

**ENGINEERING STATEMENT COVERING
BROADCAST MULTIPLE OWNERSHIP STUDY
CMCG PUERTO RICO LLC
ARECIBO & MAYAGUEZ, PUERTO RICO**

NOVEMBER 2005

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This engineering statement and supporting tabulations and figures has been prepared on behalf of **CMCG PUERTO RICO LLC** (“**CMCG**”). The purpose of the statement is to demonstrate **CMCG** compliance with *Section 73.3555* of the Commission’s Rules with respect to multiple ownership of TV broadcast facilities.

CMCG proposes common ownership in the following two stations:

WMEI (TV)	Arecibo, PR	CH 60	FCC ID 26676
WOST (TV)	Mayaguez, PR	CH 16	FCC ID 60357

These two stations are considered as one market since the principal community contours for WMEI (TV) and WOST (TV) do overlap and *73.3555(b)* defines Puerto Rico as a market.

A multiple ownership analysis was prepared considering the above described television stations under proposed common ownership or control, which stations have overlapping Grade B contours (64 dBu for UHF, 56 dBu for VHF CH7-13 and 47 dBu for TV CH 2-6) in accordance with *Section 73.3555* of the FCC Rules.

TELEVISION MARKETS & METHODOLOGY

The “television market” applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping Grade B contours of the stations proposed to be commonly owned. In this case the market is made up of WMEI (TV) & WOST (TV). The

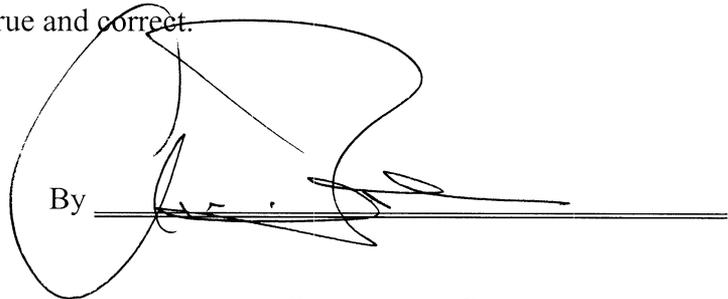
predicted Grade B contours for both stations are shown on Figure 1, attached and are plotted in blue.

Table I lists all 32 other TV stations whose Grade B contour duplicates some portion of the market. The contours for these stations are plotted on Figure 1 in green for UHF, brown for VHF CH 7-13 and orange for VHF CH 2-6.

Only known CP or licensed operating full service stations were employed in the study. Distances to the TV contours were determined based on the methodology of 47 CFR 73.684. Terrain data was derived from the N.G.D.C. 3 second computer database for each of the TV stations, using radials spaced every 5 degrees of azimuth.

Based on the above analysis, it is believed that the proposed common ownership of stations complies with *Section 73.3555(b)(2)(ii)* of the Commission's Rules as there are a total of 34 TV stations in the Market. **CMCG** will own two TV stations in the Market.

The foregoing was prepared on behalf of **CMCG Puerto Rico LLC** by Clarence M. Beverage of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.

By 

Clarence M. Beverage
for Communications Technologies, Inc.
Marlton, New Jersey

SUBSCRIBED AND SWORN TO before me,

this 23rd day of November, 2005,

Esther G. Sperbeck, NOTARY PUBLIC

ESTHER G. SPERBECK
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES OCT 15, 2007

TABLE I

TV STATIONS IN THE ARECIBO & MAYAGUEZ, PUERTO RICO, MARKET

NOVEMBER, 2005

CALL ARN LATITUDE	ST	CITY OWNER LONGITUDE	FREQ HAAT:m AMSL:m	CHN	CL	ERP	STAT
WJWN-TV BMLCT20030516ACI 18-19-06.0 N	PR	SAN SEBASTIAN S&E NETWORK, INC. 67-10-42.0 W	615.25000 342.854 395.000	38	NTSC	85.100	LIC
WVEO BLCT19950606KE 18-19-06.0 N	PR	AGUADILLA INTERNATIONAL BROADCASTING CORPORATION 67-10-42.0 W	651.25000 382.854 435.000	44	NTSC	309.000	LIC
WELU BLET19870112KG 18-18-46.0 N	PR	AGUADILLA PABELLON EDUCATIONAL BROADCASTING, INC. 67-11-09.0 W	579.25000 317.501 367.000	32	NTSC	9.330	LIC
WQHA BLCT19930715KE 18-19-06.0 N	PR	AGUADA CONCILIO MISION CRISTIANA FUENTE DE AGUA VIVA, INC. 67-10-49.0 W	687.25000 355.035 406.000	50	NTSC	501.000	LIC
WOST 920102KE BPCT19920102KE 18-18-51.0 N	PR	MAYAGUEZ SIGNAL BROADCASTING 67-11-24.0 W	483.25000 335.738 385.000	16	NTSC	9.550	CP
WOLE-TV BLCT19930714KE 18-09-00.0 N	PR	AGUADILLA WESTERN BROADCASTING CORP. OF PUERTO RICO 66-59-00.0 W	204.26000 666.843 972.000	12	NTSC	275.000	LIC
WIRS BLCT19920207KF 18-10-10.0 N	PR	YAUCO TELEVICENTRO OF PUERTO RICO, LLC 66-34-36.0 W	639.25000 836.881 1348.000	42	NTSC	1510.000	LIC
WIPM-TV BLET19920313KE 18-09-00.0 N	PR	MAYAGUEZ PUERTO RICO PUBLIC BROADCASTING CORPORATION 66-59-00.0 W	60.26000 692.843 998.000	3	NTSC	81.300	LIC
WQTO BLET20030818AEG 18-04-48.0 N	PR	PONCE SISTEMA UNIVERSITARIO ANA G. MENDEZ, INC. 66-44-56.0 W	543.25000 305.895 681.000	26	NTSC	1000.000	LIC
WDWL BLCT19910322KF 18-16-40.0 N	PR	BAYAMON BAYAMON CHRISTIAN NETWORK 66-06-38.0 W	603.25000 298.356 519.000	36	NTSC	9.330	LIC
WIPR-TV BLET19910124KE 18-06-42.0 N	PR	SAN JUAN PUERTO RICO PUBLIC BROADCASTING CORPORATION 66-03-05.0 W	82.26000 818.466 1172.000	6	NTSC	58.900	LIC

TABLE I PAGE 2

TV STATIONS IN THE ARECIBO & MAYAGUEZ, PUERTO RICO, MARKET

NOVEMBER, 2005

CALL ARN LATITUDE	ST OWNER LONGITUDE	CITY OWNER LONGITUDE	FREQ HAAT:m AMSL:m	CHN	CL	ERP	STAT
WRWR-TV BLCT19841129LB 18-16-30.0 N	PR AERCO BROADCASTING CORPORATION 66-05-36.0 W	SAN JUAN	567.25000 292.901 502.000	30	NTSC	2630.000	LIC
WSUR-TV BLCT19940823KE 18-10-09.0 N	PR WLII/WSUR LICENSE PARTNERSHIP, G.P. 66-34-36.0 W	PONCE	186.24000 870.984 1381.000	9	NTSC	178.000	LIC
WNJX-TV BLCT20030307ADG 18-09-00.0 N	PR WNJX-TV, INC. 66-59-00.0 W	MAYAGUEZ	519.25000 659.843 965.000	22	NTSC	4201.000	LIC
WKPV BLCT20010130ABD 18-04-49.0 N	PR S & E NETWORK, INC. 66-44-53.0 W	PONCE	507.25000 296.638 670.000	20	NTSC	77.600	LIC
WAPA-TV BLCT19871110KU 18-06-42.0 N	PR TELEVICENTRO OF PUERTO RICO, LLC 66-03-05.0 W	SAN JUAN	66.24000 866.466 1220.000	4	NTSC	53.700	LIC
WORA-TV BLCT19970619KG 18-09-03.0 N	PR TELECINCO, INC. 66-59-21.0 W	MAYAGUEZ	76.24000 629.903 918.000	5	NTSC	100.000	LIC
WCCV-TV BLCT19950719KH 18-14-06.0 N	PR ASOCIACION EVANGELISTICA CRISTO VIENE INC. 66-45-36.0 W	ARECIBO	711.25000 602.683 1086.000	54	NTSC	1510.000	LIC
WLII BLCT19950915KJ 18-16-54.0 N	PR WLII/WSUR LICENSE PARTNERSHIP, G.P. 66-06-46.0 W	CAGUAS	198.24000 353.255 573.000	11	NTSC	316.000	LIC
WECN BLCT19980713KH 18-17-34.0 N	PR ENCUENTRO CHRISTIAN NETWORK 66-16-02.0 W	NARANJITO	771.25000 208.383 525.000	64	NTSC	1000.000	LIC
WSTE BLCT1809 18-09-17.0 N	PR SIETE GRANDE TELEVISION, INC. 66-33-16.0 W	PONCE	174.26000 732.625 1228.000	7	NTSC	186.000	LIC
WKAQ-TV BMLCT20010404ABN 18-06-54.0 N	PR TELEMUNDO OF PUERTO RICO 66-03-10.0 W	SAN JUAN	54.26000 863.037 1216.000	2	NTSC	55.000	LIC

TABLE I PAGE 3

TV STATIONS IN THE ARECIBO & MAYAGUEZ, PUERTO RICO, MARKET

NOVEMBER, 2005

CALL ARN LATITUDE	ST	CITY OWNER LONGITUDE	FREQ HAAT:m AMSL:m	CHN	CL	ERP	STAT
WTIN BLCT19971208KF 18-10-11.0 N	PR	PONCE TELEVICENTRO OF PUERTO RICO, LLC 66-34-38.0 W	471.25000 863.261 1373.000	14	NTSC	1070.000	LIC
WVOZ-TV BLCT19860808KK 18-04-50.0 N	PR	PONCE INTERNATIONAL BROADCASTING CORPORATION 66-44-50.0 W	675.25000 246.946 620.000	48	NTSC	61.700	LIC
WUJA BLET19851107KE 18-16-40.0 N	PR	CAGUAS CAGUAS EDUCATIONAL TV, INC. 66-06-38.0 W	735.25000 319.356 540.000	58	NTSC	55.000	LIC
WMEI BMPCT19960415KE 18-10-09.0 N	PR	ARECIBO HECTOR NEGRONI CARTAGENA 66-34-30.0 W	747.25000 761.690 1279.000	60	NTSC	1000.000	CP MOD
WVSN BLCT19991101ABL 18-16-44.0 N	PR	HUMACAO LA CADENA DEL MILAGRO, INC. 65-51-12.0 W	795.25000 607.367 821.000	68	NTSC	457.000	LIC
WJPX BLCT20000821ACE 18-16-45.0 N	PR	SAN JUAN S & E NETWORK INC. 65-51-14.0 W	531.25000 584.234 798.000	24	NTSC	676.000	LIC
WPRV-TV BMLCT19951206KE 18-18-36.0 N	PR	FAJARDO CATHOLIC, APOSTOLIC & ROMAN CHURCH IN PUERTO RICO 65-47-41.0 W	210.26000 868.444 1069.000	13	NTSC	141.000	LIC
WZDE BLCT19970228KF 18-16-44.0 N	PR	CAROLINA R & F BROADCASTING INCORPORATED 65-51-12.0 W	699.25000 598.367 812.000	52	NTSC	275.000	LIC
WTCV BLCT19840808KN 18-18-36.0 N	PR	SAN JUAN INTERNATIONAL BROADCASTING CORPORATION 65-47-41.0 W	495.25000 855.444 1056.000	18	NTSC	759.000	LIC
WRUA BLCT19970216KE 18-18-36.0 N	PR	FAJARDO EASTERN TELEVISION CORPORATION 65-47-41.0 W	591.25000 855.444 1056.000	34	NTSC	50.100	LIC

TABLE I PAGE 4

TV STATIONS IN THE ARECIBO & MAYAGUEZ, PUERTO RICO, MARKET

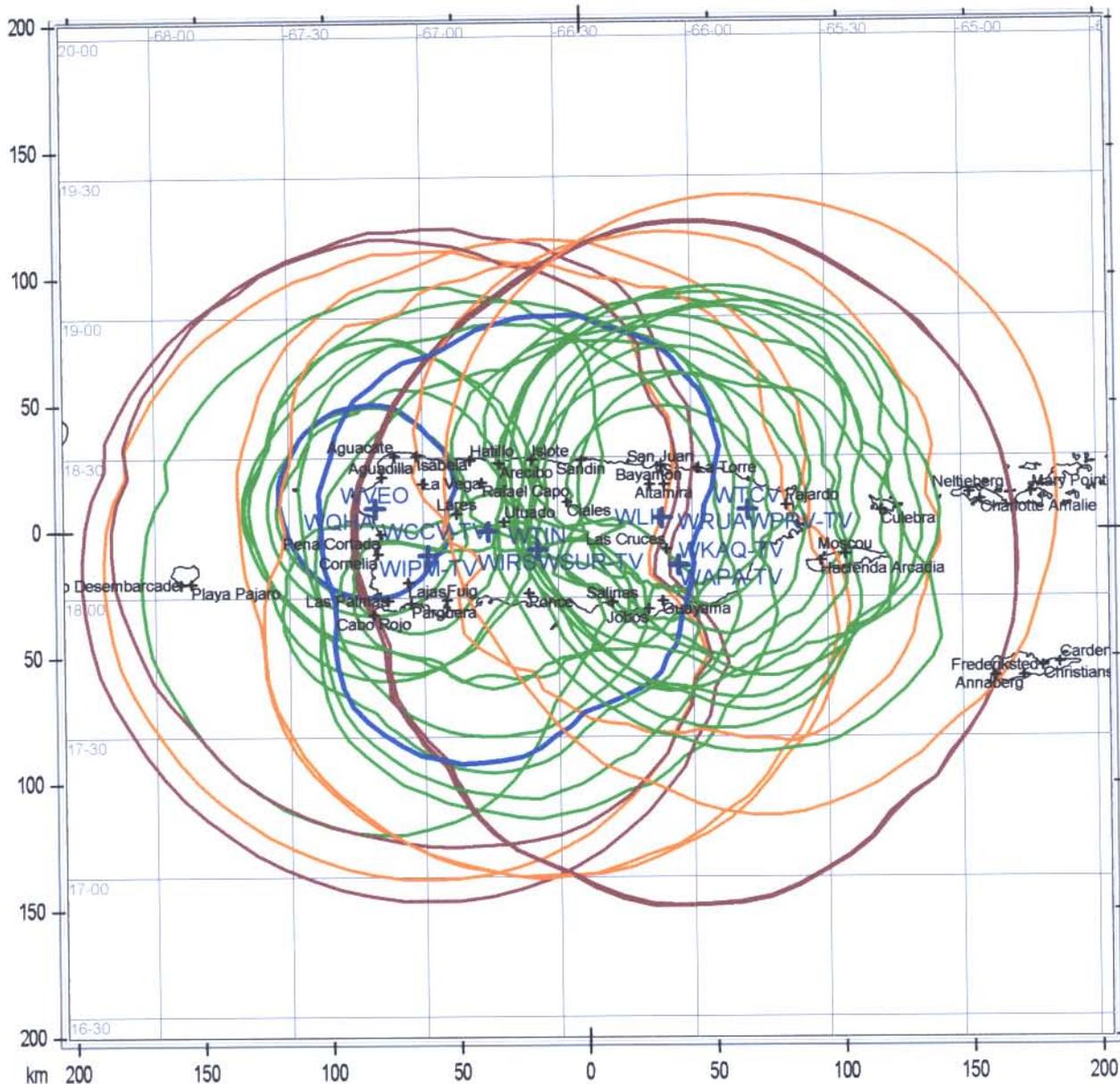
NOVEMBER, 2005

CALL ARN	ST	CITY OWNER	FREQ HAAT:m AMSL:m	CHN	CL	ERP	STAT
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WMTJ	PR	FAJARDO	627.25000	40	NTSC	1000.000	LIC
BLET19970826KH SISTEMA UNIVERSITARIO ANA G. MENDEZ, INC.							
18-18-36.0	N	65-47-41.0 W	844.444	1045.000			

WIDP	PR	GUAYAMA	663.25000	46	NTSC	1480.000	LIC
BLCT19970509KG EBENEZER BROADCASTING GROUP, INC.							
18-16-44.0	N	65-51-10.0 W	627.918	841.000			

WMEI ARECIBO & WOST MAYAGUEZ, PUERTO RICO - CONTOURS IN BLUE



Communications Technologies, Inc. Marlton, New Jersey

— National Borders — County Borders — Highways — Lat/Lon Grid

Map Scale: 1:2500000 1 cm = 25.00 km V/H Size: 400.75 x 407.47 km

Figure 1