

**ENGINEERING STATEMENT COVERING
BROADCAST MULTIPLE OWNERSHIP STUDY
MLB-DAYTON IV, LLC
DAYTON, OHIO**

MAY 2007

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This engineering statement and supporting tabulations and figures have been prepared on behalf of **MLB-Dayton IV, LLC ("MLB")**. The purpose of this statement is to demonstrate **MLB's** compliance with *Section 73.3555* of the Commission's Rules with respect to multiple ownership of AM and FM broadcast facilities.

MLB proposes common ownership in the following five stations in the Dayton, Ohio market:

WROU-FM	West Carrollton, OH	FCC ID #26451	License
WDHT(FM)	Springfield, OH	FCC ID #60252	License
WGTZ(FM)	Eaton, OH	FCC ID #25043	License
WING(AM)	Dayton, OH	FCC ID #25039	License
WKSW(FM)	Urbana, OH	FCC ID #10113	License
WKSW(FM)	Enon, OH	FCC ID #10113	BPH20070119AGI

These five stations are listed as home to the Dayton, Ohio Arbitron Market as seen on the BIA *FCC Geographic Market Definition for Dayton, Ohio* found in Appendix 1, attached. There are 38 stations in the Market. MLB's proposed ownership of four FM and one AM station, therefore, complies with 73.3555(a)(1)(ii) of the Rules.

However, WKSW is licensed to Urbana which is located in Champaign County which is not an Arbitron Metro County.¹ The WKSW facility has been analyzed using the Interim Contour Methodolgy as described fully herein. A multiple ownership analysis was prepared considering the above described radio stations under proposed common ownership or control, which stations have

¹It is noted the pending minor change application to specify Enon, Ohio as the community of license for WKSW, when implemented, would not require use of the Interim Methodology as Enon is located in Greene County, Ohio which is an Arbitron Metro County.

overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations) in accordance with *Section 73.3555* of the FCC Rules.

RADIO MARKETS & METHODOLOGY

The radio market is defined as the area encompassed by the principal community contours (predicted or measured 5 mV/m groundwave contour for AM; predicted 3.16 mV/m contour for FM) of the stations that are both mutually overlapping and proposed to be “commonly attributable” post-transaction. The number of radio stations in this defined radio market (i.e., the numerator) will not exceed the limits set forth in *Section 73.3555(a)*. A commonly attributable station whose contour overlaps the contour of some but not all of the contours of the stations that define the radio market was not counted toward the local radio ownership limits (i.e., is not counted in the numerator). Since Champaign County is not part of the Dayton Arbitron Metro this analysis is based on contour overlap. *Figure 1* depicts the principal community contours for all five stations for which common ownership is proposed. *Figure 2* depicts the market made up of the WKSX licensed facility and any other station proposed for common ownership whose contour overlaps the WKSX contour.

Table I lists all AM stations whose 5 mV/m daytime contour duplicates some portion of the market. The contours for these stations are plotted on *Figures 1 - 4* with owned stations plotted in red and other AM stations plotted in gray.

Table I also lists all FM stations whose 70 dBu contour duplicates some portion of the market. The contours for these stations are plotted on *Figures 1 - 4* with owned stations plotted in blue and other FM stations plotted in green.

Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission’s CDBS database using the appropriate Ground Wave Field Strength versus Distance Graph of 47 CFR 73.184. Ground conductivities were obtained from FCC Figure M3. Distances to the FM contours were determined based on the methodology of 47 CFR 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 5 degrees of azimuth.

CONCLUSION

Based on the above analysis, the proposed common ownership of stations complies with *Section 73.3555(a)(1)(ii)* of the Commission's Rules based on both the Arbitron analysis and the Interim Contour Methodology. Based on the contour analysis there are 26 FM and 16 AM stations considered in this study which have principal community contours that overlap some portion of the attributable stations principal community contours which make up the market based on WKSJ. Stations in the market are:

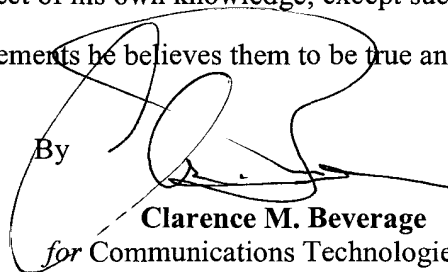
Market 1: Attributable Stations - 5 Stations (1 AM & 4 FM)

WROU-FM, WDHT(FM), WGTZ(FM), WKSJ(FM) and WING(AM).

Non Attributable Stations in Market = 37

The foregoing was prepared on behalf of **MLB-Dayton IV, LLC** by Clarence M. Beverage of *Communications Technologies, Inc.*, Marlton, New Jersey, whose qualifications are a matter of record with the Federal Communications Commission. The undersigned certifies, under penalty of perjury, that the statements herein are true and correct of his own knowledge, except such statements made on information and belief, and as to these statements he believes them to be true and correct.

By



Clarence M. Beverage
for Communications Technologies, Inc.
Marlton, New Jersey

May 17, 2007

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APPENDIX 1
MLB-DAYTON IV, LLC



FCC Geographic Market Definition for Dayton, OH

Call Letters	AM/FM	Freq	Type	Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WDHT	FM	102.9	C	Urban/RhyBI		Dayton, OH	07/02/2003	59	Radio One Inc	Springfield, OH	Clark
WULM	AM	1600	C	70s & 80s		Dayton, OH	07/02/2003	59	Urban Light Ministries Inc	Springfield, OH	Clark
WZLR	FM	95.3	C	Clsc Rock		Dayton, OH	07/02/2003	59	Cox Radio Inc	Xenia, OH	Greene
WDAO	AM	1210	C	RhyBI/Gospl		Dayton, OH	07/02/2003	59	Johnson Communications, Inc.	Dayton, OH	Montgomery
WEEC	FM	100.7	NC	Christian		Dayton, OH	07/02/2003	59	World Evangelistic Enterprise Corp	Springfield, OH	Clark
WFCJ	FM	93.7	C	Inspiration		Dayton, OH	07/02/2003	59	Miami Valley Christian Broadcasting Association	Miamisburg, OH	Montgomery
WBZI	AM	1500	C	Country		Dayton, OH	07/02/2003	59	Town And Country Broadcasting Inc	Xenia, OH	Greene
WGTZ	FM	92.9	C	Top 40		Dayton, OH	07/02/2003	59	Radio One Inc	Eaton, OH	Preble
WHIO	AM	1290	C	News/Talk		Dayton, OH	07/02/2003	59	Cox Radio Inc	Dayton, OH	Montgomery
WHKO	FM	99.1	C	Country		Dayton, OH	07/02/2003	59	Cox Radio Inc	Dayton, OH	Montgomery
WING	AM	1410	C	Sports		Dayton, OH	07/02/2003	59	Radio One Inc	Dayton, OH	Montgomery
WIZE	AM	1340	C	Sports		Dayton, OH	07/02/2003	59	p Clear Channel	Springfield, OH	Clark
WKET	FM	98.3	C	Rock		Dayton, OH	07/02/2003	59	Kettering City Schools	Kettering, OH	Montgomery
WKSW	FM	101.7	C	Country		Dayton, OH	07/02/2003	59	Radio One Inc	Urbana, OH	Champaign
WDSJ	FM	106.5	C	Smooth		Dayton, OH	07/02/2003	59	p Clear Channel	Greenville, OH	Darke
WGNZ	AM	1110	C	Christian		Dayton, OH	07/02/2003	59	L & D Broadcasters	Fairborn, OH	Greene
WONE	AM	980	C	Sports		Dayton, OH	07/02/2003	59	p Clear Channel	Dayton, OH	Montgomery
WPFB	FM	105.9	C	Country		Dayton, OH	07/02/2003	59	Radio Stations WPAY/WPFB, Inc.	Middletown, OH	Butler
WPTW	AM	1570	C	AC/Oldes		Dayton, OH	07/02/2003	59	Frontier Broadcasting LLC	Piqua, OH	Miami
WHIO	FM	95.7	C	News/Talk		Dayton, OH	07/02/2003	59	Cox Radio Inc	Piqua, OH	Miami
WTUE	FM	104.7	C	Rock		Dayton, OH	07/02/2003	59	p Clear Channel	Dayton, OH	Montgomery
WLQT	FM	99.9	C	Lite AC		Dayton, OH	07/02/2003	59	p Clear Channel	Kettering, OH	Montgomery
WMMX	FM	107.7	C	Hot AC		Dayton, OH	07/02/2003	59	p Clear Channel	Dayton, OH	Montgomery
WXEG	FM	103.9	C	Alternative		Dayton, OH	07/02/2003	59	p Clear Channel	Beavercreek, OH	Montgomery
WOKL	FM	96.9	NC	ChrsContem		Dayton, OH	07/02/2003	59	Educational Media Foundation	Troy, OH	Miami
WROU	FM	92.1	C	Urban AC		Dayton, OH	07/02/2003	59	Radio One Inc	West Carrollton, OH	Montgomery
WDKF	FM	94.5	C	Urban		Dayton, OH	07/02/2003	59	p Clear Channel	Englewood, OH	Montgomery
WEDI	AM	1130	C	Country		Dayton, OH	07/02/2003	59	Town And Country Broadcasting Inc	Eaton, OH	Preble
WCDR	FM	90.3	NC	Inspr/CCTmp		Dayton, OH	07/02/2003	59	Cedarville University	Cedarville, OH	Greene
WCSU	FM	88.9	NC	Urb/Jaz/Gsp		Dayton, OH	07/02/2003	59	Central State University	Wilberforce, OH	Greene
WDPR	FM	88.1	NC	Classical		Dayton, OH	07/02/2003	59	Dayton Public Radio Inc	West Carrollton, OH	Montgomery
WDPS	FM	89.5	NC	Variety		Dayton, OH	07/02/2003	59	Dayton City Schools	Dayton, OH	Montgomery
WQRP	FM	89.5	NC	Relig Music		Dayton, OH	07/02/2003	59	WQRP Family Radio Inc	Dayton, OH	Montgomery
WUSO	FM	89.1	NC	AOR		Dayton, OH	07/02/2003	59	Wittenberg University	Springfield, OH	Clark

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for Dayton, OH

Call Letters	AM/ FM	Type Freq	Station Format	Home Market	Market Designn Date	Home Mkt Rank	Owner	City & State of License	County of License
WWSU	FM	106.9	NC Variety	Dayton, OH	07/02/2003	59	Wright State University	Fairborn, OH	Greene
WYSO	FM	91.3	NC AAA/News	Dayton, OH	07/02/2003	59	Antioch University	Yellow Springs, OH	Greene
WUDR	FM	98.1	NC Variety	Dayton, OH	11/05/2004	59	University of Dayton	Dayton, OH	Montgomery
WOAR	FM	88.3	NC ChrsContem	Dayton, OH	08/07/2006	59	Educational Media Foundation	South Vienna, OH	Clark

Number of Stations in Geographic Market 38

Previous Stations in Geographic Market

WKFI	AM	1090	C Country		08/01/2005	0	Town And Country Broadcasting Inc	Wilmington, OH	Clinton
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"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

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TABLE I

**BROADCAST FACILITIES CONSIDERED IN MLB DAYTON, OHIO
MULTIPLE OWNERSHIP ANALYSIS USING CONTOUR METHODOLOGY
MAY 2007**

AM STATIONS

CALL	ST	CITY	FREQ	PAT	AG	PWR	DESC
	ARN	OWNER					
LATITUDE		LONGITUDE					
WONE	OH	DAYTON	980.00000	LD		5.000	DAN
		BL19830105AE					CITICASTERS LICENSES, L.P.
39-40-03.0 N		84-10-01.0 W					
WLW	OH	CINCINNATI	700.00000	LU		50.000	ND1
		BL19790104AI					JACOR BROADCASTING CORPORATION
39-21-11.0 N		84-19-30.0 W					
WDAO	OH	DAYTON	1210.00000	LD		1.000	NDD
		BLRA1104CY					JOHNSON COMMUNICATIONS, INC.
39-43-36.0 N		84-12-23.0 W					
WING	OH	DAYTON	1410.00000	LD		5.000	DAN
		BL					BLUE CHIP BROADCASTING LICENSES, LTD
39-40-56.0 N		84-09-33.0 W					
WHIO	OH	DAYTON	1290.00000	LD		5.000	DAN
		BL20011217ABZ					COX RADIO, INC.
39-40-44.0 N		84-07-49.0 W					
WPFB	OH	MIDDLETOWN	910.00000	LD		1.000	ND2
		BL					RADIO STATIONS WPAY/WPFB, INC.
39-30-57.0 N		84-21-05.0 W					
WPTW	OH	PIQUA	1570.00000	LU		0.250	ND1
		BP19930112DA					FRONTIER BROADCASTING, LLC #2
40-08-25.0 N		84-16-07.0 W					
WULM	OH	SPRINGFIELD	1600.00000	LD		1.000	ND1
		BL19871230AG					URBAN LIGHT MINISTRIES, INC.
39-57-11.0 N		83-52-07.0 W					

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**BROADCAST FACILITIES CONSIDERED IN MLB DAYTON, OHIO
MULTIPLE OWNERSHIP ANALYSIS USING CONTOUR METHODOLOGY
MAY 2007**

AM STATIONS

CALL	ST	CITY	FREQ	PAT	AG	PWR	DESC
	ARN	OWNER					
LATITUDE		LONGITUDE					

WBZI	OH	XENIA	1500.00000	LD		0.500	NDD
		BL19791226AT	TOWN AND COUNTRY BROADCASTING, INC.				
39-42-48.0 N		83-54-48.0 W					

WRFD	OH	COLUMBUS-WORTHINGTON	880.00000	LD		23.000	NDD
		BL19970918AF	SALEM MEDIA OF OHIO, INC.				
39-56-31.0 N		83-01-20.0 W					

WIZE	OH	SPRINGFIELD	1340.00000	LD		1.000	ND2
		BL	CITICASTERS LICENSES, L.P.				
39-56-33.0 N		83-47-15.0 W					

WGNZ	OH	FAIRBORN	1110.00000	LD	AG	2.500	DAD
		BL19960607AB	L&D BROADCASTORS INC.				
39-41-15.0 N		83-57-55.0 W					

WBLL	OH	BELLEFONTAINE	1390.00000	LD		0.500	ND1
		BL	V-TECK COMMUNICATIONS, INC.				
40-22-05.0 N		83-44-02.0 W					

WOSU	OH	COLUMBUS	820.00000	LD		5.000	DAN
		BL19881021AA	THE OHIO STATE UNIVERSITY				
40-01-44.0 N		83-03-22.0 W					

WUCO	OH	MARYSVILLE	1270.00000	LD		0.500	DA2
		BL19840518AA	ST. GABRIEL RADIO, INC.				
40-14-46.0 N		83-19-50.0 W					

WTVN	OH	COLUMBUS	610.00000	LD		5.000	DAN
		BL19791010AJ	CITICASTERS LICENSES, L.P.				
39-52-26.0 N		82-58-36.0 W					

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**BROADCAST FACILITIES CONSIDERED IN MLB DAYTON, OHIO
MULTIPLE OWNERSHIP ANALYSIS USING CONTOUR METHODOLOGY
MAY 2007**

FM STATIONS

CALL	ST	CITY	FREQ	CHN	CL	ERP	STAT
FORMAT		ARN		OWNER			
LATITUDE		LONGITUDE	HAAT:m	AMSL:m			

WKSW	OH	URBANA	101.70000	A	3200.00	LIC	
BLH19950324KD BLUE CHIP BROADCASTING LICENSES, LTD							
40-02-57.0 N 83-46-06.0 W 123.066 453.000							
WPFB-FM	OH	MIDDLETOWN	105.90000	B	34000.00	LIC	
BMLH20011120AAL RADIO STATIONS WPAY/WPFB, INC.							
39-30-57.0 N 84-21-05.0 W 172.355 419.000							
WROU-FM	OH	WEST CARROLLTON	92.10000	A	890.00	LIC	
BLH19911204KB RADIO ONE OF DAYTON LICENSES, LLC							
39-43-15.0 N 84-15-39.0 W 180.579 444.000							
WDKF	OH	ENGLEWOOD	94.50000	A	3600.00	LIC	
BLH20061114ABX CITICASTERS LICENSES, L.P.							
39-49-03.0 N 84-14-53.0 W 131.263 401.000							
WDPS	OH	DAYTON	89.50000	A	6000.00	LIC	
BLED19931213KA DAYTON CITY SCHOOLS							
39-45-28.0 N 84-11-36.0 W 67.053 336.000							
WFCJ	OH	MIAMISBURG	93.70000	B	50000.00	LIC	
BMLH20030630AAA MIAMI VALLEY CHRISTIAN BROADCASTING ASSOCIATION							
39-39-35.0 N 84-18-53.0 W 159.711 418.000							
WHKO	OH	DAYTON	99.10000	B	50000.00	LIC	
BMLH20010810AAV COX RADIO, INC.							
39-44-02.0 N 84-14-53.0 W 323.987 588.000							
WDPR	OH	WEST CARROLLTON	88.10000	A	600.00	LIC	
BLED20050224ABR DAYTON PUBLIC RADIO, INC.							
39-43-16.0 N 84-15-00.0 W 239.579 503.000							

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**BROADCAST FACILITIES CONSIDERED IN MLB DAYTON, OHIO
MULTIPLE OWNERSHIP ANALYSIS USING CONTOUR METHODOLOGY
MAY 2007**

FM STATIONS

CALL	ST	CITY	FREQ	CHN	CL	ERP	STAT
FORMAT		ARN	OWNER				
LATITUDE		LONGITUDE	HAAT:m	AMSL:m			

WGTZ	OH	EATON	92.90000	B		40000.00	LIC
BLH19850204KW BLUE CHIP BROADCASTING LICENSES, LTD							
39-50-10.0 N 84-24-16.0 W 174.382 463.000							
WQRP	OH	DAYTON	89.50000	B1		6000.00	LIC
BLED19890112KC WQRP FAMILY RADIO, INC.							
39-45-28.0 N 84-11-36.0 W 67.053 336.000							
WXEG	OH	BEAVERCREEK	103.90000	A		2900.00	LIC
BLH20020823AAY CITICASTERS LICENSES, L.P.							
39-43-19.0 N 84-12-36.0 W 148.855 413.000							
WLQT	OH	KETTERING	99.90000	B		28000.00	LIC
BLH20020823AAP CITICASTERS LICENSES, L.P.							
39-43-19.0 N 84-12-36.0 W 202.855 467.000							
WTUE	OH	DAYTON	104.70000	B		28000.00	LIC
BLH20020823AAQ CITICASTERS LICENSES, L.P.							
39-43-19.0 N 84-12-36.0 W 202.855 467.000							
WMMX	OH	DAYTON	107.70000	B		28000.00	LIC
BLH20020823AAW CITICASTERS LICENSES, L.P.							
39-43-19.0 N 84-12-36.0 W 202.855 467.000							
WHIO-FM	OH	PIQUA	95.70000	B		50000.00	LIC
BMLH20010810AAO COX RADIO, INC.							
40-13-03.0 N 84-17-37.0 W 147.882 444.000							
WOKL	OH	TROY	96.90000	A		3000.00	LIC
BMLED20030619AAC EDUCATIONAL MEDIA FOUNDATION							
40-01-41.0 N 84-11-28.0 W 96.776 380.000							

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**BROADCAST FACILITIES CONSIDERED IN MLB DAYTON, OHIO
MULTIPLE OWNERSHIP ANALYSIS USING CONTOUR METHODOLOGY
MAY 2007**

FM STATIONS

CALL FORMAT	ST ARN	CITY LONGITUDE	FREQ OWNER	CHN	CL	ERP HAAT:m AMSL:m	STAT
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WOAR OH SOUTH VIENNA 88.30000 A 1000.00 LIC
BLED20060803ADL EDUCATIONAL MEDIA FOUNDATION
39-55-54.0 N 83-36-36.0 W 83.421 425.000

WEEC OH SPRINGFIELD 100.70000 B 50000.00 LIC
BLH19920806KC WORLD EVANGELISTIC ENTERPRISE CORP.
39-57-42.0 N 83-52-05.0 W 146.737 457.000

WJYD OH LONDON 106.30000 A 6000.00 LIC
BLH19920828KF BLUE CHIP BROADCASTING LICENSES, LTD
39-53-05.0 N 83-25-23.0 W 105.316 414.000

WUSO OH SPRINGFIELD 89.10000 A 100.00 LIC
BLED20060323AHH THE BOARD OF DIRECTORS OF WITTENBERG COLLEGE
39-56-09.0 N 83-48-41.0 W 27.276 338.000

WYSO OH YELLOW SPRINGS 91.30000 B 37000.00 LIC
BLED19950815KA ANTIOCH UNIVERSITY
39-45-46.0 N 83-52-59.0 W 124.855 419.000

WCSU-FM OH WILBERFORCE 88.90000 A 1000.00 LIC
BMLED20030324AAJ CENTRAL STATE UNIVERSITY
39-42-57.0 N 83-52-27.0 W 56.776 350.000

WDHT OH SPRINGFIELD 102.90000 B 50000.00 LIC
BLH19870511KC BLUE CHIP BROADCASTING LICENSES, LTD
39-57-11.0 N 83-52-07.0 W 151.645 460.000

WCDR-FM OH CEDARVILLE 90.30000 B 30000.00 LIC
BLED19991222ABL THE CEDARVILLE UNIVERSITY
39-45-46.0 N 83-52-59.0 W 112.855 407.000

WNCI OH COLUMBUS 97.90000 B 175000.00 LIC
BLH7323 CITICASTERS LICENSES, L.P.
39-58-10.0 N 83-00-10.0 W 176.289 418.000

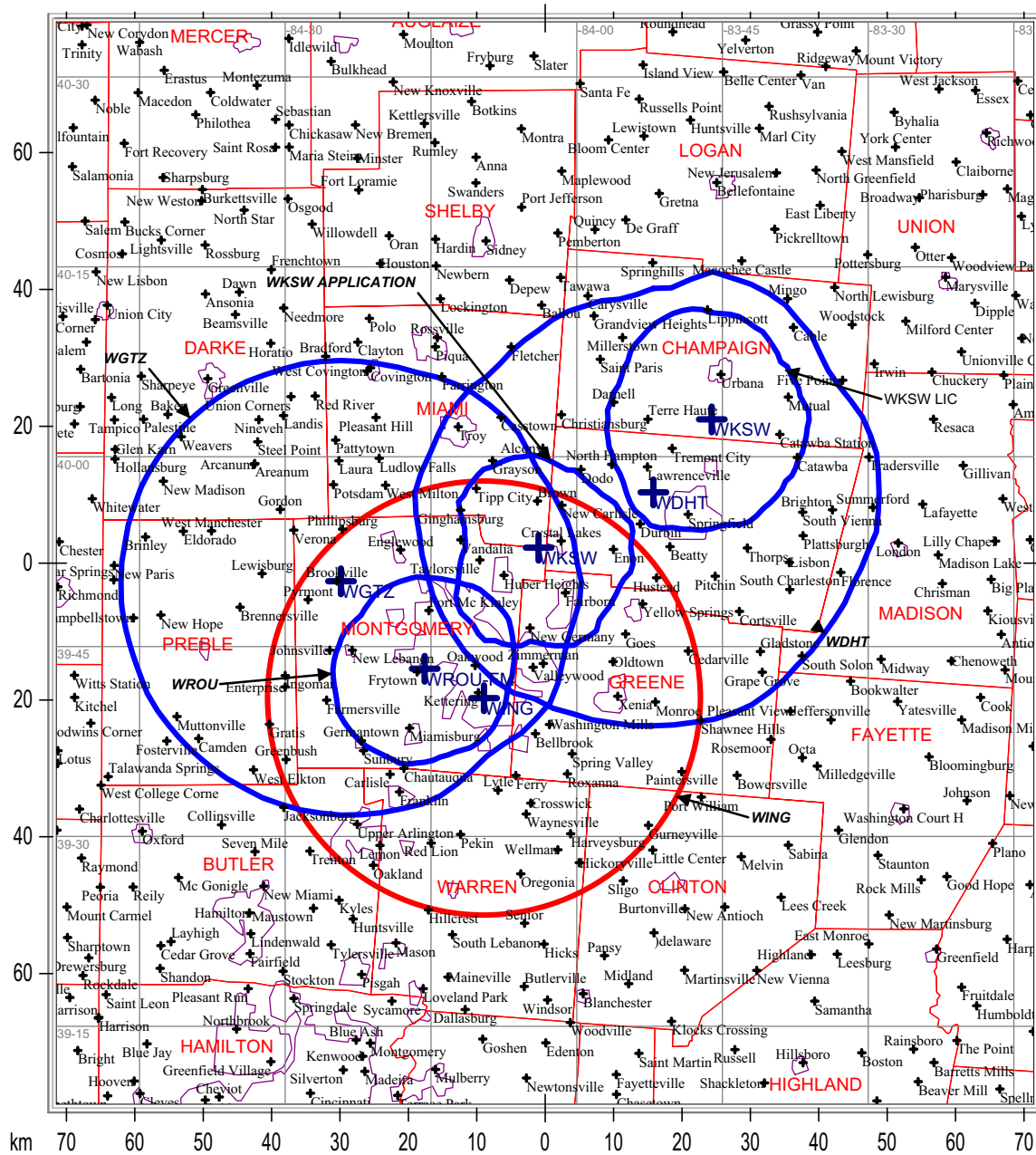
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**BROADCAST FACILITIES CONSIDERED IN MLB DAYTON, OHIO
MULTIPLE OWNERSHIP ANALYSIS USING CONTOUR METHODOLOGY
MAY 2007**

FM STATIONS

WZLR OH XENIA 95.30000 A 6000.00 LIC
BMLH20010810AAN COX RADIO, INC.
39-37-52.0 N 83-53-39.0 W 100.303 388.000

MLB STATIONS DAYTON, OHIO BLUE = FM RED = AM



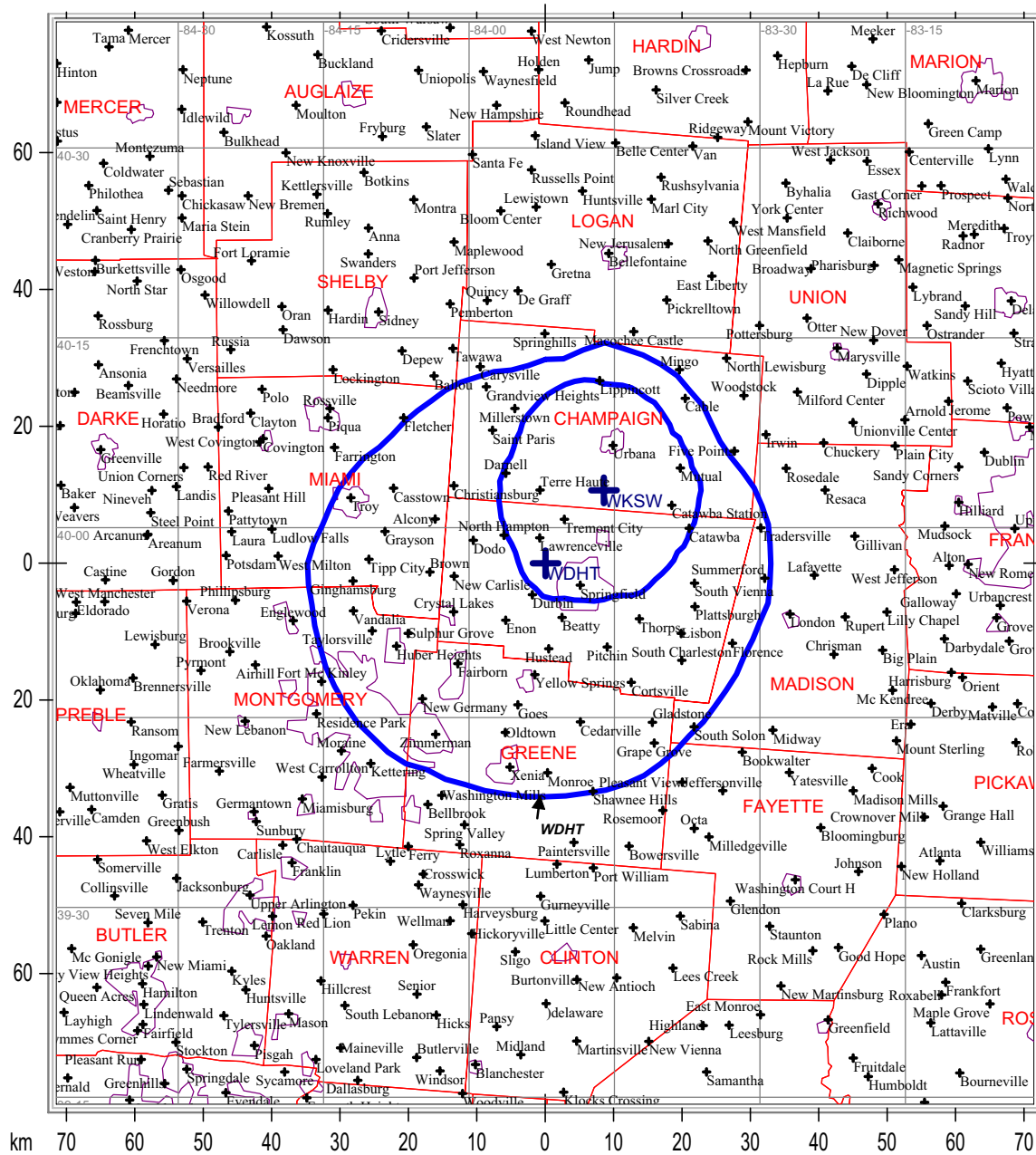
Communications Technologies, Inc. Marlton, New Jersey 08053

County Borders City Borders Lat/Lon Grid

Map Scale: 1:1000000 1 cm = 10.00 km V/H Size: 158.19 x 142.91 km

FIGURE 1

MLB STATIONS DAYTON, OHIO STATIONS CONSIDERED UNDER INTERIM METHODOLOGY BLUE = FM



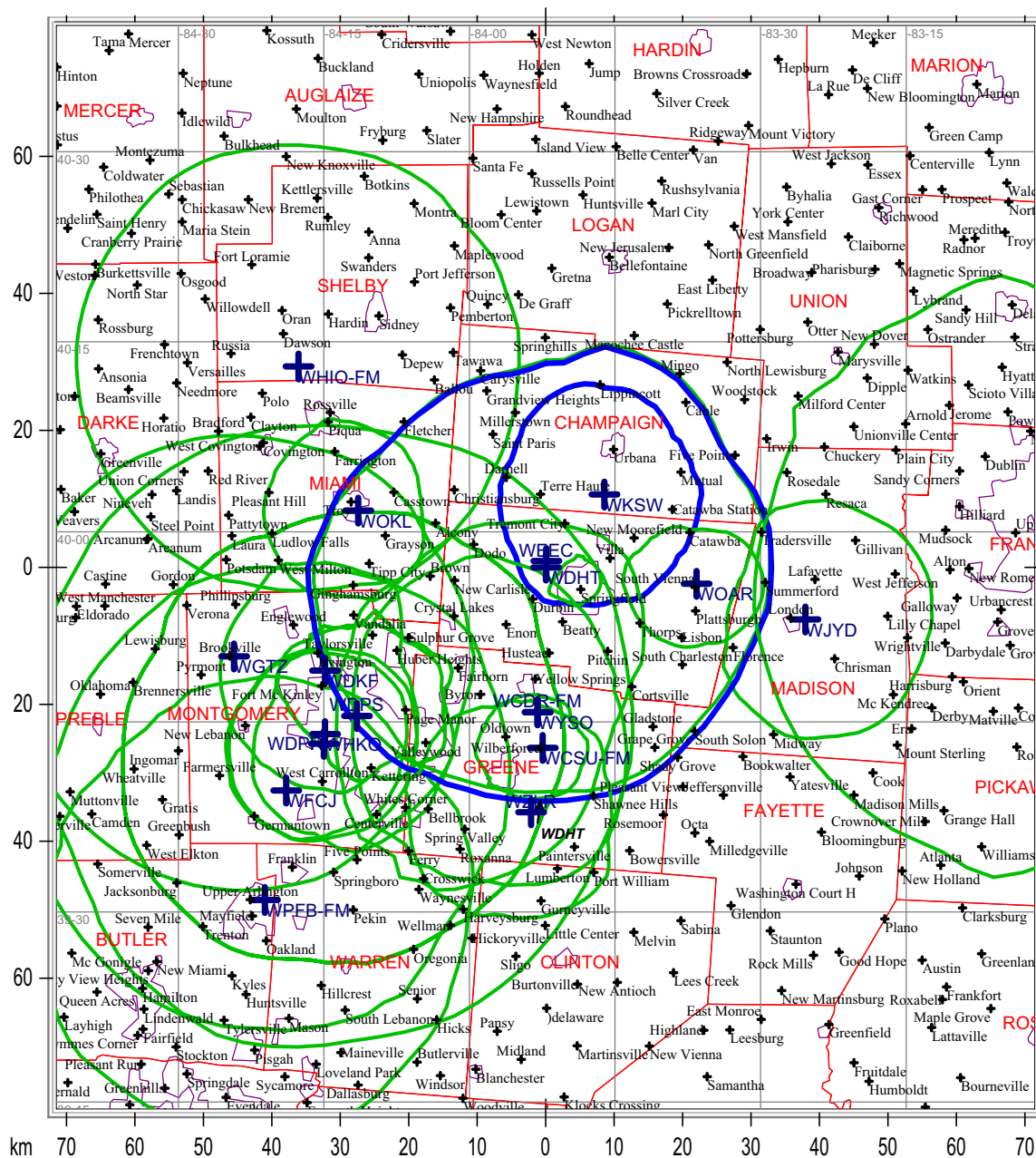
Communications Technologies, Inc. Marlton, New Jersey 08053

— County Borders
 — City Borders
 — Lat/Lon Grid

Map Scale: 1:1000000 1 cm = 10.00 km V/H Size: 158.19 x 142.91 km

FIGURE 2

MLB STATIONS DAYTON, OHIO (INTERIM METHODOLOGY) BLUE = FM GREEN = OTHER FM



Communications Technologies, Inc. Marlton, New Jersey 08053

County Borders City Borders Lat/Lon Grid

This map displays the central United States, covering parts of Minnesota, Wisconsin, Illinois, Indiana, Michigan, Ohio, Kentucky, Tennessee, Missouri, Arkansas, Louisiana, and Mississippi. It shows county boundaries, major cities, and a network of radio stations. A blue circle highlights a specific region around the Chicago area, and a red circle highlights a region around the St. Louis area. The map includes latitude and longitude coordinates and a scale bar in kilometers.

FIGURE 4