

**RADIO MARKET ANALYSIS**  
**MILLER COMMUNICATIONS, INC.**  
**WQKI-FM/WQKI AM RADIO STATION**  
**ST. MATTHEWS, SOUTH CAROLINA**  
**WIGL FM RADIO STATION**  
**ORANGEBURG, SOUTH CAROLINA**  
**WGFG FM RADIO STATION**  
**BRANCHVILLE, SOUTH CAROLINA**  
**March 2003**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits were prepared on behalf of Miller Communications, Inc. ("MCI"), proposed assignee of radio stations WQKI-FM, Channel 230A, and WQKI AM, 710 kHz, St. Matthews; WIGL (FM), Channel 275A, Orangeburg<sup>1</sup>; and WGFG (FM), Channel 286A, Branchville, South Carolina. The 3.16 mV/m contours of WGFG and WIGL overlap and the 3.16 mV/m contours of WIGL and WQKI-FM overlap. The contours of all the FM stations overlap with the 5.0 mV/m contour of WQKI AM. This results in MCI having attributable interests in two FM facilities and one AM facility in the one market (Radio Market #1 - WGFG/WIGL/WQKI AM) and two FM facilities and one AM facility in a second market (Radio Market #2 - WIGL/WQKI-FM/WQKI AM). Exhibit #1 is a map depicting the subject stations.

2. A study has, therefore, been conducted to determine if ownership of these facilities, in two markets, complies with §73.3555 of the Commission's rules. The study is to determine the number of other commercial AM and FM stations that either have transmitter sites within the subject radio market, or have principal community contour overlap with any of the subject stations. Since the contours of WQKI AM is in both markets, it will be used to determine the

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1) WIGL also has an outstanding construction permit to increase height and decrease power. This CP does not effect the Radio Market Boundary.

number of other stations in the relevant markets. The number of subject stations will then be added to the number of other stations for a total number of stations in the respective Radio Market.

3. Exhibit #2 is a depiction of the Radio Market with the transmitter sites or city grade contours of ten commercial AM and FM stations excluding the three subject stations. Exhibit #3 is a tabulation of the stations in Radio Market #1, in which there are thirteen stations, including the subject stations. Exhibit #4 is the tabulation of the stations in Radio Market #2, in which there are thirteen stations, excluding the subject stations. The total number of stations in each Radio Market 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 market). Therefore, MCI's interests in two FM stations and one AM station in two separate markets are in compliance with the Commission's rules. MCI's proposed ownership of WQKI-FM, WQKI AM, WIGL and WGFG is in compliance with §73.3555 of the rules.

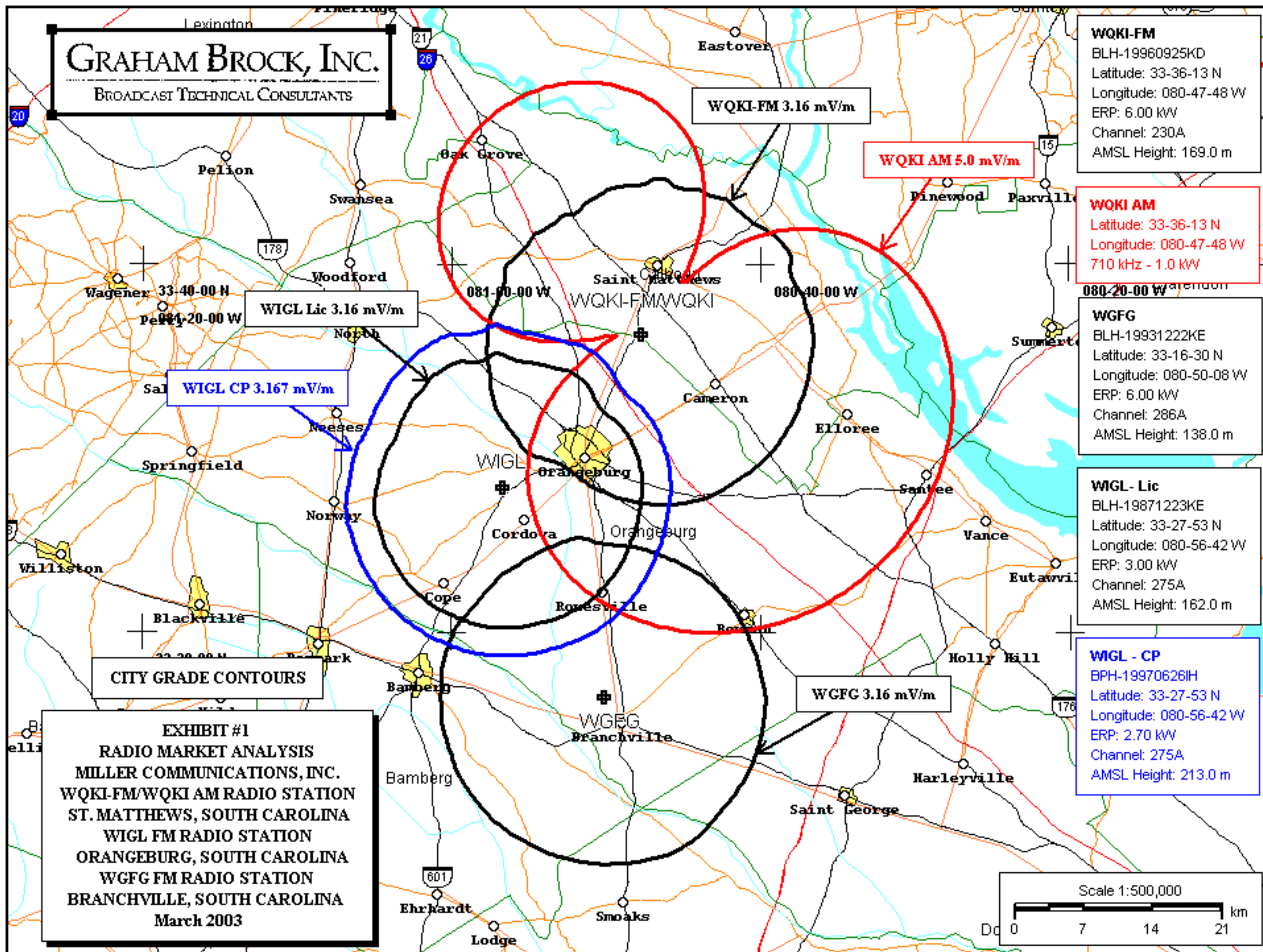
4. The foregoing technical statement was prepared on behalf of Miller Communications, Inc., by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities was extracted from the pertinent CDBS database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.

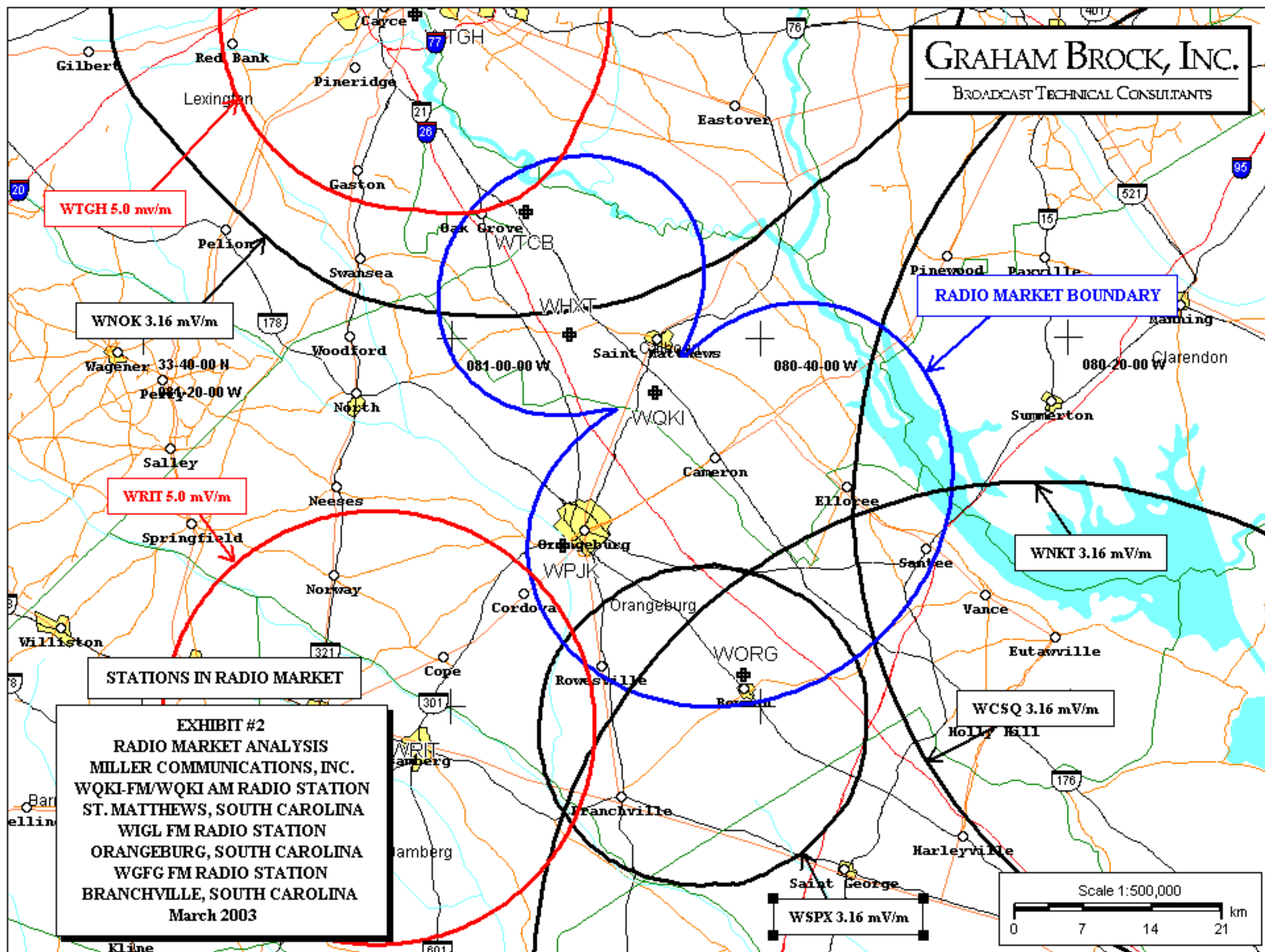
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2) There are additional stations in the market, but they were not considered since the number of stations depicted was sufficient to demonstrate that the total of stations to be commonly held is in compliance with the Commission's rules.

# GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS





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**EXHIBIT #3**

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

**AM Stations**

|   |      |          |                     |
|---|------|----------|---------------------|
| + | WTGH | 620 kHz  | Cayce, SC           |
| * | WQKI | 710 kHz  | St. Matthews, SC    |
| + | WRIT | 790 kHz  | Bamberg-Denmark, SC |
|   | WPJK | 1580 kHz | Orangeburg, SC      |

Total AM Stations - 4

**FM Stations**

|   |      |          |                 |
|---|------|----------|-----------------|
| + | WCSQ | Ch 223C  | Manning, SC     |
| + | WSPX | Ch 233A  | Bowman, SC      |
|   | WORG | Ch 262C3 | Elloree, SC     |
| * | WIGL | Ch 275A  | Orangeburg, SC  |
| + | WHXT | Ch 280C3 | Orangeburg, SC  |
| + | WNOK | Ch 284C  | Columbia, SC    |
| * | WGFG | Ch 286A  | Branchville, SC |
|   | WTCB | Ch 294C1 | Orangeburg, SC  |
| + | WNKT | Ch 298C  | St. George, SC  |

Total FM Stations - 9

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

\* Subject station.

+ City grade contour provides service to Radio Market.

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**EXHIBIT #4**

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

**AM Stations**

|   |      |          |                     |
|---|------|----------|---------------------|
| + | WTGH | 620 kHz  | Cayce, SC           |
| * | WQKI | 710 kHz  | St. Matthews, SC    |
| + | WRIT | 790 kHz  | Bamberg-Denmark, SC |
|   | WPJK | 1580 kHz | Orangeburg, SC      |

Total AM Stations - 4

**FM Stations**

|   |         |          |                  |
|---|---------|----------|------------------|
| + | WCSQ    | Ch 223C  | Manning, SC      |
| * | WQKI-FM | Ch 230A  | St. Matthews, SC |
| + | WSPX    | Ch 233A  | Bowman, SC       |
|   | WORG    | Ch 262C3 | Elloree, SC      |
| * | WIGL    | Ch 275A  | Orangeburg, SC   |
| + | WHXT    | Ch 280C3 | Orangeburg, SC   |
| + | WNOK    | Ch 284C  | Columbia, SC     |
|   | WTCB    | Ch 294C1 | Orangeburg, SC   |
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