

RADIO MARKET ANALYSIS
CUMULUS LICENSING LLC
WWIZ (FM) RADIO STATION
WEST MIDDLESEX, PENNSYLVANIA
January 2007

TECHNICAL STATEMENT

1. This Technical Statement and attached exhibits were prepared on behalf of Cumulus Licensing LLC ("Cumulus"), licensee of FM station WWIZ, Channel 280A, Mercer, Pennsylvania. Cumulus is proposing to change the community of license of WWIZ to West Middlesex, Pennsylvania. As such, a Radio Market Analysis is needed. West Middlesex, Pennsylvania, the proposed community of license, is not located in a metro county within any rated market. However, WWIZ is presently considered "home" to the Youngstown-Warren, Ohio Arbitron Market. Cumulus also has attributable interests in stations WSOM, 600 kHz, and WQXK, Channel 286B, Salem, Ohio; WBBW, 1240 kHz, and WHOT-FM, Channel 266B, Youngstown, Ohio; WPIC, 790 kHz, and WYFM, Channel 275B, Sharon, Pennsylvania; and WLLF, Channel 244A, Mercer, Pennsylvania. WBBW and WHOT-FM are licensed to metro counties in the Youngstown-Warren, Ohio market. WSOM, WQXK, WPIC and WYFM are designated "home" to the Youngstown-Warren, Ohio market. There is also contour overlap between WWIZ and some of the other stations. As such, a hybrid analysis for both rated and non-rated markets is needed.

ARBITRON/BIA RATED MARKET ANALYSIS

2. As shown on Exhibit #1, there are twenty-six AM and FM (commercial and non-commercial) stations listed in the Youngstown-Warren, Ohio Arbitron Market. Cumulus is

presently, and would continue to be, in control of five FM stations and three AM stations in the 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. The combination of stations owned by Cumulus existed prior to the change in §73.3555 of the rules and, as such, is grandfathered.³ Further, pursuant to Note 4, §73.3555 (2003), since the WWIZ minor change application will not change the concentration of stations in the subject Arbitron Market, it is believed that the WWIZ application remains grandfathered under the Commission's ownership rules in the Youngstown-Warren, Ohio market.

REVISED CONTOUR OVERLAP ANALYSIS

3. Attached as Exhibit #2 is a map depicting the city grade contours of the eight stations. Based on these facilities and their respective city grade contours, three distinct overlap markets are created. Market #1 consists of AM station WPIC and FM stations WWIZ, WLLF, WYFM and WHOT-FM. Market #2 consists of AM stations WSOM, WBBW and WPIC and FM stations WWIZ, WHOT-FM and WYFM. Market #3 consists of AM stations WBBW and WPIC and FM stations WWIZ, WQXK, WYFM and WHOT-FM.

4. A study, therefore, has been conducted to determine if ownership of these facilities complies with §73.3555 of the Commission's rules. As the city grade contour of WHOT-FM is a subject station in all three markets, we will determine the number of contributing stations which have sites within, or provide city grade service to, the WHOT-FM contour. To this total we will

3) Under the former contour overlap analysis rules, Cumulus was in compliance with the ownership rules.

then add the relevant subject stations to show compliance in the three markets. Therefore, the WHOT-FM contour establishes the “Radio Market Boundary” for this review. Only those stations with transmitter sites within 92.0 kilometers will be considered as contributors to the market. No other station in which Cumulus has interests will be considered, unless it is a subject station in the market under review.

5. Exhibit #3 is a depiction of the non-subject contributing stations within, or providing service to, the WHOT-FM Radio Market boundary. A total of thirteen stations are depicted. Exhibit #4 is a tabulation of the stations in Radio Market #1, which, including the five subject stations, totals eighteen stations. The number of stations depicted falls in the fifteen to twenty nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.⁴ At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service. As such, Market #1 is in compliance.

6. Exhibit #5 is a tabulation of the stations in Radio Market #2, which, including the six subject stations, totals nineteen. The number of stations depicted falls in the fifteen to twenty nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules.⁵ At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service. As such, Market #2 is in compliance. Exhibit #6 is a tabulation of the stations in the Radio Market #3, which, including the six subject stations, totals nineteen stations. The number of stations depicted falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii)

4) There are additional stations, however they were not considered as the number of stations shown were sufficient to demonstrate compliance, based on the number of stations to be commonly held.

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of the Commission's rules.⁶ At the fifteen to twenty-nine stations level, common ownership or control of up to six stations, with no more than four in the same service. As such, Market #3 is in compliance with the rules. Based on Cumulus's interests in the above referenced stations in three contour overlap markets, it is demonstrated herein that the proposed change of community of license for WWIZ is in compliance with revised contour overlap rules.

7. Based on the grandfathered status of the Cumulus stations in the rated market, and compliance with the contour overlap rules, it is believed the proposed change of community of license for WWIZ is in compliance with the Commission's ownership rules.

8. The foregoing technical statement was prepared on behalf of Cumulus Licensing 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 was extracted from the CDBS database. Data regarding the relevant Arbitron market was determined using the BIA MEDIA Access Pro Version 4.2. We assume no liability for errors or omissions in either database which may be adverse to the information contained herein.

6) See Footnote 2, *supra*.



FCC Geographic Market Definition for Youngstown-Warren, OH

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WBBW	AM	1240	C	Sports	Youngstown-Warren, OH	07/02/2003	117	Cumulus Broadcasting Inc	Youngstown, OH	Mahoning
WWGY	FM	95.1	C	Country	Youngstown-Warren, OH	07/02/2003	117	Forever Broadcasting Incorporated	Grove City, PA	Mercer
WGFT	AM	1330	C	Gospel	Youngstown-Warren, OH	07/02/2003	117	p D.B. Zwirn & Co LP	Campbell, OH	Mahoning
WASN	AM	1500	C	Tlk/Spn/Var	Youngstown-Warren, OH	07/02/2003	117	p D.B. Zwirn & Co LP	Youngstown, OH	Mahoning
WEXC	FM	107.1	C	ChrsContem	Youngstown-Warren, OH	06/15/2006	117	Beacon Broadcasting Inc	Greenville, PA	Mercer
WNIO	AM	1390	C	Nstlg/Sprts	Youngstown-Warren, OH	07/02/2003	117	p Clear Channel	Youngstown, OH	Mahoning
WHOT	FM	101.1	C	CHR	Youngstown-Warren, OH	07/02/2003	117	Cumulus Broadcasting Inc	Youngstown, OH	Mahoning
WKBN	AM	570	C	News/Talk	Youngstown-Warren, OH	07/02/2003	117	p Clear Channel	Youngstown, OH	Mahoning
WMXY	FM	98.9	C	Mix AC	Youngstown-Warren, OH	07/02/2003	117	p Clear Channel	Youngstown, OH	Mahoning
WWIZ	FM	103.9	C	Rock	Youngstown-Warren, OH	07/02/2003	117	Cumulus Broadcasting Inc	Mercer, PA	Mercer
WKTJ	AM	830	C	Varty/Ethnc	Youngstown-Warren, OH	07/02/2003	117	Kossanyi Family	Cortland, OH	Trumbull
WAKZ	FM	95.9	C	CHR	Youngstown-Warren, OH	07/02/2003	117	p Clear Channel	Sharpsville, PA	Mercer
WRTK	AM	1540	C	Urban	Youngstown-Warren, OH	07/02/2003	117	Beacon Broadcasting Inc	Niles, OH	Trumbull
WANR	AM	1570	C	Oldies	Youngstown-Warren, OH	07/02/2003	117	Beacon Broadcasting Inc	Warren, OH	Trumbull
WPIC	AM	790	C	News/Talk	Youngstown-Warren, OH	07/02/2003	117	Cumulus Broadcasting Inc	Sharon, PA	Mercer
WBBG	FM	106.1	C	Oldies	Youngstown-Warren, OH	07/02/2003	117	p Clear Channel	Niles, OH	Trumbull
WQXK	FM	105.1	C	Country	Youngstown-Warren, OH	07/02/2003	117	Cumulus Broadcasting Inc	Salem, OH	Columbiana
WHKZ	AM	1440	C	Chrst/Talk	Youngstown-Warren, OH	07/02/2003	117	Salem Communications Corporation	Warren, OH	Trumbull
WSOM	AM	600	C	Oldies	Youngstown-Warren, OH	07/02/2003	117	Cumulus Broadcasting Inc	Salem, OH	Columbiana
WLLF	FM	96.7	C	Soft Rock	Youngstown-Warren, OH	07/02/2003	117	Cumulus Broadcasting Inc	Mercer, PA	Mercer
WYFM	FM	102.9	C	Clsc Rock	Youngstown-Warren, OH	07/02/2003	117	Cumulus Broadcasting Inc	Sharon, PA	Mercer
WNCD	FM	93.3	C	Clsc Rock	Youngstown-Warren, OH	07/02/2003	117	p Clear Channel	Youngstown, OH	Mahoning
WRBP	FM	101.9	C	Urban AC	Youngstown-Warren, OH	07/02/2003	117	p D.B. Zwirn & Co LP	Hubbard, OH	Trumbull
WKTL	FM	90.7	NC	Variety	Youngstown-Warren, OH	07/02/2003	117	Struthers, OH City Schools Board of Directors	Struthers, OH	Mahoning
WYSU	FM	88.5	NC	Clis/Nws/Inf	Youngstown-Warren, OH	07/02/2003	117	Youngstown State University	Youngstown, OH	Mahoning
WYTN	FM	91.7	NC	Religion	Youngstown-Warren, OH	07/02/2003	117	Family Stations Inc	Youngstown, OH	Mahoning

Number of Stations in Geographic Market 26

Previous Stations in Geographic Market

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

"p" indicates pending sale to owner listed

Graham Brock, Inc. - Broadcast Technical Consultants

WWIZ Proposed

Latitude: 41-12-16 N
Longitude: 080-21-49 W
ERP: 6.00 kW
Channel: 280A
Frequency: 103.9 MHz

WYFM

BLH-200307802AAA
Latitude: 41-03-26 N
Longitude: 080-38-22 W
ERP: 33.00 kW
Channel: 275B
Frequency: 102.9 MHz

WQXK

BLH-200004140ACM
Latitude: 40-53-08 N
Longitude: 080-49-55 W
ERP: 88.00 kW
Channel: 286B
Frequency: 105.1 MHz

WHOT-FM

BLH-19971006KD
Latitude: 41-03-26 N
Longitude: 080-38-22 W
ERP: 24.50 kW
Channel: 266B
Frequency: 101.1 MHz

WLLF

BLH-19871130KD
Latitude: 41-18-43 N
Longitude: 080-16-39 W
ERP: 1.40 kW
Channel: 244A
Frequency: 96.7 MHz

WSOM

Latitude: 40-49-47 N
Longitude: 080-55-49 W
ERP: 1.00 kW
Frequency: 600.0 kHz

WBBW

Latitude: 41-04-50 N
Longitude: 080-38-54 W
ERP: 1.00 kW
Frequency: 1240.0 kHz

WPIC

BL-20061113AGG
Latitude: 41-13-10 N
Longitude: 080-28-25 W
ERP: 1.30 kW
Frequency: 790.0 kHz

WPIC 5.0 mV/m

WBBW 5.0 mV/m

WLLF 3.16 mV/m

WYFM 3.16 mV/m

WHOT-FM 3.16 mV/m

WQXK 3.16 mV/m

WSOM 5.0 mV/m

WWIZ 3.16 mV/m

Scale 1:850,000

0 10 20 30 km

EXHIBIT #2
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EXHIBIT #4
Tabulation of Stations in Radio Market #1

AM Stations

	WKBN	570 kHz	Youngstown, Ohio
*	WPIC	790 kHz	Sharon, Pennsylvania
	WGFT	1330 kHz	Campbell, Ohio
	WNIO	1390 kHz	Youngstown, Ohio
	WLOA	1470 kHz	Farrell, Pennsylvania
	WASN	1500 kHz	Youngstown, Ohio
	WRTK	1540 kHz	Niles, Ohio
	WANR	1570 kHz	Warren, Ohio

Total AM Stations - 8

FM Stations

	WYSU	Ch 203B	Youngstown, Ohio
	WKTL	Ch 214B1	Struthers, Ohio
	WNCD	Ch 227B	Youngstown, Ohio
	WAKZ	Ch 240A	Sharpsville, Pennsylvania
*	WLLF	Ch 244A	Mercer, Pennsylvania
	WMXY	Ch 255B	Youngstown, Ohio
*	WHOT-FM	Ch 266B	Youngstown, Ohio
	WRBP	Ch 270A	Hubbard, Ohio
*	WYFM	Ch 275B	Sharon, Ohio
*	WWIZ	Ch 280A	West Middlesex, Pennsylvania

Total FM Stations - 10

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 18

- * Subject station.
- + Provides city grade coverage to radio market.

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EXHIBIT #5

Tabulation of Stations in Radio Market #2

AM Stations

	WKBN	570 kHz	Youngstown, Ohio
*	WSOM	600 kHz	Salem, Ohio
*	WPIC	790 kHz	Sharon, Pennsylvania
*	WBBW	1240 kHz	Youngstown, Ohio
	WGFT	1330 kHz	Campbell, Ohio
	WNIO	1390 kHz	Youngstown, Ohio
	WLOA	1470 kHz	Farrell, Pennsylvania
	WASN	1500 kHz	Youngstown, Ohio
	WRTK	1540 kHz	Niles, Ohio
	WANR	1570 kHz	Warren, Ohio

Total AM Stations - 10

FM Stations

	WYSU	Ch 203B	Youngstown, Ohio
	WKTL	Ch 214B1	Struthers, Ohio
	WNCD	Ch 227B	Youngstown, Ohio
	WAKZ	Ch 240A	Sharpsville, Pennsylvania
	WMXY	Ch 255B	Youngstown, Ohio
*	WHOT-FM	Ch 266B	Youngstown, Ohio
	WRBP	Ch 270A	Hubbard, Ohio
*	WYFM	Ch 275B	Sharon, Ohio
*	WWIZ	Ch 280A	West Middlesex, Pennsylvania

Total FM Stations - 9

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 19

- * Subject station.
- + Provides city grade coverage to radio market.

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EXHIBIT #6

Tabulation of Stations in Radio Market #3

AM Stations

	WKBN	570 kHz	Youngstown, Ohio
*	WPIC	790 kHz	Sharon, Pennsylvania
*	WBBW	1240 kHz	Youngstown, Ohio
	WGFT	1330 kHz	Campbell, Ohio
	WNIO	1390 kHz	Youngstown, Ohio
	WLOA	1470 kHz	Farrell, Pennsylvania
	WASN	1500 kHz	Youngstown, Ohio
	WRTK	1540 kHz	Niles, Ohio
	WANR	1570 kHz	Warren, Ohio

Total AM Stations - 9

FM Stations

	WYSU	Ch 203B	Youngstown, Ohio
	WKTL	Ch 214B1	Struthers, Ohio
	WNCD	Ch 227B	Youngstown, Ohio
	WAKZ	Ch 240A	Sharpsville, Pennsylvania
	WMXY	Ch 255B	Youngstown, Ohio
*	WHOT-FM	Ch 266B	Youngstown, Ohio
	WRBP	Ch 270A	Hubbard, Ohio
*	WYFM	Ch 275B	Sharon, Ohio
*	WWIZ	Ch 280A	West Middlesex, Pennsylvania
*	WQXK	Ch 286B	Salem, Ohio

Total FM Stations - 10

GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 19

- * Subject station.
- + Provides city grade coverage 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 Cumulus Licensing 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 17th day of January 2007.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 17th day of January 2007*



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