

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
CONNOISSEUR MEDIA OF ERIE, LLC

This radio multiple ownership analysis was prepared on behalf of Connoisseur Media of Erie, LLC (herein “Connoisseur”). Connoisseur was the winning bidder in Auction 94 for FM channel 240A at Erie, Pennsylvania and is filing a long form application to implement its winning bid on channel 240A at Mina, New York. Therefore, a review of the stations that Connoisseur has an interest was completed. Specifically, the following stations are considered under ownership or control:

Call Sign / Facility ID	Location	Facilities
New/191524 <i>Proposed Facility</i>	Mina, NY	CH 240A 1.55 kW (DA) 200 M
Application/189438 <i>BNPH-20110603AAQ</i>	Westfield, NY	CH 265A 4.8 kW -15 M
WFNN(AM)/26611 <i>BL-20070607AEX</i>	Erie, PA	1330 kHz, 5 kW-U DA-2
WJET(AM)/33769 <i>Licensed</i>	Erie, PA	1400 kHz, 1 kW-U ND
WRKT(FM)/55063 <i>BPH-20110509AAL</i>	North East, PA	CH 285B1 4.5 KW 161 M
WRTS(FM)/55028 <i>BLH-19871209KC</i>	Erie, PA	CH 279B 50 kW 152 M
WXBB(FM)/52144 <i>BLH-19991029AEL</i>	Erie, PA	CH 234A 1.7 kW 187 M
WTWF(FM)/76244 <i>BLH-20040301AAO</i>	Fairview, PA	CH 230A 6 KW 91 M

The principal community contours (3.16 mV/m for FM stations, 5 mV/m for AM stations) of the stations are depicted on a map included herein as Figure 1.* Since some of these stations have overlapping principal community contours, an ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

* Only those stations involved in contour overlap with the proposed Mina Ch 240A operation have been shown on Figure 1.

Radio Market

The “radio market” applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned.[†] There are two “radio markets” defined for analysis under the Commission’s Rules created by the proposed Mina channel 240 operation. The table below lists the defined markets:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	--	Mina Ch 240A, WRTS, Westfield App.
Market 2	WFNN	Mina Ch. 240A, WRTS, WRKT(CP)

Count of Stations in Defined Market

The number of other radio stations in a “radio market” is determined by counting the operating stations having principal community contours that intersect the principal community contours which define the radio market, plus the subject stations that are co-owned. Only those stations located within 92 kilometers of the perimeter of the mutual overlap area of the respective defined market area were employed in the count of the stations. Commonly controlled stations were not considered in the count of stations in the defined markets. The results of the analysis are tabulated below:

Defined Radio Market	Minimum Number of Other Stations in Radio Market
Market 1	5 AM, 15 FM; 20 Total
Market 2	4 AM, 15 FM, 19 Total

Figure 2 is a tabulation of the radio stations identified in the defined radio markets tabulated above. It is noted that the tabulation is not a complete list of all of the other stations in the market, but rather enough stations to show compliance with the FCC’s radio multiple ownership rules. Only known licensed, operating stations were employed for the study.

[†] See Order in Implementation of Section 202(a) and 202(b)(1) of the Telecommunications Act of 1996 (Broadcast Radio Ownership) FCC 96-90, released March 8, 1996 and Memorandum Opinion and Order in Revision of Radio Rules and Policies 7 FCC Rcd 6387, 6395 para. 39 (1992).

Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission's AM database and the appropriate Ground Wave Field Strength versus Distance Graph of 47 CFR 73.184. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR 73.313. Terrain data was derived from the N.G.D.C. 30-second computer database for each of the FM stations using radials evenly-spaced every 5 degrees of azimuth.

Based on the above, it is concluded that the applicant will be in compliance with the Section 73.3555(a) of the FCC Rules using the interim contour method.

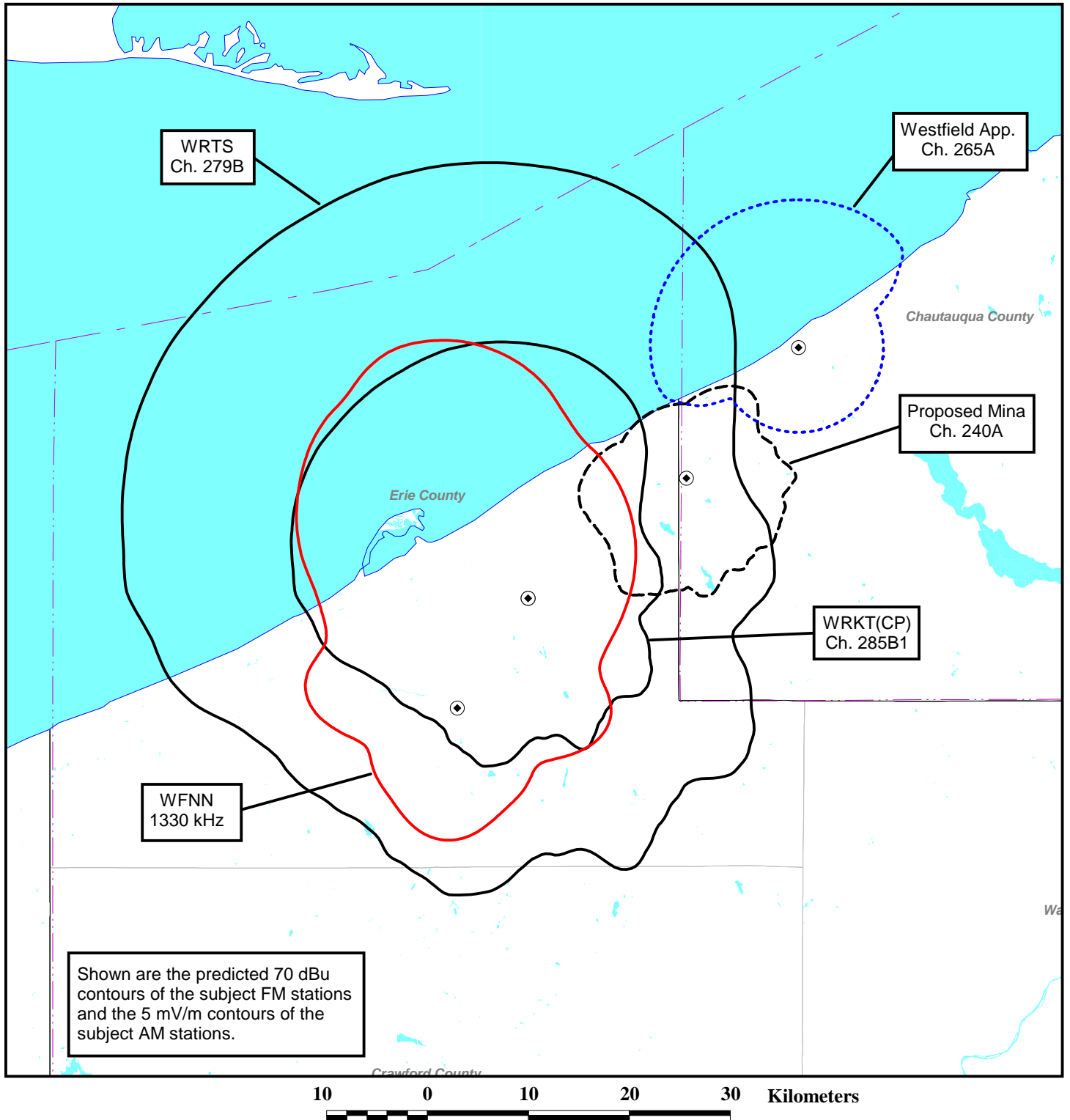


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Figure 1



PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

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Tabulation of Other Stations Defined in the Radio Market

<u>AM Stations</u>			
<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
WMCE	North East	PA	1300 kHz
WRIE	Erie	PA	1260
WPSE	Erie	PA	1450
WDOE	Dunkirk	NY	1410
WHYP	Corry	PA	1370
<u>FM Stations</u>			<u>Channel</u>
WFSE	Edinboro	PA	205A
WEFR	Erie	PA	201A
WERG	Erie	PA	213A
WGYY	Meadville	PA	262B
WCTL	Union City	PA	292A
WWSE	Jamestown	NY	227B
WXKC	Erie	PA	260B
WMCE-FM	Erie	PA	203A
WQLN-FM	Erie	PA	217B
WQHZ	Erie	PA	272A
WXTA	Edinboro	PA	250B1
WXMJ	Cambridge Springs	PA	283A
WCGM	Wattsburg	PA	274A
WCGF	Cambridge Springs	PA	210B1
WEHP	Lawrence Park	PA	224A