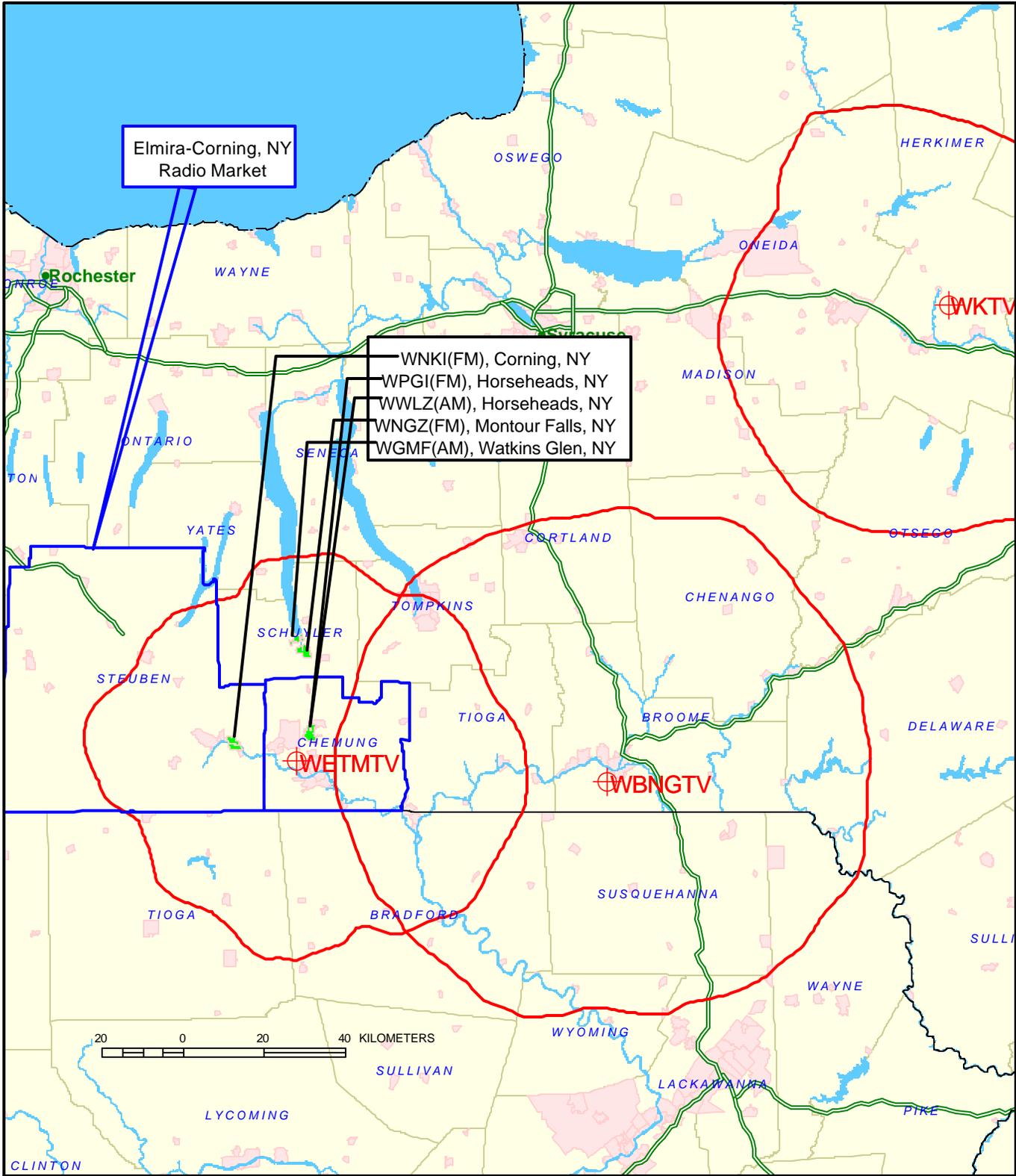
<sup>1</sup> According to Arbitron data, WGMF(AM), Watkins Glen, NY, is not listed in the Elmira-Corning radio market which consists of Chemung County and Steuben County. Watkins Glen is located in Schuyler County, NY, outside the Arbitron boundaries of the Elmira-Corning radio market, in an un-rated radio market.

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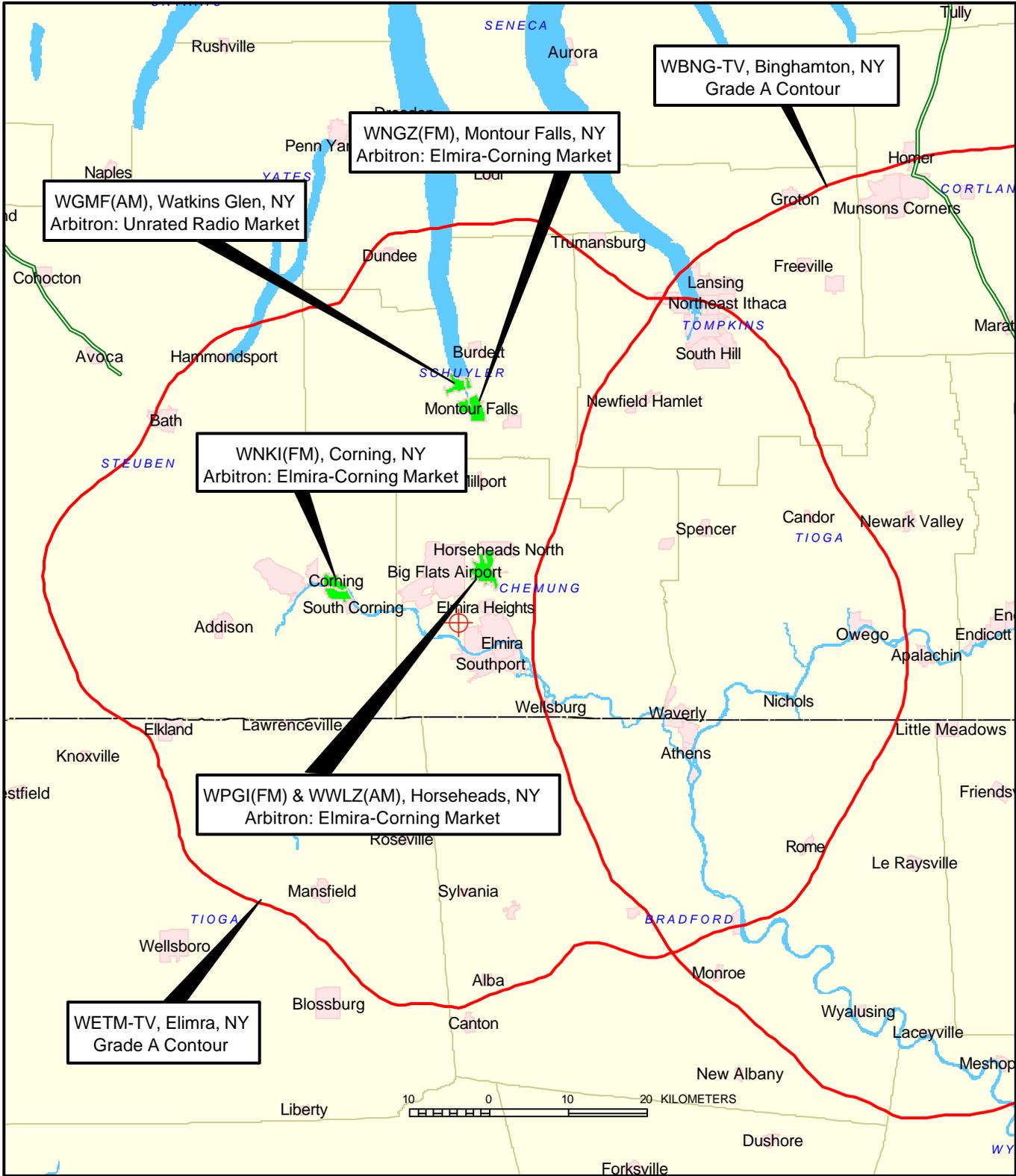
This statement and the supporting Exhibits and Table were prepared by me or under my direct supervision and are believed to be true and correct.

DATED: August 10, 2004

  
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William J. Getz



TELEVISION: GRADE A CONTOURS  
RADIO: COMMUNITIES OF LICENSE  
ELMIRA-CORNING RADIO MARKET BOUNDARY  
AUGUST, 2003



TELEVISION: GRADE A CONTOURS  
RADIO: COMMUNITIES OF LICENSE  
RADIO: ARBITRON HOME MARKETS  
AUGUST, 2004

**INDEPENDENT VOICES IN MARKET STUDY  
ELMIRA-CORNING, NEW YORK  
AUGUST, 2004**

<b>Voice #</b>	<b>Call Sign</b>	<b>City, State</b>	<b>Service</b>	<b>Owner</b>
1	WABH	Bath, NY	AM	Pembrook Pines Mass Media
2	WCBA	Corning, NY	AM	Group A Licensee, LLC
3	WCEB	Corning, NY	FM	Corning Community College
4	WCIH	Elmira, NY	FM	Family Life Ministries, Inc.
5	WCKR	Hornell, NY	FM	PMJ Communications, Inc.
6	WECW	Elmira, NY	FM	Elmira College
7	WHHO	Hornell, NY	AM	Bilbat Radio, Inc.
8	WLNL	Horseheads, NY	AM	Lighthouse Media, Inc.
9	WNGZ	Montour Falls, NY	FM	Chemung County Radio, Inc.
10	WPHD	South Waverly, PA	FM	Fitzgerald and Hawras
11	WSQA	Hornell, NY	FM	WSKQ Public Telecom Council
12	WENY-TV	Elmira, NY	TV	Lilly Broadcasting, LLC
13	WYDC	Corning, NY	TV	Vision Communications, LLC