

## TECHNICAL STATEMENT RADIO MULTIPLE OWNERSHIP ANALYSIS

We propose to modify WMKS (FM) High Point, North Carolina, a multiple ownership analysis was prepared considering radio stations under present or proposed common ownership, time brokerage or joint sales.

Table 1: Proposed Commonly Owned, Brokered or Jointly-Sold Stations Studied and Associated Metro Market<sup>1</sup> Information

Calls	Fac ID	Band	Community	County	Geographic Arbitron Market	Declared Arbitron Market
WMAG	73258	FM	High Point	Guilford	Greensboro-Winston Salem-High Point, NC	Greensboro-Winston Salem-High Point, NC
<b>WMKS-PrP</b>	<b>74204</b>	<b>FM</b>	<b>High Point</b>	<b>Guilford</b>	<b>Greensboro-Winston Salem-High Point, NC</b>	<b>Greensboro-Winston Salem-High Point, NC</b>
WPTI	55754	FM	Eden	Rockingham	<b>Non-Metro</b>	Greensboro-Winston Salem-High Point, NC
WTQR	58392	FM	Winston-Salem	Forsyth	Greensboro-Winston Salem-High Point, NC	Greensboro-Winston Salem-High Point, NC
WVBZ	501	FM	Clemmons	Forsyth	Greensboro-Winston Salem-High Point, NC	Greensboro-Winston Salem-High Point, NC
WEND	74074	FM	Salisbury	Rowan	Charlotte-Gastonia-Rock Hill, NC-SC	Charlotte-Gastonia-Rock Hill, NC-SC
WDCG	53597	FM	Durham	Durham	Raleigh-Durham, NC	Raleigh-Durham, NC
WNCB	53596	FM	Cary	Wake	Raleigh-Durham, NC	Raleigh-Durham, NC
WKKT	68207	FM	Statesville	Iredell	Charlotte-Gastonia-Rock Hill, NC-SC	Charlotte-Gastonia-Rock Hill, NC-SC
WRFX	53970	FM	Kannapolis	Cabarrus	Charlotte-Gastonia-Rock Hill, NC-SC	Charlotte-Gastonia-Rock Hill, NC-SC

Since certain of these stations that are not geographically in a Metro have overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations), or are located in, or home to, the same Arbitron Metro market, an ownership study has been prepared in accordance with the Federal Communications Commission’s local radio ownership rule.<sup>2</sup>

We do not have an attributable interest in any other station with a principal community contour that overlaps or intersects the principal community contour of WMKS(FM) as proposed, which is not located in an Arbitron market, or regardless of contour overlap, which is located<sup>3</sup> in the same Metro as WMKS(FM). The community of license of WMKS(FM) is within, and, WMKS(FM) is reported by BIA as being “Home” to the Greensboro-Winston

<sup>1</sup> Metro Market data presented herein is obtained from BIA’s “Media Access Pro.”

<sup>2</sup> See 47 C.F.R. § 73.3555(a).

<sup>3</sup> A station is considered to be “located in a Metro” if the station’s community of license is located within the boundaries of that Metro, or, the station is listed as “Home” to that Metro by BIA.

Salem-High Point, NC Metro. Contour overlap of the station to be modified, as depicted in *Figure 1*, also occurs with commonly-owned stations whose communities of license are located in other Metro markets, and commonly owned station WPTI whose community of license is located outside any Metro market.

Metro Market Study

WMKS(FM) is reported by BIA as being “Home” to the Greensboro-Winston Salem-High Point, NC Metro. This proposal is in compliance with the local radio ownership rules for that Arbitron Metro, as evidenced by *Table 2* below:

Table 2 – Stations Considered to be in the Greensboro-Winston Salem-High Point, NC Arbitron Metro<sup>4</sup>

Count	Call	Band	Owner	Mkt Join Date
1	WSML	AM	Alamance Media Partners Inc	7/2/2003
2	WJYJ	FM	Baker Family Stations	7/2/2003
3	WODY	AM	Baker Family Stations	7/2/2003
4	WTJY	FM	Baker Family Stations	7/2/2003
5	WXRI	FM	Baker Family Stations	7/2/2003
6	WPIP	AM	Berean Christian School	7/2/2003
7	WHPE-FM	FM	Bible Broadcasting Network Inc	7/2/2003
8	WSMX	AM	Blue Ridge Broadcasting	7/2/2003
9	WBRF	FM	Blue Ridge Radio Inc	7/2/2003
10	WKTE	AM	Booth-Newsom Broadcasting Inc	7/2/2003
11	WMAG	FM	iHeartMedia Inc	7/2/2003
12	WMKS	FM	iHeartMedia Inc	7/2/2003
13	WPTI	FM	iHeartMedia Inc	7/2/2003
14	WTQR	FM	iHeartMedia Inc	7/2/2003
15	WVBZ	FM	iHeartMedia Inc	4/28/2006
16	WCOG	AM	Curtis Media Group	7/2/2003
17	WMFR	AM	Curtis Media Group	7/2/2003
18	WPCM	AM	Curtis Media Group	7/2/2003
19	WSJS	AM	Curtis Media Group	7/2/2003
20	WYMY	FM	Curtis Media Group	11/3/2004
21	WLXN	AM	Davidson County Broadcasting	7/2/2003
22	WKRR	FM	Dick Broadcasting Company Incorporated	7/2/2003
23	WKZL	FM	Dick Broadcasting Company Incorporated	7/2/2003
24	WWLV	FM	Educational Media Foundation	7/2/2003
25	WSOE	FM	Elon College	7/2/2003
26	WEAL	AM	Entercom	7/2/2003
27	WJMH	FM	Entercom	7/2/2003
28	WPAW	FM	Entercom	7/2/2003
29	WPET	AM	Entercom	7/2/2003
30	WQMG	FM	Entercom	7/2/2003
31	WSMW	FM	Entercom	7/2/2003
32	WBAG	AM	Gray Broadcasting LLC	7/2/2003
33	WQFS	FM	Guilford College	7/2/2003
34	WGOS	AM	Iglesia Nueva Vida of High Point Inc	7/2/2003
35	WKXR	AM	Keith, Fred R	7/2/2003
36	WYSR	AM	Latino Communications LLC	7/2/2003
37	WBLO	AM	GHB Broadcasting Inc	7/2/2003

<sup>4</sup> Source: BIA.

Count	Call	Band	Owner	Mkt Join Date
38	WIST-FM	FM	GHB Broadcasting Inc	7/2/2003
39	WNAA	FM	North Carolina Agricultural & Technical State U	7/2/2003
40	WZOO	AM	RCR of Randolph County Ltd	7/2/2003
41	WDSL	AM	Shoaf, Farren K	7/2/2003
42	WTOB	AM	Southern Broadcast Media LLC	7/2/2003
43	WSGH	AM	TBLC Media LLC	7/2/2003
44	WWBG	AM	TBLC Media LLC	7/2/2003
45	WWNT	AM	TBLC Media LLC	7/2/2003
46	WBFJ	AM	Triad Family Network Incorporated	7/2/2003
47	WBFJ-FM	FM	Triad Family Network Incorporated	7/2/2003
48	WKEW	AM	Truth Broadcasting Corporation	7/2/2003
49	WPOL	AM	Truth Broadcasting Corporation	7/2/2003
50	WTRU	AM	Truth Broadcasting Corporation	7/2/2003
51	WUAG	FM	University of North Carolina	7/2/2003
52	WUNW-FM	FM	University of North Carolina	12/20/2013
53	WFDD	FM	Wake Forest University	7/2/2003
54	WSNC	FM	Winston-Salem State University	7/2/2003

Interim Contour-Overlap Analysis

Because the community of license for station WPTI is located outside any Metro market, an interim contour-overlap analysis is also set forth in this statement.

Interim Contour-Based Radio Markets

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 one “radio market” for interim contour-overlap analysis under the Commission’s rules as shown below in *Table 3*.

Table 3, Table of Contour Markets

Radio Market
5- FM
WMKS-Prp
WMAG
WPTI
WTQR
WVBZ

Count of Stations in Defined 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 AM band stations have been considered, as depicted in *Figure 2*.

In the interim contour-overlap "radio market" studied herein, there are the required count of radio stations, including the subject co-owned stations, which overlap or intersect with the defined "radio market." *Figure 3* is a tabulation of the radio stations identified in the contour-overlap "radio market", and Table 4 is a summary of that data.

Table 4, Table of Market Station Count

Market 1	
Count	54

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 Metro Market studied herein, there are at least 54 radio stations, including the subject commonly-owned 5-FM stations, which are home to the Greensboro-Winston Salem-High Point, NC Metro. This proposal does not affect the existing number of commonly-owned stations in the subject Arbitron Metro.

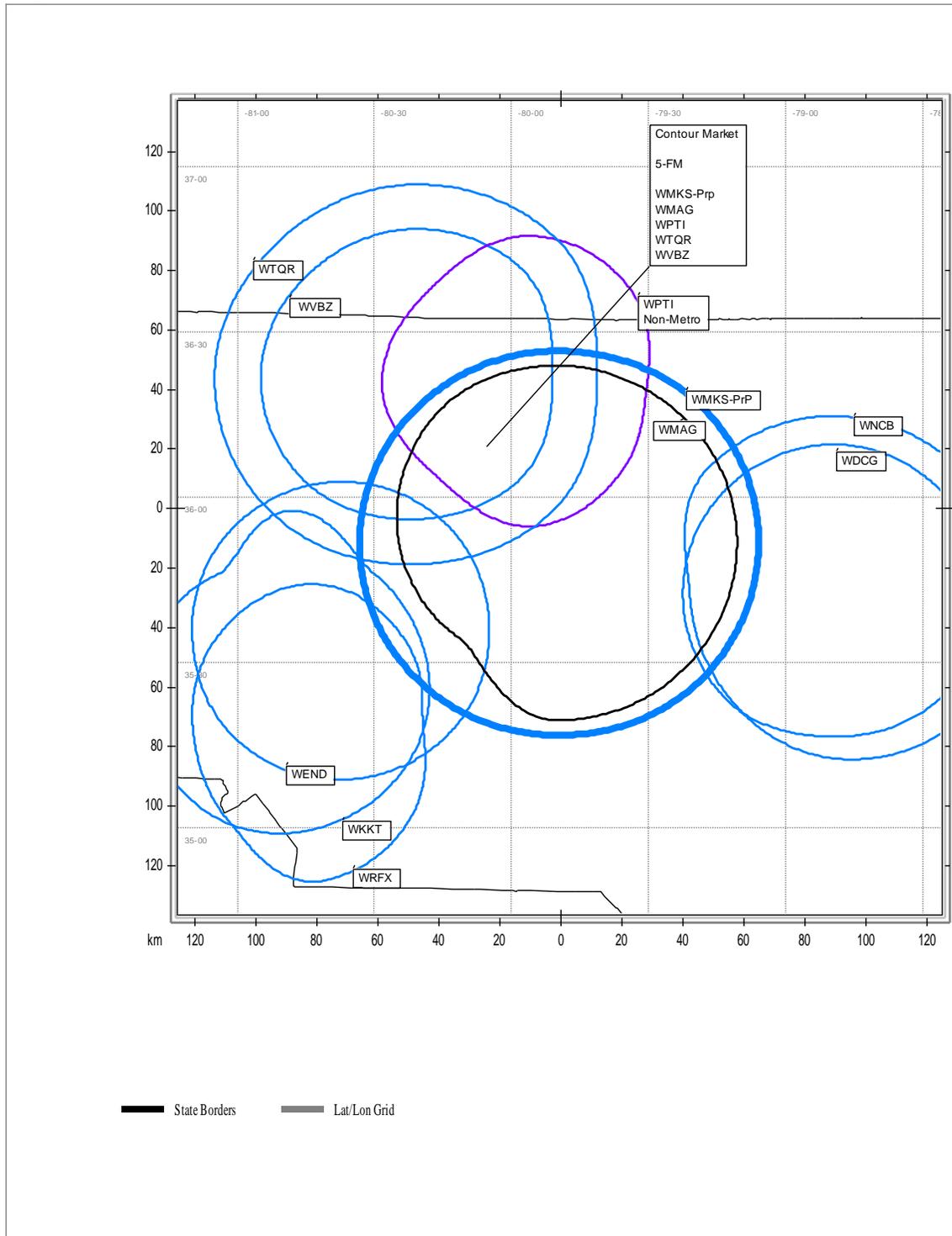
In the interim contour-overlap "radio markets" studied herein, there is at least the minimum required count, including the commonly-owned stations.

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

Respectfully submitted,

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VP, Technical Regulatory Affairs  
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Figure 1 Contour Market Stations





**Figure 3 - Tabulation of Stations in Contour Market**

Count	Call Sign	Fac_id	Licensee	Dist_km
1	WSAT	43140	2B PRODUCTIONS, LLC	66.39
2	WSTP	74075	2B PRODUCTIONS, LLC	64.97
3	WSML	740	ALAMANCE MEDIA PARTNERS, INC.	55.3
4	WPIP	41508	BEREAN CHRISTIAN SCHOOL	16.42
5	WKTE	6427	BOOTH-NEWSOM BROADCASTING, INC.	29.55
6	WCBX	18887	CALVARY CHAPEL OF TWIN FALLS, INC.	61.01
7	WPCM	9082	CAROLINA RADIO GROUP, INC.	54.52
8	WNCA	10664	CHATHAM BROADCASTING CO., INC. OF SILER CITY	72.63
9	WCOG	74203	CRESCENT MEDIA GROUP LLC	15.44
10	WMFR	73257	CRESCENT MEDIA GROUP LLC	24.63
11	WSJS	58391	CRESCENT MEDIA GROUP LLC	25.3
12	WLXN	15838	DAVIDSON COUNTY BROADCASTING COMPANY, INC.	31.38
13	WCLW	48701	DR JERRY L CARTER D/BA/ REIDSVILE BAPTIST CHURCH	48.57
14	WEAL	49315	ENTERCOM LICENSE, LLC	28.71
15	WPET	71271	ENTERCOM LICENSE, LLC	28.71
16	WREV	41442	ESTUARDO VALDEMAR RODRIGUEZ	46.17
17	WJRM	43632	FAMILY WORSHIP MINISTRIES, INC.	91.73
18	WDSL	71354	FARREN K. SHOAF	52.13
19	WBLO	54552	GHB RADIO, INC.	23.36
20	WYZD	17047	GOSPEL BROADCASTING, INC	63.46
21	WFIC	59418	GRACE MISSIONARY BAPTIST CHURCH D/B/A GRACE	62.44
22	WSYD	64066	GRANITE CITY BROADCASTING, INC.	58.94
23	WBAG	63782	GRAY BROADCASTING, LLC	57.35
24	WGOS	56508	IGLESIA NUEVA VIDA OF HIGH POINT, INC.	28.64
25	WMPW	15501	LAKES MEDIA, LLC	77.56
26	WWDN	67269	LAKES MEDIA, LLC	77.07
27	WYSR	34353	LATINO BROADCASTING, LLC	20.46
28	WMVA	40510	MARTINSVILLE MEDIA, INC.	62.53
29	WHEE	51825	MARTINSVILLE MEDIA, INC.	59.63
30	WMYN	40794	MAYO BROADCASTING CORP.	28.69
31	WLOE	40793	MAYO BROADCASTING CORPORATION	46.75
32	WDVA	43244	MITCHELL COMMUNICATIONS, INC.	73.54
33	WHHV	39626	NEW LIFE CHRISTIAN COMMUNICATIONS, INC.	86.27
34	WGFC	23044	NEW LIFE CHRISTIAN COMMUNICATIONS, INC.	85.79
35	WHEO	46335	PATRICK COMMUNITY MEDIA, INC.	53.03
36	WBTM	52544	PIEDMONT BROADCASTING CORP.	75.96
37	WODY	69983	POSITIVE ALTERNATIVE RADIO, INC.	61.01
38	WZOO	20558	RCR OF RANDOLF COUNTY, LTD	50.2
39	WYNC	59673	SEMORA BROADCASTING, INC.	72.57

Count	Call Sign	Fac_id	Licensee	Dist_km
40	WRNA	61153	SOUTH ROWAN BROADCASTING CO., INC.	80.39
41	WKXR	55102	SOUTH TRIAD BROADCASTING CORP.	55.33
42	WTOB	40996	SOUTHERN BROADCAST MEDIA LLC	15.73
43	WSPC	49041	STANLY COMMUNICATIONS, INC.	87.27
44	WZKY	49044	STANLY COMMUNICATIONS, INC.	90.04
45	WAME	63146	STATESVILLE FAMILY RADIO CORPORATION	81.01
46	WWBG	67831	TBLC GREENSBORO STATIONS, LLC	15.44
47	WSGH	72967	TBLC GREENSBORO STATIONS, LLC	38.01
48	WWNT	59270	TBLC GREENSBORO STATIONS, LLC	21.38
49	WBFJ	73708	TRIAD FAMILY NETWORK, INC.	16
50	WPOL	72970	TRUTH BROADCASTING CORPORATION	18.69
51	WTRU	63478	TRUTH BROADCASTING CORPORATION	11.62
52	WKEW	73156	TRUTH BROADCASTING CORPORATION	28.16
53	WSMX	24682	TRUTH BROADCASTING CORPORATION	18.69
54	WPAQ	54971	WPAQ RADIO, INC.	61.41