

**RADIO MARKET ANALYSIS**  
**MILLER COMMUNICATIONS, INC.**  
**WWBD FM, BAMBERG, SOUTH CAROLINA**  
**WQKI-FM, ORANGEBURG, SOUTH CAROLINA**  
**WGFG FM, BRANCHVILLE, SOUTH CAROLINA**  
**WQKI-AM, ST. MATTHEWS, SOUTH CAROLINA**  
**December 2004**

**TECHNICAL STATEMENT**

1. This technical statement and attached exhibits were prepared on behalf of Miller Communications, Inc. ("Miller"), licensee of radio stations WWBD, Channel 239A, Bamberg, South Carolina; WQKI-FM, Channel 275A, Orangeburg, South Carolina; WGFG, Channel, 286A, Branchville, South Carolina; WIGL (FM), Channel 230A, St. Matthews, South Carolina; and WQKI (AM), 710 kHz, St. Matthews, South Carolina. Miller proposes to amend the pending modification application for WWBD (BMPH-20040429AAY). There are also pending minor change applications on file to relocate WQKI-FM and WGFG. As a result, the location of the city grade contour(s) of the stations will change. All of the Miller stations are located in non-rated markets.<sup>1</sup> As such, the use of the modified contour overlap rule is used to demonstrate compliance with the multiple ownership rules. A map showing the city grade contours of the stations is attached as Exhibit #1. As can be seen, there are two defined markets. Market #1 consists of stations WIGL (FM) and WQKI (AM). This market is unchanged and is not further addressed. Market #2 consists of stations WWBD, WGFG, WQKI-FM and WQKI (AM).

2. A study has, therefore, been conducted to verify the WWBD, WQKI-FM and WGFG applications are in compliance with the Commission's multiple ownership rules. The city grade

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1) The closest rated market is Columbia, South Carolina (Arbitron Market #90). None of these stations are listed in the market based on the BIA/Arbitron database.

contours of the subject stations will be used to determine the number of other AM or FM stations that either have transmitter sites within, or provide coverage to, the subject stations' contours, herein after described as the "Radio Market".

3. To simplify compliance with the multiple ownership provisions, we will consider ONLY the proposed WWBD city grade contour, as the most conservative market boundary. In order to determine compliance, this study examines the number of stations providing city grade service to the WWBD proposed city grade contour, or who have sites falling within the city grade contour of this subject station. No station with a transmitter farther than 92.0 kilometers from the common overlap area is considered. Further, no stations in which Miller has an interest are considered contributing stations to a market under study, unless they are a subject station in the market.

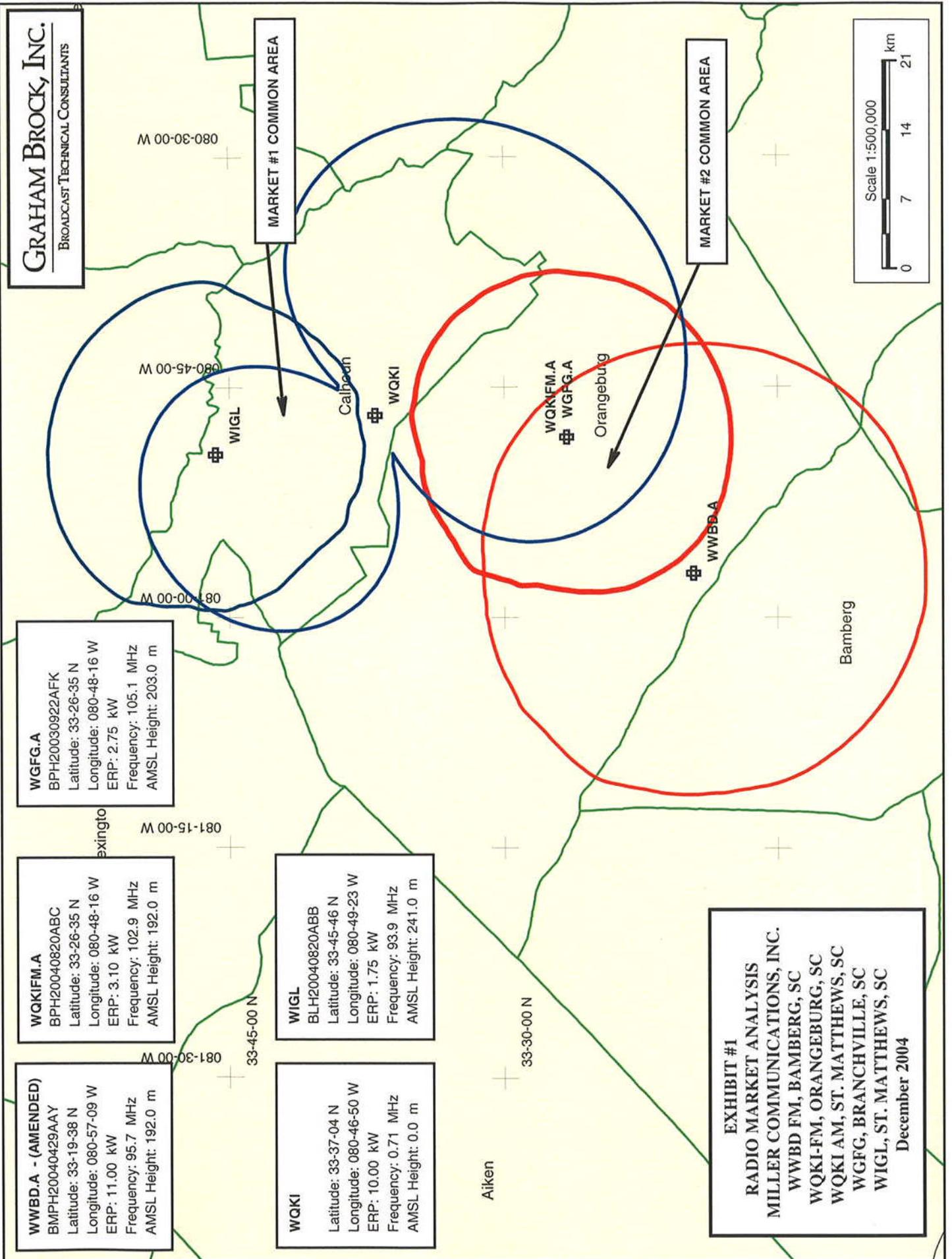
4. Exhibit #2 is a depiction of the FM stations (commercial and non-commercial) providing service to the WWBD contour. The map shows four FM (commercial and non-commercial) stations and two AM stations.<sup>2</sup> Exhibit #3 is a tabulation of the stations in Radio Market #2, which totals ten stations, including the four subject stations. The number of stations depicted falls in the fourteen or fewer stations tier of §73.3555(a)(1)(iv) of the Commission's rules. At this level, common ownership or control of up to five stations, with no more than three in the same service, is permissible. Therefore, this market is in compliance with the rules.

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2) There are additional stations, but they were not considered since the number of stations shown was adequate to demonstrate compliance based on the number of stations to be commonly held.

5. Therefore, based on Miller's interests in the above referenced stations in the noted market, it has been herein demonstrated that the proposed relocation applications of WWBD, WQKI-FM and WGFG are in compliance with §73.3555 of the Commission's rules.

6. 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 CDBS database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.



**WWBD.A - (AMENDED)**  
BMPH20040429AA  
Latitude: 33-19-38 N  
Longitude: 080-57-09 W  
ERP: 11.00 kW  
Frequency: 95.7 MHz  
AMSL Height: 192.0 m

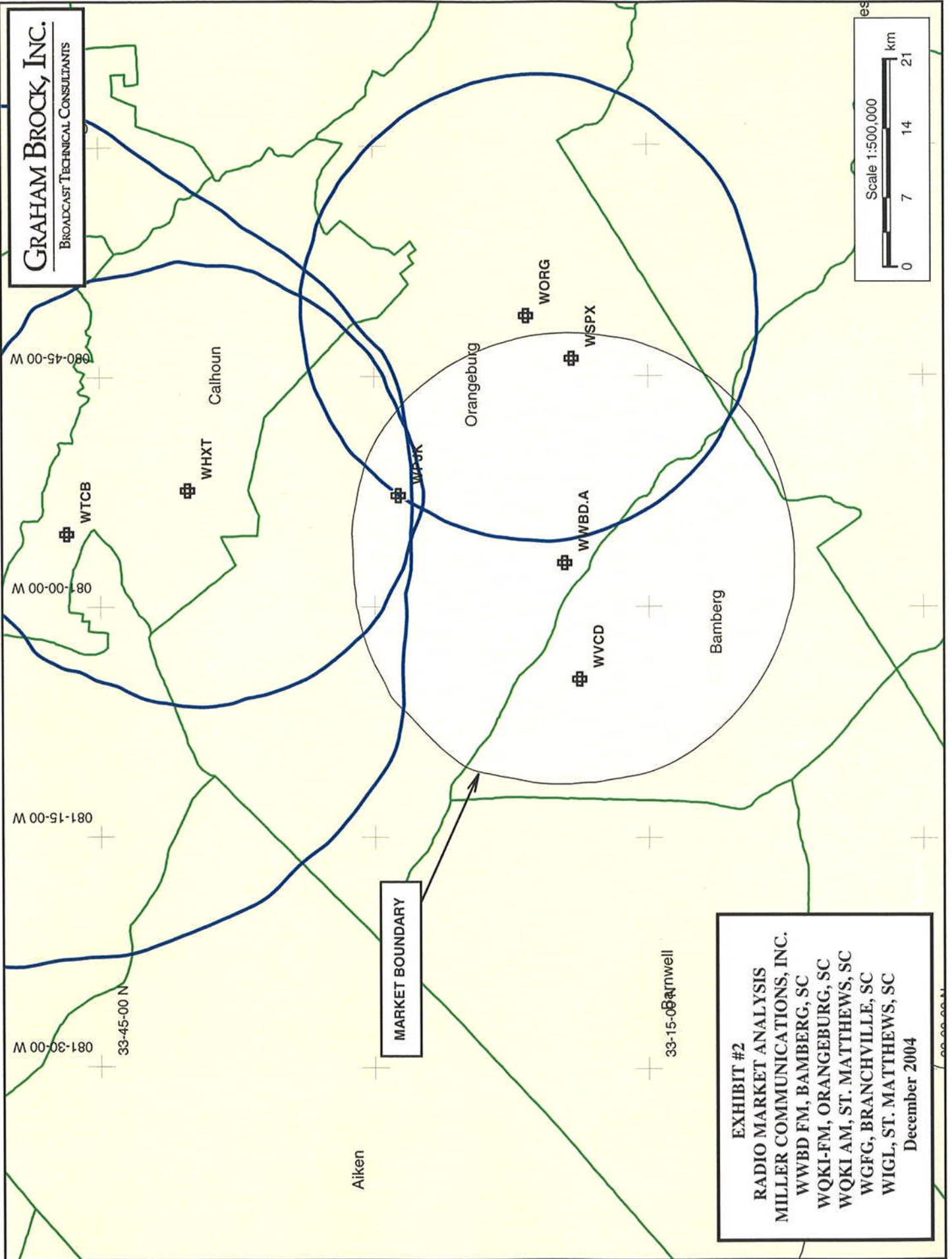
**WQKIFM.A**  
BPH20040820ABC  
Latitude: 33-26-35 N  
Longitude: 080-48-16 W  
ERP: 3.10 kW  
Frequency: 102.9 MHz  
AMSL Height: 192.0 m

**WGFG.A**  
BPH20030922AFK  
Latitude: 33-26-35 N  
Longitude: 080-48-16 W  
ERP: 2.75 kW  
Frequency: 105.1 MHz  
AMSL Height: 203.0 m

**WQKI**  
Latitude: 33-37-04 N  
Longitude: 080-46-50 W  
ERP: 10.00 kW  
Frequency: 0.71 MHz  
AMSL Height: 0.0 m

**WIGL**  
BLH20040820ABB  
Latitude: 33-45-46 N  
Longitude: 080-49-23 W  
ERP: 1.75 kW  
Frequency: 93.9 MHz  
AMSL Height: 241.0 m

**EXHIBIT #1**  
**RADIO MARKET ANALYSIS**  
**MILLER COMMUNICATIONS, INC.**  
WWBD FM, BAMBERG, SC  
WQKI-FM, ORANGEBURG, SC  
WQKI AM, ST. MATTHEWS, SC  
WGFG, BRANCHVILLE, SC  
WIGL, ST. MATTHEWS, SC  
December 2004



MARKET BOUNDARY

**EXHIBIT #2**  
**RADIO MARKET ANALYSIS**  
**MILLER COMMUNICATIONS, INC.**  
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**EXHIBIT #3**

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

**AM Stations**

* WQKI	710 kHz	St. Matthews, SC
# WVCD	790 kHz	Bamberg, SC
# WPJK	1580 kHz	Orangeburg, SC

Total AM Stations - 3

**FM Stations**

# WSPX	Ch 233A	Bowman, SC
* WWBD	Ch 239C3	Bamberg, SC
+ WORG	Ch 262C3	Elloree, SC
* WQKI-FM	Ch 275A	Orangeburg, SC
+ WHXT	Ch 280C3	Orangeburg, SC
* WGFG	Ch 286A	Branchville, SC
+ WTCB	Ch 294C1	Orangeburg, SC

Total FM Stations - 7

**GRAND TOTAL OF STATIONS CONSIDERED IN STUDY - 10**

- \* Subject station.
- # Station with transmitter site within the Radio Market
- + Station providing city grade coverage to the market.

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

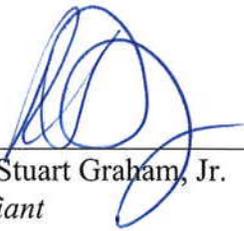
*State of Georgia )*  
*St. Simons Island ) ss:*  
*County of Glynn )*

**R. STUART GRAHAM**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Miller Communications, Inc., to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He is a graduate of Auburn University and has been active in Broadcast Engineering since 1972.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 7th day of December, 2004.*

  
\_\_\_\_\_  
R. Stuart Graham, Jr.  
*Affiant*

*Sworn to and subscribed before me  
this the 7th day of December, 2004.*

  
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*Notary Public, State of Georgia*  
*My Commission Expires: September 3, 2007*