

FCC § 73.3555(a)(iii)

**MULTIPLE OWNERSHIP EXHIBIT
WACO ENTERTAINMENT GROUP, LLC
CHANNEL 266C2 MERTZON, TX**

JUNE 28, 2016

This statement and attached exhibits were prepared on behalf William W. McCutchen, III ("McCutchen"). McCutchen is filing an FCC Form 301 to modify construction permit BNPH-20130724AFZ for Channel 278C2, Facility ID No. 191504, Mertzon, Texas and as such a demonstration of compliance with § 73.3555(a) of the Commission's multiple ownership rules is required. Channel 278C2 is not located in any Nielsen Audio metro county and is not listed as home to any Neilson Audio rated market.

REVISED CONTOUR OVERLAP ANALYSIS

Because Channel 278C2 is licensed to a non-metro county and not listed as home to any Nielsen Audio Metro, a contour overlap analysis has been conducted for ownership compliance. McCutchen has an attributable interest in Waco Entertainment Group, LLC applicant for Channel 266C2, Mertzon, TX. McCutchen is the sole owner of construction permit BNPH-20130724AFZ for Channel 278C2 at Mertzon, Texas. The combined FCC F(50,50) 70 dBu city grade contours of the proposed Channel 266C2 facility at Mertzon and construction permit modification of BNPH-20130724AFZ for Channel 278C2, Mertzon, Texas have been determined to be the Defined Radio Market Boundary. The Defined Radio Market Boundary is shaded in blue on Map One. The contours used to create the Defined Radio Market Boundary are the FCC F(50,50) 70 dBu for FM stations (shown in red), and the 5.0 mV/M for AM stations (shown in black). The contours of the two subject stations are shown in blue. No stations with transmitters more than 92 km from the boundary of the common overlap of subject stations will

be considered. Further, no other facility of which the principle shareholders of Waco have an attributable interest will be considered as a market contributor unless it is a subject station in the radio market under study. There are a total of 21 radio stations in the Defined Radio Market. There are 18 FM stations including the two subject stations and three AM stations. The Table of Contours Shown lists details of all radio stations that comprise the Defined Radio Market. Section 73.3555(a)(iii) of the Commission's Rules allow in a radio market with between 15 and 29 (inclusive) full power, commercial and noncommercial radio stations, not more than 6 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM). McCutchen would own or have an attributable interest in two FM stations in this market. Based on the review of the Defined Radio Market, it is believed that the proposed modification of Channel 266C2 at Mertzon, Texas is in compliance with §73.3555(a)(iii) of the Commission's rules.

All data relating to AM and FM facilities was extracted from the CDBS database. Contour overlap studies were created using V-Soft Probe Version 4.69 Professional, We assume no liability for errors or omissions in that database or program which may be adverse to the information contained herein.

TABLE OF CONTOURS SHOWN

Total number of overlapping contours: 21

Total number of common owned subject stations: 2

Total number of stations in Non-Neilsen Defined Radio Market: 21

Reference: Subject Stations

| Callsign | Type | Chan | City | St | File Number | Dist (km) | Azi (deg) |
|----------|------|-------|---------|----|-----------------|-----------|-----------|
| NEW.C | FM | 278C2 | Mertzon | TX | BNPH20130724AFZ | 0.0 | 0.0 |
| NEW | FM | 266C2 | Mertzon | TX | BNPH20151013AIA | 35.5 | 60.8 |

Overlapping Contours:

| Callsign | Type | Chan | City | St | File Number | Dist (km) | Azi (deg) |
|----------|------|-------|---------------|----|-----------------|-----------|-----------|
| KDCD | FM | 225C1 | San Angelo | TX | BLH19800509AC | 34.3 | 56.5 |
| KCRN-FM | FM | 230C1 | San Angelo | TX | BMLD20111011AFG | 71.2 | 46.8 |
| KIXY-FM | FM | 234C1 | San Angelo | TX | BLH19860306KC | 47.0 | 58.3 |
| KMLS | FM | 238C3 | Miles | TX | BLH20141128ADB | 61.0 | 61.0 |
| NEW.C | FM | 240C2 | Christoval | TX | BMPH20140929AAX | 37.5 | 124.9 |
| KNRX | FM | 243C2 | Sterling City | TX | BLH20000222ABI | 37.1 | 3.6 |
| KGKL-FM | FM | 248C1 | San Angelo | TX | BLH19851101KD | 50.4 | 59.3 |
| KELI | FM | 254C0 | San Angelo | TX | BLH19861216KA | 79.2 | 81.6 |
| KQTC | FM | 258C2 | Christoval | TX | BLH20160120AAR | 44.2 | 130.0 |
| KCLL | FM | 261C2 | San Angelo | TX | BLH20040719AAQ | 46.9 | 51.2 |
| KWFR | FM | 270C1 | San Angelo | TX | BLH19951201KB | 48.4 | 58.7 |
| KCCN | FM | 276C1 | Ballinger | TX | BLH20060613ABW | 86.2 | 59.0 |
| KPTJ | FM | 283C3 | Grape Creek | TX | BLH20110804ABM | 34.2 | 55.8 |
| KLDE | FM | 285C2 | Eldorado | TX | BLH20100405AAF | 51.6 | 149.2 |
| KMDX | FM | 291C2 | San Angelo | TX | BLH20010316AAK | 34.3 | 56.5 |
| KSJT-FM | FM | 298C1 | San Angelo | TX | BMLH20130410ABX | 34.2 | 55.8 |

Total FM Stations (including 2 subject stations) = 18

| | | | | | | | |
|------|----|------|------------|----|----------------|------|------|
| KGKL | AM | 960 | SAN ANGELO | TX | BML20060417AHH | 50.2 | 59.5 |
| KKSA | AM | 1260 | SAN ANGELO | TX | BL19860306AB | 47.0 | 58.3 |
| KCRN | AM | 1340 | SAN ANGELO | TX | BML20110602ADL | 45.3 | 58.4 |

Total AM Stations = 3

Total Radio Stations in Defined Market = 21

Distance and bearing calculations from coordinates: 31-15-55 N, 100-52-11 W

Duopoly Options:

TV: Not Included

FM: 3.16 mV/m (70 dBu)

AM: 5.0 mV/m

Stations more than 92 km from the common area were excluded.