

TECHNICAL EXHIBIT
CHANGE OF PRINCIPAL COMMUNITY
WSOL-FM

Brunswick, Georgia
Yulee, Florida

Multiple Ownership Study

This narrative and accompanying Figures have been prepared on behalf of station WSOL-FM, Brunswick, Georgia, Facility ID No. 23830, in support of a minor change application to specify operations on channel 268C at Yulee, Florida, in lieu of channel 268C at Brunswick, Georgia, with no change in technical parameters. This multiple ownership analysis was prepared considering radio stations under present or proposed common ownership, time brokerage or joint sales.

Metro Market Study

The current WSOL-FM community of license, Brunswick, Georgia is geographically located in Glynn County, which is part of the Brunswick, GA Metro Market. The number of stations owned by us in the Brunswick, GA Metro Market is not increasing by this proposed modification.¹

Currently (and since at least July 2, 2003), WSOL-FM is designated as "Home" to the Jacksonville, FL Metro Market. The proposed WSOL-FM community of license, Yulee, Florida, is geographically located in Nassau County, which is part of the Jacksonville, FL Metro Market. The number of stations owned by us in the Jacksonville, FL Metro Market is not increasing by this proposed modification. The "Home" market designation of WSOL-FM

¹ None of the following stations are attributable by virtue of a time brokerage agreement or joint sales agreement.

will not be changed by this modification.

According to the FCC's local ownership "tiers," in a Nielsen Metro reported by BIA as having 45 and more commercial and noncommercial educational full-power radio stations, a party may have a cognizable interest in up to 8 commercial full-power radio stations, not more than 5 of which are in the same service (AM or FM). This application complies with the multiple ownership rules because 6 of 45 full-power radio stations (5 FM and 1 AM) in the Jacksonville, FL Metro Market are attributable to us.

Table 1. Stations in the Jacksonville, FL Metro Market Per Nielsen²

Count	Calls	Fac ID	Band	Owner	Community	Join Date	Status ³
1	WKTZ	31937	AM	American Family Association Incorporated	Jacksonville	7/2/2003	b
2	WYKB	40483	FM	Ardman, Neal	Fernandina Beach	7/2/2003	b
3	WYMM	11127	AM	AVM Broadcasting LLC	Jacksonville	7/2/2003	b
4	WFXJ	51973	AM	iHeartMedia Inc	Jacksonville	7/2/2003	b
5	WJBT	51975	FM	iHeartMedia Inc	Callahan	7/2/2003	b
6	WKSL	67243	FM	iHeartMedia Inc	Neptune Beach	7/2/2003	b
7	WQIK-FM	29728	FM	iHeartMedia Inc	Jacksonville	7/2/2003	b

² Source: BIA.

³ Status: "a" -- the station is reported by BIA as "Home" to this Nielsen Metro; "g" -- the station's community of license is located within the geographic boundaries of this Nielsen Metro; "b" -- the station is listed by BIA as both "Home" to this Nielsen Metro, and its community of license is geographically located in this Nielsen Metro.

Count	Calls	Fac ID	Band	Owner	Community	Join Date	Status ³
8	WSOL-FM	23830	FM	iHeartMedia Inc	Brunswick	7/2/2003	a
9	WWJK	51974	FM	iHeartMedia Inc	Green Cove Springs	7/2/2003	b
10	WBOB	53588	AM	Chesapeake-Portsmouth Broadcasting Corp	Jacksonville	7/2/2003	b
11	WMUV	48243	FM	Chesapeake-Portsmouth Broadcasting Corp	Brunswick	7/2/2003	a
12	WSOS-FM	74071	FM	Chesapeake-Portsmouth Broadcasting Corp	Fruit Cove	7/2/2003	b
13	WAYL	49963	FM	Delmarva Educational Association	St. Augustine	7/2/2003	b
14	WTRJ-FM	47425	FM	Delmarva Educational Association	Orange Park	7/2/2003	b
15	WZNZ	48393	AM	Queen of Peace Radio Incorporated	Atlantic Beach	7/2/2003	b
16	WAPE-FM	70863	FM	Cox Media Group	Jacksonville	7/2/2003	b
17	WEZI	28894	FM	Cox Media Group	Ponte Vedra Beach	7/2/2003	b
18	WJGL	53590	FM	Cox Media Group	Jacksonville	7/2/2003	b
19	WOKV	53601	AM	Cox Media Group	Jacksonville	7/2/2003	b
20	WOKV-FM	72081	FM	Cox Media Group	Atlantic Beach	7/2/2003	b
21	WXXJ	53602	FM	Cox Media Group	Jacksonville	7/2/2003	b
22	WJKV	31936	FM	Educational Media Foundation	Jacksonville	7/2/2003	b
23	WJXL	63600	AM	Emerald Broadcast Partners LP	Jacksonville Beach	7/2/2003	b
24	WJXL-FM	22005	FM	Emerald Broadcast Partners LP	Jacksonville Beach	7/2/2003	b
25	WJFR	20864	FM	Family Stations Incorporated	Jacksonville	7/2/2003	b
26	WFCF	21688	FM	Flagler College	St. Augustine	7/2/2003	b

Count	Calls	Fac ID	Band	Owner	Community	Join Date	Status ³
27	WBHU	53672	FM	Flagler County Broadcasting LLC	St. Augustine Beach	7/2/2003	b
28	WSOS	70404	AM	GLK Consultants LLC	St. Augustine Beach	7/2/2003	b
29	WAYR	24625	AM	Good Tidings Trust Inc	Fleming Island	7/2/2003	b
30	WROS	66333	AM	Hall, Elwyn V.	Jacksonville	7/2/2003	b
31	WCGL	30609	AM	JBD Communications Inc	Jacksonville	7/2/2003	b
32	WJNJ	29736	AM	New Covenant Ministries Inc	Jacksonville	7/2/2003	b
33	WEWC	11214	AM	Norsan Consulting and Management Inc	Callahan	7/2/2003	b
34	WJXR	73151	FM	Norsan Consulting and Management Inc	Macclenny	7/2/2003	b
35	WNNR	71219	AM	Norsan Consulting and Management Inc	Jacksonville	7/2/2003	b
36	WVOJ	49214	AM	Norsan Consulting and Management Inc	Fernandina Beach	7/2/2003	b
37	WAOC	2706	AM	Phillips Broadcasting LLC	St. Augustine	7/2/2003	b
38	WFOY	60271	AM	Phillips Broadcasting LLC	St. Augustine	7/2/2003	b
39	WQOP	51976	AM	Queen of Peace Radio Incorporated	Jacksonville	7/2/2003	b
40	WCRJ	48390	FM	Radio Training Network, Inc	Jacksonville	7/2/2003	b
41	WEJZ	55706	FM	Renda Broadcasting Corporation	Jacksonville	7/2/2003	b
42	WGNE-FM	15897	FM	Renda Broadcasting Corporation	Middleburg	8/3/2005	b
43	WZAZ	68761	AM	Titus Harvest Dome Spectrum Church Inc	Jacksonville	7/2/2003	b
44	WJGM	52032	FM	West Jacksonville Baptist Church Inc	Baldwin	7/2/2003	b
45	WJCT-FM	73125	FM	WJCT Inc	Jacksonville	7/2/2003	b

Interim Contour-Based Radio Market Study

A "radio market" under the interim contour-overlap method is the area encompassed by the mutually overlapping principal community contours of the stations under common-ownership or attribution. Here, such mutually overlapping contours form two (2) "radio markets" for interim contour-overlap analysis under the Commission's rules as shown below in Table 2 as well as by the contour map of Figure 1.

Table 2. Table of Contour Markets

Market 1		Market 2	
Call Sign	Band	Call Sign	Band
WGIG	AM	WFXJ	AM
WBGA	AM	WSOL-FM	FM
WSOL-FM	FM	WKSL	FM
WHFX	FM	WQIK-FM	FM
WQGA	FM	WJBT	FM
WYNR	FM	WWJK	FM

Count of Stations in Radio Markets

The number of radio stations in a contour-overlap "radio market" is determined by counting the operating stations having principal community contours which overlap or intersect the principal community contours which define the radio market, plus the subject commonly owned or attributable stations, excluding any stations whose transmitter sites are further than 92 kilometers from the perimeter of mutual overlap, and excluding any commonly owned or attributable stations that do not serve to define the market. For simplicity of analysis only stations which overlap

WMYI as proposed have been considered, as depicted in Figure 2.

In the interim contour-overlap "radio market" studied herein, there are the required number of radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio market." Figure 2 through Figure 5 detail the radio stations identified in each contour-overlap "radio market," and Table 3 is a summary of that data.

The local radio ownership rule establishes the numerical limits on radio station ownership based on the total number of commercial radio stations in a market.⁴

Those limits are:

(1) in a radio market with 45 or more radio stations, a party may own, operate, or control up to 8 radio stations, not more than 5 of which are in the same service (AM or FM);

(2) in a radio market with between 30 and 44 inclusive radio stations, a party may own, operate, or control up to 7 radio stations, not more than 4 of which are in the same service (AM or FM);

(3) in a radio market with between 15 and 29 (inclusive) radio stations, a party may own, operate, or control up to 6 radio stations, not more than 4 of which are in the same service (AM or FM); and

(4) in a radio market with 14 or fewer radio stations, a party may own, operate, or control up to 5 radio stations, not more than 3 of which are in the same service (AM or FM), except that a party may not own, operate, or control more than 50 percent of the stations in such market.

Overlap between two stations in different services is permissible if neither of those two stations overlaps a third

⁴ See 47 C.F.R. § 73.3555(a).

station in the same service.

Table 3. Table of Radio Market Station Counts

Market 1		Market 2	
Count	31	Count	59

As detailed in the Figures, there are 2 AM and 4 FM radio stations attributable to us in Market 1, which is compliant with the limit for a market with 31 total stations, and there are 1 AM and 5 FM radio stations attributable to us in Market 2, which is compliant with the limit for a market with 59 total stations.

Only known licensed, operating radio stations were included in this tabulation. Distances to contours for AM stations 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 C.F.R. § 73.184. Ground conductivities were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 C.F.R. § 73.313. Terrain data was derived from the N.G.D.C. 30 second computer database for each of the FM stations using radials spaced every 45 degrees of azimuth.

Conclusions

In the Nielsen Metro market studied herein, there are at least 45 radio stations, including the subject commonly-owned 1-AM / 5-FM stations, which are home to the Jacksonville, FL Metro. This proposal does not affect the existing number of commonly-owned stations in the subject Nielsen Metro.

In the interim contour-overlap "radio markets" studied herein, the number and service type of radio stations attributable to the applicant and its affiliates complies with the local radio

limit for a market of such size.

Based on the above, it is concluded that the proposed modification complies with Section 73.3555(a) of the FCC Rules.

Respectfully submitted,

Troy G. Langham
Vice President,
Technical Regulator Affairs
21 December 2018

Figure 1. Contour Radio Market

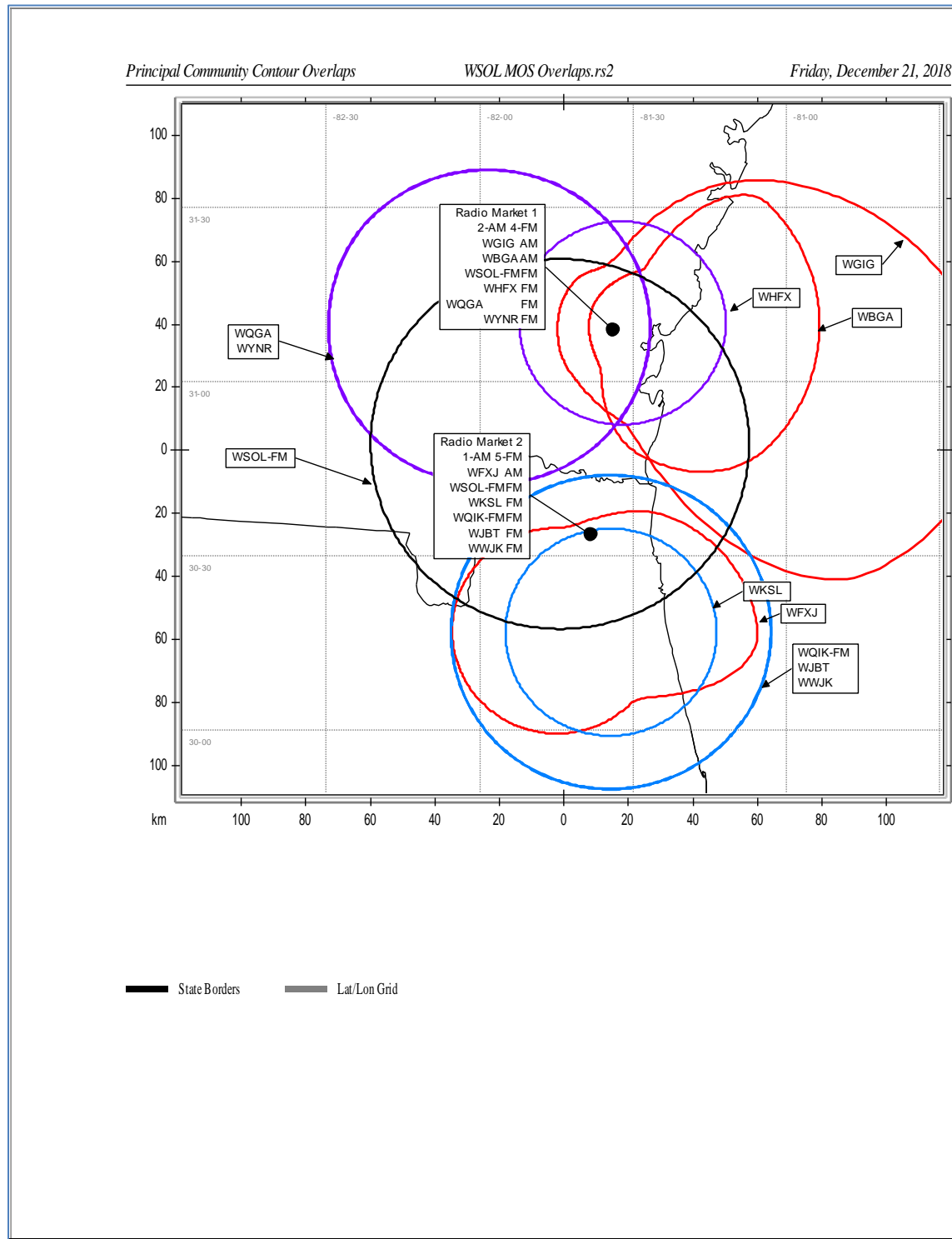


Figure 2. Count of Stations in Radio Market 1

Count	Call Sign	Fac_id	Licensee	Dist_km
1	WBGA	36930	AMFM RADIO LICENSES, L.L.C., AS DEBTOR IN POSSESSION	8.92
2	WGIG	63432	AMFM RADIO LICENSES, L.L.C., AS DEBTOR IN POSSESSION	3.3
3	WSOL-FM	23830	CITICASTERS LICENSES, INC., AS DEBTOR IN POSSESSION	40.34
4	WYNR	57785	AMFM RADIO LICENSES, L.L.C., AS DEBTOR IN POSSESSION	38.56
5	WHFX	63431	AMFM RADIO LICENSES, L.L.C., AS DEBTOR IN POSSESSION	3.3
6	WQGA	65020	AMFM RADIO LICENSES, L.L.C., AS DEBTOR IN POSSESSION	38.56
7	WKUB	40704	HIGGS MULTIMEDIA GROUP, LLC	77.59
8	WWUF	71149	HIGGS MULTIMEDIA GROUP, LLC	65.78
9	WMUV	48243	CHESAPEAKE-PORTSMOUTH BROADCASTING CORPORATION	40.34
10	WKBX	54649	RADIO KINGS BAY, INC.	40.57
11	WYKB	40483	NIA BROADCASTING, INC.	72.44
12	WATY	83543	DELMARVA EDUCATIONAL ASSOCIATION	40.34
13	WECC-FM	81294	LIGHTHOUSE CHRISTIAN BROADCASTING CORP.	28.11
14	WBQO	191581	QBS BROADCASTING, LLC	8.48
15	WSSI	36929	GOLDEN ISLES BROADCASTING, LLC	8.46
16	WRJY	472	GOLDEN ISLES BROADCASTING, LLC	8.48
17	WWIO-FM	23944	GEORGIA PUBLIC TELECOMMUNICATIONS COMMISSION	8.78
18	WXMK	61418	GOLDEN ISLES BROADCASTING, LLC	8.48
19	WAYR-FM	77585	GOOD TIDINGS TRUST, INC	8.48
20	WAYX	129162	SATILLA BROADCAST PROPERTIES, LLC	72.15
21	WVOJ	49214	NORSAN CONSULTING AND MANAGEMENT, INC.	54.04
22	WROS	66333	THE ROSE OF JACKSONVILLE	90.25
23	WEWC	11214	NORSAN CONSULTING AND MANAGEMENT, INC.	88.04
24	WNNR	71219	NORSAN CONSULTING AND MANAGEMENT, INC.	85.77
25	WYMM	11127	AVM BROADCASTING LLC	89.32
26	WKTZ	31937	AMERICAN FAMILY ASSOCIATION	91.94

Count	Call Sign	Fac_id	Licensee	Dist_km
27	WWIO	38286	LIGHTHOUSE CHRISTIAN BROADCASTING CORP.	43.58
28	WCGA	14240	COX BROADCAST GROUP, INC.	20.79
29	WSFN	29131	SOUTHERN MEDIA INTERACTIVE LLC	1.78
30	WOLP	31095	JESUP BROADCASTING CORP.	61.6
31	WLPT	23953	AUGUSTA RADIO FELLOWSHIP INSTITUTE, INC.	66.11

Figure 3. Contour Map of Stations in Radio Market 1

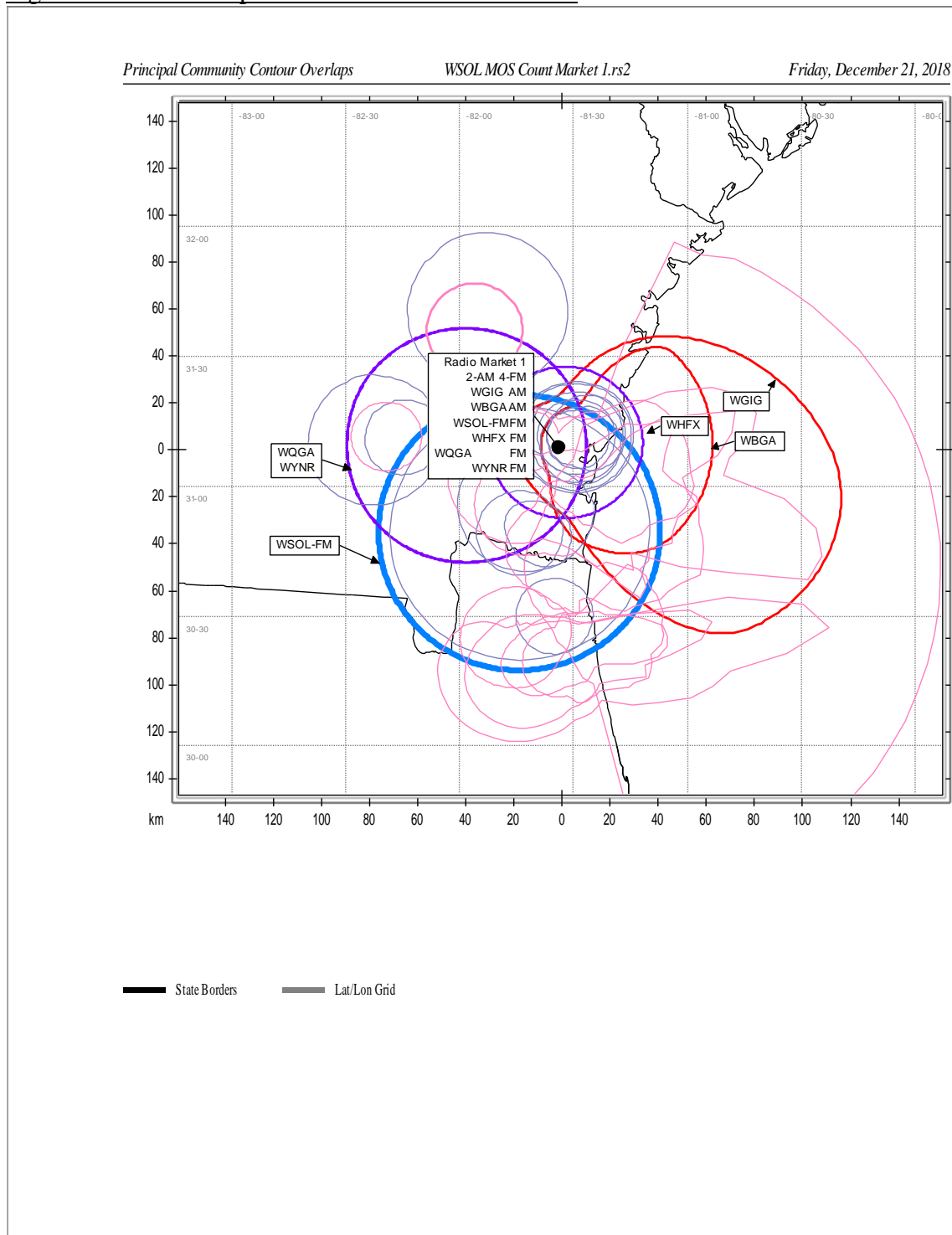


Figure 4. Count of Stations in Radio Market 2

Count	Call Sign	Fac_id	Licensee	Dist_km
1	WFXJ	51973	CLEAR CHAN. B/CASTING LICENSES, INC.,AS DEBTOR IN POSSESSION	32.86
2	WSOL-FM	23830	CITICASTERS LICENSES, INC., AS DEBTOR IN POSSESSION	29.73
3	WQIK-FM	29728	CITICASTERS LICENSES, INC., AS DEBTOR IN POSSESSION	32.38
4	WWJK	51974	CLEAR CHAN. B/CASTING LICENSES, INC.,AS DEBTOR IN POSSESSION	32.39
5	WJBT	51975	CLEAR CHAN. B/CASTING LICENSES, INC.,AS DEBTOR IN POSSESSION	32.38
6	WKSL	67243	CLEAR CHAN. B/CASTING LICENSES, INC.,AS DEBTOR IN POSSESSION	32.38
7	WEAG-FM	16906	DICKERSON BROADCASTING, INC.	83.56
8	WJXR	73151	NORSAN WJXR, LLC	46.83
9	WJGM	52032	WEST JACKSONVILLE BAPTIST CHURCH, INC.	43.05
10	WWUF	71149	HIGGS MULTIMEDIA GROUP, LLC	90.46
11	WFCF	21688	FLAGLER COLLEGE	84.16
12	WBHU	53672	FLAGLER BROADCASTING, LLC	84.8
13	WAYL	49963	DELMARVA EDUCATIONAL ASSOCIATION	84.82
14	WMUV	48243	CHESAPEAKE-PORTSMOUTH BROADCASTING CORPORATION	29.73
15	WJFR	20864	FAMILY STATIONS, INC.	26.95
16	WJXL-FM	22005	RIVER CITY BROADCASTING, LLC	33.02
17	WAPE-FM	70863	COX RADIO, INC.	27.06
18	WSOS-FM	74071	CHESAPEAKE-PORTSMOUTH BROADCASTING CORPORATION	55.2
19	WJGL	53590	COX RADIO, INC.	33
20	WJCT-FM	73125	WJCT, INC.	32.39

Count	Call Sign	Fac_id	Licensee	Dist_km
21	WKBX	54649	RADIO KINGS BAY, INC.	26.25
22	WEJZ	55706	REND A BROADCASTING CORP. OF NEVADA	27.06
23	WEZI	53602	COX RADIO, INC.	33
24	WGNE-FM	15897	REND A BROADCASTING CORP. OF NEVADA	27.06
25	WJKV	31936	EDUCATIONAL MEDIA FOUNDATION	33.01
26	WXXJ	28894	COX RADIO, INC.	32.95
27	WYKB	40483	NIA BROADCASTING, INC.	8.81
28	WTRJ-FM	47425	DELMARVA EDUCATIONAL ASSOCIATION	33.02
29	WATY	83543	DELMARVA EDUCATIONAL ASSOCIATION	29.73
30	WCRJ	48390	RADIO TRAINING NETWORK, INC.	33.02
31	WOKV-FM	72081	COX RADIO, INC.	33
32	WECC-FM	81294	LIGHTHOUSE CHRISTIAN BROADCASTING CORP.	40.99
33	WBQO	191581	QBS BROADCASTING, LLC	70.96
34	WSSI	36929	GOLDEN ISLES BROADCASTING, LLC	70.96
35	WRJY	472	GOLDEN ISLES BROADCASTING, LLC	70.96
36	WWIO-FM	23944	GEORGIA PUBLIC TELECOMMUNICATIONS COMMISSION	70.52
37	WXMK	61418	GOLDEN ISLES BROADCASTING, LLC	70.96
38	WAYR-FM	77585	GOOD TIDINGS TRUST, INC	70.96
39	WJXL	63600	SEVEN BRIDGES RADIO, LLC	46.18
40	WFOY	60271	PHILLIPS BROADCASTING, LLC	84.8
41	WAOC	2706	PHILLIPS BROADCASTING, LLC	84.8
42	WSOS	70404	WSOS RADIO LLC	75.78
43	WOKV	53601	COX RADIO, INC.	48.53

Count	Call Sign	Fac_id	Licensee	Dist_km
44	WAYR	24625	GOOD TIDINGS TRUST, INC.	56.69
45	WVOJ	49214	NORSAN CONSULTING AND MANAGEMENT, INC.	21
46	WROS	66333	THE ROSE OF JACKSONVILLE	25.49
47	WCGL	30609	JBD COMMUNICATIONS, INC.	32.26
48	WEWC	11214	NORSAN CONSULTING AND MANAGEMENT, INC.	23.48
49	WQOP	51976	QUEEN OF PEACE RADIO, INC.	28.46
50	WNNR	71219	NORSAN CONSULTING AND MANAGEMENT, INC.	20.28
51	WZAZ	68761	TITUS HARVEST DOME SPECTRUM CHURCH, INC.	26.95
52	WYMM	11127	AVM BROADCASTING LLC	24.83
53	WKTZ	31937	AMERICAN FAMILY ASSOCIATION	27.59
54	WWIO	38286	LIGHTHOUSE CHRISTIAN BROADCASTING CORP.	21.92
55	WBOB	53588	CHESAPEAKE-PORTSMOUTH BROADCASTING CORPORATION	31.77
56	WJNJ	29736	NEW COVENANT MINISTRIES, INC.	31.73
57	WZNZ	48393	QUEEN OF PEACE RADIO, INC.	33.51
58	WCGA	14240	COX BROADCAST GROUP, INC.	54.24
59	WSFN	29131	SOUTHERN MEDIA INTERACTIVE LLC	64.27

Figure 5. Contour Map of Stations in Radio Market 2

