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MULTIPLE OWNERSHIP SERVICE CONTOUR ANALYSIS

**Prepared for
WGHN, Inc.
July 2011**

The attached analysis of compliance with the radio multiple ownership rules was prepared in accordance with the Rules and Regulations of the Federal Communications Commission, in connection with an application for a new FM station on Channel 226A at Ferrysburg, Michigan (Facility ID #189472).

Unrated Market

All of WGHN, Inc.'s attributable stations are located in the vicinity of Grand Haven, Michigan:

New FM	226A	Ferrysburg	(this application)
WGHN-FM	221A	Grand Haven	
WGHN	1370 kHz	Grand Haven	

While all of these stations are or will be licensed to communities within the Arbitron Grand Rapids Market, Commission staff has requested that an "unrated market" study be provided owing to the fact that Ferrysburg is not currently noted as being part of that market. Therefore, analysis has been made consistent with the Commission's interim rules for unrated markets. The 70 dBu contours of FM stations were determined from the technical data contained in the most recent edition of the FCC FM Database. The listed antenna height above average terrain was used together with topographic data obtained from the digitized 30 second or 3 second database. The 5 mV/m daytime contours of AM stations were determined from the technical data contained in the most recent edition of the FCC AM Database. The listed antenna parameter information was used together with a digitized version of the FCC M-3 or Region II ground conductivity database.

The service contours were plotted using correct map projection mathematics. Those stations whose transmitter sites are within the respective principal community service contours of the stations proposed to be commonly owned have only the sites rather than their contours shown. All contours and enclosed transmitter site locations have been labeled. A list of all stations considered is included with this statement.

In counting stations providing service to the "market" defined by each of the discrete clusters formed in unrated markets, stations whose transmitter sites are located in excess of 92 km from the perimeter of the common overlap area have been excluded, as have other stations to be commonly-owned but which are not a part of the discrete cluster being studied.

This exhibit evidences at least the minimum number of stations necessary to demonstrate compliance with the rules concerning radio multiple ownership in unrated markets. In order to qualify for common ownership of this 1AM/2FM cluster, there must be at least 6 stations in the relevant "market". This study demonstrates that there are at least 8 stations in the relevant market.

July 25, 2011

A handwritten signature in black ink, appearing to read "Erik C. Swanson". The signature is fluid and cursive, with the first name "Erik" and last name "Swanson" clearly distinguishable.

Erik C. Swanson

